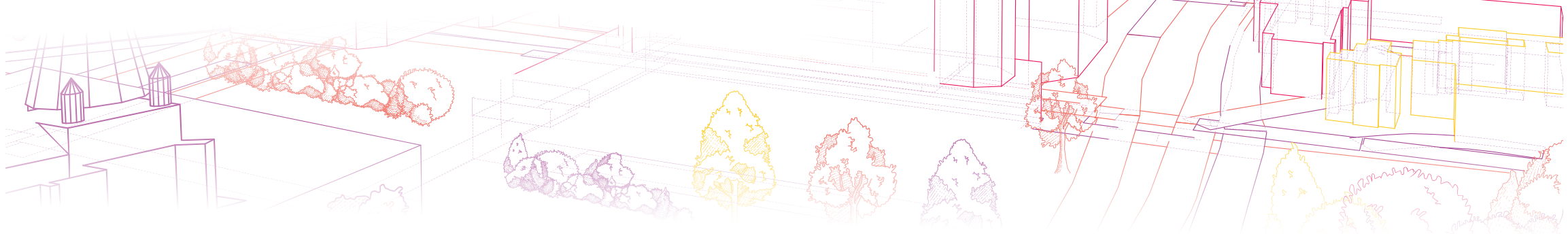


CITY PLAN 2019 – 2040

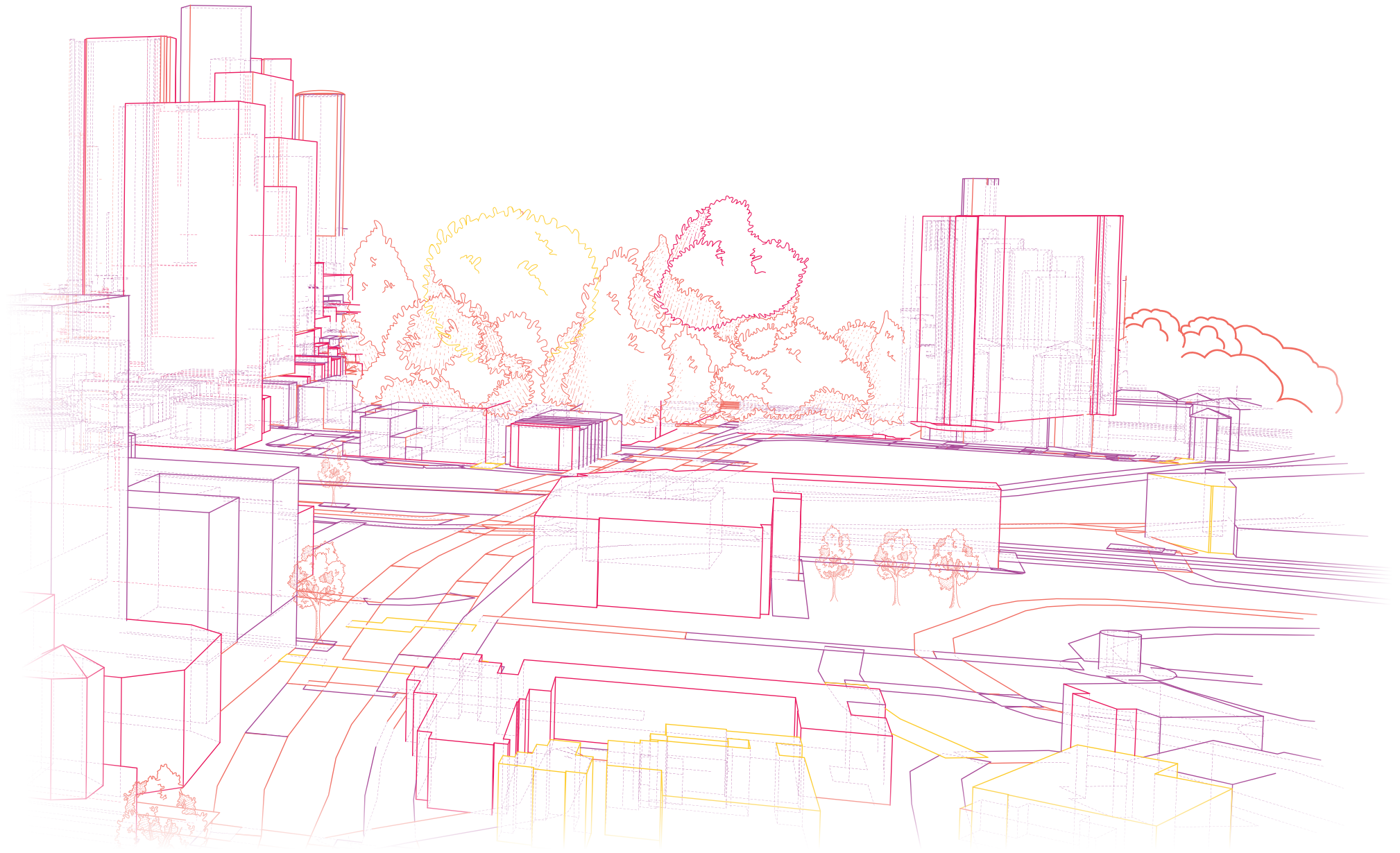


FAIRER
WESTMINSTER

Regulation 19 Publication Draft
March 2024



City of Westminster



FOREWORD



The City Plan 2019-2040, first and foremost is a plan for people. It outlines a strategy to ensure Westminster is a fairer, healthier, and more welcoming city. Under this strategy, Westminster will remain on the world map as one of the best places to live, work and play.

Being a city where people want and can afford to live is at the forefront of our agenda. Whilst we are immensely proud that a quarter of all homes in Westminster are social rented, we have an increasingly urgent need for new, genuinely affordable homes. In this partial review of the Plan, we are strengthening our affordable housing policy by increasing the proportion of new socially rented homes, maximising the provision of genuinely affordable housing for those that need it most.

As rents increase and shopping trends and demand for office space evolves, it is imperative we take decisive action to ensure London's West End remains an unparalleled cultural, commercial and leisure destination. The Central Activities Zone (CAZ) outlined in this strategy will aid us in delivering a first-class leisure experience, with an unrivalled visitor offer and good jobs for Londoners.

Unlocking development to meet the needs of Westminster's distinctive communities is a key ambition of the plan. The continued regeneration of Victoria, Paddington, and the north west of the city, will greatly enhance both our residential and business capabilities, bolstered by a new focus on development of four strategic site allocation policies. These will help bring forward much needed investment in housing, employment and public realm improvements.

This plan is a plan for growth. But this growth needs to be sustainable as we aim to become a net zero city by 2040. We are introducing a new retrofit-first policy that encourages building owners to invest in insulation, refurbishment and electric heating rather than demolition and rebuild.

Westminster has a world-renowned historical character and it is vital that new development is never at the expense of this heritage. This plan aims to strike the right balance between protecting this invaluable asset and facilitating good growth. Our approach is about conservation not just preservation. For example, we have identified 'specialist clusters' to be protected; places whose character is essential to London's global appeal, such as Soho, Mayfair, Harley Street and Savile Row.

As we develop our future Westminster, the golden thread running through every development we undertake will be inclusivity, transparency and fairness for all. This will guide us on our journey to a fairer Westminster.

A handwritten signature in black ink, appearing to read 'Geoff Barraclough'.

Geoff Barraclough

Cabinet Member for Planning and Economic Development

HOW TO USE THIS PLAN

This is the City Plan for Westminster to 2040. Along with the Mayor of London's *London Plan* and any neighbourhood plans which may be made in future, it is the statutory development plan setting out our vision and strategy for the development of the city, and contains policies that will be used in determining planning applications.¹

If you are submitting, assessing or commenting on applications, or want to find out more about the policies for your area:

Step 1: Start with the vision and spatial strategy. They show the main areas for growth and change in the city.

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.

Step 3: Some policies in the Plan deal with different types of use. This helps to determine whether a use or change of use of a building is appropriate or not. The contents pages and specific topic-based chapters should also help you identify the relevant policies.

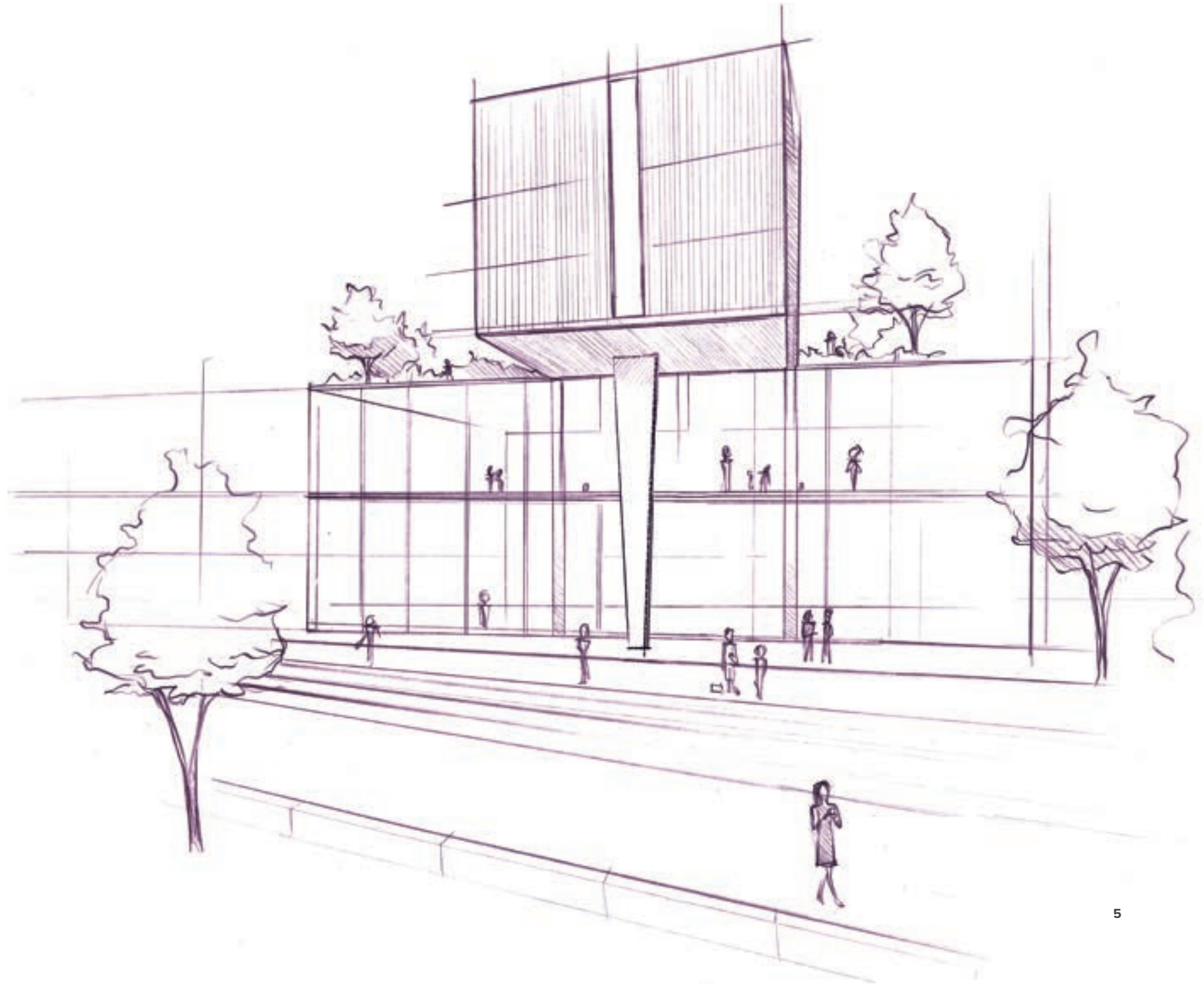
Step 4: Other policies set out requirements for the form that the development should take and any measures needed to mitigate its impacts.

The City Plan should be read as a whole to understand if a development will be acceptable. Policies are not cross-referenced throughout the Plan, however there are many interrelated issues across the chapters which should be considered in tandem.

Appendix 2 identifies our strategic policies and will be particularly helpful to anyone involved in creating, or commenting on, neighbourhood plans.

The partial review of this Plan inserts a new Retrofit First policy (Policy 8) and five new Site Allocation policies (numbered 9-12). It also replaces existing Policy 9 with a new Affordable Housing policy (now Policy 13). All other policies in the plan have been re-numbered to reflect these insertions. Other minor incidental changes to the adopted plan or factual updates are shown as ~~red strikethrough~~ where text is intended to be deleted and red underlined where new text is proposed.

¹ Under section 38(6) of the *Planning and Compulsory Purchase Act 2004* planning decisions should be taken in accordance with the statutory development plan unless material planning considerations indicate otherwise.



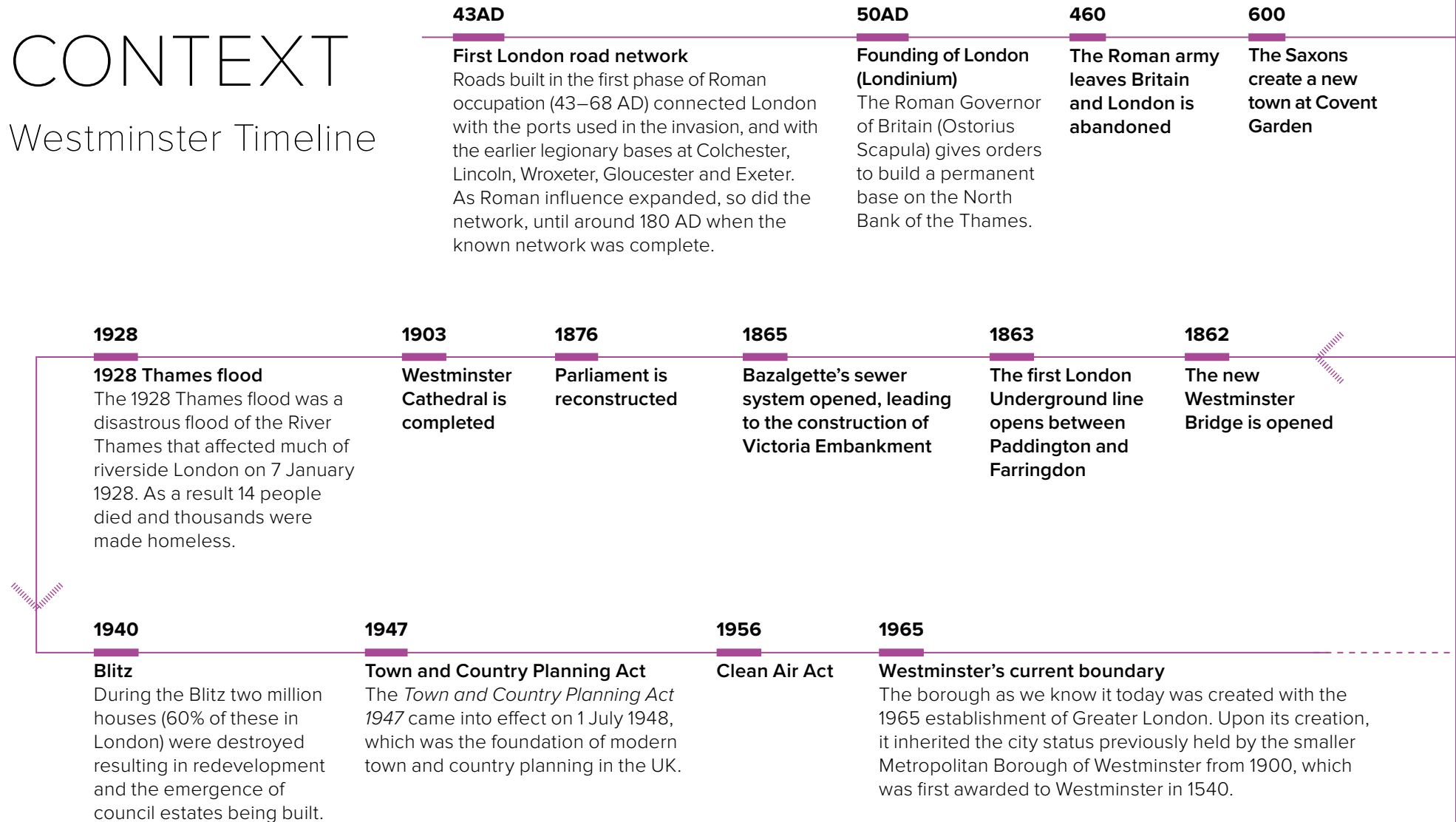
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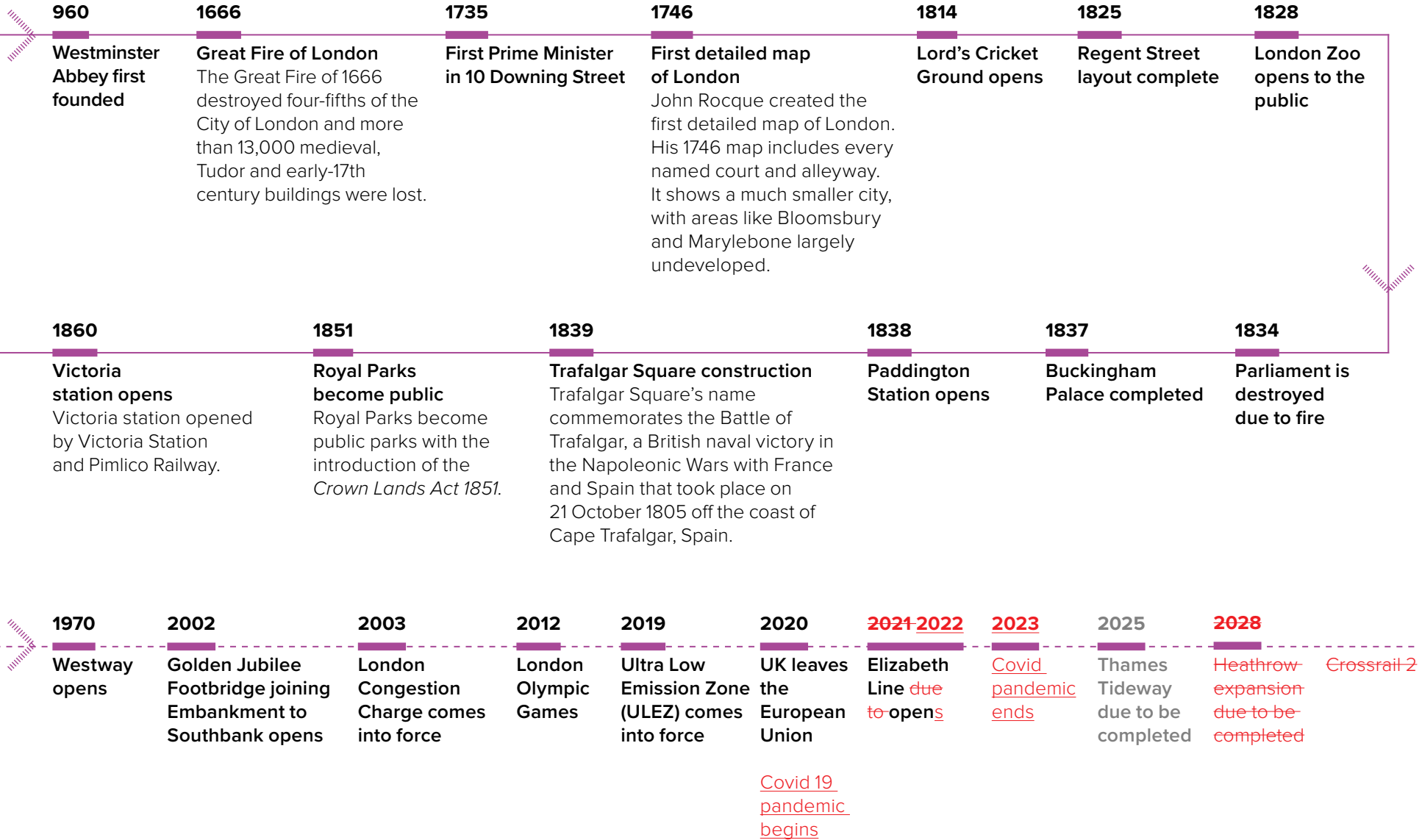
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CONTEXT

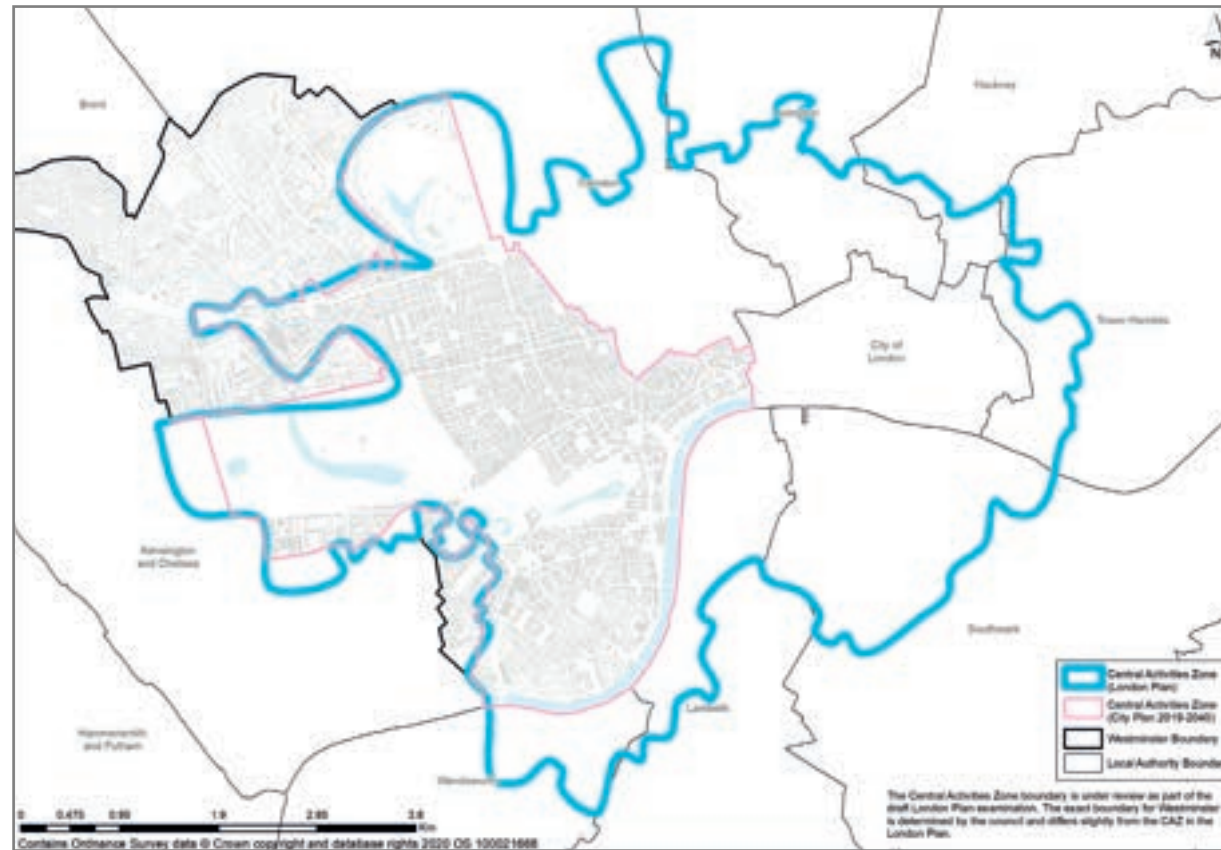
Westminster Timeline





Stretching just over eight square miles, Westminster is one of London’s largest central boroughs and one of only two to have city status. Much of Westminster is within the Central Activities Zone (CAZ) which is a designation set by the Mayor of London to guide planning policies.

We are home to many of the landmarks synonymous with ‘tourist London’. We have some of the most affluent residential areas in the country, but a diverse demographic means also some of the most deprived (see Figures 1 and 2). Ours is a densely populated city, with **48 98** people per hectare; **almost double significantly higher** than the London average of **57¹ 75¹**. This means that space is at a premium, so we must ensure its most effective use.



¹—ONS, Mid-year Population Estimates 2019

¹ ONS, Mid year Population Estimates 2022

Figure 1: London Central Activities Zone

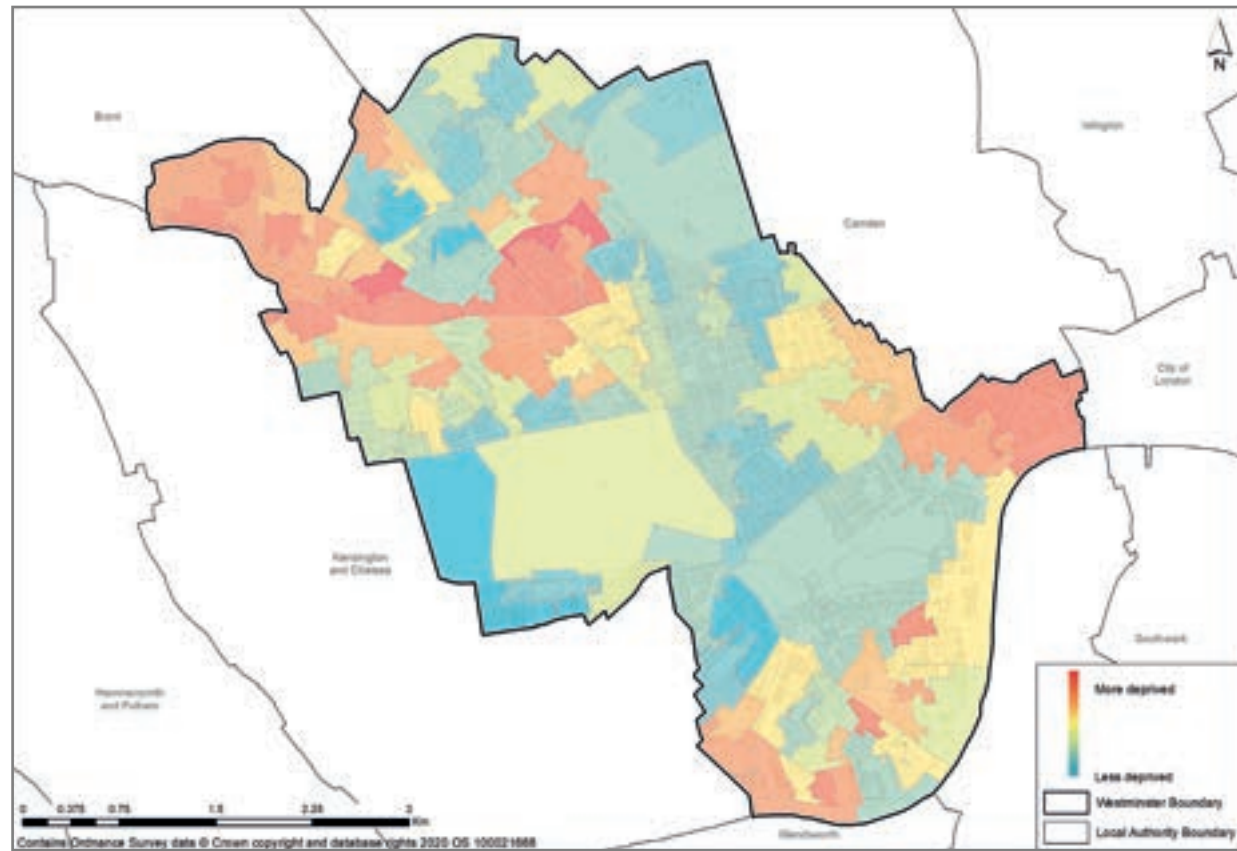


Figure 2: Levels of deprivation in Westminster. Source: ONS Index of Multiple Deprivation 2019

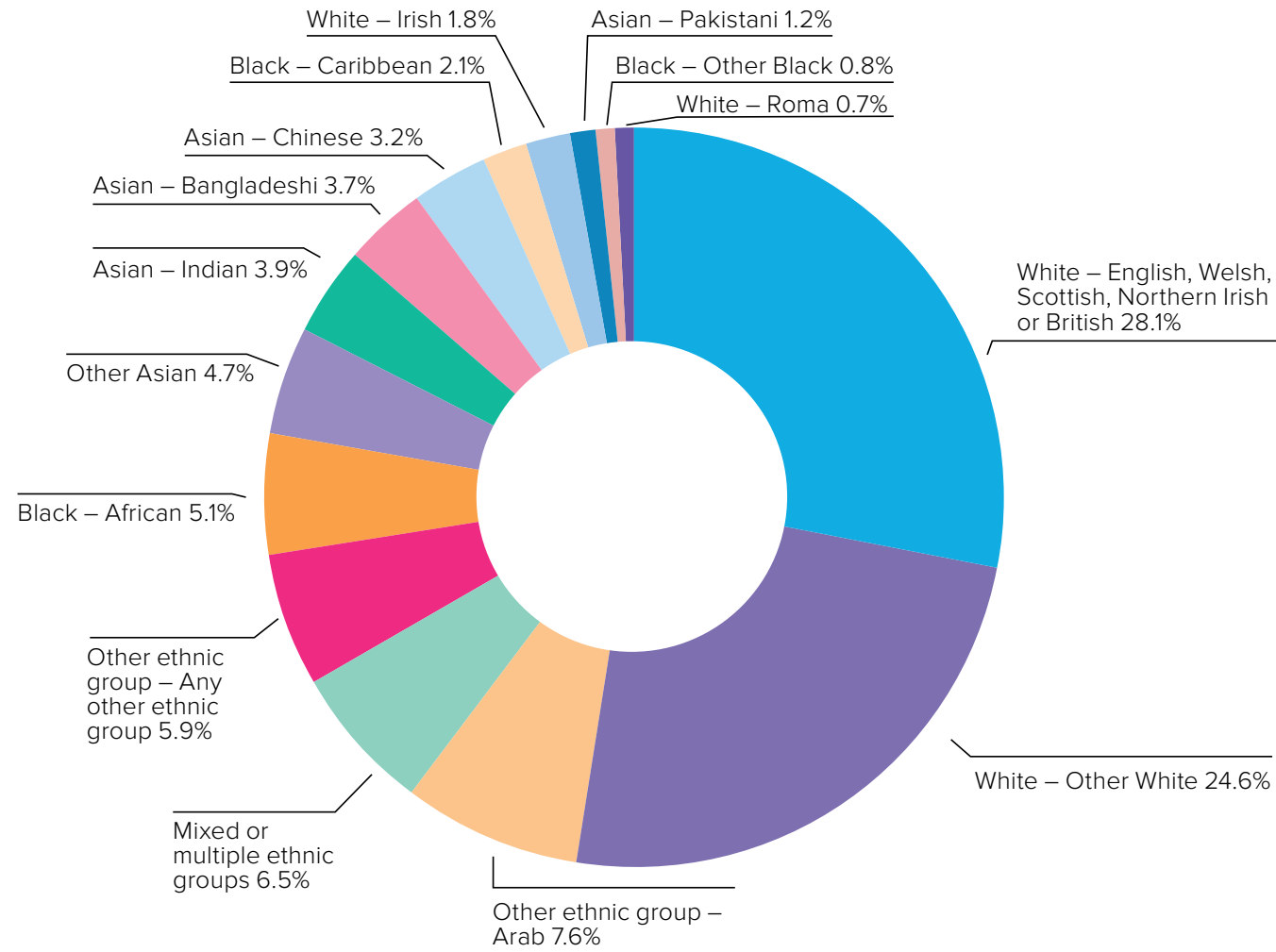


Figure 3: Westminster's ethnic mix. Source: GLA 2016-based ethnic group population projection

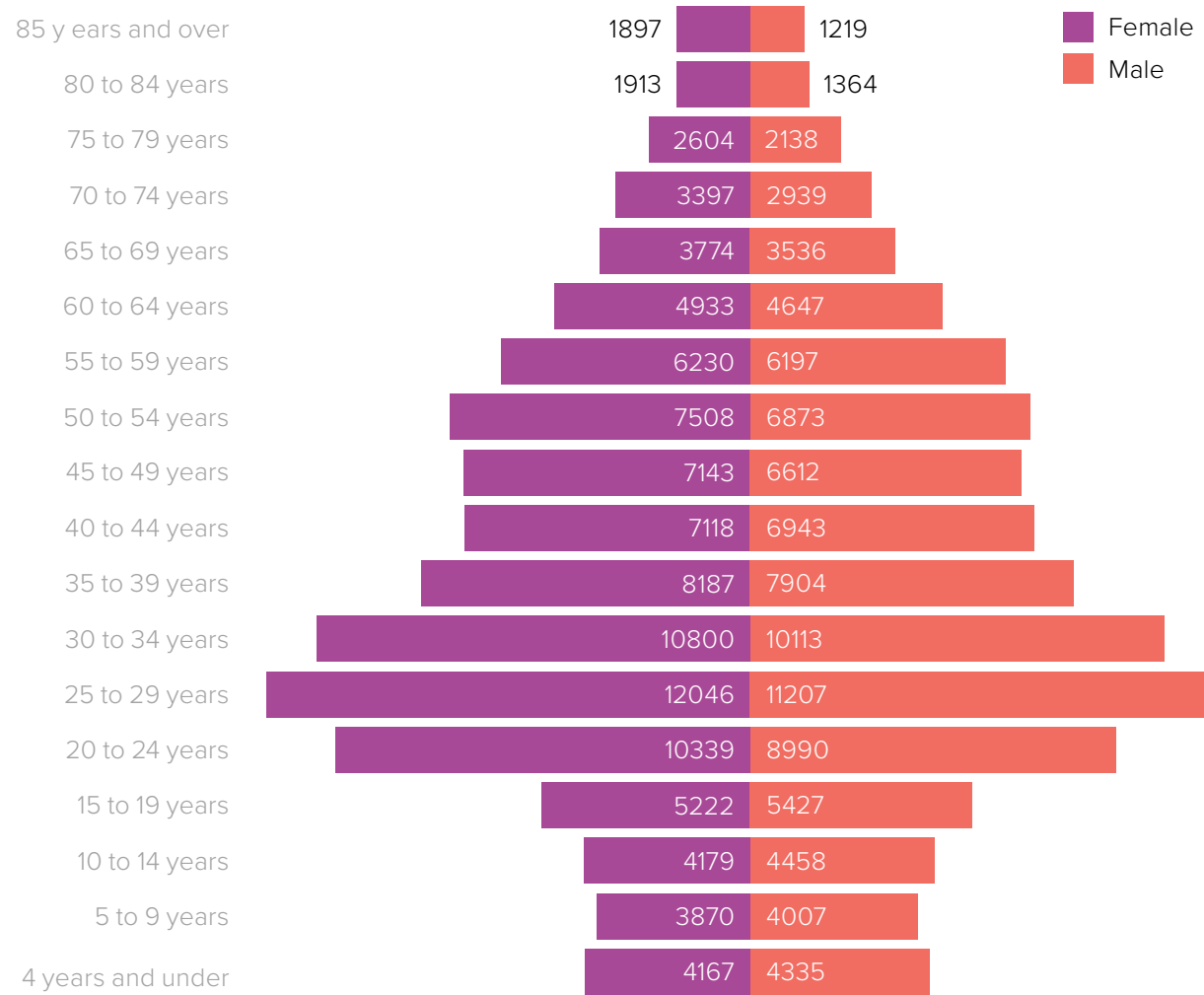


Figure 4: Age mix in Westminster. Source: City Intelligence, 2018

The average mean household income in Westminster is ~~£52,199~~ £60,994 (CACI, 2022), yet the median house price was ~~£1,054,400 in 2017~~ ~~£968,017 in February 2023~~. That’s nearly two times higher than London as a whole, and ~~almost five~~ ~~three times~~ higher than that of the UK.² There is high contrast in income between different wards with an average mean income of ~~£62,074~~ ~~£81,243~~ in Knightsbridge and Belgravia compared to ~~£31,601~~ ~~£40,511~~ in Church Street. Rental property prices now top the ~~£3,000~~ ~~£3,100-a-month~~ mark.³ ~~Lack of intermediate housing stock means that less than 2% of homes are available for people who can’t afford to rent on the open market but are ineligible for social housing – creating a unique problem.~~

This is an issue further compounded by a growing population. ONS Population Projections estimate that Westminster’s population will increase to 284,300 by 2040.⁴

The ~~latest Strategic Housing Market Assessment (2024)~~⁵ ~~local housing market needs assessment~~ has identified ~~a very high need for affordable~~

2 ~~Average Property Price, Land Registry 2017 UK House Price Index~~

3 Valuation Office Agency (VOA) data

4 Population projection for 2040, GLA (2016)

5 Westminster’s ~~Strategic~~ Housing Market Assessment, ~~2019~~ ~~2024~~

~~housing in the city, and particularly for social housing, the need for 316 intermediate homes and 247 social homes each year.~~ City Plan 2019 – 2040 looks to support innovation and delivery, with an emphasis that is people focussed. It is essential that affordable doesn’t mean inferior quality but enhances the quality of life for those who live here. ~~There are 3,100 homes within the city declared as second homes with many more used as short term lets. It is estimated that 12% of the housing stock is empty~~ According to the 2021 Census, there were ~~29,775 vacant dwellings in Westminster and 4,395 second homes with no usual residents.~~⁶

We have identified existing housing estates which are in need of renewal – Church Street, Ebury Bridge and Tollgate. The renewal of these estates will bring about much needed housing growth and improvements to existing stock. Other housing estates may be identified by us in future for renewal.

~~The local housing market assessment⁷ has identified the need for 316 intermediate homes and 247 social homes each year.~~ City Plan 2019 – 2040 looks to support innovation and delivery, with an emphasis that is people focussed. It is essential that affordable doesn’t mean inferior quality but enhances the quality of life for those who live here.

6 ~~Number of vacant dwellings and second homes (with no usual residents) - Office for National Statistics (ons.gov.uk)~~


7 Westminster Housing Market Assessment, 2019

~~There are 3,100 homes within the city declared as second homes with many more used as short term lets. It is estimated that 12% of the housing stock is empty.~~

Housing


~~121,000~~ ~~128,910~~ households with ~~31%~~ ~~28%~~ owner occupied, ~~40%~~ ~~44%~~ private rented, ~~26%~~ ~~28%~~ social rented and ~~3%~~ other tenure

Median property price
~~£1,054,400~~ ~~£968,017~~



Incomes

Average household income:
~~£55,897~~



Population

~~261,000~~ ~~211,365~~ including ~~51,500~~ ~~30,226~~ children⁸

Population increases to **1.1 million**
Up to **1 million** people can be in Westminster on any given day workers with the influx of workers, shoppers and tourists in the day time



8 ~~Mid-year estimates 2022, ONS~~

Neighbourhood Planning is a key tool to ensuring good growth within Westminster and the City Plan provides the framework for emerging neighbourhood plans to follow to deliver that growth for their areas. The council strongly supports and encourages neighbourhood planning in Westminster, as evidenced by almost all of the city being covered by designated neighbourhood areas. Within the majority of these areas, designated local neighbourhood forums have the power to make neighbourhood plans. The council will engage with and advise these forums as their plans are prepared. The Knightsbridge Neighbourhood Plan was the first neighbourhood plan to be formally made.

Westminster is home to a number of internationally renowned educational institutions such as King's College London, London School of Economics and Political Sciences, University of Westminster, Imperial College London, University of the Arts and many others. They are a huge asset as they help to boost local economies and with both national and international reputations they make Westminster an attractive place to come and study.

Westminster's unique historic environment is an irreplaceable resource, with an exceptional concentration of heritage assets, one of the highest of any local authority in the country. These date from all eras and alongside more recent buildings, help tell the story of Westminster's continuing growth and development.

We have more than 11,000 listed buildings and structures, with over 200 of them being Grade I listed including Buckingham Palace, the National Gallery, the Royal Albert Hall and 10 Downing Street. Westminster Cathedral, is another world renowned example of a historic building within Westminster that is highly symbolic and serves a very important religious function attracting not only local residents but visitors from afar.

Perhaps the best known listed building is The Palace of Westminster – one of the most iconic and significant buildings in the world, which, alongside Westminster Abbey and St Margaret's Church, forms the Westminster World Heritage Site, recognised by UNESCO as having Outstanding Universal Value.

Heritage

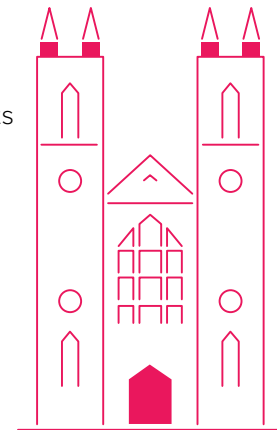
11,000 listed buildings and structures including the Westminster World Heritage Site

56 conservation areas covering **78%** of the city's footprint

23 Registered Historic Parks, including **5** Royal Parks

85 London Squares

3 scheduled monuments



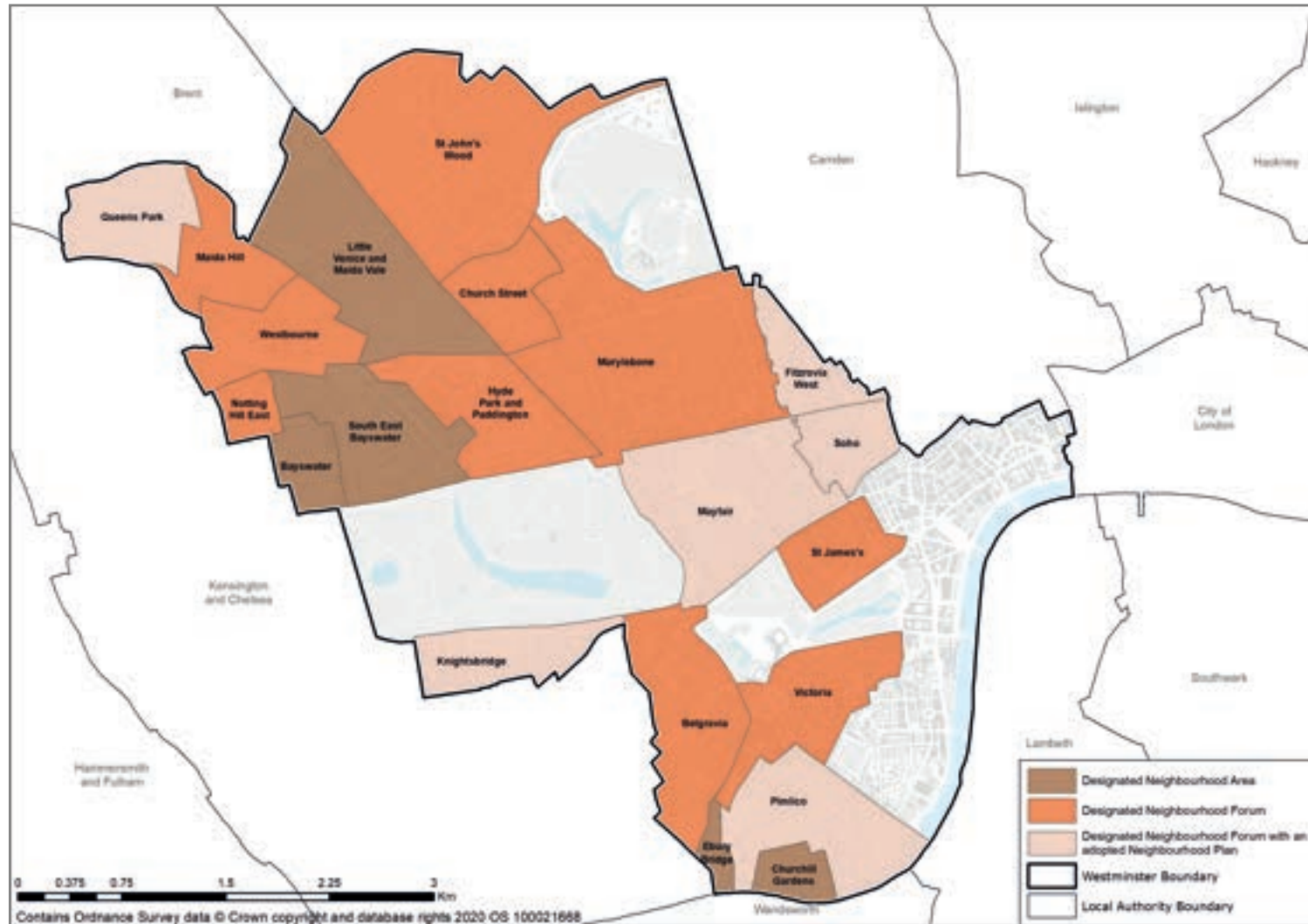


Figure 5: Neighbourhood planning in Westminster (N.B. Queen’s Park is not a neighbourhood forum, but instead is Westminster’s only Community Council)

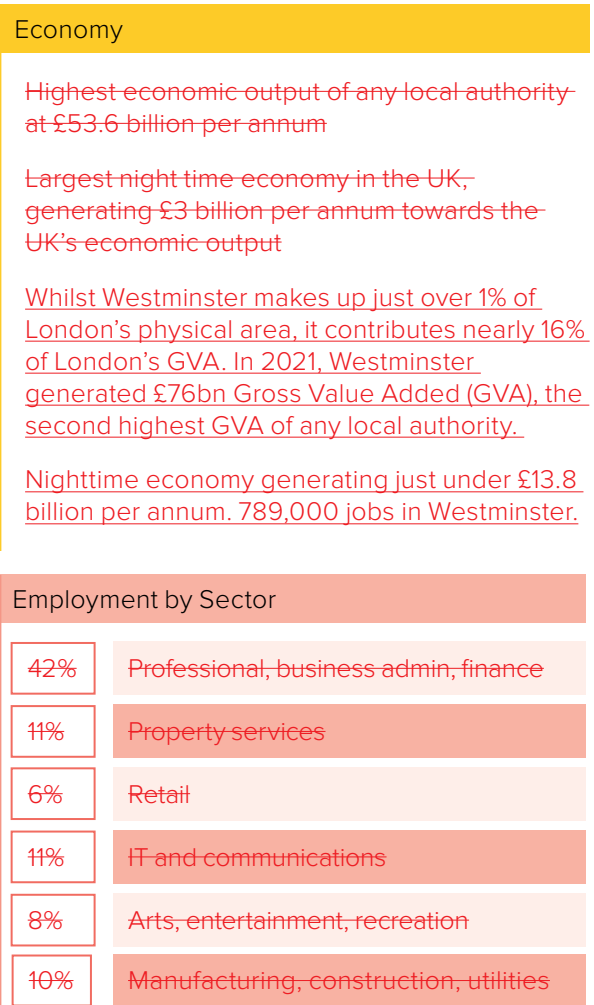
This rich heritage contributes to the townscape and distinctiveness of different areas within the city but also brings many wider benefits including being a major draw for tourists to the city and is one of the reasons why many businesses choose to locate here.

There are also 56 conservation areas, which cover 78% of our city, three scheduled monuments and many areas rich in archaeological potential as well as 23 registered historic parks and gardens.

With such a special historic environment this is a critical factor in managing development and change in the city. Westminster’s built environment is constantly evolving with 6,283 8,849 planning applications processed in 2018 2022; 1,791 1,790 of these were for listed buildings.⁹

Our challenge goes beyond conserving our historical legacy, to one where we must find ways of developing which enhance it, retaining and integrating those buildings and features which contribute positively to Westminster’s sense of place into new development to allow the city to grow in a way which retains its distinctiveness.

⁹ Based on figures returned to MHCLG



| | |
|----|---|
| 4% | Education |
| 4% | Arts, Entertainment and Recreation |
| 3% | Other Service Activities |
| 2% | Manufacturing |
| 2% | Construction |
| 1% | Transportation and Storage |
| 1% | Electricity, Gas, Steam and Air Conditioning Supply |

A vibrant and attractive city creates a vibrant economy. Westminster’s commercial activity reverberates at a national level. The scale and diversity of our ~~51,410~~ 53,000 businesses is a key factor in our sustained growth. From our large retailers on Oxford Street to our many local street markets, ~~Westminster has a range of commercial and shopping activities that helped contribute £66 billion in gross value added (GVA) in 2018;¹⁰ 15% of London’s total and 3.2% of that of the UK.¹¹ Westminster has a diverse retail offer that helped contribute £3.5 billion in Gross Value Added (GVA) in 2021; 19% of London’s total and 3.5% of that of the UK, for this industry.~~

Whilst professional ~~services business and financial industries~~ make up the largest sector, we’re also a global hub for ~~creative industries with 27% of all London’s jobs in music, performing arts and visual arts creativity, with 30% of all London’s jobs in the Creative and Music Industries~~ based within the city. Westminster is home to more than 130 major cultural establishments such as Tate Britain and the National Gallery. Many cultural activities and programmes also take place in Westminster such as the City of Sculpture programme and ‘Fourth Plinth’ art Installations at Trafalgar Square.

10 ONS, 2019

11 Greater London Authority Economics, Current Issues Note 55: Examining GVA in London’s local authorities in a London and UK context, 1997-2015 (September 2017)

Westminster is home to numerous uses and functions of national and international importance including the seat of Government, cultural institutions, higher education Institutions, sporting venues such as Lord’s Cricket Ground, and many research and medicine facilities. These help to boost the economy as workers, students, visitors and tourists spend time in Westminster. Many of the buildings that feature these uses have great historical value and contribute positively to local areas and the heritage of the city.

Westminster is home to various unique areas and neighbourhoods each with distinctive townscape character and serving different functions and uses. Many of these areas are rich in history and heritage assets and have widely recognised reputations making them unique. Savile Row for example is well known for its suit tailoring, while Soho offers a mix of small independent shopping and a vibrant night life.

Many famous attractions make Westminster a very popular destination for tourists and visitors alike. The West End provides a vibrant night life shown by the huge economic output. There are nearly 500 hotels, **56 60** theatres and **21 20** LGBTQI+ night time venues.¹² Hotels are an integral part of the CAZ generating both direct and indirect spending in the local economy. There are a range of hotels in Westminster accommodating for different budgets – from well-known historic hotels such as the Ritz and the Savoy to the smaller local hotels.

The GLA estimates that between 2016–2041 there will be a need for approximately 75,000 additional office-based jobs in Westminster.¹³ Over the Plan period an increased demand for other commercial spaces, including hotels, retail and leisure developments is also expected, meaning additional commercial floorspace of a range of types will be required.

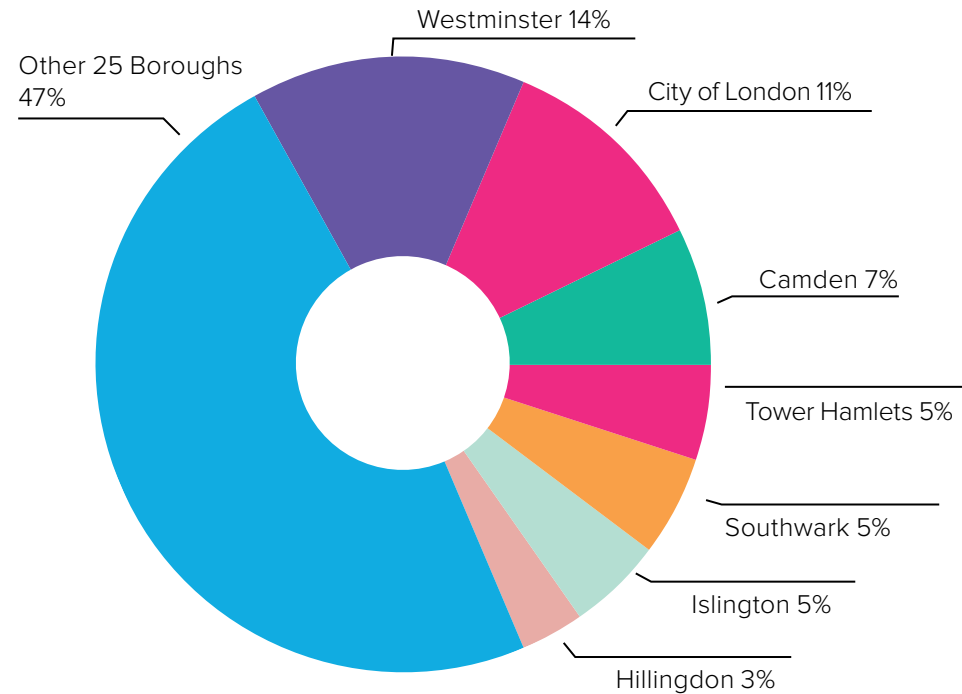


Figure 6: Proportion of London's jobs within each borough 2015-16 2022¹⁴

12 Cultural Infrastructure Map, Mayor of London

13 London Office Policy Review, 2017 2023

14 [Business Register and Employment Survey 2015 /16-2022](#)



Main Airport Links

- Luton
- Heathrow
- Stansted
- Gatwick
- City



4 Terminal Train Station

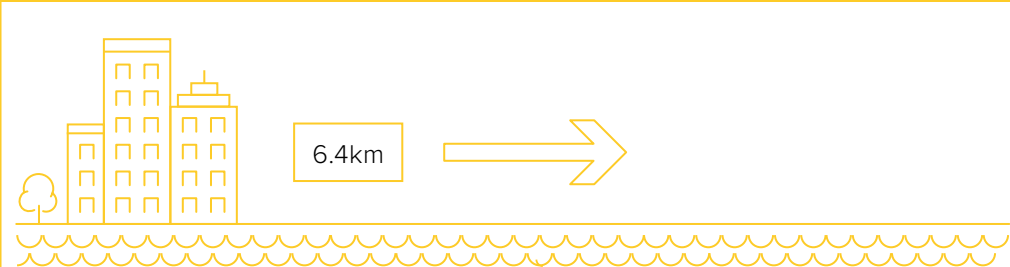
- Charing Cross
- Paddington
- Marylebone
- Victoria



Elizabeth Line Stations

- Bond Street
- Paddington
- Tottenham Court Road

Canal Frontage



Population density puts pressure on every aspect of our infrastructure. A constant challenge is how our 1.1 million daytime population moves around the city. Increased capacity, more ‘joined-up travel’, greater efficiency and more sustainable transport options, as well as more choice is needed to meet increasing demand.

The structure of our city is also a major contributor to CO₂ emissions. In the UK, buildings are responsible for around 40% of CO₂ emissions. In Westminster that figure is more than double at around 90%. This not only wastes energy but amplifies the urban heat island effect. The Mayor of London’s target is to reduce emissions by 60% by 2025. This target informs everything we do as we strive towards being a Cleaner Air City. Regeneration of our waterways, canals and streets to promote greener travel options and encourage walking and cycling is essential if we are to meet our ambitious carbon reduction targets.

Air quality isn’t the only pollution issue Westminster faces. We have a responsibility to address all forms of pollution. Westminster receives the highest number of noise complaints in London. Light pollution wastes energy, detracts from the character of our conservation areas and can negatively impact on health.

Westminster is home to many high-quality sporting facilities and open green spaces with significant investment over the past decade. There are six swimming pools, 16 physical activity centres and 58 park-based sports facilities within the city.¹⁵ Several regular sporting events take place in the city including the London Marathon and the Westminster Mile. Enabling residents to stay active is crucial to their health and well-being but it also contributes to the local economy and relieves stress on the health service. Our green spaces, parks and the River Thames frontages not only provide recreational opportunities but contribute to the character and attractiveness of the city and provide access to nature. In particular, our five Royal Parks are a huge asset to the city and as designated tranquil spaces, they provide a welcome break from the urban environment.

The challenges we face are not insurmountable, in fact they afford us the great opportunity create a [sustainable city for all Fairer Westminster](#). Every action we undertake must enhance the lives of everyone who comes to our city, whether to live, work or visit.

City Plan 2019 – 2040 is a plan for people.

¹⁵ Active Westminster Strategy, 2018



3 passenger piers



32 underground stations



150 + bus routes

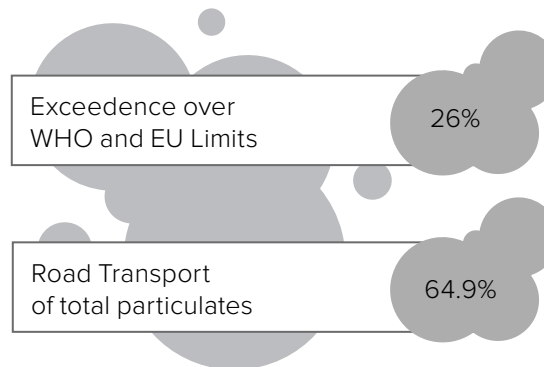


~~170~~ 171 cycle hire docking stations



350 km of highway

Air Quality



OUR APPROACH FOR WESTMINSTER

A city where people choose to live or work because it's enriching and fair.

A city that focuses fairly on the needs of our community and beyond.

A fairer city that will be sustainable for generations to come.

City Plan 2019 – 2040 brings together our vision for a Fairer Westminster.

A fairer vision for homes and communities

Westminster will be a city where the housing needs of residents are met through the provision of greener and more genuinely affordable housing. Where people feel they belong to connected and thriving communities.

Affordable housing is at the heart of our vision. Through smart design and innovation we will have created not just enough new homes to meet our housing targets, but more crucially to exceed the expectations of the people who live here.

By 2040, at least 35% of all new homes delivered will be affordable. But that's just part of the story. We need not only to create affordable housing, but the right kind of housing. That means providing the size and type of homes that take into account our changing demographic and the diverse needs of everyone who lives here.

The golden standard is for people of all ages and all abilities to feel safe, and have a sense of belonging and enjoyment. Being able to connect with other people will forge communities, improve well-being, and make social isolation a thing of the past.

We want people to feel connected to nature even though they live in the heart of the city. Initiatives like the regeneration of the Grand Union Canal, and development of the north bank of the Thames will open up even more of the city to a new generation. We want every resident to be within a five fifteen minute walk distance of an open space, so they have the benefits of a healthier life on their doorstep.

Living in Westminster should afford residents the opportunity to live the best life possible.

A fairer vision for a healthier and greener city

~~Improvements in our air quality will improve our quality of life.~~

Climate change is changing the way we do things. Design We will prioritise retrofit first and the use of sustainable construction materials, with energy-efficiency on an equal footing as aesthetic appeal. We will be a world leader in sustainable design. Specialist attention will be given to retrofitting our historic buildings, so they can take their place in the modern world.

Our city will be characterised not just by our stunning built environment, but also our natural environment. Soft landscaping which weaves micro-habitats for wildlife into buildings and spaces, whilst helping to mitigate the effects of CO₂. By bringing nature into the city we inspire active travel, as moving around the city becomes a leisure activity in itself.

The move away from petrol and diesel cars towards more energy efficient electric cars is going to be made easier by changes to our roads and more electric vehicle charging points. Reduction in traditional forms of traffic will improve our air quality and considerably reduce our noise pollution. Multiple polluting delivery vehicles won't be clogging up our streets and pumping out fumes, because better, more convenient, options to consolidate deliveries will exist.

By 2040 we will have regained our status as a 'river city', through a complete transformation of the public realm at the north side of the Thames. A transformation that will bring a whole new dimension to the area, without impacting on the views of the iconic buildings around.

~~Improvements in our air quality will improve our quality of life.~~ Over the course of the next 20 years Westminster's air quality will improve dramatically.

It will feel like a healthier city because it will be a healthier city.

A fairer vision for the right kind of growth

The very best design, using the most innovative technology will create the heritage of the future.

City Plan 2019 – 2040 sets out a blueprint for how Westminster will enter the next few decades in a strong and competitive position. To do this we need to be adaptable to change, but at the same time conserve the character of a city with one of the world's most iconic skylines.

Growth in the right kind of housing is a huge priority. People want to live here; we need to create the conditions to make that happen. The most notable significant areas of housing growth will be seen in the Victoria and Paddington Opportunity Areas as new thriving streets with new homes and new jobs are created. [New site allocations will unlock the development potential of complicated sites to deliver sustainable growth, and benefits in infrastructure, public realm and facilities for existing and new communities.](#) The north west of the city will see economic regeneration and housing developments in Church Street / Edgware Road and Ebury Bridge estates will bring a renewed vitality. A vitality that will resonate throughout the city.

An exciting, more creative approach to retail will offer residents and visitors alike a complete leisure experience. The West End will be the place to go for leisure, because it will offer everything; a place where people can shop, socialise and be entertained. Our high streets will be vibrant hubs of commercial activity, providing the kind of experience that online retailing simply can't compete with.

Soho is unique, and this plan will ensure it stays that way. As an area in our 'special clusters' zone, the focus will be on protecting its vibrant and cosmopolitan character that has made it such a dynamic place to live, work and socialise.

Westminster is a powerhouse of business. Our offices showcase the very best in contemporary design and we continue to attract the most dynamic workforce. By 2040, our business landscape will have grown to create some 63,000 new jobs. We'll be setting the pace for changing working patterns with office space and super digital connectivity allowing for more flexible working, giving people a better work-life balance, and so better lives.

City Plan 2019 – 2040 will cement our reputation as a place where people want to live, work and contribute to our growth.

OBJECTIVES

These objectives all contribute to our commitment to improve the health and well-being of the city's residents and workers and to help ensure Westminster is a place we can be proud to hand to our successors. The objectives also contribute to the delivery of **three key themes** in the council's **ambition to make Westminster a Fairer Westminster Strategy ambitions, namely Fairer Housing, Fairer Environment and Fairer Economy City for All: homes and communities, a healthier and greener city, and opportunities for growth**. The success of the Plan will be monitored against these objectives.

5 Enhance connections by improving options for cycling, walking, leisure, sport and play, whilst prioritising pedestrians and improving the interchange between transport modes and incorporating innovative solutions to manage the highway network.

6 Improve quality of life, climate resilience and tackle environmental challenges by protecting, enhancing, expanding our valuable network of parks and open spaces.

1 Increase the stock of high-quality housing and provide variety in terms of size, type and tenure to meet need and promote mixed and inclusive communities, with a clear focus on affordability and family homes.

7 Improve air quality, minimise noise and other polluting impacts, and reduce carbon and water demands by minimising detrimental impacts from development.

2 Enable job growth across a range of sectors vital to the UK economy, and ensure those from disadvantaged backgrounds benefit from the opportunities this presents.

3 Enhance the West End as London's primary retail, leisure, and visitor destination, and ensure our town centres and high streets can adapt to the challenges they face.

4 Broaden the city's cultural offer, while managing the impacts of clusters of uses, and of the evening and night time economies on existing residential communities.

8 Promote quality in the design of buildings and public spaces, ensuring that Westminster is attractive and welcoming.

9 Making sure our neighbourhoods continue to thrive.

10 Make the most of our unique heritage and historic environment, while encouraging innovations in building technology and improving a sense of place.

HOMES AND COMMUNITIES

A city with community at its heart.

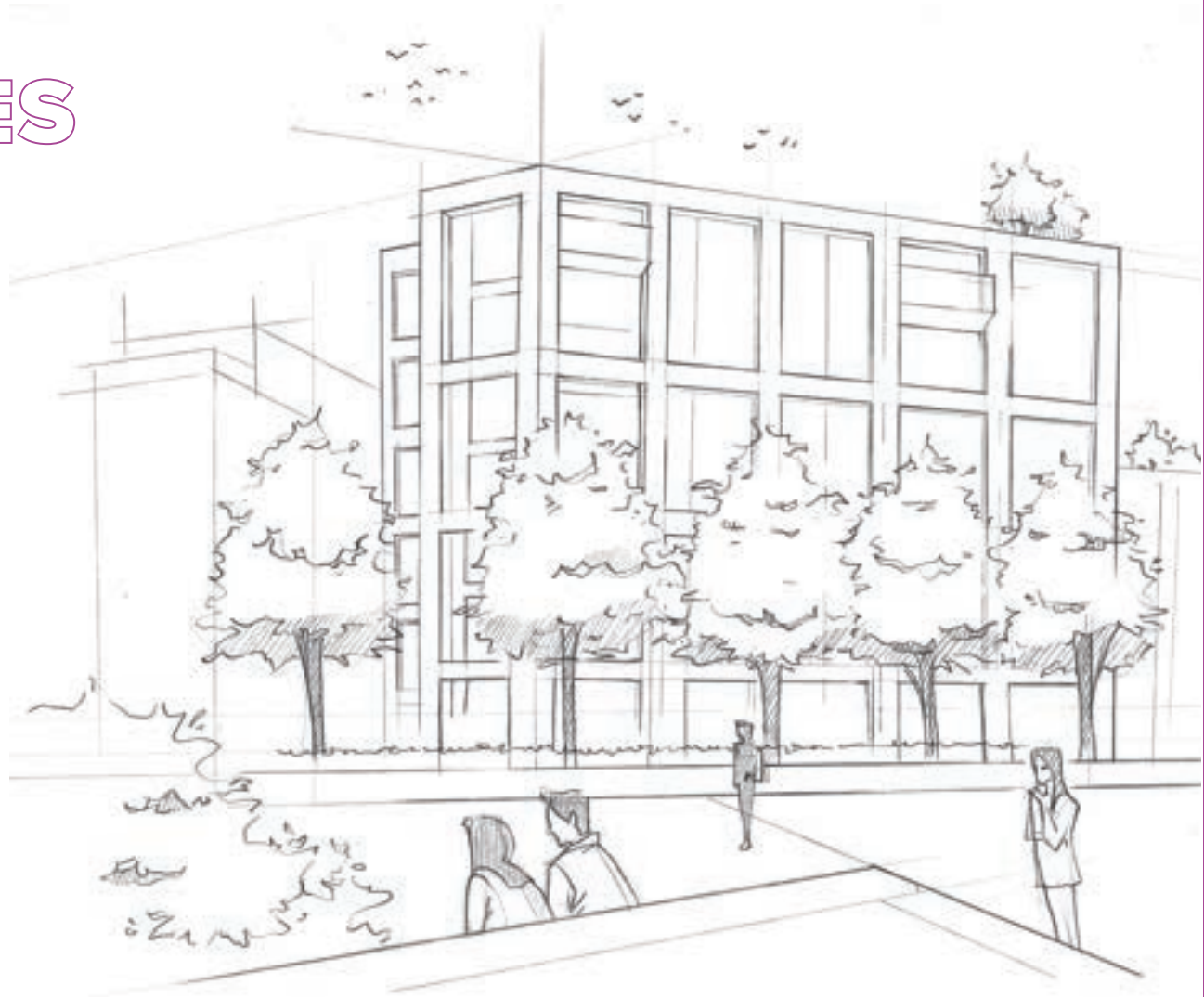
Westminster is one of London's most densely populated boroughs, with growth set to rise year on year. With this challenge comes the opportunity to transform the lives of the people who live here. This plan is key to that transformation.

By 2040 we will have created enough new homes to exceed our target for affordable homes.

But we're not just looking to build homes, we're looking to build communities.

Communities where every consideration has been given to the people who live there. Safe communities that bring people together. Healthy communities with green open spaces within a five minute walk where people can feel a million miles away from the everyday pressures of city life.

Communities where people can truly enjoy where they live.



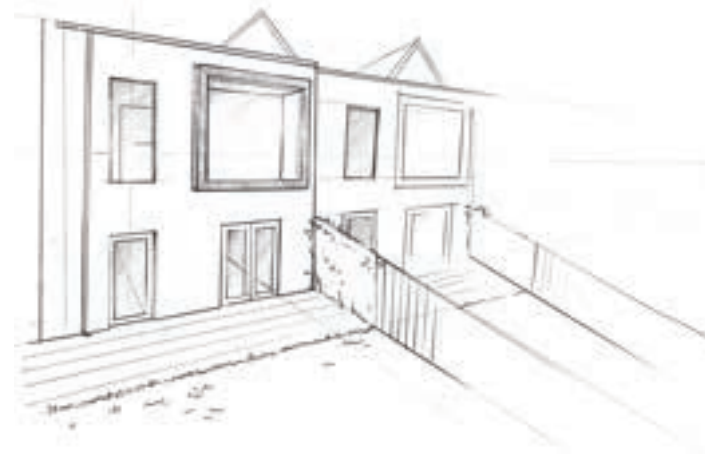
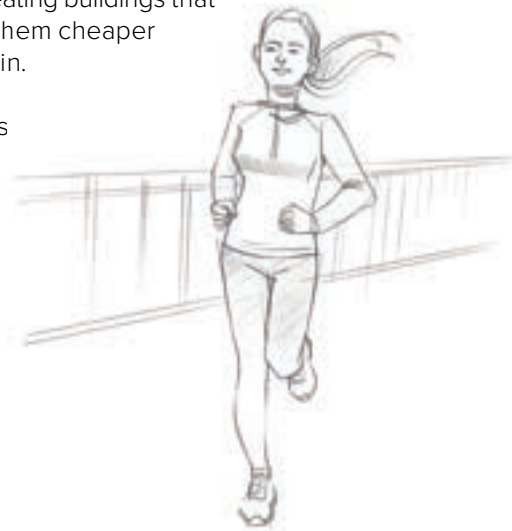
A HEALTHIER AND GREENER CITY

A healthier and greener Westminster.

The greener Westminster of 2040 is already being built. It's one where everything we plan, everything we design, everything we build makes our city a more carbon-neutral, healthier place to live. The policies we set out will help us to deliver exactly that.

It's about those little changes that make a big difference; maximising soft landscaping, planting more trees, being less wasteful. It's protecting our open spaces so people can enjoy healthier, more active leisure time. It's making greener travel the best travel because it's more efficient, more pleasant and costs less. It's creating buildings that are more energy efficient, making them cheaper to run and more comfortable to be in.

It's a city that's greener. A city that's healthier. A city that's better.



OPPORTUNITIES FOR GROWTH

Nurturing growth in Westminster

Growth is the lifeblood of any city. But growth is only possible when that city is a rewarding place to live, work or visit. Here we set out how new developments will help us build on our rich heritage to create an environment where people can enjoy more fulfilling leisure time. Creating more open spaces, making the most of our waterways, and expanding our retail offering.

Ambitious projects to regenerate Victoria, Paddington and the north west of the borough will bring a new vitality.

To sustain successful economic growth, it's not enough just to attract new businesses. We also have to nurture them.

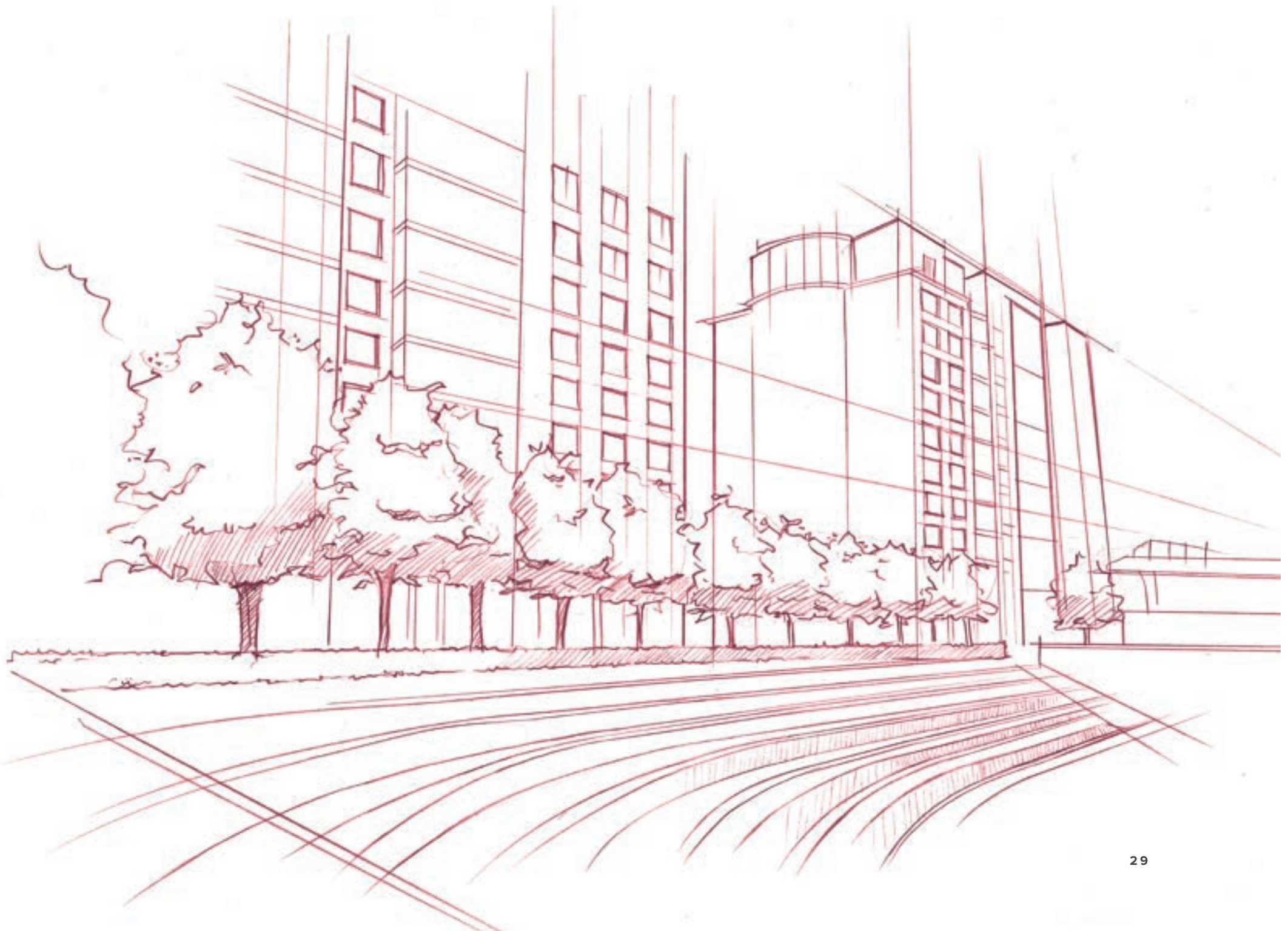
SPATIAL STRATEGY

Building better futures

To respond to our growth we need to develop in a sustainable way; the challenge is to support and encourage growth by maximising our limited space, whilst also retrofitting instead of demolishing where possible to reduce the city's carbon emissions and make the best use of our buildings. The West End Retail and Leisure Special Policy Area will bring significant jobs growth through a range of commercial development, alongside affordable new homes. Transforming the public realm of the north bank of the Thames will create an exciting new buzz.

Opportunity Areas inspire the redevelopment of brownfield land to create new possibilities and deliver the homes and jobs growth the city needs, but always with an eye on what has gone before. Preserving our design, our character, our heritage is paramount. Special Policy Areas like Soho, Harley Street and Mayfair have enhanced protection, as each brings its own unique contribution to our economy. And to us.

This is a Spatial Strategy that looks beyond building a city to building futures.



1. Westminster's spatial strategy

A. Westminster will continue to grow, thrive and inspire at the heart of London as a World City by:

1. Supporting intensification and optimising densities in high quality new developments that integrate with their surroundings and make the most efficient use of land, including through developments that showcases the best of modern architecture.
2. Delivering at least 20,685 homes, of which at least 35% will be affordable.
3. Supporting the growth, modernisation and adaptation of a variety of business space to provide at least 63,000 new office-based jobs alongside other forms of commercial growth.
4. Balancing the competing functions of the Central Activities 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 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.

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 in identified 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. 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.

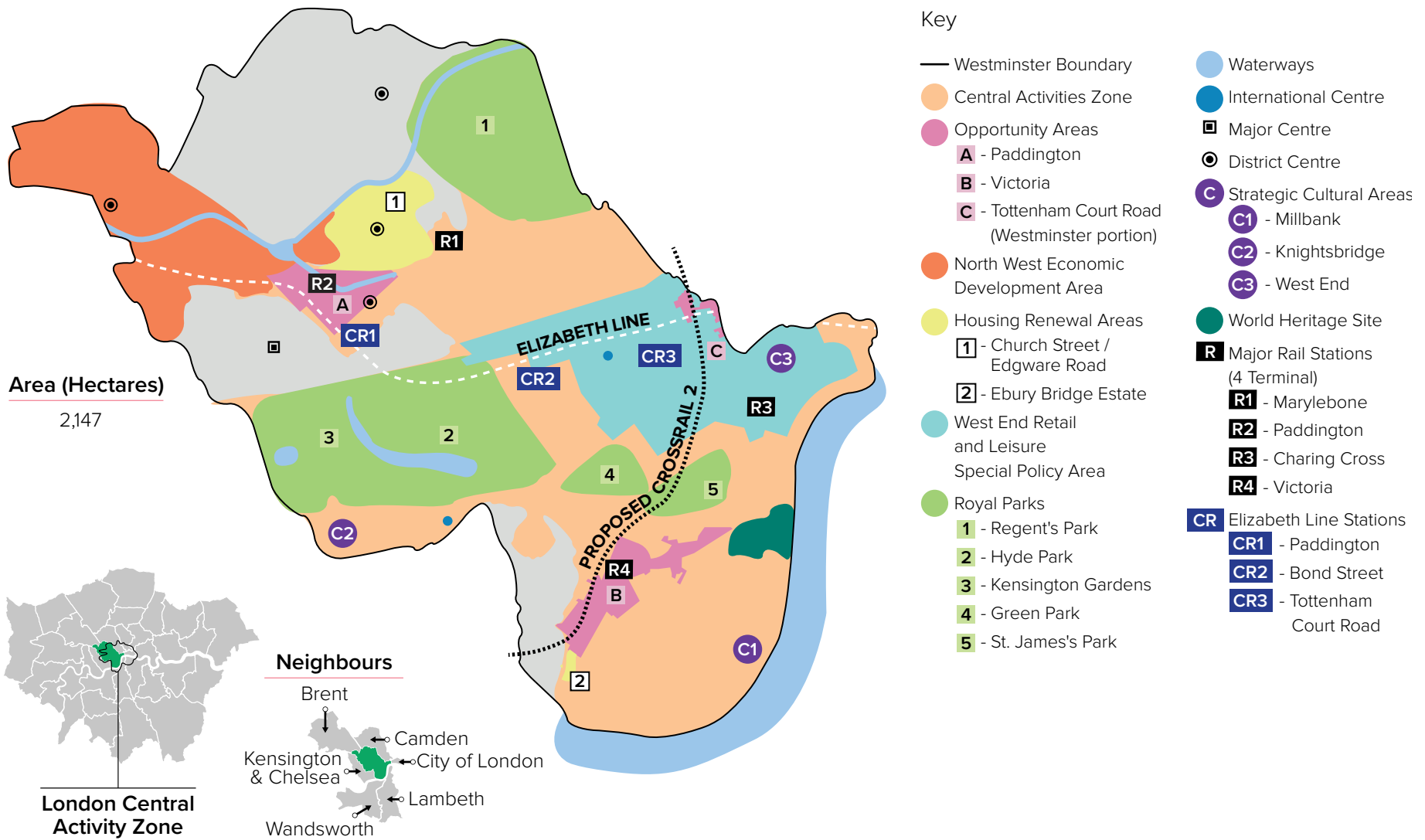


Figure 7: Key Diagram

1.1 / Westminster's growth will be managed to maximise benefits for residents, businesses, workers and visitors in accordance with the principles of good growth established through the London Plan. It should make the most efficient use of land while protecting and respecting Westminster's natural and built environment, including the Royal Parks, the Westminster World Heritage Site, our conservation areas, listed buildings, and the urban heritage of the city more broadly.

1.2 / Our Infrastructure Delivery Plan (IDP) sets out the key infrastructure needed to support growth. It identifies key infrastructure projects, their location, timescale for delivery and funding sources.

Intensification and optimisation

1.3 / Westminster is already very densely developed with highly valued open space and heritage worthy of conservation. To deliver additional growth in the city, it will be necessary to intensify existing urbanised areas. This includes optimising opportunities for infill development and extensions to existing buildings, up as well as out. This plan encourages high quality, creative and contemporary design solutions to deliver additional growth.

1.4 / Developers will be encouraged to work together to bring forward coordinated proposals, including combining adjacent sites into larger development opportunities. This approach is likely to offer greater potential to increase the scale and mass of buildings through exemplary design. It will encourage the most efficient use of scarce land, helping to create places

that are better integrated with the surrounding built environment and that work effectively for existing communities and future occupants.

Housing

1.5 / Like the rest of London, demand for new housing across all tenures in Westminster is very high. The affordable housing target will ensure that in addition to meeting the demands from the private housing market, delivery also meets identified need in the affordable sector, and conforms with the Mayor's strategic target of 50% affordable housing across all of London.

1.6 / The policies in this plan encourage much more housing development of the right types, sizes and tenures, to meet the city's needs. It includes support for new types of housing rarely seen in Westminster, embraces innovative designs, and is based on an expectation of higher densities across the city. The Plan also enables the delivery of large housing renewal projects such as at Church Street / Edgware Road and the Ebury Bridge Estate.

Employment

1.7 / Employment activity in Westminster is highly diverse, and of vital importance to the wider UK economy. To secure the right conditions for continued economic growth, the past trend of losing business space must be halted, and the growth of a range of spaces that meets the needs of modern businesses supported.

The Central Activities Zone (CAZ)

1.8 / The CAZ is designated through the London Plan, and includes more land in Westminster than any other London borough. It provides a rich mix of commercial uses that contribute to central London's wide appeal but is also home to a substantial residential population. As the heart of a world city, Westminster's portion of the CAZ includes the functions of monarchy and government, a variety of cultural, educational, professional and religious institutions, world-class retail, headquarters of national and international businesses, embassies, leisure and entertainment.

1.9 / The future growth and intensification of the CAZ in a manner that balances its many competing functions is supported. This includes the protection and intensification of office clusters, and a growth and diversification in retail and leisure activity that respects residential amenity. Additional residential development that does not compromise nearby businesses' continued commercial functions can also positively contribute to the vibrancy and diversity of the area.

Uses of international and/or national importance

1.10 / Central to London's world-class capital city status, Westminster is home to a variety of uses and buildings that are of international and national importance, and positively contribute to its unique appeal. This includes buildings and uses that host the functions of government and the state, centres of excellence for higher education, research and medicine, world-famous arts and cultural institutions and other prestigious institutions, an international sporting venue (Lord's Cricket Ground), and major tourist attractions. Many of the buildings that host these uses contribute to Westminster's heritage, and are vitally important to London and the UK's tourist industry.

1.11 / A Restoration and Renewal Programme is underway to protect and enhance the outstanding universal value of the Palace of Westminster. Over the lifetime of the Plan, to safeguard the country's democracy, development proposals to facilitate the temporary full decant of the House of Lords and House of Commons will be necessary, and is supported in principle. The programme will enable continuous parliamentary activities whilst refurbishment is undertaken, and secure the historic legacy of one of the world's most iconic buildings for future generations. It will ensure that the Palace of Westminster is a resilient, sustainable and functional building that is more open and accessible, develops heritage skills, and strengthens the World Heritage Site's appeal as a visitor destination.

Specialist clusters of uses

1.12 / Within some parts of Westminster, clusters of specialist uses exist that have a distinct character, make a major contribution to London's global appeal, and merit policy protection. These include:

- Soho Special Policy Area: small scale mixed use including specialist retail, creative industries, cultural and entertainment uses.
- Harley Street Special Policy Area: medical uses.
- Mayfair and St James's Special Policy Area: art galleries and luxury / niche retail.
- Savile Row Special Policy Area: bespoke tailoring.

1.13 / The West End, Millbank and Knightsbridge Strategic Cultural Areas also provide important clusters of uses. Within these areas cultural uses are afforded protection to retain the character and function of the area.

Town centres and high streets

1.14 / The evolution of town centres and high streets will be supported to ensure they can respond to the challenges posed by online retailing and to make certain that they remain vibrant hubs of commercial activity which meet the needs of local neighbourhoods, workers and visitors.

Heritage and townscape

1.15 / Westminster's heritage and townscape value reflects its rich history and importance as a leading world city. It includes the Palace of Westminster and Westminster Abbey World Heritage Site, over 11,000 listed buildings and structures, and conservation areas covering approximately 78% of the city. These assets positively contribute to the city's wide appeal to visitors, businesses, and residents. New development will therefore need to respond positively to this context through high quality design and architecture as the city continues to evolve. Heritage assets should be seen as an asset that positively shapes new developments and contributes to a sense of place, rather than a constraint.

Natural environment, public realm, and North Bank riverfront

1.16 / The quality of the public realm and green infrastructure network are vitally important to the continued growth and success of Westminster, as acknowledged through a number of council strategies¹. It includes the city's streets, the Royal Parks, canals and waterways, and London Squares. Together these provide opportunities for rest and relaxation, the setting to the city's iconic architecture, enable the safe movement of people, and help address climate change. High quality streets, parks and spaces can and should encourage, facilitate and enable physical activity by default and well-designed spaces should be flexible and support a range of physical activity, leisure and sport. Enhancing these areas over the lifetime of the Plan will help achieve a more pleasant walkable environment and better air quality - to the benefit of residents, workers and visitors. A shift towards more sustainable travel patterns that makes the most of central London's extensive public transport network will also be necessary to make efficient use of scarce land and accommodate the levels of commercial and residential growth the city needs.

¹ Including the ActiveWestminster Strategy 2018-2022, A Partnership Approach to Open Spaces and Biodiversity in Westminster (2019), the Westminster Walking Strategy 2017-2027, and the Westminster Cycling Strategy (2014)

1.17 / The River Thames is a strategic waterway at the heart of London's origin. It reflects the city's history and its worldwide position. The river is also one of the city's largest spaces and has itself become a tourist attraction. The North Bank is home to some of Westminster's more distinctive buildings and institutions and is also an incomparable platform from where other London landmarks can be observed. It therefore provides a significant opportunity to create a new destination that reconnects the buzz of the city with its water boundary, where people meet, relax and play while activating public life and contributing to the city's success. Improvements to the public realm, alongside uses that promote the cultural and commercial character of the area and help activate the riverfront are therefore supported in principle – to help realise this ambition.

Infrastructure

1.18 / New development will be supported by investment in supporting infrastructure. This will include physical infrastructure such as the transport network, and social and community uses that help support good growth. We will combine developer contributions, secured through the Community Infrastructure Levy and Section 106 planning obligations, with council resources and other public funding streams such as grants, in order to maximise delivery of the objectives set out in this plan.

2. Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area

The intensification of the West End Retail and Leisure Special Policy Area (WERLSPA) over the Plan period will deliver the following priorities:

- A. Significant jobs growth through a range of commercial-led development including retail, leisure, offices and hotel use. Additional commercial floorspace will be provided in a manner that respects its setting, through:
 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;
 2. The sensitive refurbishment and extension, or replacement of existing buildings across the WERLSPA.
- B. An improved retail and leisure experience that responds to innovation and change in the sector, including the transformation of the Oxford Street District.

- C. A diverse evening and night-time economy and enhanced cultural offer.
- D. A more co-ordinated approach to managing the area's freight, servicing, and delivery demands.
- E. An enhanced pedestrian environment, public realm (including along the North Bank), and network of public transport infrastructure.
- F. Protection of the unique character of central London's distinct and iconic places and heritage assets.

2.1 / The West End is a showcase for London on the international stage, attracting visitors from around the world. It provides one of the largest and most diverse concentrations of jobs anywhere in the UK. The nature of commercial activity that takes place in the West End is vital to the UK economy – generating more gross value added (GVA) than the City of London.²

2.2 / The area contains some of London's most iconic shopping and leisure districts, alongside its role as a global office centre. It is home to Oxford Street, Regent Street, Bond Street, (which alongside Knightsbridge, as International Shopping Centres, sit at the top of London's town centre hierarchy),

² West End Good Growth, Arup, 2018

and other world-renowned retail and leisure destinations including Covent Garden, Soho, and Theatreland. It also contains some of London's most recognised tourist attractions and public spaces such as Piccadilly Circus, Leicester Square, Trafalgar Square, and parts of the River Thames. The quality of the built environment, with a high concentration of listed buildings and heritage assets, positively contribute to a unique setting.

2.3 / The current mix of attractions and workplaces already result in intense activity across the area. This is set to increase as the introduction of the Elizabeth Line brings a projected further 1.5 million people within 45 minutes reach of central London.³ While new development is welcomed, it must be managed in a way that respects and enhances the character of some of London's most distinct and recognisable places and heritage assets. This includes protecting the character and function of areas with clusters of specific uses that have been identified as Special Policy Areas (SPAs), and the wider quality of the built environment.

2.4 / Historically the area was designated as the West End Retail Special Policy Area, which covered a smaller area of the West End International Centre, Soho, and Covent Garden. This has now been expanded to better reflect the mixed-use nature of the wider area, and interdependence of uses that is much more diverse and varied than simply retail.

³ crossrail.co.uk/news/crossrail-in-numbers

Tottenham Court Road Opportunity Area

2.5 / The area around Tottenham Court Road station, which includes land both in Westminster and Camden, has been identified as an Opportunity Area in the London Plan. This is in recognition of the significant capacity for high quality new development that delivers new jobs and homes and an enhanced public realm, alongside transport improvements associated with the Elizabeth Line. The London Plan sets out indicative growth targets of 6,000 additional jobs and 300 new homes over the period 2016-2041 for the entire Tottenham Court Road Opportunity Area – including land in both Westminster and Camden. As one of London's more mature Opportunity Areas, and given the progress already made on upgrading the station environs, a substantial contribution towards these growth targets has already been made. At least 50% of the overall London Plan target will be achieved within Westminster (including what has been permitted or built since 2016). 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 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.

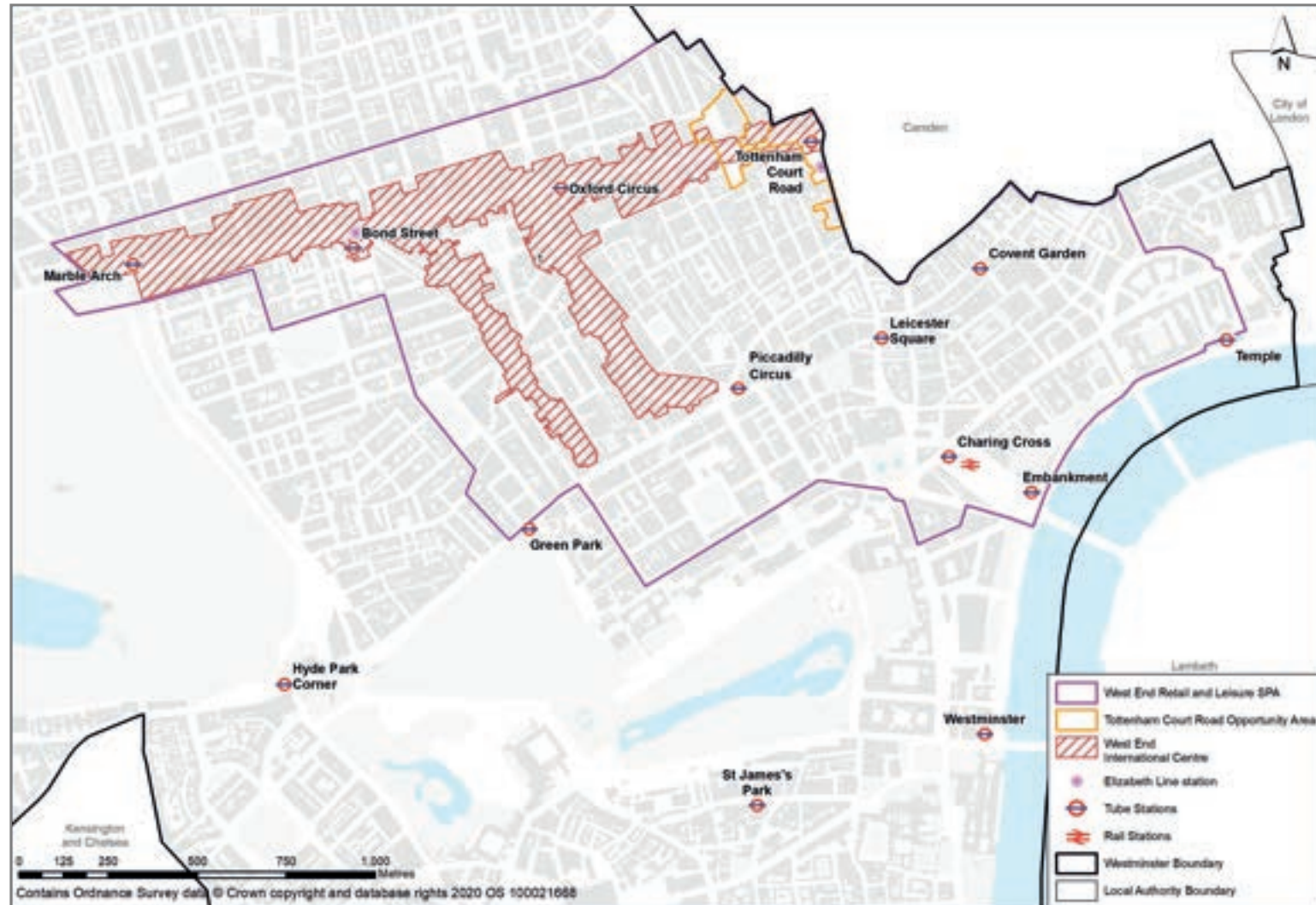


Figure 8: WERLSPA and Tottenham Court Road Opportunity Area

Commercial-led development

2.6 / Identified growth within the WERLSPA will be commercially led and will require the delivery of additional floorspace alongside the intensification of existing space. Growth will be achieved through new developments with increased scale and massing that respect local context, including within Tottenham Court Road Opportunity Area, along Oxford Street, and the area's key thoroughfares. Replacement buildings will be focused in areas of lower townscape value, whilst in areas of higher townscape value, sensitive refurbishment and extension of existing buildings can also support growth. The majority of commercial growth is anticipated to come through windfall development, as has historically been the case in Westminster.

Good growth

2.7 / The WERLSPA is anticipated to absorb much of Westminster's future commercial growth – reflecting its unique status, size, and wide appeal. Scenario testing for the West End⁴ has projected potential for an uplift of 124,000 jobs across the entire West End (including parts of London Borough of Camden) to the period 2041, through a range of commercial development including retail, food and drink uses, hotels, arts, culture and entertainment and offices. Investment in all of these sectors will be necessary to achieve good growth that:

- Enhances the West End's position as a globally competitive retail destination;
- Secures a diverse range of office space that supports increased employment opportunities in growth sectors and takes full advantage of the opportunities the Elizabeth Line (and Crossrail 2) bring;
- Protects and supports the arts, culture and entertainment offer for residents, workers, and visitors;
- Supports the visitor economy, including through the upgrading of hotel stock;
- Diversifies the food and beverage offer to complement the retail environment; and
- Minimises negative impacts on residential neighbourhoods.

Oxford Street

2.8 / Growth in retail and leisure floorspace will ensure the West End responds to change in the sector and its status and reputation is enhanced. This will include the transformation of Oxford Street to ensure a more diverse and interesting mix of uses and better quality public realm that prioritises pedestrians, enhances the shopper experience, and makes it a more attractive place to visit and enjoy. Along with an improved public realm, the built form of Oxford Street offers scope for increased height to deliver a range of commercial floorspace that complements the retail offer and provides modern workspace - reinforcing its role as a key commercial centre.

Evening and night-time economy and cultural offer

2.9 / The West End is home to the largest evening and night-time economy in the UK. It has a wealth of cultural uses, pubs, bars, restaurants, nightclubs, cinemas, theatres and other leisure uses. To ensure the area is welcoming and attractive to all communities, the appropriate management and further diversification of the evening and night-time economy will be supported. This will be done through enhancements to its cultural offer, hosting of events and art installations such as Lumiere London, and late-night shopping.

2.10 / This activity will help ensure the evening and night-time economy is not dominated by the consumption of alcohol, which can lead to issues of anti-social behaviour and deter those who do not drink from visiting central London outside of the daytime. Enhancing the cultural offer will include support for new venues, ancillary uses that enable existing ones to thrive (e.g. cafés within museums or theatres), and investment in the public realm around existing clusters such as that proposed at the Strand / Aldwych.

4 West End Good Growth, Arup, 2018

Freight and servicing

2.11 / The nature and intensity of activity in the West End generates significant freight and servicing requirements. This causes congestion and pollution, and makes the area less attractive to walk and cycle. We will work with landowners and businesses to support the better coordination of freight and servicing in order to minimise unnecessary vehicular trips. This will be done alongside interventions that secure a more pleasant environment that incentivises walking, cycling and use of public transport. This will include investment in the public realm to help green the area as part of the Wild West End programme,⁵ improved wayfinding, and investment in public transport interchanges by TfL and Network Rail. As set out in the spatial strategy, investment in the public realm along the North Bank is also a key priority for the area.

Partnership working

2.12 / The rich mix of historic buildings, uses and level of activity in the West End results in a complex number of issues and challenges which cannot be met through land-use planning alone. We will therefore continue to work within the West End Partnership⁶ and with other stakeholders to achieve the shared objectives of enhancing and maintaining its global reputation, improving the retail and leisure offer and pedestrian environment, and make visiting the area a more pleasurable experience.

⁵ wildwestend.london

⁶ westendpartnership.london

3. Spatial Development Priorities: Paddington Opportunity Area

Development in the Paddington Opportunity Area will deliver the following priorities:

- A.** The achievement of the growth targets for the area of at least 1,000 new homes and 13,000 additional jobs identified in the London Plan.
- B.** New workspace through an expanded range of offices, light industrial units and workshops with particular support for flexible workspaces.
- C.** Inclusive and high-quality public realm that enhances sense of place and encourages dwelling.
- D.** Enhanced sustainable travel modes through improvements to transport interchanges and the pedestrian and cyclist environment, including public access to the canal waterfront.
- E.** Reduced severance from surrounding areas including Church Street, Edgware Road station, the North West Economic Development Area (NWEDA) and Praed Street town centre.

F. Upgraded healthcare facilities.

G. Enhanced job opportunities and community facilities for the residents of Paddington and the neighbouring areas of Church Street and the NWEDA.

3.1 / While a significant amount of growth has already happened in Paddington, the area remains one of the city's most significant opportunities for large-scale regeneration thanks to the presence of under-utilised brownfield sites and the expansion of the Paddington Station transport node with the arrival of the Elizabeth line. We want to ensure the area continues to develop as a successful place and destination that is welcoming and accessible to all and can help bring together existing and emerging communities. We will continue our commitment to working in partnership with local stakeholders to develop a Place Plan for Paddington to deliver our shared ambitions for the area.

Paddington Station

3.2 / Paddington Station is Westminster's major transport node. A Grade I listed building contributing to London's distinctiveness, the station is one of the key arrival points into central London. It has a number of railway services that link London to the west of the country and four London underground lines, with the new Elizabeth line also coming to serve the station in the near future. The station provides connection to the expanding Heathrow

Airport and to growth areas to the west of the city including the Old Oak and Park Royal Opportunity Area. With increased numbers of passengers arising from residential and commercial growth and expanded transport network capacity, it is important that Paddington Station continues to be sensitively adapted to accommodate the higher volumes of traffic and ensure a seamless integration between different transport nodes.

3.3 / Significant changes in pedestrian flows and routes are expected in connection to different phases of station improvement works and major redevelopment projects in the area around the station (including Crossrail and Paddington Square) will require different solutions to enable the operations of the transport hub and the success of its neighbourhood. This is key to ensure the area is accessible and can be easily navigated, which in turn will enable growth and help encourage sustainable modes of travel, including active mobility.

Homes and jobs growth

3.4 / The London Plan has identified capacity for further high-density development in this area and sets out indicative growth targets of at least 13,000 additional jobs and 1,000 new homes over the period 2016-2041 for the Paddington Opportunity Area. Over the Plan period, we will continue to facilitate the further intensification of this area.

3.5 / The excellent public transport connections in the area provide opportunities for building at higher density while maintaining a focus on liveable public spaces and high-quality housing. The arrival of the Elizabeth line to the area will help increase Paddington's connection to other parts of London and the wider region and enable further growth in the area. In addition to its excellent links, Paddington's location within the CAZ has enabled this area to achieve significant office gains in the last two decades. It is now – together with Victoria – home to most of Westminster's larger office spaces, but there is scope for further office provision and for widening the range of workspaces. This will encourage new types of business and align with evolving trends in office styles and flexible work patterns, create more job opportunities and act as a catalyst for further commercial growth beyond the Opportunity Area boundary through to Edgware Road.

3.6 / We welcome proposals for all types of workspace across the Opportunity Area from large floorplates to flexible space. There are particular opportunities to accommodate workshops and light industrial units, on canal-side locations and under the Westway such as is seen at Great Western Studios in the nearby NWEDA. Meanwhile uses are also supported in these locations to encourage and support proposals from small businesses and start-ups and to prevent long-term vacancy.

3.7 / Paddington is not just an office location. To ensure development contributes to making an inclusive, sustainable neighbourhood and to strengthening the area's offer as a destination, a mix of other commercial and community uses will also be supported.

Development sites

3.8 / 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.

3.9 / The Travis Perkins site to the north of the Paddington Basin is occupied by an industrial use which supports the strategic function of the CAZ. The site presents a significant opportunity for change to deliver the priorities of the area. We will support proposals of high-quality design that can enhance the public realm and create permeability, including public access to the canal.

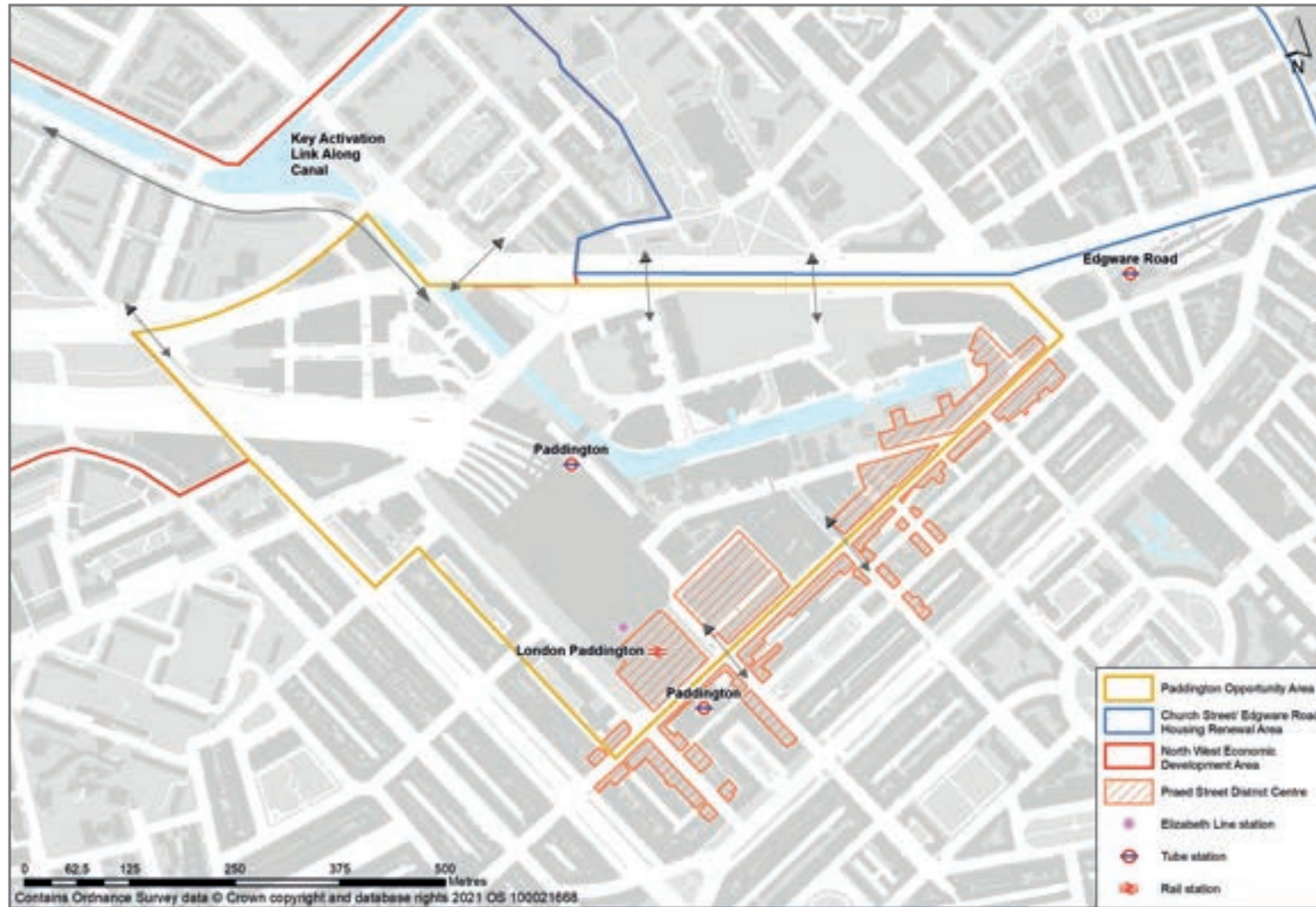


Figure 9: Paddington Opportunity Area

Connections and public realm

3.10 / The Grand Union Canal and the Paddington Basin are already strong assets to the area providing a sense of place. There are opportunities to further improve these waterside places in ways that encourage walking and cycling for pleasure and as an alternative last-mile connection to the Paddington public transport hub. An improved canal side environment will also strengthen links with other areas to the north west of Paddington along the course of the canal. An improved public realm will help ease congestion linked with the volume of pedestrians using the station and provide accessible, welcoming spaces for people to rest and enjoy the area.

3.11 / Across the Opportunity Area developments should contribute to improving permeability and legibility to create intuitive routes, public space and townscape improvements that support pedestrian and cycle movement throughout the area. Developments should aim to minimise severance and strengthen links with the neighbouring areas of Church Street, Edgware Road, the NWEDA and Praed Street.

4. Spatial Development Priorities: Victoria Opportunity Area

Development in the Victoria Opportunity Area will deliver the following priorities:

- A.** The achievement of the growth targets for the area of at least 1,000 new homes and 4,000 additional jobs identified in the London Plan.
- B.** Additional and enhanced social and community facilities.
- C.** Improved integration between public transport modes.
- D.** Inclusive and high-quality public realm that enhances sense of place and encourages dwelling.
- E.** Enhanced sustainable travel modes through improvements to the public realm and local environmental quality to strengthen the area's capacity, legibility and permeability, particularly for pedestrians and cyclists.
- F.** Support for the relocation of Victoria Coach Station.
- G.** The safeguarding of sites for Crossrail 2.

H. Enhanced routes and connections between visitor attractions.

I. The safeguarding and enhancement of heritage assets, particularly Westminster's World Heritage Site.

4.1 / Victoria faces unique pressures and challenges given its unique position as a busy transport hub, hotspot for businesses and government functions, place of tourism and leisure, and home to a growing residential population. We want to encourage growth in this Opportunity Area alongside improvements to public transport, accessibility and the public realm to enable the area to thrive and grow its reputation as an attractive destination. We will continue our commitment to working with local stakeholders to develop a Place Plan for Victoria to deliver our shared ambitions for the area.

Home and jobs growth

4.2 / The well-connected nature of the area means that it has the potential to accommodate higher residential and office density, particularly where it contributes to achieving the other objectives of the Opportunity Area. Parts of the Victoria Opportunity Area fall between conservation areas, providing greater scope for change.



Figure 10: Victoria Opportunity Area

4.3 / The London Plan sets out indicative growth targets of 4,000 additional jobs between 2016 and 2041 and 1,000 new homes over the period 2019-2041 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.

4.4 / Victoria Street is dominated by commercial activity at ground floor, with office entrances, shops, restaurants and theatres adding to the vitality of this area. A mix of uses on development sites in this area including active frontages at ground floor level is encouraged unless this would compromise movement in and around the Victoria Transport Interchange, or access and operational requirements for existing activities.

Social and community uses and open spaces

4.5 / With local population numbers expected to rise through densification of the housing stock, it is essential that housing delivery is supported by adequate provision of social and community facilities including libraries, facilities for children and young people, and sports and leisure facilities. This will be achieved through new facilities as well as improvements to and re-provision of existing stock.

Townscape and heritage assets

4.6 / The area contains a significant number of larger and taller buildings which are primarily located along the key routes of Buckingham Palace Road, Vauxhall Bridge Road and Victoria Street. Victoria is also home to a significant number of heritage assets, including the Grade II Listed station, Grade I listed Westminster Cathedral and is in close proximity to the Royal Parks, the Thames and the Westminster World Heritage Site. Development in the Opportunity Area will need to be sensitive to these assets and their settings, and contribute to their enhancement where possible.

The Victoria Transport Interchange

4.7 / Victoria is one of the best-connected areas in the country both in terms of public transport and the road network. Movement is therefore one of the area's main activities and a defining feature of the south western extent of the Opportunity Area. The Victoria Transport Interchange comprises underground and a mainline railway station providing direct links with Gatwick Airport and connecting central London with the wider south east, and a busy bus terminus and coach station.

4.8 / Victoria is undeniably a congested area. Currently there is insufficient capacity to accommodate pedestrians using the interchange which can result in conflicts between pedestrians and vehicular traffic. Existing developments sometimes contribute to this issue, presenting

physical obstacles to movement. The dominance of roads over pedestrian desire lines force people to undertake confusing and counter-intuitive journeys. The area also lacks a coherent sense of place and of urban quality. Visual clutter and the absence of key landmarks add to this.

4.9 / The Department for Transport has made a safeguarding direction for Crossrail 2 and we will support the project in safeguarding sites. Should this project be realised it will result in an even busier transport interchange and provide a further catalyst for change. Crossrail 2 presents an opportunity to re-imagine the station and the surrounding area to deliver a modern transport interchange that can support increased future operation, improve access to transport, movement in the area and enhance the public realm. As part of this and because the coach station operations have grown beyond the capacity of the building and its location, we support the potential future relocation of the coach station, which is among the safeguarded sites for Crossrail 2. This may be to outside of Westminster.

Development sites

4.10 / Victoria Station represents a key opportunity to deliver our priorities for the area, 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 ensure 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.

Improving public space and connections

4.11 / Developing the potential of Victoria and particularly its role as an integrated transport hub is largely dependent on managing the high levels of pedestrian and vehicular traffic to ease movement in and around the area. This will be achieved by sensibly improving the public realm to make it easy to navigate through enhanced wayfinding. Improved and new public spaces should be inclusive, pleasant, and safe to encourage residents, visitors and commuters to enjoy and relax in the area. Active frontages can also contribute to interest and visual entertainment which can support a sense of place and aid legibility.

4.12 / The railway tracks and the busy Buckingham Palace Road are barriers, hindering pedestrian movement east to west and vice-versa, particularly for the residential areas of Pimlico and Belgravia. Improved connectivity throughout the area could be achieved by strengthening the area's links with neighbouring sites and visitor attractions, including Parliament Square and the World Heritage Site and other significant heritage assets such as the Royal Parks and the Thames.

4.13 / Traffic domination and poor air quality are key challenges that need to be addressed in order to improve the quality of public space and enable active travel and easier movement throughout the area. We welcome interventions that can help improve the pedestrian and cyclist environment and priority on Victoria Street and Parliament Square, as well as enhanced connections between the two areas.

4.14 / Provision of green infrastructure as well as permanent and temporary landscaping interventions (e.g. on cleared sites awaiting redevelopment) can help soften the streetscape and contribute to improved air and environmental quality and enhanced sense of place. Christchurch Gardens represents one such opportunity to improve existing green space, and provide a quieter space away from the buzz of the main street where workers, residents and visitors can rest and interact. Improvements to the character, appearance and safety of Westminster Cathedral Piazza will also be encouraged.

5. Spatial Development Priorities: North West Economic Development Area

Regeneration of the North West Economic Development Area (NWEDA) over the Plan period will deliver the following priorities:

- A.** Increased job opportunities, particularly for local residents. This will include the protection of existing employment floorspace, and the provision of additional employment and commercial floorspace, in particular that which is suitable for small and medium enterprises (SMEs) and / or helps diversify the local economy.
- B.** New residential and mixed-use developments that improve housing quality and help diversify the area's tenure mix.
- C.** A greener and more walkable environment that addresses issues of severance caused by the railway, canal, Harrow Road and the Westway, and creates opportunities for the extension of, and greater use of, the Grand Union Canal towpath.
- D.** Enhancements to Harrow Road District Centre to provide a greater range of activity and a more attractive physical environment.
- E.** The provision of new and improved social and community infrastructure that meets the needs of the local community.

5.1 / The NWEDA has long contained some of Westminster's most deprived areas, with lower levels of qualifications, earnings and health, and higher levels of worklessness, than elsewhere in the city. It is an area requiring coordinated intervention to tackle persistent levels of inequality. Efforts through this plan will include providing for improved opportunities within the area itself, but also ensuring residents benefit from the opportunities offered by development in more central parts of Westminster. The boundary of the area has been amended from the previous adopted City Plan to exclude Paddington Opportunity Area – to reflect the different nature of development expected in both areas.

Commercial growth

5.2 / Much of the NWEDA is primarily residential, with a high proportion of social rented affordable housing. It also contains some commercial areas. The Woodfield Road area is home to a variety of businesses and offers opportunities for intensification that can deliver new job opportunities alongside additional high-quality homes. Building on the success of Great Western Studios nearby, there is scope to grow the local offer for creative, start-up, and grow-on business space including workshops, studios and canal boat offices – distinct from the employment offer elsewhere. Land under the A40 Westway also offers potential for additional enterprise space. Multi-purpose spaces that provide opportunities for community use, such as at Paddington Arts, will be welcomed, as will meanwhile use of space

in advance of redevelopment proposals. New commercial development in Harrow Road District Centre for town centre uses can help sustain its long-term vitality and viability and provide employment opportunities.

Open space and connectivity

5.3 / The area is deficient in publicly accessible open space. Severance from the Grand Union Canal, A40 Westway, and railway lines, all currently limit access to existing open spaces within the area and beyond. New development should therefore seek to green the area, by providing new publicly accessible open spaces wherever possible, such as that being provided at Walterdon and Elgin Community Homes Gardens.

5.4 / Development in the area represents an opportunity to increase activity along the Grand Union Canal. The canal is a significant underutilised asset that offers opportunities to provide an attractive walking and cycling environment – both to job opportunities in nearby Paddington, the Kensal area and Old Oak Common, and to high quality open space at Regent's Park. Bids are being made to TfL's Liveable Neighbourhoods Programme to fund interventions that help encourage walking, cycling and use of public transport. We will work with TfL and the Canal & River Trust to facilitate the Paddington to West Drayton Quietway.

5.5 / Redevelopment in the Woodfield Road area represents an opportunity to improve the pedestrian environment in this part of the NWEDA and to address the issues of severance identified above. Developments in the NWEDA will deliver a mix of uses including housing, will help to improve pedestrian permeability and provide better connections both within and beyond the NWEDA. These opportunities will be further explored in the Harrow Road Place Plan.

Retail

5.6 / Harrow Road District Centre provides the main cluster of shops and other town centre uses within the area. It is important that this continues to provide for local residents' shopping and servicing needs alongside Maida Hill Market, but also that it adapts to the challenges traditional high streets face.



Figure 11: North West Economic Development Area

5.7 / The findings of the Westminster Town Centre Health Check 2018 identified poor quality public realm, lack of active shop fronts, and the presence of some low-quality retail and uses such as hot food takeaways and betting shops. Greater diversity within the centre, including the growth of the evening and night-time economy, hotels, and spaces for small businesses with active frontages (including meanwhile uses) will therefore be supported, alongside investment in the public realm to improve its physical appearance. To secure its long-term sustainability, it is envisaged that the retail core of the centre will remain close to Maida Hill Market, with a more diverse mix of uses supported on the periphery of the centre. Recent investments to improve Maida Hill junction will help enhance the centre by securing a safer, more welcoming environment for pedestrians and cyclists. Opportunities to reduce severance to the District Centre so it more conveniently serves a wider catchment area will also be sought. This could include additional or more inviting canal crossings and road underpasses. Proposals for the centre will be set out in a forthcoming Harrow Road Place Plan.

Social and community infrastructure

5.8 / New social and community infrastructure in the area will be important to support sustainable growth, meet the needs of local communities, and provide opportunities for them to mix. Development will therefore be supported by investment in the improved education, health and leisure facilities necessary to support growth.

6. Spatial Development Priorities: Church Street / Edgware Road and Ebury Bridge Estate Housing Renewal Areas

CHURCH STREET / EDGWARE ROAD HOUSING RENEWAL AREA

Redevelopment of the Church Street / Edgware Road Housing Renewal Area over the Plan period will deliver the following priorities:

- A.** At least 2,000 high quality new homes, in accordance with the Church Street Masterplan.
- B.** At least 350 new jobs and linking further employment opportunities in the CAZ to the local community.
- C.** Community facilities, including a new health and well-being hub.
- D.** New green infrastructure and public realm improvements, including a north-south green route or 'green spine'.
- E.** Improved mobility through infrastructure improvements to support active travel.
- F.** Innovative and high-quality design to ensure the most efficient use of land, including tall buildings.

- G.** Enhancements to Church Street / Edgware Road District Centre, including improved facilities for Church Street Market.

EBURY BRIDGE ESTATE HOUSING RENEWAL AREA

The renewal of the Ebury Bridge estate will deliver the following priorities:

- H.** Approximately 750 new high-quality homes.
- I.** Enhanced connections to the wider area through improved public realm and green infrastructure.
- J.** Innovative and high-quality design to ensure the most efficient use of land.
- K.** Improvements to the Ebury Bridge Local Centre in the form of new retail accommodation and community facilities.

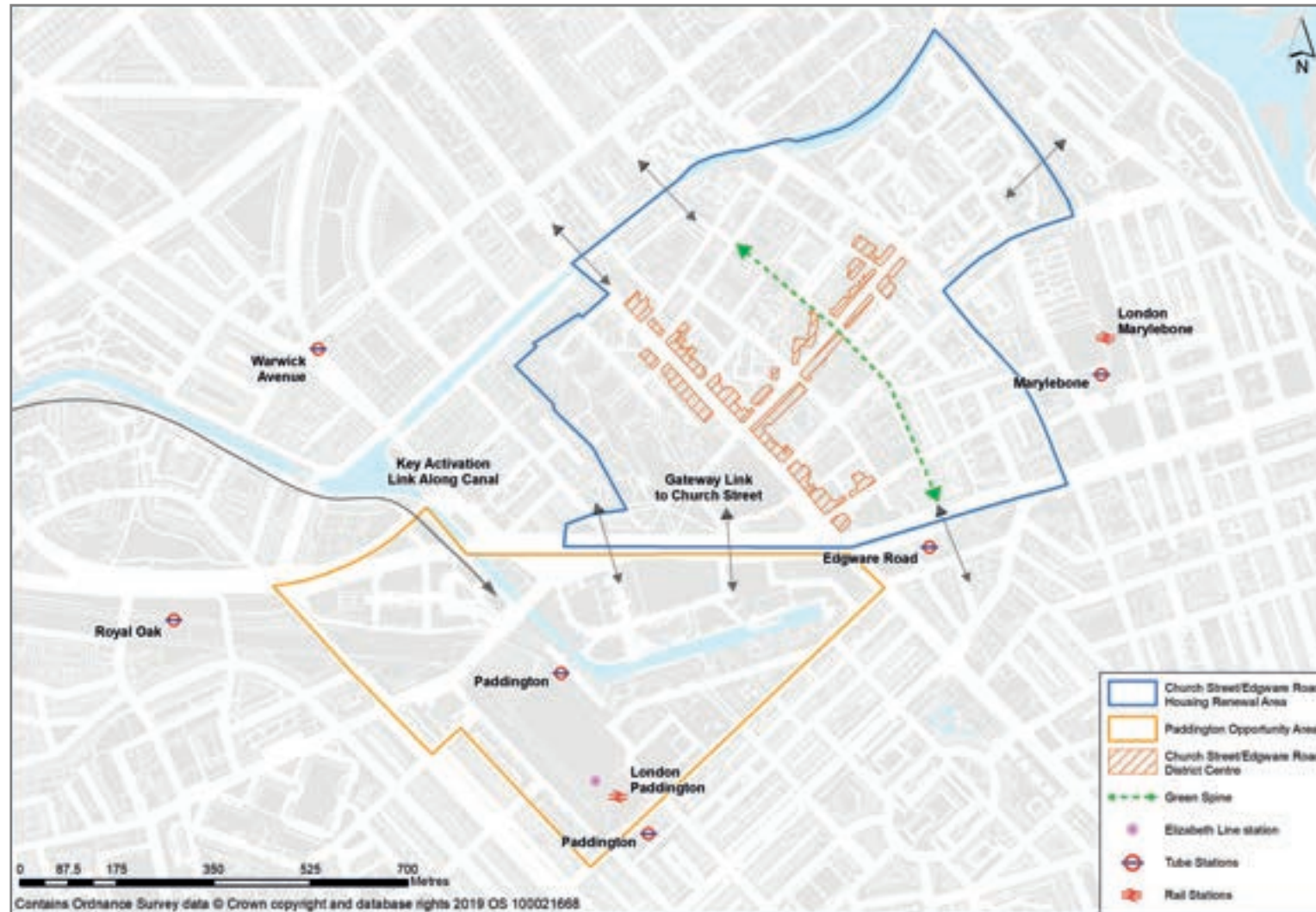


Figure 12: Church Street/Edgware Road Housing Renewal Area

Church Street / Edgware Road Housing Renewal Area

6.1 / The redevelopment of the Church Street / Edgware Road Housing Renewal Area is a key priority for us. We have worked closely with the local community to produce an ambitious masterplan, which will be delivered over the City Plan period. The Church Street Masterplan creates a framework for development in the area and is a material consideration for any planning applications.

6.2 / At least 2,000 new homes will be delivered in the Church Street / Edgware Road Housing Renewal Area over the next 15-20 years. Sites in the area will make efficient use of land through densification, incorporating innovative and high-quality design, including the development of higher buildings where these will deliver high quality homes that meet local needs.

6.3 / Alongside the delivery of new homes, the regeneration of Church Street / Edgware Road will create at least 350 new jobs in the local area, as well as supporting around 3,500 jobs during the construction phase. The area is within easy reach of transport hubs at Edgware Road Station and Marylebone Station, and the potential these links have to attract businesses and create a new destination for workspace has not yet been fully realised. Opportunities to link further job growth in Westminster, particularly in the CAZ, to the local community in Church Street / Edgware Road is a priority for us and will be explored and secured using planning powers where appropriate.

6.4 / 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.

Open space and connectivity

6.5 / Church Street / Edgware Road lies within an area of open space deficiency. The redesign of public realm and the introduction of a ‘green spine’ north-south route across the area represents an opportunity to improve both mobility and access to open space. The Church Street Masterplan envisages an increase of up to 40% in publicly accessible open space in the area. Public realm and environmental improvements to increase walking and cycling and to enhance accessibility, connectivity, safety and comfort, will improve mobility and active travel across the area, including the introduction of 20mph traffic calming zones.

6.6 / Development proposals will be encouraged to make the most of the area’s potential, maximising opportunities to improve connectivity through the implementation of the objectives of the Westminster Walking Strategy. Pedestrians will be prioritised in public realm developments to link Lisson Grove and Edgware Road. Improvements to wayfinding and streetscape along Marylebone Road will help to strengthen connections between the area and Regent’s Park. Enhancements to the Regent’s Park canal towpath will also contribute to improvements in east-west connectivity.

Retail

6.7 / The redevelopment of the area also presents an opportunity to enhance the Church Street / Edgware Road District Centre. This will continue to be an important hub for the local community, providing access to retail and community facilities, including a new health and well-being hub. The centre will also provide opportunities for skills, training, business support and other initiatives to broaden possibilities for local residents. There will also be improved facilities for Church Street Market, including a new layout, higher quality public realm, and parking and storage facilities for traders. The existing antiques markets are an important source of local employment and are an important feature of Church Street’s identity. The masterplan envisages a new cultural quarter centred around these and the adjacent Cockpit Theatre.

Ebury Bridge Estate Housing Renewal Area

6.8 / The Ebury Bridge Estate is situated between Victoria Station and the Thames, bounded by the railway line to the east and Ebury Bridge Road to the west. It comprises 13 blocks and 336 existing homes. In 2010 Ebury Bridge Estate was highlighted as a strategic opportunity in our Housing Renewal Strategy. The site has the potential to create a significant uplift in the number of homes, contributing to meeting strategic housing need, but it will also deliver wider benefits for the community, made possible by the large-scale nature of the estate renewal.

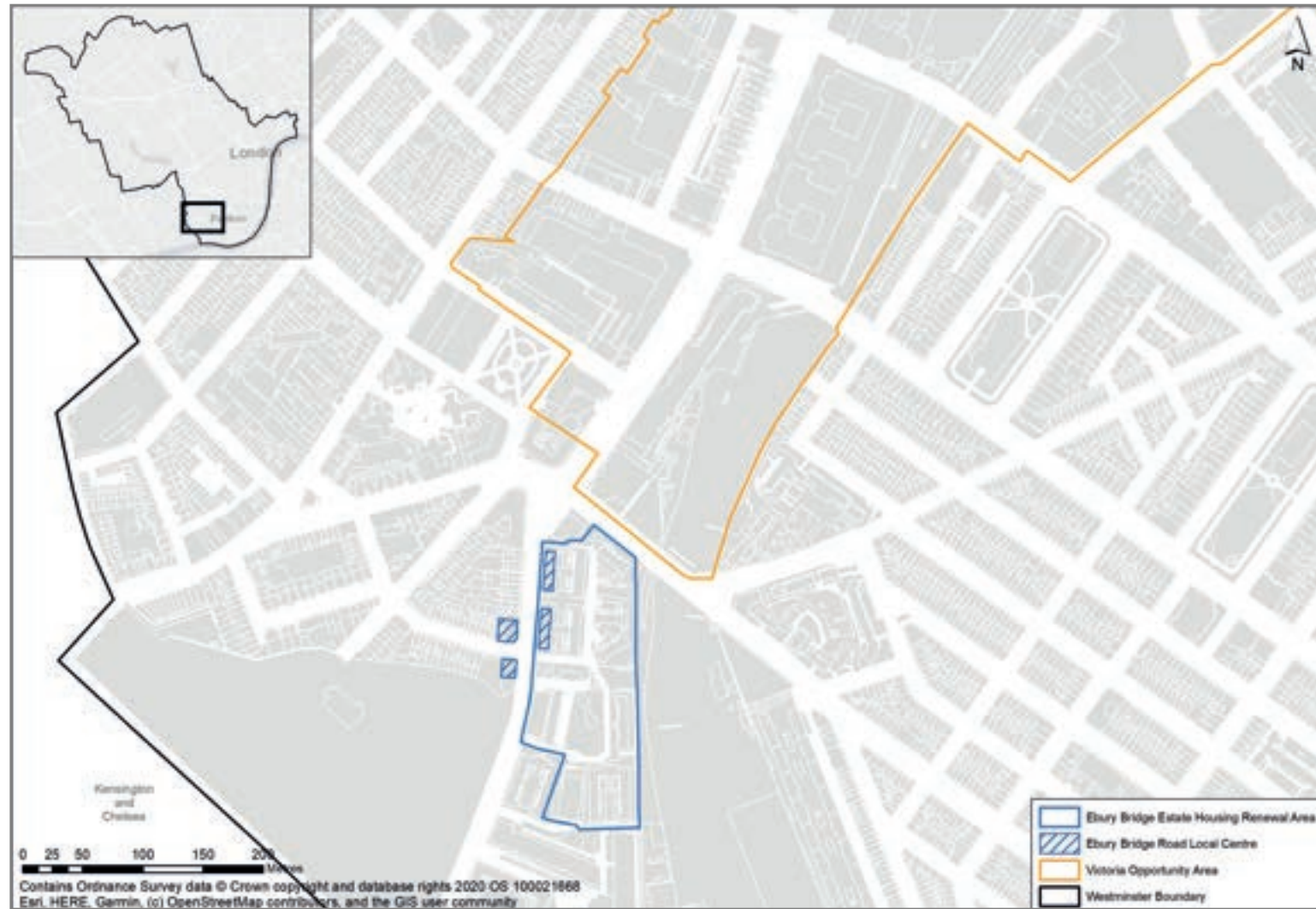


Figure 13: Ebury Bridge Estate Housing Renewal Area

6.9 / The renewal of the estate over the Plan period represents an opportunity to improve quality of life for existing residents by upgrading the ageing housing stock, addressing overcrowding and providing improved public realm, which will deliver walking links to the surrounding areas including Victoria Opportunity Area, the nearby Chelsea Barracks site and Belgravia. The long-term regeneration of the estate will allow for the phasing of new buildings, and the introduction of meanwhile uses on-site, ensuring the continued presence of community facilities and local convenience retail whilst the estate is redeveloped.

7. Managing development for Westminster's people

Development will be neighbourly by:

- A.** Protecting and where appropriate enhancing amenity, by preventing unacceptable impacts in terms of daylight and sunlight, sense of enclosure, overshadowing, privacy and overlooking.
- B.** Protecting and where appropriate enhancing local environmental quality.
- C.** Protecting and positively responding to local character and the historic environment.
- D.** Not overburdening the capacity of local infrastructure.
- E.** Contributing to the greening of the city.
- F.** Improving sustainable transport infrastructure and highway conditions.
- G.** Making appropriate and effective waste management arrangements.

7.1 / Westminster is already densely developed. As the city grows, detrimental impacts on existing users of the area must be avoided. It is imperative that design solutions are found to avoid negative impacts associated with further growth. By adopting the principle of neighbourly development, we expect development to make a positive contribution to the quality and function of the local area. We will take a balanced approach that considers the specific location and context as well as the merits of each proposal including the wider benefits a scheme can deliver, against impacts on the surrounding area.

7.2 / The principles of neighbourly development contained in this policy apply to all applications. Opportunities to enhance the quality of the local area might differ for developments depending on scale and typology, and we may therefore apply relevant criteria flexibly. We encourage early engagement with us for advice on the application of this and other policies in the Plan.

Amenity impacts

7.3 / Negative effects on amenity should be minimised as they can impact on quality of life. Provision of good indoor daylight and sunlight levels is important for health and well-being and to decrease energy consumption through reduced need for artificial heating and lighting. Overshadowing affects the quality or operation of adjacent buildings and can negatively impact on the use of public and private open space for recreation, rest and play. Positioning, scale and orientation of buildings as well as the incorporation of design measures should be considered to minimise overshadowing and overlooking and ensure adequate levels of privacy. Even when there may be no material loss of daylight or sunlight, new developments should prevent unacceptable increases in the sense of enclosure.

Local environmental quality

7.4 / Polluted air, excessive smells, noise and strong vibrations are examples of environmental impacts that have an adverse impact on quality of life and health and well-being. Development must prevent unacceptable environmental impacts on existing and new users of building or its neighbours. The policies in the environment chapter cover these issues in more detail. We will utilise the Agent of Change principle, which places the burden on the applicant to ensure mitigation measures are included to safeguard future local amenity and ensures development does not cause existing nearby uses from having to curtail their activities.

Character

7.5 / Westminster consists of many distinct and high-quality neighbourhoods, including townscapes, buildings and spaces that contribute to our heritage. The built and natural environment of Westminster is of exceptional quality and new development should seek to celebrate and reinforce this. The policies in the design chapter set out our approach to the creation of high-quality places. There are also several areas known for particular functions and uses, attracting visitors and businesses. The Special Policy Areas in the economy chapter set out the principles to protect the uses and character of these areas.

Infrastructure

7.6 / A range of facilities, services and other types of infrastructure play a vital role for our communities and the successful operation of the city. When infrastructure capacity is overburdened, this can create major nuisances to residents, businesses and visitors. Development should, where possible, seek to enhance infrastructure provision. We will work with applicants and infrastructure providers to realise this. The Infrastructure Delivery Plan sets out our approach to the delivery of infrastructure to support future growth in the city.

City greening

7.7 / The Royal Parks and other open spaces make an important contribution to the quality of Westminster. These spaces also include important biodiversity assets, which are supported by our tree

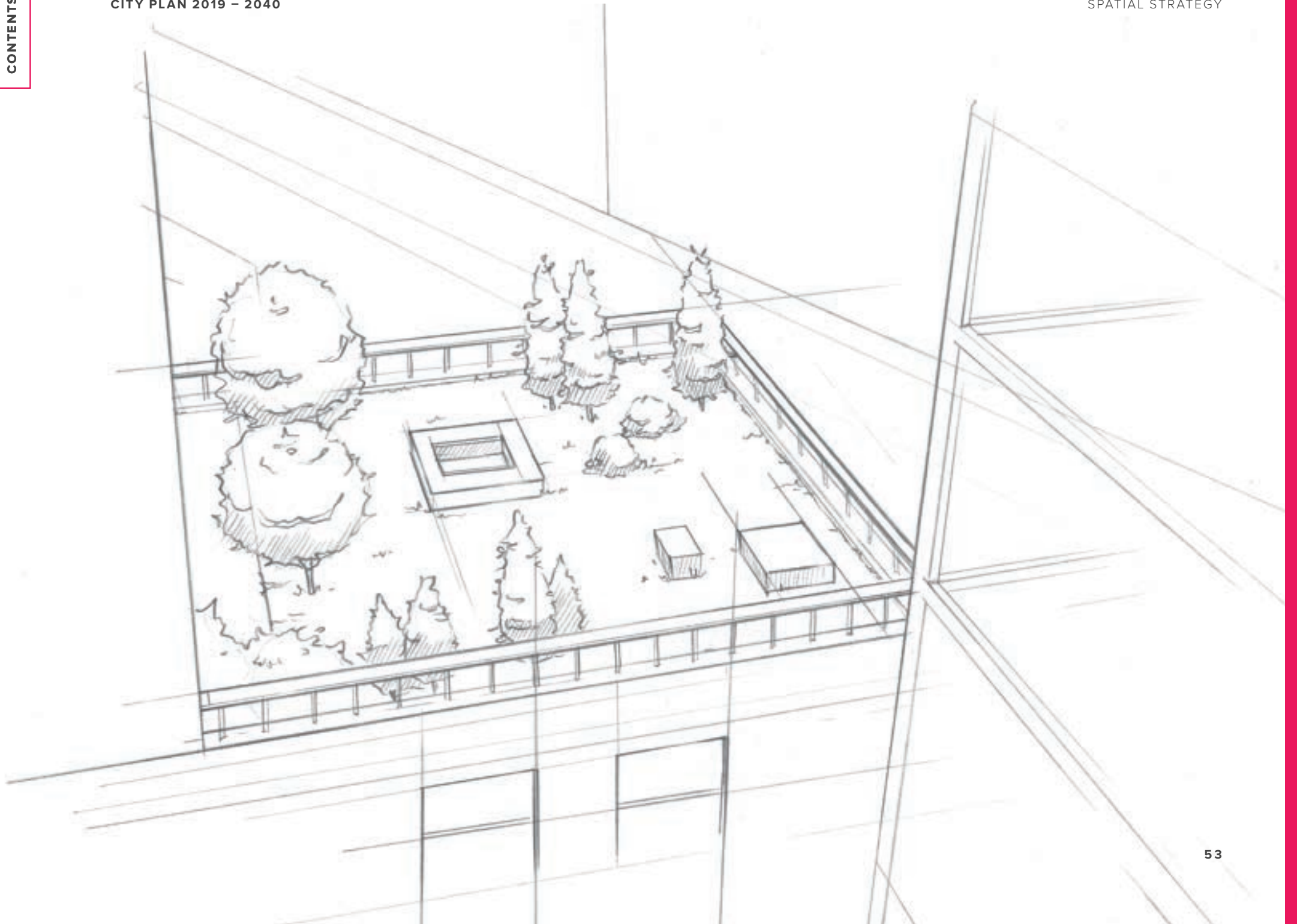
population and other green features. Additional growth in the city will put these spaces under increased pressure. Development must therefore protect and enhance the green infrastructure in the city. This includes seeking to achieve wider benefits of greening such as climate resilience, enhanced amenity and well-being. The environment chapter sets out our approach to the greening of the city.

Highways

7.8 / The highway is used by pedestrians, cyclists and motorists, both for movement and for a variety of other activities. Development should not obstruct the normal functioning of the highway. As far as possible, the pedestrian environment should be enhanced, as well as integrated with other transport modes to facilitate active travel. Parking and servicing arrangements require particular attention in a city with competing priorities. The policies in the connections chapter set out our approach to transport management.

Waste management

7.9 / Poor waste management can negatively affect the quality of the street scene, impact on health and safety and cause disturbance for highway users and neighbouring uses. Appropriate waste management will be required for new developments in accordance with this plan and in line with Westminster's Waste Management Strategy which has a focus on maximising waste reduction, reuse and recycling.



SITE ALLOCATIONS

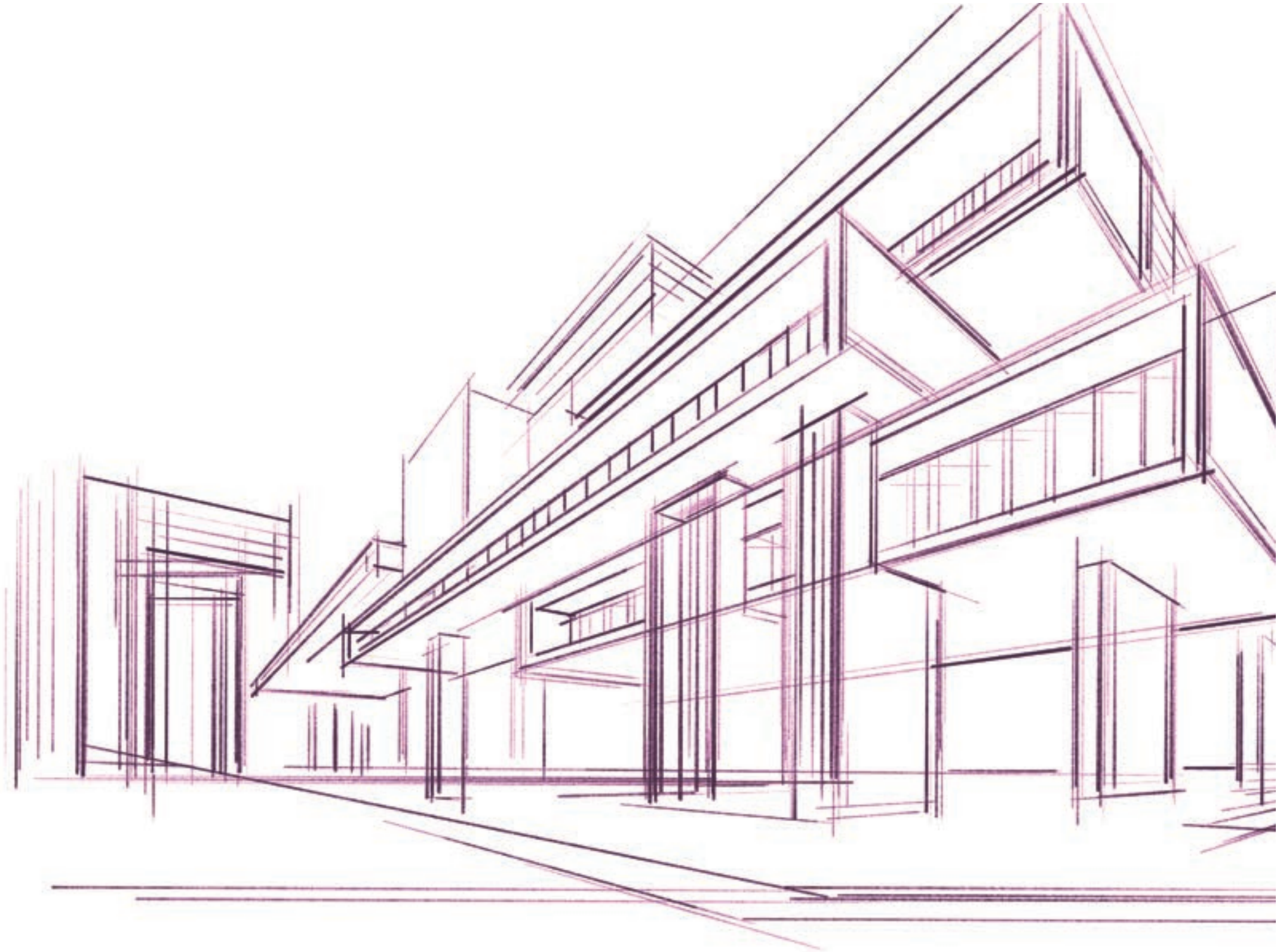
The City Plan allocates four key and highly complex brownfield sites in the city for significant levels of new development: St Mary's Hospital, Westbourne Park Bus Garage, Land adjacent to Royal Oak and Grosvenor Sidings.

The site allocations included here merit additional site-specific guidance to help shape and unlock significant levels of growth at these key sites in a manner that responds to site context, conforms with our spatial strategy, and secures benefits for local residents – through increased job opportunities, new homes, improved public realm, and key infrastructure. They represent unique sites that either have a significant proportion of underutilised land where development could occur without the need for large-scale demolition of buildings, or where development can secure enhanced infrastructure of London-wide significance.

The policies provide site-specific guidance to set out the aspirations we have for the sites, the contribution they can make to the city and to give certainty to help unlock their potential that may not otherwise come forward or be facilitated through the implementation of the thematic City Plan policies.

The purpose of the site allocation policies is to clearly set out what land uses are suitable, the core principles for development and the design parameters which should be considered by applicants, without being overly prescriptive and impeding creative design solutions to address the sites' constraints.

All other policies in the plan apply to the site allocations in the usual way.



New Policy 8. St Mary's Hospital

VISION

Our vision for St Mary's is the delivery of world-class cityscape, incorporating a high quality sustainable mixed-use development that contributes to the objectives of the Paddington Opportunity Area as an area for commercial-led growth and improved healthcare provision.

Development will include the delivery of a new state of the art hospital that meets modern healthcare needs, alongside commercial growth that supports new high value jobs, a significantly enhanced public realm, and complementary uses.

CORE PRINCIPLES

Development proposals should come forward as part of a master-planned approach to the site that delivers on the following core principles:

- A.** The delivery of a new hospital that meets projected future healthcare needs and provides an enhanced patient experience, including improved legibility for those arriving from Paddington Station;
- B.** Existing levels of healthcare to be maintained across the site during the construction of any new hospital building/s;

C. Sustainability should be at the heart of proposals, in terms of:

1. The design, operation and adaptability of new buildings;
2. The approach to the retention of existing buildings on site - which should consider heritage value and embodied carbon;
3. The approach to transport and access and the promotion of active travel;
4. Climate resilience; and
5. Urban greening and securing biodiversity net gain.

D. Where any existing land is evidenced to no longer be needed for healthcare purposes, alternative uses such as commercial, community and/or residential will contribute to the objectives of the Paddington Opportunity Area, be designed to a high standard, and should not compromise the operational requirements of any new hospital;

E. Where hospital floorspace is evidenced to be required through the delivery of a tall building/s, all other uses should grade down in scale from this, so the important public function of the hospital is given prominence and provides legibility benefits. Optimisation of development densities across the site shall be in a manner that responds to the

townscape and heritage value on site and the prevailing character and scale of the surrounding area;

- F.** Enhancements to permeability should be made through the site, including pedestrian access to the canal and improvements to the character of key routes through the site;
- G.** Increased activation of existing and future routes throughout the site, including along the Paddington Basin, Praed Street, Tanner Lane and South Wharf Road;
- H.** A coordinated approach to the movement of vehicles and people across the site, informed by a site-wide transport strategy. This should balance the competing demands for access by emergency vehicles, public transport, servicing and maintenance, and the needs of people with limited mobility;
- I.** Preservation and enhancement of the canal and Paddington Basin as a key local asset of ecological, heritage and recreational value;
- J.** New development should include the provision of new and enhanced public realm including spaces for leisure and rest. This should promote high amenity values, limit negative microclimatic conditions and optimise separation distances between buildings of greater massing.

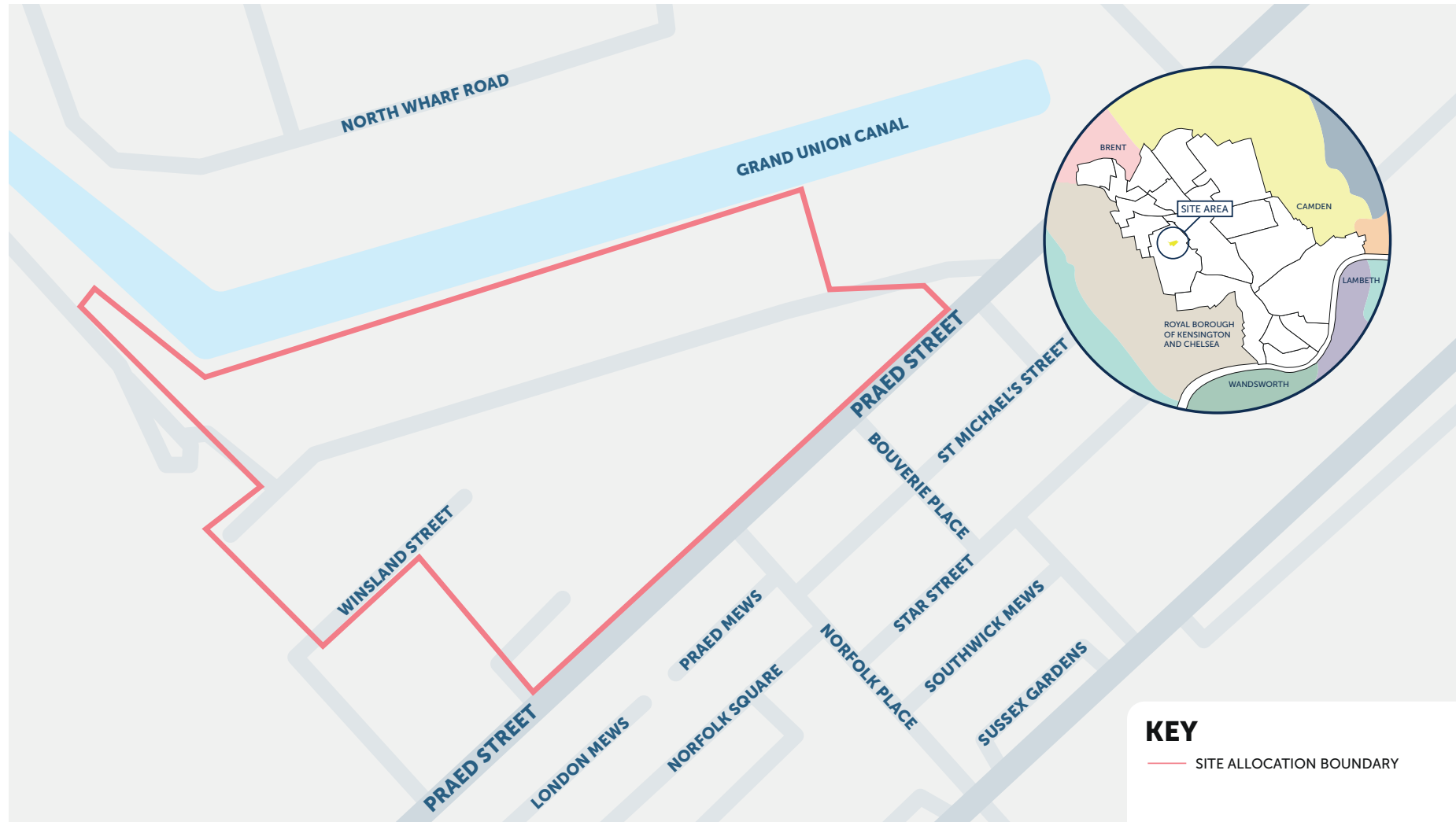
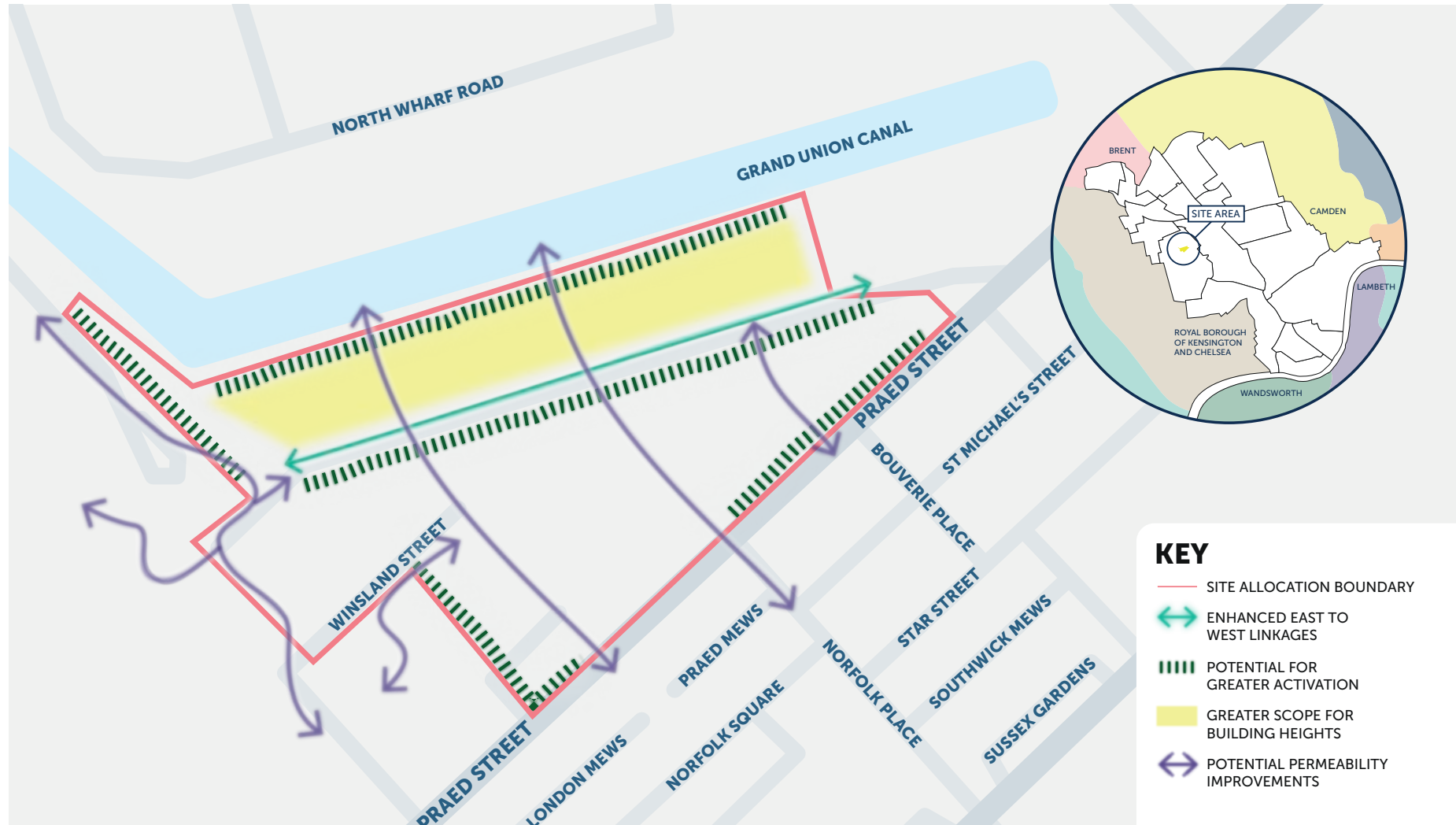


Figure 14: St. Mary's Hospital boundary



KEY

- SITE ALLOCATION BOUNDARY
- ↔ ENHANCED EAST TO WEST LINKAGES
- ▨ POTENTIAL FOR GREATER ACTIVATION
- GREATER SCOPE FOR BUILDING HEIGHTS
- ↔ POTENTIAL PERMEABILITY IMPROVEMENTS

Figure 15: St Mary's Hospital site allocation

8.1 / St Mary's Hospital represents a large and unique site in Westminster. The site offers scope for significant new development that secures a new hospital as a critical piece of infrastructure and meets a range of other policy objectives that could include jobs growth, new homes, and an improved public realm. Whilst the full redevelopment of the entire site will take time, and be delivered in phases, a comprehensive, master-planned approach, that responds to the vision and core principles above, is required. This will ensure that the future hospital forms part of a wider approach to placemaking in the area, maximising the benefits of any new development, along with ensuring that the impact of proposals across the site on their surroundings are properly understood at the planning application stage.

The need for a new hospital

8.2 / St Mary's Hospital is London's busiest trauma centre, a world-renowned teaching and research hospital, and the major acute hospital for north-west London serving a population of 2.4 million. It is one of four main trauma centres in London and includes a 24/7 Accident and Emergency Department.

8.3 / However, existing hospital buildings are in a poor state of repair, with high maintenance costs, and provide an inefficient and disorientating layout for patients, visitors and staff. It is also the only trauma centre in central London without helipad access.

8.4 / Current projections are that new hospital floorspace of approximately 136,000sqm GIA is needed. This is coupled with a need to consolidate the functional requirements of such floorspace in a manner that optimises clinical adjacencies and enables helipad access, to secure better quality healthcare provision. These requirements will need to be balanced whilst maintaining existing levels of healthcare provision during the construction of any new hospital building/s.

Optimisation of the site

8.5 / Upon the completion of a consolidated new, fit for purpose hospital on site, where it is evidenced that some existing floorspace currently used for healthcare purposes is then surplus to operational requirements, alternative uses that can positively contribute to wider objectives of the Paddington Opportunity Area are supported.

8.6 / Intensification of the site through optimised development densities would reflect the site's sustainability credentials (including high levels of public transport accessibility and existing provision of shops and services in Praed Street District Centre), and its location within the CAZ and Paddington Opportunity Area.

8.7 / Intensification of the site will however need to respond to existing heritage and townscape value, within the context of the need to deliver a new hospital on site. Figure 16 identifies key heritage assets and designations within the site. In addition, as there is some potential for some significant 19th century archaeology within the site (as set out in the

Archaeological Statement), any planning application should be accompanied by an updated archaeological assessment that sets out appropriate mitigation measures where relevant.

8.8 / As the southern portion of the site is within the Conservation Area and is where the majority of buildings of heritage value are located, there is potential scope for greater building heights towards the canal basin, with a graduation of height across the whole site. This would reflect the shift in character to the north of the site and beyond - where modern developments represent an increase in density and building heights.

8.9 / Where new hospital floorspace may be provided through a tall building/s, this should be given primacy in terms of building height across the site, reflecting the important public function of its use, increasing its legibility, and providing functional benefits in terms of the need for helipad access.

Land uses

8.10 / In terms of other land uses across the site, alongside new hospital floorspace, there is also scope for commercial development. The emergence of Paddington as an office location in recent years also means the further clustering of such development could help secure additional high-value jobs growth. This could include uses with synergies between the hospital such as clinical life sciences, research, innovation and other sectors. Other uses such as retail, community and residential can also contribute to a sustainable and vibrant mix of uses.

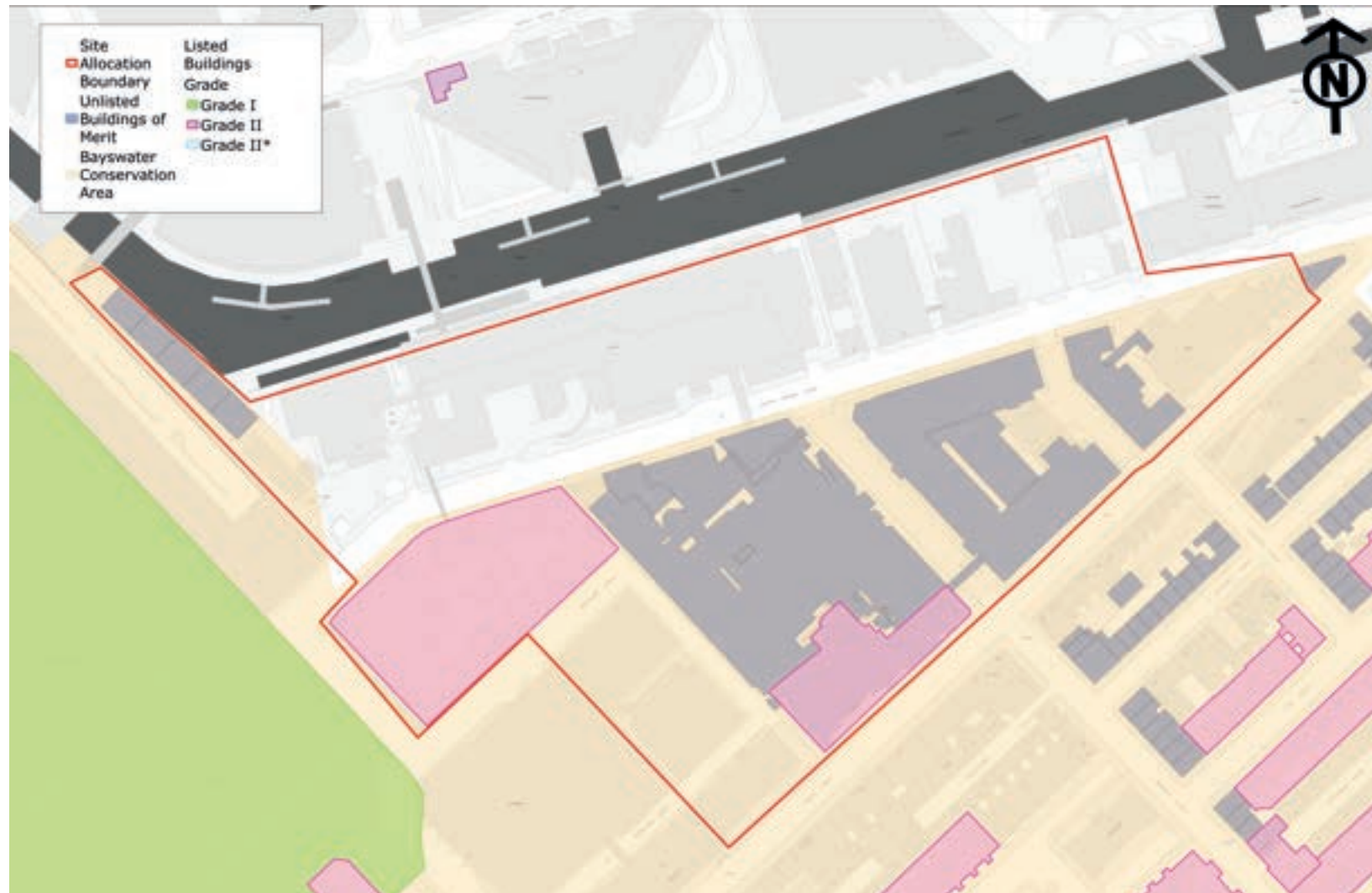


Figure 16: Heritage designations within the St Mary's Hospital site allocation

Sustainability

8.11 / The council has declared a climate emergency and an ecological emergency, and St Mary's Hospital represents a large, prominent site in a highly accessible location that should be an exemplar of sustainable development. This includes through making the efficient use of land, promoting active travel, the provision of a vibrant mix of uses, high design quality and energy efficiency in new and repurposed buildings, and securing biodiversity enhancements across the site. A focus on ensuring that the overall site is resilient to climate change impacts should also be considered in any development proposals.

Accessibility, permeability, and the public realm

8.12 / A people-led transport, movement, access, and parking masterplan for the phased development of the site should be prepared to demonstrate how accessibility can be promoted for current and future patients, visitors, residents and workers of all abilities.

8.13 / The Infrastructure Delivery Plan identifies a need for improved permeability through the site to Paddington Station. The existing street layout means that South Wharf Road currently provides a route through the site that provides relief from the highly congested and heavily trafficked Praed Street, where pavements are narrow, yet its current use and relationship to the buildings that abut it is of an uncoordinated and back land nature. Development proposals should therefore enhance the east to west permeability through the

site and incorporate greater activation of uses at ground floor level. The use of high-quality materials and potential greening measures across the public realm should also be maximised.

8.14 / Consideration should also be given to greater active frontages along Praed Street which could strengthen the role and function of the Praed Street District Centre.

8.15 / The Paddington Basin is an important piece of public realm that development should seek to better utilise and which new buildings could provide an improved relationship to. To ensure this becomes attractive and inviting, separation distances that allow light into it should be provided between buildings. Such spaces could also provide much needed dwell space and incorporate the use of Sustainable Drainage Systems that alleviate flood risk and enhance biodiversity. Any improvements to the canal shall also consider the work being undertaken as part of the Paddington Public Realm Strategy to the north of the site.

8.16 / Across the site, opportunities for greening, public art and the inclusion of street furniture should all be considered, to ensure development secures significant enhancements to the public realm, which will be imperative as the site becomes used more intensely. Opportunities to celebrate the site's industrial and healthcare histories should also be explored. This should include the reinstatement of the wharf side shelter and store which has not been delivered to date within the Paddington Basin (historically located to

the rear of the builder's merchant at 22 Praed Street) within public realm improvements.

Living conditions

8.17 / The incorporation of some residential development (which could include key worker housing or residential care uses) into proposals can help address high levels of housing need and contribute to a vibrant mix of uses across the site. However, likely levels of noise, and access requirements associated with hospital use, mean that any such provision will need to be carefully considered and, if provided, sited and designed with high levels of sound insulation in order to achieve satisfactory living conditions for future residents.

New Policy 9. Westbourne Park Bus Garage

VISION

Our vision for the Westbourne Park Bus Garage site is the redevelopment and upgrade of the Bus Garage that meets current and future sustainable transport and staff needs, alongside the delivery of a high quality sustainable mixed-use residential-led development that contributes to the objectives of the North West Economic Development Area.

This will align with the ambitions for the local area as a place for residential growth, increased employment opportunities and for a greener and more walkable public realm. New development will celebrate the site's industrial history and unique location by the Grand Union Canal.

CORE PRINCIPLES

Development proposals should deliver on the following core principles:

- A.** The efficient use of land that supports the delivery of:
 1. A residential-led mixed-use development that contributes to meeting the city's housing needs; and
 2. A modern bus garage that meets current and projected future transport

needs and provides a healthy work environment for staff members.

- B.** Current and future operations of the Bus Garage, Tarmac Paddington Concrete Plant and railway are maintained during both the construction and operation of any new development.
- C.** Sustainability should be at the heart of proposals, in terms of:
 1. The design, operation and adaptability of new buildings;
 2. The approach to the retention of existing buildings and structures on-site (which should consider heritage value and embodied carbon);
 3. The approach to transport and access and the promotion of active travel;
 4. Climate resilience, including flood risk;
 5. Remediation of any potential on-site contamination; and
 6. Urban greening and securing biodiversity net gain.
- D.** The optimisation of development densities in a manner that responds to the site's context. This should have regard for the heritage and townscape values of the Grand Union Canal and other relevant heritage assets and associated views.

Access to new buildings should be secured at all times (including in the event of the canal towpath being closed).

- E.** Buildings adjacent to the Westway which include residential floorspace should provide homes in floors that are above the height of the Westway. Proposals should secure high quality living conditions by addressing the sound, vibration and air quality impacts associated with nearby transport infrastructure.
- F.** New commercial uses should support Small and Medium Enterprises to contribute to the North Paddington Creative Enterprise Zone goals and include affordable workspaces.
- G.** New commercial uses such as food and beverage or light industrial should ensure the character of the canal towpath is maintained with consideration given to the impacts of new uses on its transport function, along with moorings and floating homes.
- H.** An enhanced pedestrian experience and permeability through the site should be prioritised through:
 1. The creation of a new route and visual connection between Great Western Road and the Grand Union Canal;

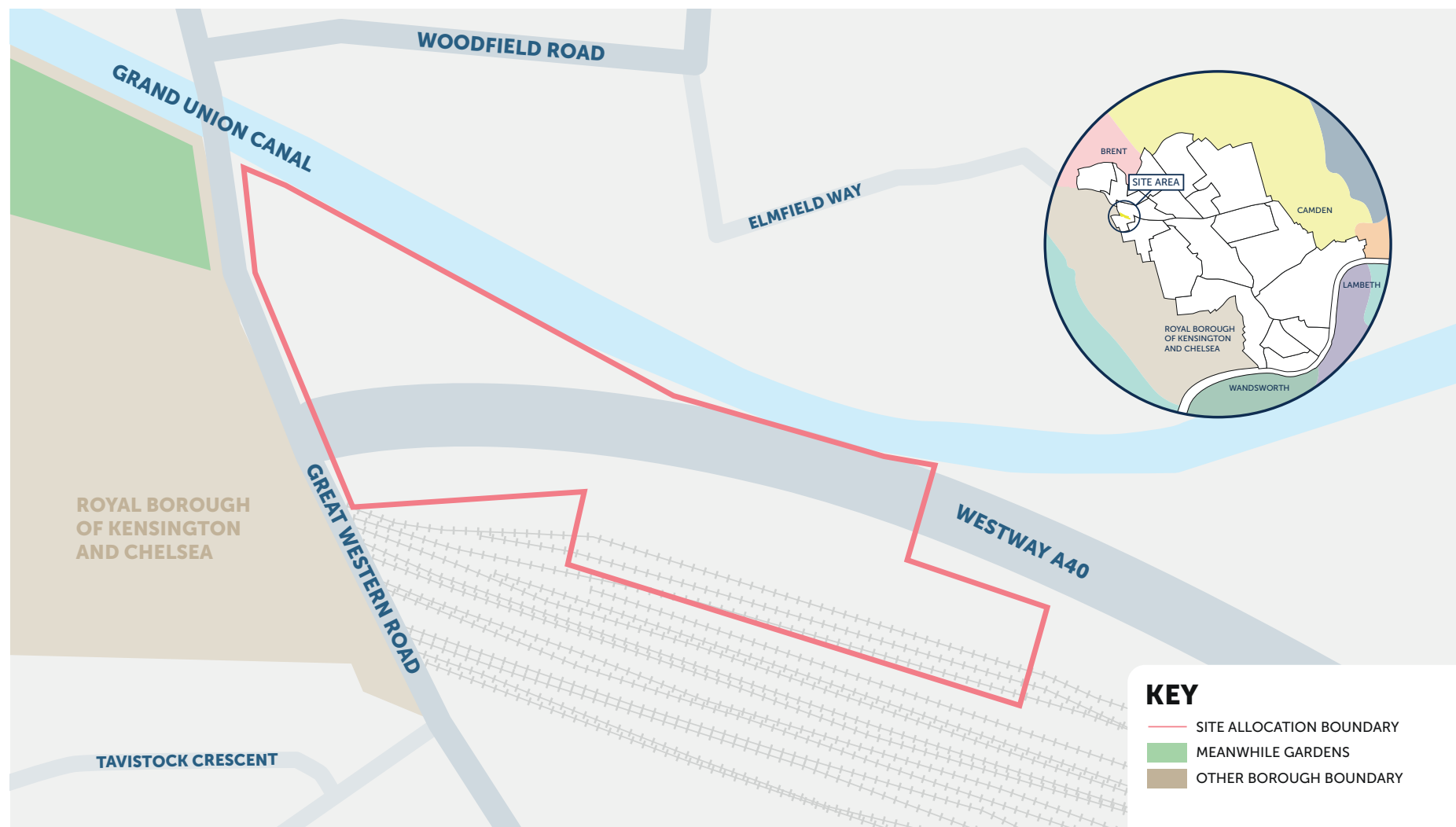


Figure 17: Westbourne Park Bus Garage boundary

2. The activation of existing and new public spaces at ground floor level, including along Great Western Road and the canal towpath;
 3. Exploring opportunities for a new pedestrian connection over the canal via a bridge; and
 4. Enhancements to Great Western Road following the Healthy Streets Approach as a key route for access to the site and for connections to the Harrow Road District Centre.
- I. The delivery of new dwell spaces, through maximising separation distances between buildings and building setbacks from the bridge and Grand Union Canal should be prioritised, with a focus on ensuring that these public areas are safe and accessible;
 - J. Opportunities for creating a green corridor between the site and Meanwhile Gardens and maintaining and enhancing light into the Grand Union Canal, should be maximised;
 - K. The protection and reprovision of existing telecommunications infrastructure; and
 - L. Meanwhile uses that activate the site and improve safety while works are completed may be encouraged.

9.1 / Westbourne Park Bus Garage is a unique site in the north of Westminster. The site offers scope for development that secures an upgraded bus garage to the south of the site, to enable the release of surplus land to the north to deliver new homes, create new jobs, and to provide a more inviting public realm.

9.2 / The vision and core principles identified above are for the site allocation overall. It is therefore recognised that different parcels may not be redeveloped simultaneously and may instead form part of an overarching phased development scheme. Overall, however, the vision and core principles should be reflected across the site as a whole to ensure the delivery of a revitalised place that benefits residents, workers and visitors.

The need for the bus garage

9.3 / The Westbourne Park Bus Garage has been functioning since 1981 and is one of the few bus garages located in Central London and the only one in Westminster. Currently, its buses serve both day and night Transport for London routes. The bus garage is key to the functioning of London's sustainable transport network.

9.4 / However, the existing bus garage configuration provides an inefficient layout and is spread across different parcels of land. Transport for London and Network Rail indicate that there is a potential to reconfigure the garage to release land for a residential-led mixed-use development.

9.5 / Given the importance of the bus garage in providing successful bus services in this part of London, its reconfiguration to the south of the site should ensure that London's transport network is not negatively impacted. Future strategic transport needs should also be considered, including a potential expansion and electrification of the network. Proposals should also ensure staff welfare is not negatively impacted.

Optimisation of the site

9.6 / Where it is evidenced that current and future bus garage and network operations will not be impacted through reconfiguration, land could be released for redevelopment north of the site for other forms of development that contribute to the wider objectives of the North West Economic Development Area. Development across the site will reflect its sustainability credentials including high levels of public transport accessibility and proximity to existing shops and services in the Harrow Road District Centre.

9.7 / In line with the Heritage Impact Assessment, intensification of the site will however need to respect and respond to existing heritage and townscape value, including having regard for the Grand Union Canal, Meanwhile Gardens and any impacts on views, including on the Grade II* listed Trellick Tower in the Royal Borough of Kensington and Chelsea. Design proposals should also seek to celebrate the site's industrial history.

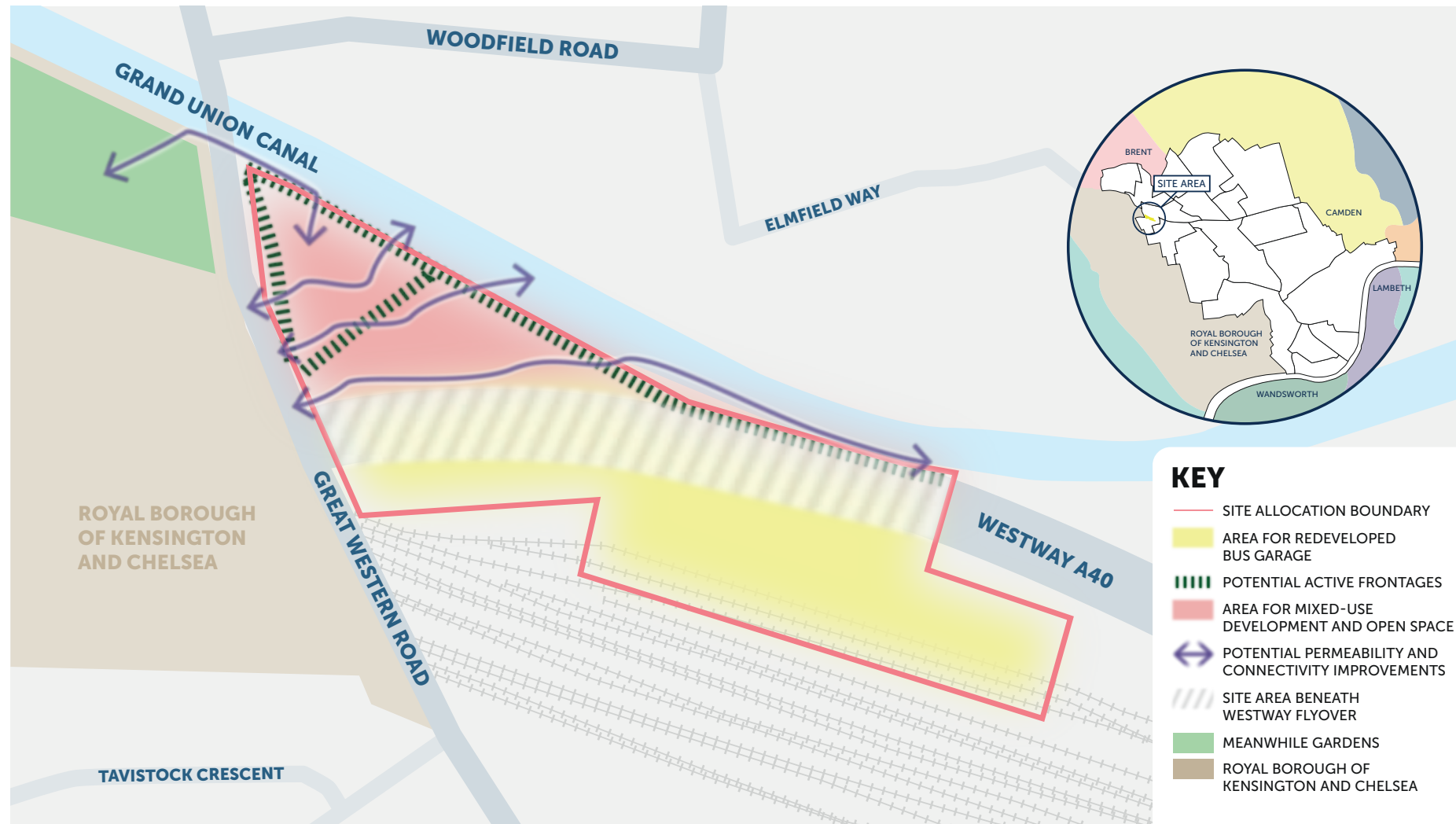


Figure 18: Westbourne Park Bus Garage site allocation

9.8 / Given the nearby transport infrastructure (including Great Western Road and the Grand Union Canal), design proposals should consider building setbacks, and shall ensure that buildings can be accessed at all times.

9.9 / In terms of land uses across the site, there is scope for the delivery of a new residential-led development that contributes to meeting Westminster's acute housing needs. Given that the site is in mixed private/public use and ownership, proposals should clearly set out how they are maximising affordable housing delivery in line with the Mayor of London's approach to affordable housing and viability.

9.10 / Additional uses could include commercial development that activates the lower levels of any new buildings and that contributes to the North Paddington Creative Enterprise Zone by delivering space for Small and Medium Enterprises, including affordable workspaces. Such development will create jobs and could also include retail, food and drink, light industrial and community uses that contribute to a sustainable and vibrant mix of uses that benefits the community.

Sustainability

9.11 / The council has declared a climate and an ecological emergency, and Westbourne Park Bus Garage represents a large site in a unique accessible location in the north of the city that should be an exemplar of sustainable development. Development will be expected to make an efficient

use of land, deliver high design quality and energy efficiency in new and repurposed buildings, promote active travel, provide climate resilient buildings and secure greening and biodiversity enhancements across the site.

Living and working conditions

9.12 / Residential development will be of a high quality. However, likely levels of noise and vibration and air quality impacts associated with the nearby transport infrastructure mean that such provision will need to be carefully sited and designed with high levels of insulation in order to achieve satisfactory living conditions for future residents. Development should also consider how air quality can be improved.

9.13 / Existing telecommunications infrastructure should be protected and improved if necessary, to ensure access to high quality digital infrastructure and information and communications technology in this part of the city.

Permeability, activation and public realm

9.14 / Development should increase permeability through the site to enable safe and attractive pedestrian movement between Westbourne Park station, the Harrow Road District Centre and the Grand Union Canal. The site's redevelopment provides an opportunity to create a new pedestrian and green spine, and visual connection to the canal.

9.15 / Development should explore the delivery of new active travel routes for pedestrians and cyclists, and not preclude further improvements to the network. Enhanced permeability could be achieved through the provision of a new route for cyclists or a new pedestrian bridge, if agreed with the relevant authorities.

9.16 / Great Western Road is congested and heavily trafficked. Some of the public realm areas alongside the canal are also in a neglected state and can attract anti-social behaviour, making people feel unsafe. Development should therefore seek to enhance the attractiveness of the site to encourage access into and across the site for a range of users. Meanwhile uses could help activate the space in the short-term during the construction period.

9.17 / New public realm will also be delivered as part of proposals and will include dwell spaces. Existing and new public realm will be redesigned to be high quality, include greening measures that increase biodiversity and incorporate Sustainable Urban Drainage Systems to manage flood risk.

9.18 / The canal is a major asset and important piece of public realm and blue infrastructure that development should seek to better utilise. However, uses located by the canal should consider impacts on pedestrian movement and existing moorings and floating homes. The tranquillity of the canal as a place to live and walk beside should be considered. Design proposals should consider how overshadowing of the canal can be minimised to maintain its positive features and limit harm to biodiversity.

New Policy 10. Land adjacent to Royal Oak

VISION

Development on the site should deliver enhanced station approach and access, and improved permeability for pedestrians through the site, enabled through a high quality and sustainable mixed and commercial use development, which may include well-designed residential. Non-residential land uses at the site should reflect the needs and aspirations for the local area, providing for a range and mix of flexible work-spaces, light industrial, logistics, and offices.

CORE PRINCIPLES

Development proposals should come forward as part of a master-planned approach to the site that delivers on the following core principles:

- A.** The viable delivery of improvements to the access of Royal Oak station and its surrounds, and permeability through the site for pedestrians, alongside the delivery of a mix of uses including commercial land (office or light industrial) uses to positively contribute to the needs of the local area;
- B.** The optimisation of development densities across the site in a manner that responds to its heritage value and the integrity of the

adjacent tall building cluster, ensuring that building heights grade down significantly from the buildings at Kingdom Street;

- C.** Enhanced permeability through the site and activation of public spaces at ground floor level, including around Royal Oak station, and in particular pedestrian through routes, including dwell spaces, through strategic separation distances between buildings. Access routes at lower ground floor level should be maintained;
- D.** Sustainability and biodiversity should be at the heart of proposals – including in the design and operation of new buildings, the approach to the re-use of any materials from the site, the approach to transport and access, and maintaining and enhancing biodiversity on the site;
- E.** Where provided, any new residential development should secure high quality living conditions – including through the provision of high levels of sound insulation given the noise associated the hard transport infrastructure, and measures to prevent overheating.
- F.** Meanwhile uses for the site should be explored, in particular considering the potential of the site for waste management and supporting the circular economy.

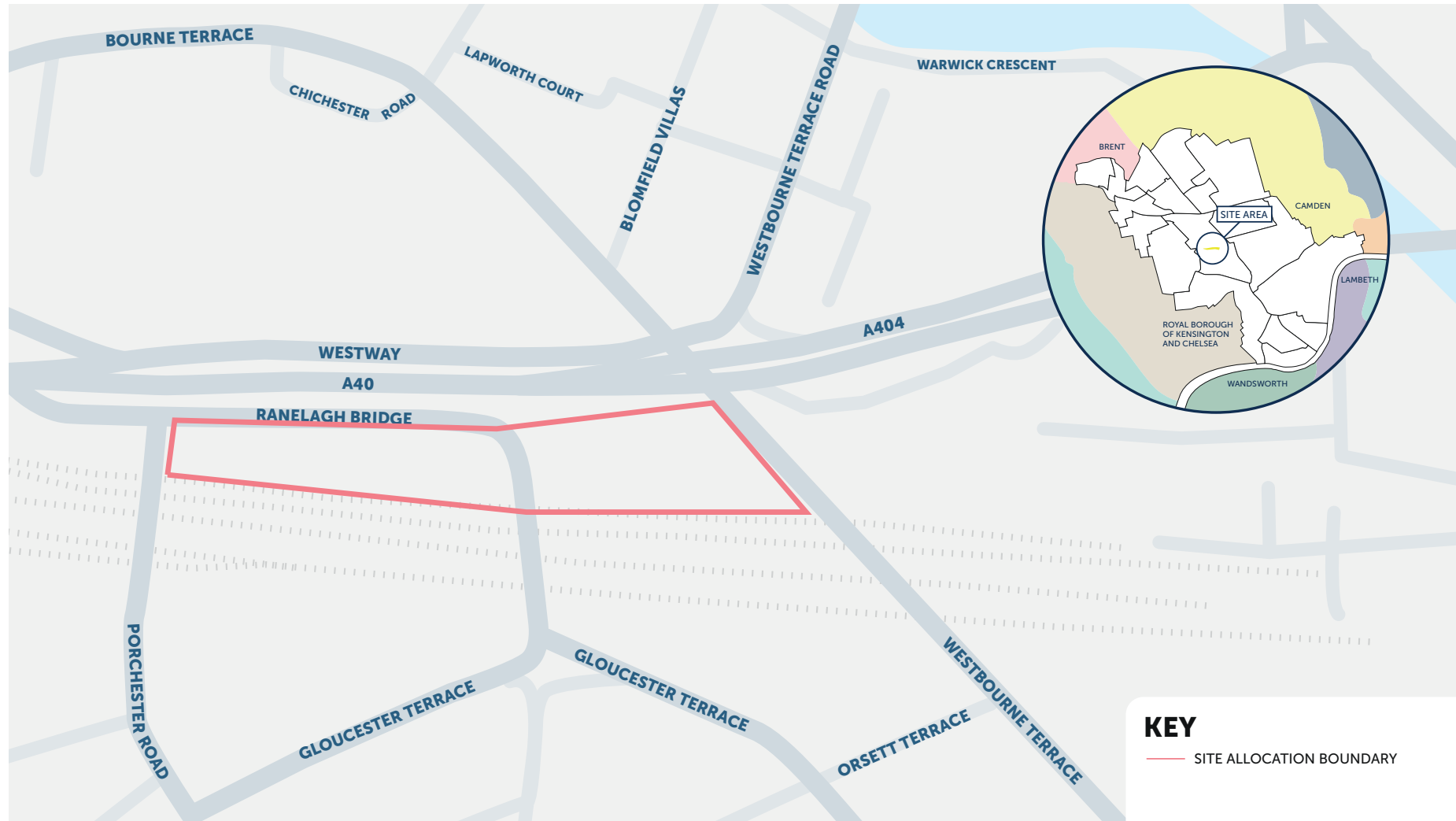


Figure 19: Royal Oak boundary

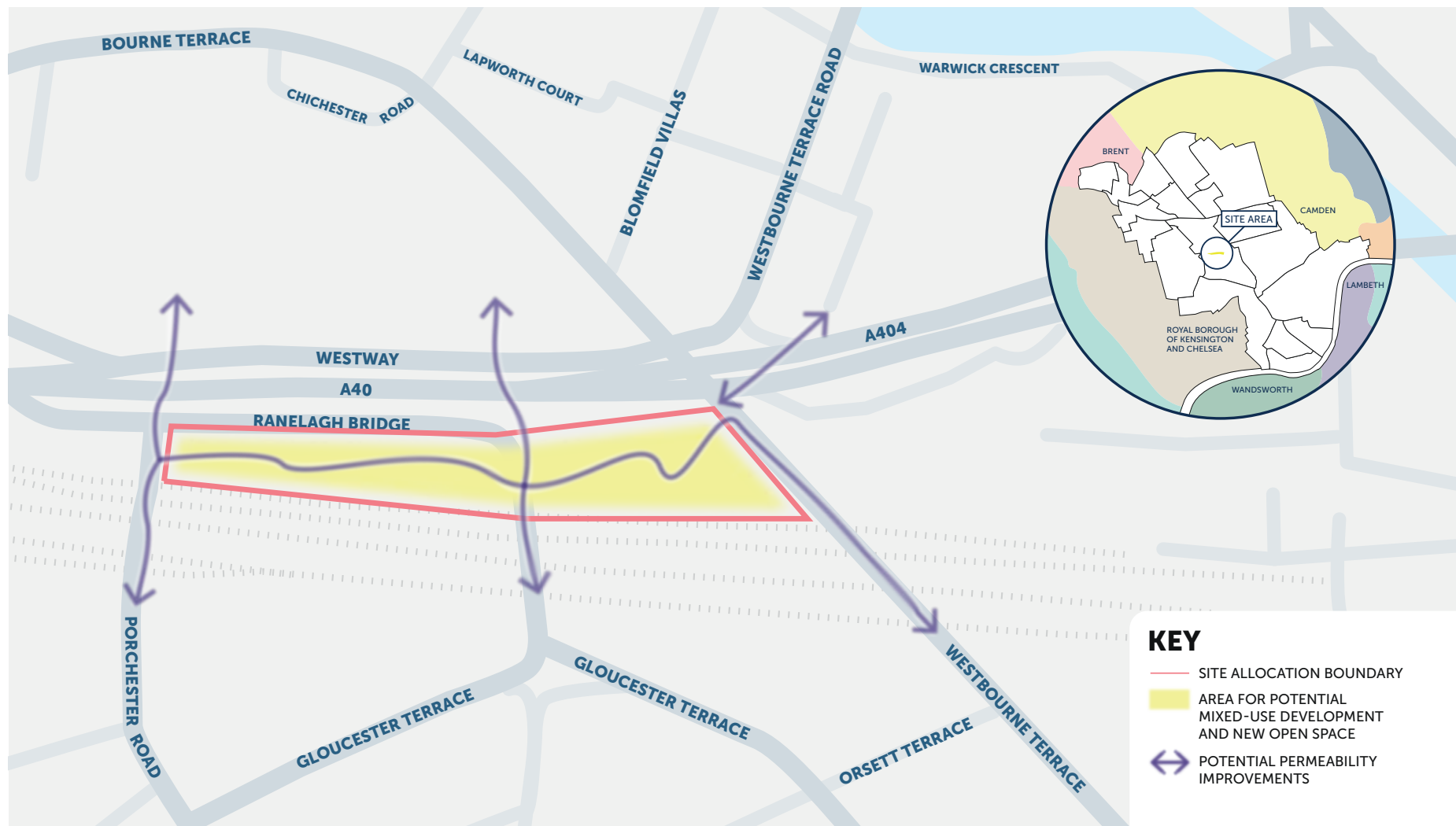


Figure 20: Land adjacent to Royal Oak site allocation

10.1 / The Land adjacent to Royal Oak is an underutilised site, which has several significant constraints which need careful consideration. The site does present an opportunity for improving the environs of Royal Oak station, and delivering growth. Careful management of land uses and mitigation of the constraints should enable a viable development to be delivered. It may take some time for a suitable scheme to come forward, and so meanwhile uses could be considered for the site. The site's relatively set back location, and brownfield character, could lend itself to number of meanwhile uses, and opportunities for this should be explored, and fully justified – but could include public recreation, waste management (in particular where this facilitates the circular economy), or urban logistics.

Vision

10.2 / The site sits within the NWEDA and the CAZ, and any proposals for the site should respond to the spatial strategy of the NWEDA and the CAZ, in particular by providing new commercial floorspace, with the potential for residential as part of mixed-use development. Land uses should cater for a range of different businesses, including affordable and smaller scale commercial space, which will support the diversity of commercial and job opportunities in the NWEDA. The pedestrian environment around Royal Oak station requires significant improvement, and is a key objective for the site. In particular, development should secure improved pedestrian permeability from Royal Oak station towards Paddington Basin.

Site optimisation

10.3 / The site densities should be optimised, while respecting the surrounding townscape and heritage. The site is bordered by the Bayswater Conservation Area, and a Grade II listed bridge. Furthermore, adjacent to the site is a tall building cluster within the Paddington Opportunity Area, and so the integrity of this cluster should be preserved. Opportunities for viable residential development should be explored, within the parameters of an optimised design of the site. Given the significant constraints, especially in relation to access and adjacent heavy transport infrastructure, and subsequent impact on viability, non-conventional housing (including live/work spaces or student housing) may be more appropriate than homes suitable for family life which could be more challenging to viably deliver.

Sustainability

10.4 / There are limited options for material re-use or retrofitting on site, and so for the site to contribute to net zero targets, any new building should be of exemplary sustainable design.

10.5 / Enabling works, including raising the floor level, building access routes, or remodelling of some of the bridges are likely to significantly increase the embodied carbon of the development, and so careful re-use of any materials, and sustainable design will be paramount. A relatively significant amount of biodiversity exists at the site, and this should be re-provided and enhanced in line with biodiversity net gain requirements.

10.6 / Waste management sites, including those designed to facilitate regional circular economies are in short supply throughout the inner London area, and the site may present opportunities for a meanwhile use which contributes to the management and re-use of materials in the locality, which is supported.

New Policy 11. Grosvenor Sidings

VISION

Our vision for Grosvenor Sidings is the delivery of a high quality sustainable residential-led mixed-use development alongside complementary uses. Development will respect and respond to the site's context, history and character, and integrate sensitively with the surrounding townscape, enhancing the civic environment, whilst also creating a distinctive identity and sense of place that connects with the wider Victoria area.

CORE PRINCIPLES

Development proposals will deliver on the following core principles:

- A.** The efficient use of land for housing-led development alongside supporting commercial and community uses that meet the needs of the wider Victoria area;
- B.** Ensuring that the British Transport Police building remains operational during construction and is retained or re-provided within development plans for the site, unless an alternative location is secured;

C. Sustainability should be at the heart of proposals, in terms of:

1. The design, operation and adaptability of new buildings;
2. The approach to the retention of existing buildings and structures on-site (which should consider heritage value and embodied carbon);
3. The approach to transport and access and the promotion of active travel;
4. Climate resilience;
5. Urban greening and securing biodiversity net gain.

D. Proposals should be designed in such a way that respects and responds to the local context, sustaining and/or enhancing views to adjacent heritage assets and Conservation Areas, along with strategic and local views. Proposals should also sensitively repurpose the on-site listed 123A Grosvenor Road building and adjacent workshop building;

E. Enhanced permeability through the site and beyond, providing access routes north to south from the River Thames to London Victoria Station and east to west through adjacent residential estates;

F. Provision of new public open and play spaces within the development to provide opportunities for social interaction and to activate the space to reduce the potential for crime and anti-social behaviour;

G. Provision of green and blue infrastructure that enhances biodiversity, and acts as a natural buffer between new development and existing occupiers of the Peabody residential estate, limiting impacts on residential amenity;

H. Proposals should be designed in such a way that are in line with the recommendations of the Strategic Flood Risk Assessment by ensuring risks to surface and ground water flooding are minimised through provision of flood resistance and resilience measures and the incorporation of Sustainable Urban Drainage Systems; and

I. Where provided, any new residential development should secure high quality living conditions and not compromise the operational requirements of the railway – including through the provision of high levels of sound insulation given the noise associated with railway use.

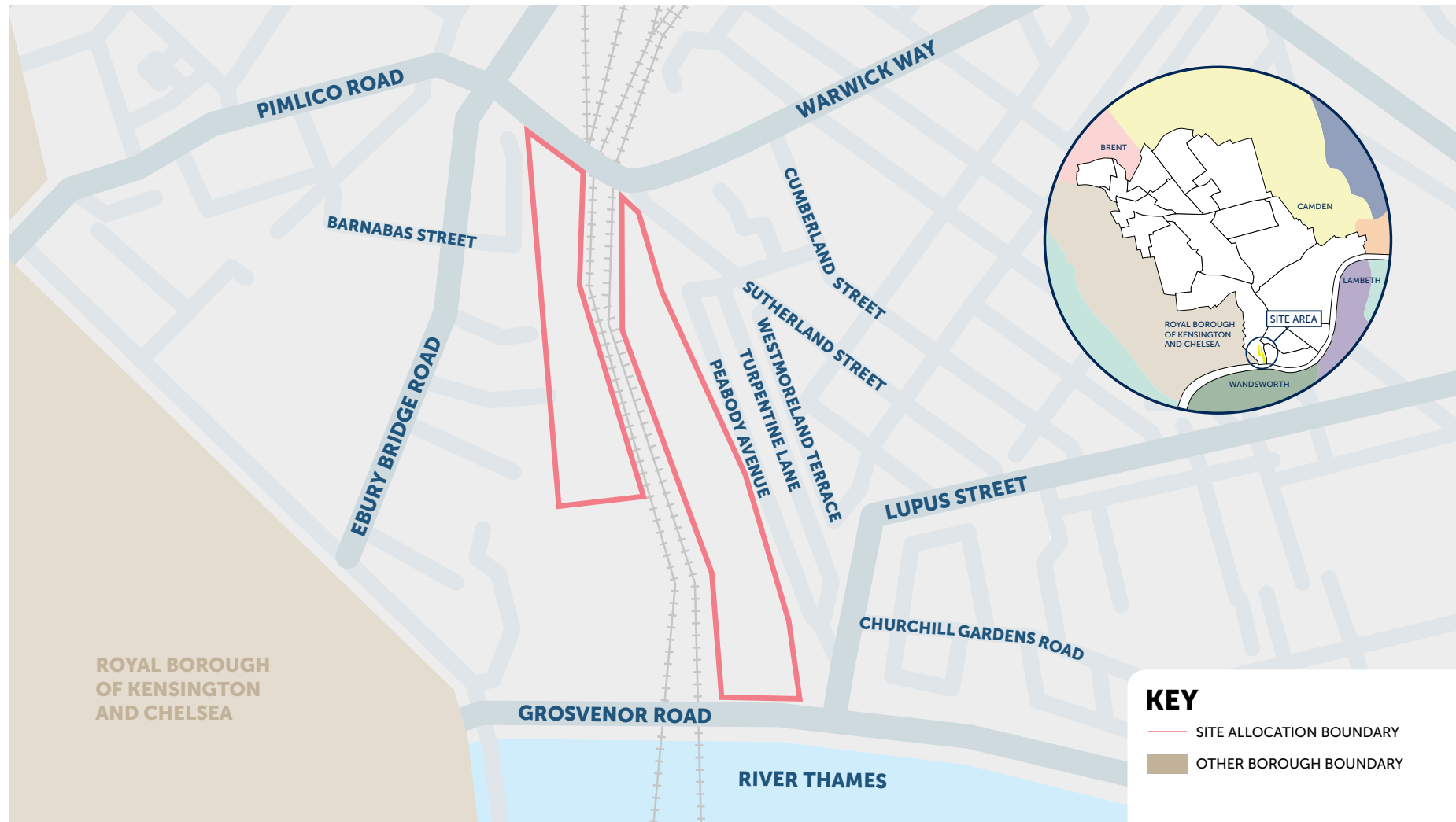


Figure 21: Grosvenor Sidings boundary

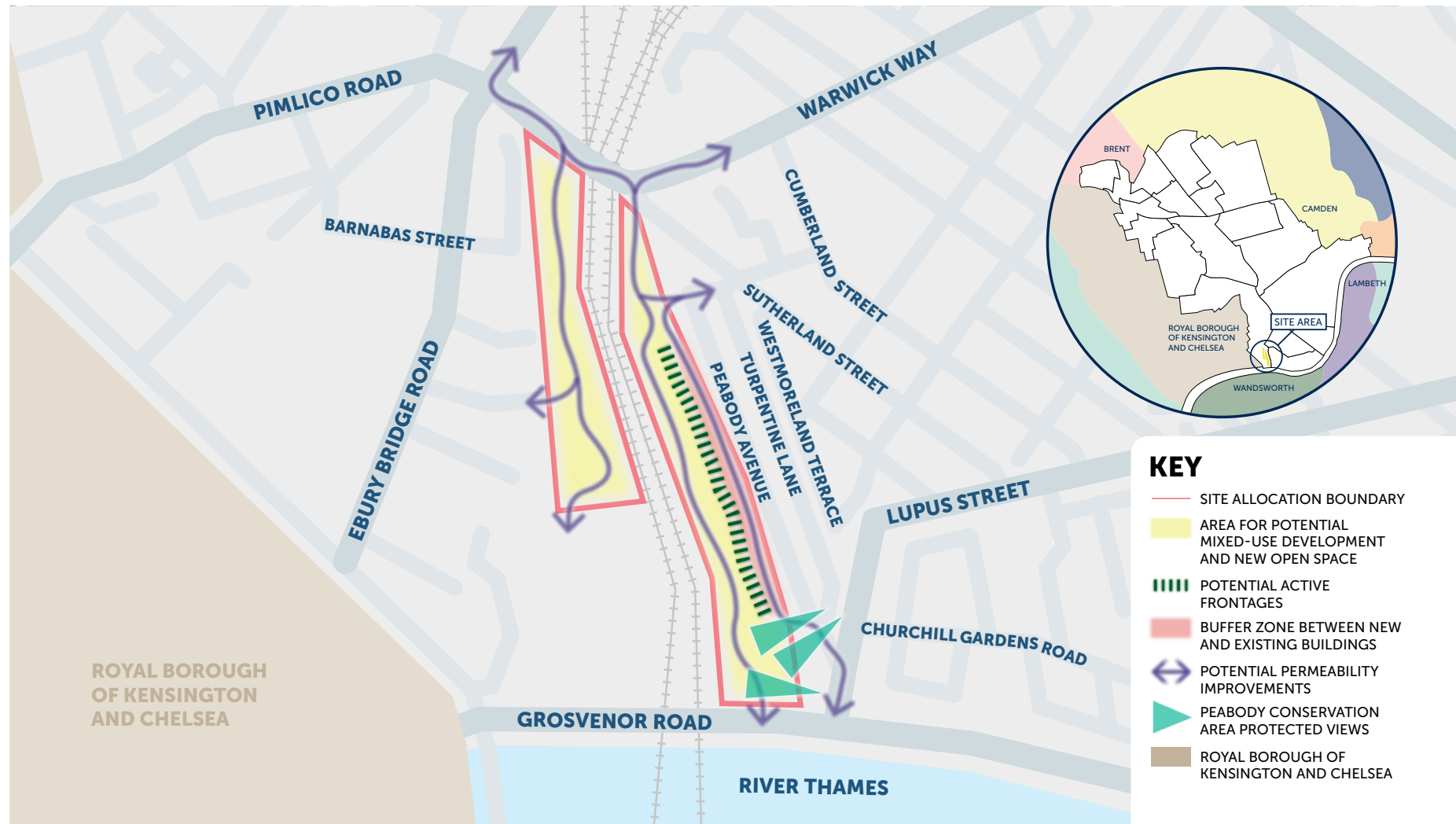


Figure 22: Grosvenor Sidings site allocation

11.1 / The Grosvenor Sidings site comprises land including the existing Grosvenor Sidings to the east and the Pugs Hole sidings and Ebury British Transport Police site to the west. Together it represents an area that provides opportunities for new development that can deliver high quality homes and supporting uses that meet a range of other policy objectives, including job growth, new public open and green spaces, enhanced permeability and improved public realm. There is an opportunity to optimise the site and to balance townscape and heritage interests to ensure that the impact of proposals on their surroundings are properly understood at the planning application stage, and the benefits new development can bring are maximised.

11.2 / The vision and core principles identified above are for the site allocation overall, however it is recognised that land to the east and west may not be redeveloped simultaneously and may instead form part of an overarching phased development scheme. Overall, however, the vision and core principles should be reflected across the site allocation as a whole to ensure the delivery of a new place that benefits residents, workers and visitors and that responds to its local context.

Proposed and existing operational use

11.3 / Grosvenor Sidings to the east and Pugs Hole Sidings to the west currently operate as sidings/ depots for trains, supporting the operations of the Chatham and Brighton mainline serving to and from London Victoria Station. As part of proposals for the site, it is envisioned that the sidings will be

relocated elsewhere on the network and continue to serve the London train network. In addition, to the west of the site resides the current Ebury British Transport Police building which will seek to be retained or re-provided as part of development plans for the site, or where an appropriate alternative location is secured.

11.4 / In line with the London Plan policy for the Central Activities Zone, the site provides an opportunity for a mixed-use scheme alongside delivering homes and supporting uses. Given that the site is in public ownership, it is expected that where residential units are provided that at least 50% of these shall be affordable housing. Opportunities to provide affordable workspace should also be explored.

11.5 / In addition to residential uses, the site provides opportunities to incorporate active frontages through uses such as retail, food and beverage, leisure and workspaces to connect with open and play spaces and overarching public realm improvements, enhancing permeability across the site. Opportunities to incorporate community uses and/or social infrastructure should also be explored. Supporting uses to the south of the site should seek to provide a civic environment to assist in drawing visitors from the River Thames towards Victoria Station, and vice versa.

11.6 / Given the nature of the existing use in supporting the London train network and beyond, as well as being an operational transport police site, it is essential that these uses remain operational during any construction phase.

Sustainability and Environmental Considerations

11.7 / The council has declared a climate emergency and an ecological emergency which Grosvenor Sidings should seek to contribute to addressing, through exemplar sustainable development. This includes through making the efficient use of land, promoting active travel, the provision of a vibrant mix of uses, high design quality and energy efficiency in new and repurposed buildings, and securing biodiversity enhancements across the site. Any new development should also seek to remediate potential contamination of the site.

Design, Heritage and Townscape

11.8 / The challenges of meeting future housing needs alongside development that contributes to economic growth, open and play spaces and improved public realm and permeability, will involve some intensification of the site. Such intensification will respond to the site's sustainability credentials, its proximity to the Ebury Bridge Regeneration Scheme which is already characterised by dense modern developments to the west and the more modest existing development of the Peabody Estate to the east.

11.9 / However, as set out in the Heritage Impact Assessment, the site and its surroundings do include elements of significant heritage and townscape value, which development should respect and respond to. The on-site Listed 123A Grosvenor Road building and adjacent non-designated heritage asset workshop building

located within Grosvenor Sidings are of heritage value which proposals must retain and sensitively re-use through ensuring the buildings are repurposed and their settings considered as part of development plans for the site.

11.10 / Furthermore, the allocation is within the Pimlico Archaeological Priority Area. As a result, any groundworks or excavations will be required to demonstrate and evaluate the archaeological potential and significance of the site through an up-to-date archaeological desk-based assessment including a geo-archaeological deposit. Any development proposal should consult Greater London Historic Environmental Record (GLHER) and Greater London Archaeological Advisory Service (GLASS) and should respond to the recommendations set out in the council's Archaeological Assessment.

11.11 / Proposals should also seek to sustain the local views identified in the Peabody Conservation Audit, and other views across the site to the Grade II Listed Western Pumping Station chimney, Battersea Power Station and reduce any impacts upon the Grade I Listed Royal Hospital Chelsea and Hospital Gardens.

11.12 / To achieve this, it is anticipated that new buildings should be of varying height so as not to impact on local views intersecting Peabody Avenue and the Pimlico Conservation Area. Designs should seek to limit overshadowing of the public realm and existing residential buildings within the Conservation Area.

11.13 / If no longer needed for ancillary uses to the existing sidings, other buildings of heritage and townscape value may also offer scope for re-purposing for alternative uses. Retention of some of the existing structures within the Grosvenor Sidings site to the east could also be considered as part of re-purposing for alternative uses to maintain connections to the industrial character of the area.

11.14 / Proposals should ensure that designs within the site are complementary to not only the wider neighbourhood context but to other buildings proposed for development throughout the site. In particular, development proposals east and west of the railway line should seek to respect and reflect the urban grain of Pimlico to the east and Ebury to the west.

Permeability, public realm and open spaces

11.15 / Routes between developments within the site area should maximise accessibility, promote permeability and ensure cohesion across the site and to neighbouring areas. Development proposals should consider how to include wayfinding through and to the site, to ensure pedestrians and cyclists know how to move around the area. This includes improving pedestrian access from Ebury Bridge to the River Thames on Grosvenor Road. This route forms part of a larger potential network of pedestrian routes from Victoria Station to the river. Additional access routes and permeability between the Peabody Avenue and Ebury Regeneration estates should also be considered, so as to encourage integration between existing and future residents.

11.16 / Given the site falls within an open and green space deficiency area, development proposals should seek to incorporate new public open and play spaces to provide opportunities for social interaction, leisure and tranquillity. As part of any proposals, development should be designed with the needs of all users, including those with mobility constraints, in mind. Furthermore, the design of these spaces should consider how these can be activated at all hours of the day to improve perceptions of public safety, whilst reducing the likelihood of crime or anti-social behaviour.

11.17 / Through the provision of open space, opportunities should be taken to enhance the green and blue infrastructure network within the area, along with considering how this can act as a natural buffer between new development in the east of the site and the adjacent Peabody Estate. Provisions for a green and blue infrastructure network should seek to secure biodiversity net gain and act as an attractive, safe environment that contributes to the enhancement of the public realm.

Flooding

11.18 / The majority of the site is situated in Flood Zone 3 and therefore at high risk of flooding. The southern section of the site is also susceptible to ground water flooding and is at risk if a breach from the River Thames were to occur. With this in mind, highly vulnerable uses which includes self-contained basement dwellings will not be suitable. Basements may be acceptable for less vulnerable uses (non-habitable) provided flood resistance and resilience measures are incorporated and there is both internal and external stair access to a safe level which is above the maximum likely water level.

11.19 / A Site Specific Flood Risk Assessment (SFRA) will need to accompany any planning application when the detailed design and layout of a scheme are known, taking into account the recommendations below regarding:

- The raising of finished floor levels;
- The incorporation of sustainable drainage systems;
- The incorporation of flood resistant and flood resilient measures; and
- The incorporation of safe access and egress routes from new dwellings.

11.20 / In addition, provision of financial contributions towards flood risk management infrastructure will be sought, to help ensure the development will be safe for its lifetime and help reduce flood risk overall.

11.21 / Development proposals will need to incorporate appropriate flood mitigations measures in accordance with the council's SFRA (Level 1 and 2), any up-to-date flood risk data published by the relevant bodies and the council's environment policies and guidance. Proposals must consider how new buildings may alter how surface water flows through or around the site during heavy rainfall and incorporate sustainable drainage systems.

11.22 / Proposals should seek to incorporate sustainable drainage systems which aim to deliver multiple benefits such as the enhancement of biodiversity, water quality, water harvesting, flood risk and amenity.

Living conditions

11.23 / The incorporation of some residential development into proposals can help address high levels of housing need and contribute to a vibrant mix of uses across the site. However, likely levels of noise, and access requirements associated with the railway line, mean that any such provision will need to be carefully sited and designed with high levels of sound insulation in order to achieve satisfactory living conditions for future residents.



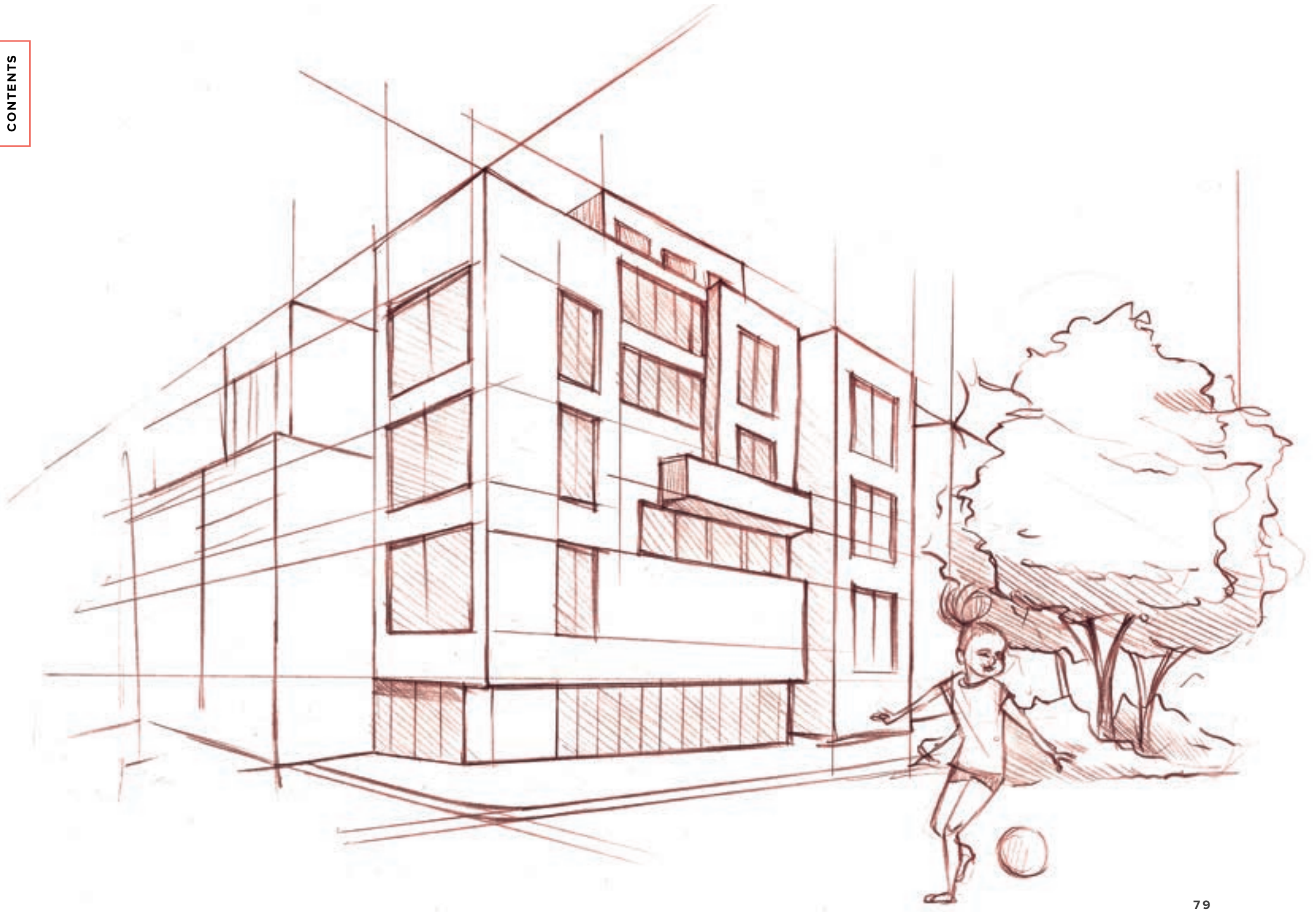
HOUSING

Improved housing, improved lives

Historically our housing hasn't grown at the same rate as the rest of the city. That's changing. By 2040 we will have delivered over 20,000 new homes. Good, affordable housing that will contribute towards healthier, happier lives. Housing that makes the most of the land available and embodies the very highest standards of design.

Whilst Westminster is home to some of the most affluent postcodes in the country, we have diverse communities. This brings an immediate need to create housing that's affordable, inclusive and allows everyone to share in the economic prosperity of the city.

How we respond to housing speaks volumes about who we are as a city. Our response needs to be world-class.



12. Housing delivery

- A.** The number of new homes built in Westminster will exceed 20,685 over the Plan period. This will be achieved by:
1. optimising site densities, including those in Housing Renewal Areas;
 2. delivering a higher number of homes on small sites;
 3. permitting appropriate upwards extensions;
 4. planning positively for tall buildings in certain locations.
- B.** No new homes in Westminster will exceed 200 sq m Gross Internal Area (GIA), except where it is necessary to protect a heritage asset.

EXISTING HOUSING

- C.** All existing residential units, uses, floorspace and land will be protected, except where:
1. the reconfiguration or redevelopment of supported or affordable housing would better meet need; or
 2. non-family sized housing is being reconfigured to create family sized housing.

- D.** The change of use of any type of housing to temporary sleeping accommodation on a permanent basis will not be permitted.

12.1 / Achieving Westminster's housing targets to help meet growing and diversifying housing need is a key priority of this plan. To do this, it is necessary to protect existing housing and fully optimise the delivery of new provision across the city, ensuring land is used most efficiently. This means delivering as many new homes as each site can accommodate, without compromising quality of life for both new and existing neighbouring residents. This will require higher density living in the majority of cases.

Housing Target

12.2 / The London Plan sets all London boroughs an annual housing target based on the GLA's estimate of land capacity through the Strategic Housing Land Availability Assessment (SHLAA). The target allocated to Westminster in the London Plan is 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.

12.3 / The National Planning Policy Framework requires local planning authorities to use a standard methodology to calculate the number of homes needed unless exceptional circumstances exist to justify using a different methodology. The standard

methodology differs from the SHLAA's capacity-based approach in that it starts off with a baseline housing need based on population projections, then adjusts that figure based on an 'affordability factor'. The resultant figure is then capped at 40% above the existing housing target. Using this methodology results in an annual requirement of 1,495 homes per year for Westminster.

12.4 / 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. Through this approach, we expect to exceed the London Plan derived target of 20,685 homes across the Plan period.

Housing Supply

12.5 / In reviewing our housing trajectory, we have considered how changes in our strategic policies will influence housing delivery up to 2040. This includes a high number of smaller sites, based on previous levels of delivery and a stronger level of policy encouragement in both this plan and the London Plan. This City Plan is supportive of design solutions to meet housing needs through less prescriptive design requirements. Taken together with a more welcoming approach to innovative housing delivery, including through upwards extensions, this plan will deliver more housing than previous policies have.

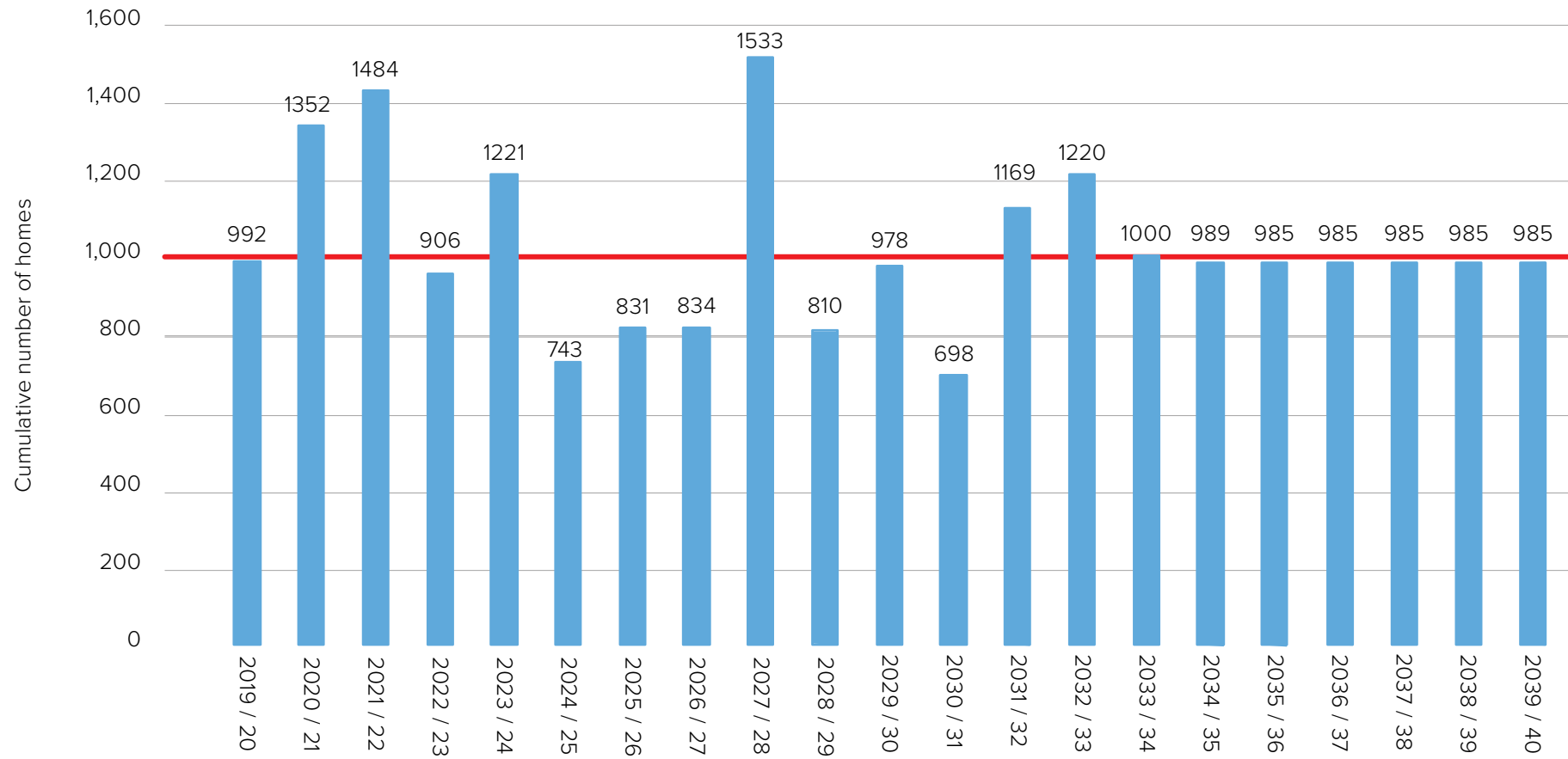


Figure 23: Housing trajectory

12.6 / Historically more than 80% of Westminster’s housing delivery has come forward as windfall. Through our 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 sites will inevitably continue to come forward as windfalls and therefore we continue to include a windfall allowance in our housing trajectory. Consistent past trends and future projections are used to estimate the scale of windfall delivery.

Density and the size of new homes

12.7 / 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.

Existing housing

12.8 / 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 our Annual Affordable Housing Statement or up-to-date evidence specific to Westminster.

12.9 / To help meet the continued need for family sized housing in Westminster, we 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.

12.10 / Internal design features such as including utility space to dry washing, extra internal storage space and partitions that can be moved to alter room layouts can contribute to making high-density developments acceptable. Good external design, public realm and provision of high-quality open space, including trees and soft landscaping, can also help ensure the right kind of growth, where impacts on surrounding neighbourhoods are mitigated.

12.11 / Furthermore, in order to ensure that site capacities are optimised, no new homes in Westminster (including changes of use and residential extensions where new homes are created) will exceed 200sq m of Gross Internal Area (GIA). This size restriction is needed because Westminster’s position in the global housing market can create demand for super-sized properties do not optimise development density on our scarce land. The only exception to this will be where a larger unit is needed to ensure the protection of a heritage asset or a converted home as we recognise that it is not always practicable or appropriate to merge parts of the floors to create larger units. The 200sq m limit is 62sq m above the highest minimum standard in the Nationally Described Space Standards and is higher than the average size of recently built private homes in Westminster (163sq m between 2013 and 2018). The limit will still enable generously sized homes to be developed to meet demand from the prime market and large families, but balances that against the other, more strategic housing needs of the city. The limit will not apply to the replacement of a single dwelling.

Permanent temporary sleeping accommodation (short-term lets)

12.12 / While delivering new homes is essential, if we are to meet Westminster’s growing housing needs we must also ensure that existing stock remains available for permanent residents. Westminster has seen the number of properties used for temporary short-term lets grow significantly since the need for planning permission to short-term let a property was removed.¹ In addition to the impact on housing availability, this can have unacceptable impacts on the residential amenity of those living in neighbouring properties. Regular noise disturbance for neighbours, anti-social behaviour, inappropriate disposal of waste, reduced security and overcrowding of properties are all consequences of this entrenched commercialisation of residential properties. Restricting change of use to short-term letting will safeguard our existing housing supply and protect residents from the negative aspects of this activity. The restriction on short-term letting applies to purpose-built student accommodation outside of term time, unless the letting is directly linked to conferences taking place on the education premises the accommodation is linked to. This is because student homes are often situated in residential areas rather than on purpose-built campuses and the amenity of permanent residents must be protected from the negative impacts of a churn of holiday makers.

¹ Since 2015 planning permission has not been required to short-term let a home in London for less than 90 nights within a calendar year

New Policy 13. Affordable housing

- A.** The council will ensure housing development helps meet the housing needs of Westminster residents and contributes to the London Plan strategic target for 50% affordable housing delivery in London.
- B.** All residential developments will maximise the provision of affordable housing:
 1. On private land, a minimum of 35% affordable housing is required;
 2. On public sector land, the requirement increases to 50% affordable housing;
 3. Where a portfolio approach to delivery on public sector land is proposed in agreement with the Mayor of London, all the portfolio sites will be located in Westminster.

Delivery mechanism

- C.** Major residential development should deliver the affordable housing requirement on-site. In exceptional cases, affordable housing provision can be made off-site or via a contribution to the council’s Affordable Housing Fund. This will only be accepted where it is sufficiently demonstrated that on-site provision is physically or otherwise

impracticable, is inappropriate in terms of the quantity or quality of affordable housing to be provided or it is demonstrated that it will best contribute to achieving mixed communities.

1. Applicants should first explore the possibility of providing the affordable housing requirement off-site (in whole or in part) in the vicinity of the host development site. Delivery beyond the vicinity of the host development site will only be acceptable where it can be demonstrated that a rigorous search for sites revealed no sites are available for affordable housing in the vicinity that could be reasonably and viably purchased.
2. As a last resort, developments not able to deliver the affordable housing requirement on-site or off-site (in whole or in part), will financially contribute to the council’s Affordable Housing Fund.

- D.** Small-scale residential developments (those providing fewer than 10 homes) are not required to deliver affordable housing on-site and follow the delivery cascade set out in Clause C, and may provide from the outset the affordable housing requirement in the form of a payment in-lieu into the council’s Affordable Housing Fund.

Tenure and size mix

- E. Where residential development provides affordable housing on and/or off-site:
1. At least 70% of the affordable homes will be social homes and 30% will be provided as intermediate homes, in line with guidance and income levels set out in the council's Planning Obligations and Affordable Housing SPD;
 2. The size of the affordable homes, including the number of bedrooms required to meet need, will be provided in line with the council's Annual Affordable Housing Statement.

Viability and payments in lieu

- F. In line with the Mayor's threshold approach to applications, major developments that deliver the full affordable housing requirement on-site and adhere to the tenure split, may be assessed under the Fast Track Route. Schemes that follow the Viability Tested Route will be required to submit viability evidence – the council may also make use of viability review mechanisms to ensure the delivery of affordable housing is maximised.

- G. Small-scale residential developments not able to deliver the full affordable housing requirement, irrespective of the delivery mechanism chosen, will be required to submit viability evidence that shows the maximum level of affordable housing that can be provided.

- H. Payments in lieu to the council's Affordable Housing Fund should be of a broadly equivalent value to the cost of meeting the affordable housing requirement on-site, and will be calculated following the methodology set out in the council's Planning Obligations and Affordable Housing SPD.

Protecting existing affordable housing

- I. Affordable housing floorspace will not be lost across the city.
- J. Proposals involving the demolition of existing affordable housing will follow the Mayor's Viability Tested Route and will not be permitted unless it is replaced by at least an equivalent amount of affordable housing floorspace. Such proposals will maximise the delivery of additional affordable housing and will result in no net loss of social housing.

Vacant building credit

- K. Vacant Building Credit will not be applied to any proposals unless it can be demonstrated to the council's satisfaction that:
1. All buildings on site have been continuously vacant for a period of at least 3 years;
 2. The site has not been vacated for the purposes of redevelopment;
 3. There is no interest in using the existing buildings on site, having been marketed with reasonable terms and conditions throughout the period of vacancy;
 4. There are no extant permissions to use the site for alternative uses; and
 5. There are site specific barriers to the re-occupation or redevelopment of the site that mean it would remain vacant in the absence of Vacant Building Credit.

13.1 / Westminster is the second most expensive local authority in the country in which to rent or purchase a home. Average house prices are over 22 times the average Westminster household income², whilst average market rents are 76% greater than the London average. Low levels of affordable housing delivery in recent years, have done little to address housing affordability concerns. Only 52 affordable homes were built in the city in 2020/21³, a further 28 in 2021/22⁴, and 71 in 2022/23⁵. This is down from 404 affordable homes delivered in 2019/20⁶ (of which 197 were provided under a council-led scheme), 83 in 2018/19⁷ and 80 in 2017/18. Westminster's Strategic Housing Market Assessment (SHMA)(January 2024) indicates that as of 2023 there is a current unmet affordable housing need for 6,437 households, with affordable housing need expected to increase over the Plan period. Based on population growth projections, the SHMA (January 2024) also concludes that Westminster's affordable housing need is particularly high for social housing.

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- 2 House price to residence-based earnings ratio – Office for National Statistics (ons.gov.uk)
- 3 Westminster City Council, Authority Monitoring Report 2019-2021
- 4 Westminster City Council, Authority Monitoring Report 2021-2022
- 5 Westminster City Council, Authority Monitoring Report 2022-2023
- 6 Westminster City Council, Authority Monitoring Report 2019-2021
- 7 Westminster City Council, Authority Monitoring Report 2018-2019

Maximising affordable housing delivery

13.2 / Therefore, maximising provision of new truly affordable housing is vital in ensuring high levels of current and projected need are met and in delivering mixed and balanced communities. Increasing affordable housing provision is a key pillar of the council's Strategy for a Fairer Westminster⁸ - beyond planning policy, the council will ensure its actions help deliver the homes Westminster needs, including by delivering high levels of affordable housing on its own land. Thus, in order to meet needs and make sure Westminster contributes to the Mayor's strategic target of 50% affordable homes across London, it is essential that all residential developments contribute to affordable housing delivery (including mixed-use schemes) and that affordable housing delivery is maximised.

13.3 / Private schemes and developments proposed on public sector land will be assessed in line with the London Plan 'Threshold approach to applications'. The council's Viability Study (February 2024) shows that most private sites are viable with 35% affordable housing. On public sector land the requirement increases to 50% affordable housing.

13.4 / Whilst the London Plan supports a portfolio approach to the provision of affordable housing on public sector land located in different parts of London when in agreement with the Mayor of

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- 8 www.westminster.gov.uk/media/document/fairer-westminster-delivery-plan-2023-24

London, this can result in some public sector sites located in Westminster delivering less than 50% affordable housing as only 35% is required on each site, provided the portfolio delivers 50% affordable housing. While this approach can contribute to meeting London's strategic affordable housing needs, it does little to help address high levels of housing need in one of the most unaffordable parts of London. Where the portfolio approach is proposed on public sector land located in Westminster, the council will accept sites which deliver less than 50% affordable housing provided all the portfolio sites are located in Westminster. This approach ensures providers have flexibility to develop their sites whilst ensuring development on public sector land located in Westminster contributes to meeting Westminster's high affordable housing needs.

13.5 / The London Plan encourages boroughs to require affordable housing from minor housing development. Since 2013, 2,548 new homes delivered in the city came from schemes delivering fewer than 10 units, which represents 29% of all homes provided within that timeframe⁹. Thus, schemes providing fewer than 10 homes consistently make a notable contribution to the total share of housing delivered in Westminster. This is unsurprising in a highly urbanised context where the availability of large brownfield development sites is finite. The nature of development in the city

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- 9 Small-scale residential developments Topic Paper (March 2024)

justifies considering new initiatives to ensure a higher delivery of affordable housing in the city. Given Westminster's Strategic Housing Market Assessment (SHMA) (January 2024) concludes that non-major developments can contribute to meeting high levels of housing need, that this is supported by the Viability Study (February 2024) and the high contribution small-scale developments make to new housing supply, it is justified requiring all residential proposals, including sites delivering fewer than 10 homes, to deliver affordable housing.

13.6 / In line with the London Plan, all affordable housing requirements from residential development will be calculated based on the total gross residential development proposed (Gross Internal Area, GIA). Where residential floorspace is proposed as part of redevelopment and intensification proposals that include existing housing, applicants should have regard to guidance set out in the Planning Obligations and Affordable Housing SPD on how the Gross Internal Area of the scheme will be determined. All planning applications will need to provide details on affordable housing by floorspace, number of homes and number of habitable rooms.

Delivery mechanism

13.7 / To achieve mixed and balanced communities, major development should deliver affordable housing on-site. This is also the quickest way to deliver much needed affordable housing. Although the National Planning Policy Framework defines major development as schemes where 10 or more homes are provided, or which site is 0.5ha or more,

the 1,000 sqm residential floorspace threshold has been used in the past in Westminster as another indicator of major development. Given there is still a high demand for larger homes in Westminster, the threshold continues to be relevant.

13.8 / Where it is accepted that affordable housing cannot be provided on-site, off-site delivery would be the second-preferred approach. Off-site affordable housing should be located as close as possible to the host development site, with a focus on the delivery of more homes or higher quality features such as larger homes, increased amenity space, or improved access to public transport and by consequence to local services, shops and community facilities. If delivery close to the host site is not possible and the council is satisfied a search for sites has taken place, options to deliver affordable housing in other parts of the city should be explored.

13.9 / For Estate regeneration only, affordable housing developments completed prior to an application for market housing may in some circumstances count towards meeting future affordable housing requirements to enable Estate regeneration to take place. Any off-site affordable housing delivered must be used in full for the Estate on which it is delivered.

13.10 / Where both on-site and off-site delivery are proven to be impractical or inappropriate, developers will provide a payment in lieu to the council's Affordable Housing Fund. Where

payments in lieu are accepted, they will be equivalent to the cost of providing the affordable housing on-site, preventing financial advantage over on-site delivery. Payments will be based on a fixed rate per sqm of floorspace that would have been provided as affordable housing on-site, ensuring a cost-neutral impact on developers. The values of the payments in lieu and indexation details are set out in the council's Planning Obligations and Affordable Housing Supplementary Planning Document. Payments in lieu may also be deemed appropriate to address shortfalls in on-site or off-site contributions.

13.11 / Notwithstanding the above, the sequential approach to affordable housing delivery may not apply to small-scale residential developments – those delivering fewer than 10 homes. While applicants are encouraged to explore on-site delivery, it is acknowledged that there may be practicable and management issues of providing small numbers of affordable housing that mean on-site delivery is not appropriate. Payments in lieu towards the council's Affordable Housing Fund therefore represents a pragmatic approach that ensures the opportunity for small-scale residential development to contribute towards affordable housing is not lost, and offers a more straightforward approach for small-scale residential schemes' developers compared to on-site delivery.

Tenure mix and size of new homes

13.12 / Recent data from the council's Strategic Housing Market Assessment (SHMA)(January

2024) reveals heightened demand for social housing and the London Plan requires boroughs to deliver ‘genuinely affordable housing’, while ensuring at least 30% social and 30% intermediate housing are provided. Therefore, when affordable housing is provided, we will require 70% affordable homes are social and 30% are ‘intermediate homes. Prioritising social housing will make sure new affordable homes meet the needs of those most in need, including the needs of those on the council’s Social Housing Register.

13.13 / For intermediate housing, the emphasis is on catering to key workers and households with varying incomes not met by the open market. The delivery of new intermediate housing will help households considering leaving or not settling in Westminster, including Westminster’s key workers, stay in the city. Although intermediate sale homes can help meet the needs of some households, the council’s SHMA (January 2024) shows these are rarely affordable in Westminster – most intermediate homes delivered in Westminster should therefore be intermediate rent housing rather than intermediate sale. The council’s Viability Study (January 2024) also shows how the council’s proposed tenure split is viable in most cases.

13.14 / As the profile of those in intermediate housing need will change during the plan period as the profile of households on the Intermediate Housing Register fluctuate and new affordable housing types are developed, the council will ensure its Planning Obligations and Affordable Housing SPD guidance

on preferred intermediate housing types and income bands is kept under review. Applicants will be required to demonstrate how the intermediate housing proposed is contributing to meeting housing needs, in light with guidance and any council or Mayoral published evidence.

13.15 / To ensure the size of new affordable properties responds to the dynamic nature of need, the council’s Annual Affordable Housing Statement sets out up-to-date affordable unit size requirements based on actual need as defined through our social and intermediate housing registers.

Viability and payments in lieu

13.16 / The council supports the London Plan ‘Threshold approach to applications’. Developments which propose fewer than minimum target levels of affordable housing, are unable to deliver the requirement on-site and/or adhere to the tenure split, will be assessed under the Viability Tested Route. Applicants will need to provide a viability assessment at planning application stage. Viability assessments should be submitted in a standardised and accessible format in accordance with London Plan requirements and will be published as part of the planning application process to ensure full transparency of what is the maximum amount of affordable housing that can be secured and the reasons underpinning this. The council may use review mechanisms to ensure affordable housing is maximised, especially when schemes are phased. Further guidance on this is set out in the council’s Planning Obligations and Affordable Housing SPD.

13.17 / Given that small-scale residential developments are not required to deliver affordable housing on or off-site, they are not required to follow the Viability Tested Route if contributing to the council’s Affordable Housing Fund, as this may be overtly onerous given the scale of the development. A viability assessment that determines the maximum affordable housing contribution will still be required if the applicant claims the required level of affordable housing cannot be provided. The assessment will determine the maximum amount the scheme can viably contribute.

Protecting existing affordable housing

13.18 / To maintain our stock in light of growing need for affordable housing, where affordable homes are redeveloped, at least an equivalent amount of affordable housing floorspace must be re-provided, and the council will seek an uplift. Redevelopment proposals will fully re-provide any existing social housing. Any re-provision should be in the vicinity of the original home(s) so that existing communities are not dispersed. As for off-site provision from new developments, provision of affordable housing in the vicinity means it is close to the host development site; 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. In line with the Mayor’s ‘Threshold approach to applications’, such proposals will be assessed under the Viability Tested Route.

13.19 / On estate regeneration schemes, the council will maximise the amount of affordable housing that can be delivered, seeking to deliver at least 50% affordable housing on public sector land where viable. On these schemes, to facilitate large-scale estate renewal and deliver mixed communities, better quality homes and a more appropriate mix of unit sizes, the affordable housing requirement may be applied 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.

Vacant Building Credit

13.20 / The Government's Vacant Building Credit policy is intended to incentivise the redevelopment of brownfield sites that would otherwise remain vacant – such as sites in post-industrial areas where the market has failed. Westminster is at the heart of the capital, where there is a strong demand for the use of any brownfield land available for development. As set out in Westminster's Strategic Housing Market Assessment (January 2024), there has only been one instance where Vacant Building Credit has been sought in Westminster, and high levels of growth have continued to be permitted and built across the city without the application of this discount to affordable housing requirements. Vacant Building Credit is unlikely to bring forward more development in Westminster, including much needed affordable homes.

13.21 / Moreover, where any vacancy does occur in Westminster, this is largely as leases come to an end and are not renewed in advance of a redevelopment proposal, or as commercial premises are being re-marketed and potentially re-furnished for new occupiers. Such vacancy is different to areas of sustained market failure, and should not be used to reduce the amount of affordable housing that should be delivered through the application of the Vacant Building Credit. The application of the Vacant Building Credit will therefore need to be robustly justified with reference to the policy criteria above.

14. Housing for specific groups

A. Residential developments will provide a mix of units in terms of size, type, and tenure to secure mixed and inclusive communities, and contribute towards meeting Westminster's housing needs for different groups.

FAMILY SIZED HOMES

B. New build homes will be designed with growing families in mind and 25% of all new homes across Westminster 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.

C. Conversion of purpose-built single-family homes into multiple family homes is welcomed. Family sized homes will be required where a House in Multiple Occupation (HMO) surplus to requirements (as demonstrated by appropriate marketing as an HMO for at least 18 months) is proposed to change to market housing.

SPECIALIST HOUSING

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 will be protected from changing to non-specialist or supported residential use except where it is demonstrated that:

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; or

4. The accommodation is being adapted or altered to better meet specialist need or to enable residents to remain in their existing property.

OLDER PEOPLE'S HOUSING

- E.** The council supports the development of high-quality accommodation for older people across a range of tenures and use classes that meets identified need.
- F.** The council will support adaptations and alterations to homes occupied by older residents, which enable them to remain in their existing property. Replacement older people's accommodation intended to be occupied by the original occupant(s), will as far as practicably possible, be located near to the original accommodation.

PURPOSE-BUILT STUDENT ACCOMMODATION

- G.** The council supports the development of new, well-managed, purpose-built accommodation for students studying at higher education institutions.
- H.** A proportion of the purpose-built student accommodation will be secured as affordable student accommodation in accordance with the London Plan. All accommodation should include a proportion of units that are

adaptable to meet specialist needs.

- I.** Existing purpose-built student accommodation will be protected unless demonstrably surplus to requirements.

GYPSY AND TRAVELLER SITES

- J.** Gypsy and traveller sites may be permitted where it is demonstrated that there is a need in Westminster, that they are appropriately designed and will not have unacceptable impacts, particularly on traffic or parking.

14.1 / Westminster has a broad range of housing needs and we support delivery of a range of housing types and sizes to meet those needs. The provision of specialist housing and accommodation will contribute to our overall housing target of at least 20,685 homes over the Plan period.

14.2 / Our strategic housing requirements are set out in both regional and local assessments and show that there are shortfalls for all sizes of homes in Westminster, except for studios. We require a range of housing sizes across different tenures to be provided to ensure the kind of homes people need are delivered, including lifetime homes. Consequently, studios will be restricted to 10% of new homes within individual developments.

Family sized homes

14.3 / To ensure that homes are adaptable, and families have enough space to grow in their existing homes, we require a proportion of double bedrooms within each new-build unit. This will give growing families the option to remain in their existing home, rather than move elsewhere or out of Westminster.

14.4 / 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 across Westminster 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.

14.5 / In new intermediate tenure homes, two and three-bedroom homes may be permitted with only one double bedroom, if it is required to make the units more affordable to eligible households and the new homes are meeting demand on the intermediate waiting list.

14.6 / 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.

Specialist and supported housing

14.7 / Westminster's existing stock of specialist housing provides accommodation tailored to the needs of the vulnerable and others with specific housing needs which are not met by conventional housing. High land values mean there is pressure to change low-value specialist housing to higher value private residential accommodation. Without this stock, the people who occupy specialist housing would be unable to remain in Westminster. The protection of existing, and encouragement of new, accommodation that meets an identified need is therefore particularly important to ensure inclusivity and maintain Westminster's rich diversity.¹⁰

14.8 / We will resist the loss of specialist housing if it only requires minor layout changes or improvements in quality to bring it up to standard to meet modern requirements. However, we appreciate that needs and service delivery change over time and specialist housing can become obsolete or surplus to requirements. The loss of specialist floorspace may therefore be considered acceptable to: make optimum use of housing sites, make our housing stock more sustainable as needs change, and deliver our or other local service provider's published strategies.

¹⁰ For new HMOs please refer to the council's licensing scheme

14.9 / We will only accept the loss of any specialist housing uses where there has been no interest from another organisation providing housing for any specialist needs in that location or by a registered provider for the use of the site for any type of specialist housing. This will be demonstrated by the housing being marketed for 18 months as a specialist or supported home.

14.10 / Where the loss of an HMO is accepted following the marketing exercise, we expect it to be converted into family sized homes. By increasing the stock of such homes in the city, the loss of the specialist floorspace will be mitigated.

14.11 / Where new specialist housing is proposed, a management plan will be required and secured via legal agreement or planning condition to ensure the new use does not have negative impacts on the amenity of neighbouring residents. The management plan will address parking pressures, noise and other potential impacts on neighbouring residents or vulnerable uses, such as schools.

Older people's housing

14.12 / Population projections indicate a 52% increase in those aged 75 and over living in Westminster between 2017 and 2030.¹¹ Additionally, there is expected to be a 45% increase in those over 65 suffering from dementia in Westminster

¹¹ Westminster Housing Needs Analysis, 2019

between 2015 and 2030.¹² There is therefore a growing need for new housing to meet a range of older people's accommodation needs. This is not necessarily restricted only to extra-care, sheltered housing or residential institutions, although there remains a need for these types of accommodation. Meeting the needs of older people can also take the form of mainstream housing designed to aid mobility, adapt to changing health or which facilitate the lifestyles of those in later life, as well as private homes marketed specifically to older people.

14.13 / We welcome new and innovative approaches to delivering this type of housing across a range of tenures. New homes to meet the needs of older people will be determined with regard to past delivery against the benchmarks set for different tenures of older people's housing in the London Plan.

14.14 / Self-contained older people's housing that does not fall within the definition of affordable housing will be required to contribute to the supply of affordable housing. This will be in the form of on-site affordable units specifically for the occupation of older people.

¹² Westminster Housing Needs Analysis, 2019

14.15 / The quality of accommodation for older people is more specific than for other types of housing. We will assess the quality of new homes proposed with particular regard to:

- design features suitable for dementia sufferers¹³ both in the home and in shared spaces which are part of the development;
- availability of on-site care and support;
- facilities in the development or nearby for community and social interaction;
- access to technology such as tele-care;
- Wi-Fi and broadband;
- storage options for mobility scooters;
- adaptability of the units for future mobility needs; and
- access to public transport.

14.16 / The location of this type of housing can be critical in ensuring a high quality of life for older residents and contributing to their independence. Older people are more likely to suffer from memory loss, which may lead to feelings of vulnerability, loss of self-confidence and independence. Where older people's housing is being redeveloped, the re-provision will preferably be in the vicinity of the original

¹³ Healthy Building Note 08-02. Dementia-friendly Health and Social Care Environments (Department of Health, 2015) should be consulted.

accommodation to ensure residents can maintain familiarity with their surroundings and their networks of friends and family.

14.17 / Housing developed specifically for older people will be subject to conditions to ensure it continues to be used for its original purpose – this may include a minimum age for the occupants or the continued delivery of on-site care, where this is included as part of the original development.

Student accommodation

14.18 / Westminster has 11 major universities and colleges, more than any other London Borough. It is also home to many smaller colleges and professional education institutions. More than a third of higher education students in London attend a Westminster-based institution, meaning that there is a high demand for purpose-built student accommodation. Nevertheless, our Housing Needs Analysis indicates that there is no overwhelming demand for accommodation for Westminster-based students to be housed in Westminster and there is no evidence to suggest that current levels of provision are affecting student numbers or profiles.

14.19 / We will continue to support the development of purpose-built student accommodation for higher education institutions, 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.

14.20 / Student accommodation must be well-managed and a sufficient proportion must be adaptable to meet specialist needs. 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.

Gypsy and traveller sites

14.21 / Proposals for new gypsy and traveller sites will be assessed based on identified need for this type of housing in Westminster, how the site optimises the land and the likely impacts the site will have. The most recent research commissioned by the Mayor of London confirms that there is no identified need for residential pitches for gypsies and travellers in Westminster.¹⁴ The city does not have reserves of sites of a size or kind suitable for use for this type of accommodation and it is unlikely that there will be any suitable sites available in the future.

¹⁴ GLA Gypsy and Traveller Accommodation Topic Paper, 2017

15. Innovative housing delivery

- A. The council welcomes applications for innovative models of high-quality housing that contribute to providing a range of housing options to Westminster’s residents.
- B. 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.
- C. The council welcomes applications for new homes built using modern methods of construction particularly when they contribute to a quick and more sustainable delivery of homes.

15.1 / London’s housing market is evolving. New housing models are emerging in response to the demand for more (and relatively affordable) homes and reflect changing lifestyles and ways of working. These new housing models include:

- self-build and custom-build homes
- build to rent homes
- rent to buy, help to buy and shared ownership homes
- large-scale purpose-built shared living and live/work schemes.

15.2 / 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. 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). 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.

Self-build and custom-build homes

15.3 / Self-build and custom-build homes can help deliver new homes that meet the needs and demands of an individual or group who organises the design and construction of the new home, with or without the help of a specialist developer.

15.4 / In accordance with the *Self-build and Custom Housebuilding Act 2015*,¹⁵ we keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in Westminster to build homes for those individuals to occupy. We use the data when

¹⁵ As amended by the *Housing and Planning Act 2016*

preparing housing assessments and analysing housing demand.

Build to rent homes

15.5 / Build to rent developments contribute to meeting the demand for rented homes and can deliver high-quality and self-contained homes that are available on longer tenancies. Build to rent developments often target a certain type of residents (e.g. young professionals, downsizers or students) and provide shared spaces and services. We welcome build to rent developments especially when they help deliver a large number of more affordable homes and offer longer-term tenancies.

Rent to buy, help to buy and shared ownership homes

15.6 / Rent to buy, help to buy and shared ownership products can help households on average income levels save for a deposit to buy their first home through bespoke rental arrangements. We therefore welcome these products and developments especially when the “rent” element is affordable and where the homes are allocated to customers on our intermediate housing register.

Large-scale purpose-built shared living and live/work schemes

15.7 / Purpose-built shared living can offer an acceptable form of accommodation for young professionals who are content to share some

space, particularly if it offers a less expensive option (when including service charges) than conventional self-contained homes. The amount of communal storage and living space provided separately to private spaces should be generous and relate directly to the number of occupants in the development, to ensure there is sufficient space for comfortable living.

15.8 / Live/work developments can additionally provide workspace for start-ups and small businesses alongside homes, which is more affordable than renting office space and will contribute to the city's economic growth. However, we expect the 'work' element to include facilities such as a high-speed internet connection, bookable meeting rooms and touchdown working space that is separate from the 'live' element. This is to ensure it is quality work space capable of meeting modern business requirements. Long term management plans will be submitted alongside proposals for purpose-built shared living schemes.

15.9 / Because purpose-built shared living schemes (including live/work developments) will have been designed to meet a specific demand, the layout is likely to mean that, without significant adaptation, changing the development to meet an alternative residential use will result in a failure to meet the minimum space standards. To protect residential amenity, we may therefore use legal agreements or conditions to prevent shared living developments from converting to other housing types.

Modern methods of construction

15.10 / The architecture, design and construction sectors are changing, and new and modern methods of construction and materials are being used. Modern methods of construction can have a positive impact on the quality of homes, the pace of delivery and its cost.

15.11 / Modular homes are homes constructed partially off-site, usually delivered by road to their destination and put in place by crane, where they are connected to utilities and fitted out. We welcome the delivery of modular homes in Westminster for a number of reasons: the units themselves can be constructed very quickly; off-site development means less deliveries being made in Westminster as only the 'modules' are delivered instead of multiple streams of construction materials and equipment – resulting in lower energy use and reduced emissions; the construction disruption caused to neighbours such as noise, dust and pollution from on-site construction is significantly reduced compared to traditionally built homes; and more homes can be delivered on small plots.

15.12 / We recognise the design and construction industry is changing and we embrace new technology which helps us respond to the housing challenge. However, new homes resulting from new construction techniques such as modular homes must be of the highest quality, with high standards of quality control throughout the entire construction process. We will only accept modular homes in Westminster which are constructed out of sustainable materials.

16. Housing quality

- A. All new homes and residential extensions will provide a well-designed, energy efficient and high-quality living environment, both internally and externally. New homes will be designed to a standard that ensures the safety, health and well-being of its occupants.
- B. 90% of all new-build homes will meet Building Regulation requirements M4 (2) “accessible and adaptable dwellings” and 10% of all new-build homes (including changes of use) will meet Building Regulation requirement M4 (3) “wheelchair user dwellings”.
- C. All new homes will meet or exceed the Nationally Described Space Standards (where the units are self-contained).

External amenity space

- 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 it is not considered practicable or appropriate to provide private external amenity space for

all or some homes, the following, measures will be required:

1. provision of communal external amenity space; or
2. provision of additional and/or higher quality public open space.

- 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.

16.1 / Housing plays an important role in the safety, health and well-being of individuals and communities and in the shaping of neighbourhoods. It must therefore be designed to a high quality. This is particularly important in Westminster given the growing need for housing driving higher density developments.

16.2 / High quality can take many forms and can be achieved through design solutions such as the location of one home’s living room in relation to another’s bedroom, private internal living or external amenity space, adaptability to mobility needs, access to natural light and a dual

aspect¹⁶ to the home for ventilation to reduce overheating and provide suitable internal air quality. Where it is impracticable or inappropriate to provide dual aspect homes (or windows have to remain closed owing to external noise), we will expect design measures to mitigate overheating and to provide adequate ventilation within each property.

16.3 / Applicants will be expected to demonstrate how hazards identified in the Housing, Health and Safety Rating System¹⁷ have been addressed in the design of new homes.

16.4 / Part A of the policy applies to: all new homes (across all tenures); residential extensions; when flats are being merged; or when a change of use results in new homes.

Mobility needs

16.5 / 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 residents being forced to move into specialist housing because their

¹⁶ Dual aspect homes have openable windows on two or more walls, allowing for views in more than one direction.

¹⁷ See Housing health and safety rating system: guidance for landlords and property-related professionals. Also refer to the Council’s guidance on bedsits/studios, self-contained flats, flats in multiple occupation standards and hostel standards.

current home cannot meet their changing needs over their lifetime. This requirement applies to new-build dwellings – it is recognised that it is sometimes impracticable to meet the Building Regulations requirements within heritage assets, 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.

Space standards

16.6 / 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 in accordance with the London Plan (see Policy D6 Housing quality and standards) and will ensure residents have access to a suitable amount of space in their self-contained homes. 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.

External amenity space

16.7 / External amenity space in housing developments contributes to good quality living environments and may provide leisure space and pleasant views. Common forms of private amenity space are balconies and gardens. The use of screens or glass enhancements or stepping back the façade 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. This requirement applies to new-build dwellings – it is recognised that it is sometimes impracticable to provide new external floorspace within heritage assets, 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.

16.8 / In a densely built environment such as Westminster, the provision of private external amenity space for all or some homes within a development may be impracticable or inappropriate. In these cases, developers should provide the external requirement in the form of communal external amenity space that will be safe, accessible for all residents across-tenures, 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.

16.9 / 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.

ECONOMY AND EMPLOYMENT

A thriving city creates a thriving economy

The scale and breadth of Westminster's economy is like no other. Our diverse range of enterprise makes us a global hub not just for business and finance, but also for creative and cultural industries. It's an economy that benefits beyond our own communities to the UK as a whole.

For our economic success to continue in the decades to come, we need to respond to people's changing needs. The need for affordable, quality housing that's suitable for our diverse demographic. The need for flexible workspaces. A city that's integrated and connected. A city where people want to be and want to stay.

By creating a thriving place where people to want to be, we create a thriving economy.



17. Supporting economic growth

- A.** New and improved office 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 through the provision of co-working space and a range of Class E (commercial, business and service) uses on site, is supported in principle in the:
1. Parts of the Central Activities Zone (CAZ) with a commercial or mixed-use character, including the West End Retail and Leisure Special Policy Area (WERLSPA) and Opportunity Areas;
 2. North West Economic Development Area (NWEDA) and Church Street / Edgware Road Housing Renewal Area; and
 3. Town centre hierarchy.
- B.** In the NWEDA and the Church Street / Edgware Road Housing Renewal Area, a range of workspace typologies, including workshops and studios, will be particularly welcome.

- C.** Proposals involving the provision of affordable workspace will generally be supported throughout the commercial areas of the city.
- D.** The net loss of office floorspace from the CAZ:
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;
 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 service) uses education or community use, as demonstrated by vacancy and appropriate marketing for a period of at least 12 months.
- E.** Proposals within the NWEDA involving the loss of space suitable for small and medium enterprises (SMEs) will be resisted. Redevelopment proposals will be required to re-provide existing employment floorspace, including dedicated space that meets the needs of SMEs.

17.1 / Westminster is a global office centre, with an estimated 8.45 million sq m of office floorspace,¹ ranging from small traditional offices in heritage buildings, to large modern floorplates. These cater for a full range of occupiers, including real estate, hedge funds, professional / financial services and creative industries. However, since 2005, more than 720,000 sq m² of office stock has been lost in the city – predominantly to residential (including permitted development schemes). Reduction in supply has resulted in low vacancy levels (a ten-year quarterly average of 6.4% across the entire West End, which includes part of Camden and Kensington and Chelsea)³ and high rents. This trend needs to be halted in order for Westminster to continue to compete globally, to support the continued growth of emerging sectors, such as creative industries and technology, and to adapt to modern working practices.

Projected need for new office floorspace

17.2 / The London Office Policy Review (2017) estimates a need for more than 75,000 office-based jobs in Westminster from 2016 to 2041 – which equates to more than 63,000 jobs over the Plan period (2019-2040). Average employment densities of 1 worker per 11.3sq m used within the London Office Policy Review would indicate that

- 1 As of March 2018 – based on 1990 Land Use Survey and pipeline updates
- 2 Pipeline data, March 2018
- 3 Central London Quarterly Office Report, Q4, Knight Frank, 2018

this could translate to a requirement for the delivery of over 710,000 sq m of additional office stock in Westminster to meet demand. However, such calculations would assume that additional jobs are only created through the provision of new office floorspace. Structural changes in the way offices are viewed in many growth sectors as places for interaction and collaboration, rather than places to go and work at a fixed desk is resulting in a rise in agile working practices such as working from home, hot desking, and shared workspace models – all of which enable the more efficient use of space. If this continues, it will reduce the extent to which new jobs need additional dedicated office floorspace, and significant jobs growth could be delivered through the refurbishment and upgrading of outdated stock, to better facilitate such working practices through ‘spaceless growth’. The London Office Policy Review also therefore looked at alternative scenarios that treats space with lower than London average employment densities as excess stock – which could reduce demand for additional floorspace in Westminster to approximately 213,000 sq m over the period 2016-2041 – or 179,000 sq m over the Plan period. As future office jobs growth is likely to come from a combination of new office floorspace and the more efficient use of existing stock, 445,000 sq m of additional office floorspace (i.e. a mid-point between 179,000 sq m and 710,000 sq m) is considered a reasonable minimum amount of office floorspace growth to plan for – taking account of likely capacity in commercial areas, and the need to respect Westminster’s townscape and heritage.

17.3 / Planning for such growth recognises that the continued loss of office stock from the city at past rates is unsustainable. This plan therefore provides stronger protection for existing office floorspace than has historically been the case, encourages its renewal and modernisation, and seeks additional provision, in accordance with recognition in the London Plan of the strategic importance of the central London office market.

Growth sectors

17.4 / The diversity of Westminster’s economy is one of its great strengths, positively contributing to its resilience. Alongside its world-class retail, arts and entertainment, and hospitality offer, the city is highly attractive to a number of economic sectors associated with office activity. The city has more registered businesses than any other London borough in each of the following categories: information and communication, finance and insurance, property, and professional, scientific and technical.⁴ It is also second only to the City of London in terms of businesses administration and support services. Together, these sectors provide a diverse range of jobs, including in software development, film production, advertising, accounting, legal services, medical research, real estate, creative industries, investment funds and insurance. Growth in these high value industries, which is projected in the London Office Policy Review to underpin London’s continued economic

growth, will drive demand for future office floorspace growth in Westminster.

Opportunities for office floorspace growth

17.5 / The West End, along with the Opportunity Areas at Paddington, Victoria and Tottenham Court Road, provide the main opportunities for significant office growth. These areas of the city:

- are home to existing concentrations of such use by a variety of occupiers (from small spaces in Mayfair and St James’s, to large floorplates in Victoria and Paddington);
- include clusters of activity in growth sectors – such as in the creative industries in Soho;
- represent areas of high demand (Paddington in particular has seen substantial office gains over the period 1997-2018 of over 134,000 sq m);⁵
- are benefiting from investment in public transport infrastructure (including the Elizabeth Line and in the future, potentially Crossrail 2); and
- offer opportunities for future growth and intensification.

⁴ Inter-Departmental Business Register 2018, ONS

⁵ Pipeline data, March 2018

17.6 / Office growth in these locations will be secured through a combination of:

- 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 changes of use that are deemed permitted development.

17.7 / 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 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.

17.8 / Beyond these key office markets, further provision of new employment space in the NWEDA and the Church Street / Edgware Road Housing Renewal Area can help complement regeneration schemes and secure a more sustainable pattern of growth. New employment space in these areas, where land values are lower, can help support small start-up businesses and enhance job opportunities in areas of deprivation. They could also offer scope for a more diverse range of workspaces than the office orientated activity found in more central locations. The provision of affordable workspace here, both as a meanwhile use and that provided by managed workspace providers, will be supported. Such provision elsewhere in Westminster could also help support growth in small businesses.

17.9 / Offices are identified in national planning policy as a town centre use, and recent changes to the use classes order 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. 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.

Changing working practices

17.10 / Technological advances are clearly resulting in changing working practices, which new and improved workspaces need to respond to. A growth in hot-desking, remote working, less regimented

working hours, freelancing and small businesses are all increasing demand for more flexible workspaces that better facilitate collaboration and provide ancillary facilities on-site for workers to help improve their work-life balance.

17.11 / To enable growing sectors to continue to thrive, new and refurbished employment floorspace should be designed to meet the needs of modern occupiers. This could include providing dedicated space for hot-desking, informal meetings and collaboration, hosting conferences, and the provision of on-site amenities that helps make them attractive to a talented workforce. Proposals to this effect should be clearly detailed on floor plans, with the rationale behind them detailed in planning or design and access statements. Development should also offer flexible spaces and leasing arrangements that can adapt to occupier's changing demands through the life-cycle of their business. Doing so is consistent with national and London planning policy that new and emerging business sectors should be planned for through the provision of a range of workspaces.

Protection of central London's office function

17.12 / 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 offices to C3 residential continue to require planning permission. Given past levels of loss,

and the national, international and London significance of the central London office market, further net loss of total office floorspace from the CAZ to residential or hotel use will normally be resisted, subject to some exceptions.

17.13 / 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.

17.14 / 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, or for other uses that fall within Class E of the Use Classes Order. 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. Where there is also no interest in these uses, well designed and managed hotels can support London's visitor economy and the strategic

functions of the CAZ. 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.

The North West Economic Development Area (NEWDA)

17.15 / Promoting growth and diversification in economic activity are central to our strategy for the future development of the NEWDA. To ensure growth is not at the expense of local job opportunities, while the intensification of the area to deliver much needed housing is supported, re-development proposals should not result in the loss of existing employment floorspace.

17.16 / To assess if development proposals would result in the loss of workspace suitable for SMEs, applicants should provide details of existing and previous occupiers, how much space they rent / rented, and at what cost. This will be used alongside any information provided by such occupiers on their needs in terms of building layout and locational requirements for proximity to supply chains, to inform re-provision proposals. The provision of co-working space within new developments could help meet the needs of SMEs, in addition to offering other economic benefits, such as facilitating the clustering of entrepreneurial activity.

18. Town centres, high streets and the CAZ

- A.** 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. Proposals in existing town centres and high streets will enhance and diversify their offer as places to shop, work and spend leisure time.
- B.** 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 at first floor level within centres characterised by large format, multi-level stores. The use of upper floors for residential use is supported in principle across all parts of the town centre hierarchy except the International Centres.
- C.** All development within the town centre hierarchy will be of a scale, type and format that reflects and enhances the role and function of the centre within which it is proposed.
 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;

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;
 3. CAZ Retail Clusters will provide further large format retail and complementary town centre uses to meet the needs of residents, workers, and visitors;
 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.
- D.** The provision of a range of retail unit sizes including small stores in redevelopment proposals are supported in principle.
- E.** Temporary proposals for 'meanwhile use' of empty spaces within the town centre hierarchy will be supported where it can be demonstrated that they will enhance town centre vitality and viability, and will be appropriately managed.
- F.** New and extended markets will be supported throughout the town centre hierarchy and

wider CAZ where any negative impacts on the surrounding area (including the operational requirements of existing businesses in the vicinity) can be mitigated.

- G.** Town centre uses will also be supported in principle throughout the 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.
- 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 (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.
- I.** Within largely residential areas not well served by the town centre hierarchy, 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.

Town centre hierarchy

18.1 / Westminster's town centre hierarchy includes some of the most iconic parts of London and provides a diverse network of areas to shop, work, visit and socialise. It includes the International Centres of the West End and Knightsbridge, the WERLSPA, CAZ Retail Clusters, Major, District, and Local Centres. The locations of these, along with the CAZ boundary, are shown in Figure 15.

18.2 / 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 Check 2018, which monitors the performance of our centres in terms of mix of uses, levels of vacancies, and their boundaries. 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.

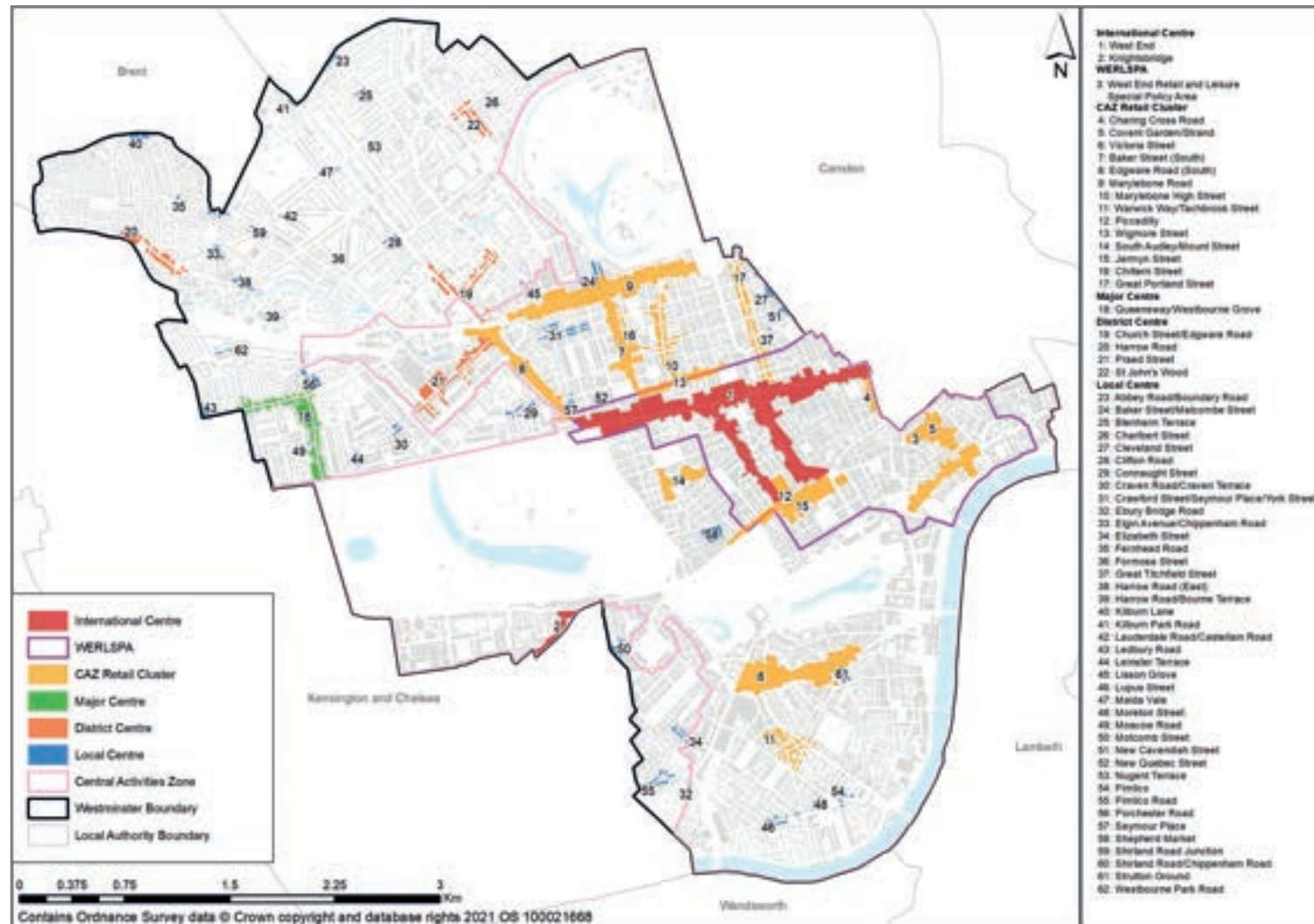


Figure 24: Town Centre Hierarchy

Growth and diversification

18.3 / GLA forecasts based on a range of scenarios indicate that despite the growing use of online shopping and increased space efficiency within stores, over the period from 2015 to 2041, there will be a need for between 284,693 sq m and 399,021 sq m (net) additional comparison retail floorspace in Westminster,⁶ assuming base expenditure levels continue. Over the Plan period, this equates to 229,944 - 322,286 sq m. 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.

18.4 / 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 and other town centre uses. This is also key to why Westminster is anticipated to absorb a significant proportion of 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.

18.5 / To ensure their long-term sustainability, it is important that town centres and high streets can adapt to 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.

18.6 / Development across the town centre hierarchy 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 also demonstrate how they will enhance the existing centre and mitigate any potential negative impacts, having regard to policies 15 Visitor economy and 16 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. For such uses, mitigating any potential negative effects will also require the production and the implementation of management plans.

Unit sizes

18.7 / Subject to the context of a proposed site and the part of the retail hierarchy it sits within, proposals for major new retail and complementary developments will be expected to provide a range of unit sizes – to encourage variety in the shopping offer and support small business growth. As a guide, small shops will generally be considered as those under 150 sq m gross retail area.

⁶ Consumer Expenditure and Comparison Goods Floorspace

Meanwhile use and innovation

18.8 / Well managed pop-up and meanwhile uses across the town centre hierarchy can help 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, 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 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.

Markets

18.9 / Suitably located, well designed and managed markets can also add to the diversity, vibrancy and experience of our town centres. They can be a source of fresh, affordable, and locally sourced food that supports a healthy diet, complement the local retail offer, and like meanwhile uses, support small businesses in showcasing their products. Existing council-run markets within Westminster include:

- Strutton Ground SW1
- Tachbrook Street SW1
- Maida Hill W9 (temporary consent)
- Church Street NW8

- Berwick Street W1
- Rupert Street W1.

18.10 / Existing markets will be enhanced through partnership working with traders, residents and businesses, in accordance with our Markets Strategy. Where it has been demonstrated that existing markets are no longer viable in their existing form and location, proposals for comparable re-provision in the vicinity impact on the surrounding area.

18.11 / Proposals for new markets will be directed to our town centre hierarchy and commercial areas of the wider CAZ – to support the existing retail offer and minimise disturbance to the amenity of residential neighbourhoods. Management plans will be sought through legal agreements in order to minimise any disturbance – through matters such as the arrangements for setting up and removing stalls and collecting refuse.

International Centres

18.12 / 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. Comparison retail is the dominant use in these centres, which are largely characterised by large format stores, often provided over multiple floors.

18.13 / The Mayor of London has identified these centres as being of high commercial growth potential⁷ 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 and increase dwell time 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. 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:

- they do not fetter opportunities for these commercial centres of international importance to continue to grow and diversify;
- the scale of commercial activity in these centres, and their operational requirements, are not compromised.

⁷ 2017 London Town Centre Health Check, Greater London Authority, 2018

18.14 / Where provided, non-retail uses should 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 they are therefore discouraged.

18.15 / As the UK's premier shopping street, the impact of changes to the retail sector will likely be most strongly felt in Oxford Street – particularly given the existing presence of large format stores and the presence of multiple stores by the same operators. Comprehensive proposals for the future of the area that respond to these challenges are therefore set out in the Oxford Street Place Strategy and Delivery Plan. This includes proposals for an enhanced public realm befitting the status of the area, that will provide a more attractive shopping environment and user experience.

West End Retail and Leisure Special Policy Area (WERLSPA)

18.16 / The WERLSPA covers the wider West End, where there is an insatiable demand for new floorspace across all land uses. Beyond the West End International Centre lie iconic areas of retail and leisure activity, such as Covent Garden, Leicester Square and Theatreland. Away from the main shopping streets, the land use is highly diverse, containing a mix of commercial activity, including retail, pubs, bars, restaurants, theatres, cinemas and other entertainment venues. Together, these provide a wealth of attractions that draw in visitors and make a major contribution to London's world city status.

The mix of uses also provides rest and refreshment for workers and shoppers during the day.

18.17 / 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.

18.18 / 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.

CAZ Retail Clusters

18.19 / The CAZ Retail Clusters provide clusters of retail and other complementary town centre uses that make a major contribution towards the strategic functions of the CAZ, as set out in the London Plan. Most are designated through the London Plan, though some additional areas have also been re-classified from designations in the previous City Plan as 'other centres in the CAZ' or 'named streets'. All CAZ Retail Clusters meet the needs of a combination of residents, workers and visitors, adding to central London's wide appeal. Catering to this wide audience, the offer in some clusters includes large format retail over multiple floors.

New development will respond to local character in terms of the scale and nature of the proposed uses. The nature of activity across the CAZ means that in many instances retail and other complementary town centre uses will be welcomed above the ground floor, though proposals will need to respect that the CAZ is also home to a large residential population. Supporting larger scale retail and complementary town centre uses within these clusters can also help respect the character of parts of the wider CAZ that are predominantly residential.

Queensway/ Westbourne Grove Major Centre

18.20 / 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. 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 community facilities, supported by residential development above and investment in the public realm.

District Centres

18.21 / The District Centres of Praed Street, St Johns Wood High Street, Harrow Road and Church Street each have their own distinct character and challenges that new development will need to respond to. The proximity of Praed Street to the Paddington Opportunity Area is likely to increase demand for retail floorspace that is more focussed on new resident's needs than the current offer, which is more orientated towards visitors, tourists and workers. Such provision could also help serve existing residential areas to the north (around Little Venice) that have limited convenience retail floorspace nearby. The presence of boutique fashion and independent retailers in small format stores is fundamental to the character of St John's Wood High Street, although there is a lack of leisure and community facilities in the centre. Harrow Road currently suffers from a comparative lack of quality and diversity in its retail offer. A balance therefore needs to be found between protecting the remaining retail and allowing for other uses that provide new employment opportunities and bring greater activity to the centre. Church Street provides a range of shops and services to local residents and has a long-established antiques market and theatre that hosts community events. A growth in retail, cultural and community facilities in the area will support sustainable growth as regeneration proposals come forward.

Local Centres

18.22 / There are numerous Local Centres in Westminster. They are smaller in scale than District Centres, playing a more localised role for residents and workers. They normally contain a mix of convenience goods shops, local service uses, such as pharmacies and laundrettes, restaurants, cafés and pubs at ground floor. These centres can provide a focal point for community activity, and the availability of a range of shops and services close to where people live can be particularly important for the less mobile. Over the Plan period, these centres will maintain a healthy mix of uses that includes a range of convenience shops for local residents to carry out their day-to-day shopping needs, supplemented by complementary uses that enhance the centres' vitality and viability. This includes uses such as banks, advice centres, doctor's surgeries and cafés.

18.23 / New Local Centres have been designated through this plan, based on the findings of the Town Centre Health Check 2018. They include the designation of a previously unidentified centre at Elgin Avenue / Chippenham Road, and the re-classification of small centres in Pimlico and Fitzrovia that serve a primarily local function.

18.24 / Beyond the existing town centre hierarchy, we will work with neighbourhood forums to identify additional retail frontages of importance to neighbourhood areas and support neighbourhood plan policies to guide development within them.

The Central Activities Zone (CAZ)

18.25 / 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, and the need to protect residential amenity, policy support is therefore provided for town centre uses 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 made neighbourhood plans. Our approach to requirements for sequential tests and impact assessments – as set out in the NPPF – reflects that whilst commercial uses should be supported throughout the parts of the CAZ with a commercial or mixed-use character, the town centre hierarchy should provide the key focus of retail related growth. 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.

Existing shops outside of the town centre hierarchy

18.26 / 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 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 by car. 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).

18.27 / Furthermore, outside of the CAZ some small undesignated parades of shops and services exist. The Town Centre Health Check 2018 found that these suffer from:

- vacancies;
- poor physical appearance;
- concentrations of uses detrimental to public health such as hot food takeaways and betting shops.

18.28 / 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.

19. Visitor Economy

- A.** We will maintain and enhance the attractiveness of Westminster as a visitor destination, balancing the needs of visitors, businesses and local communities.

ARTS AND CULTURAL USES

- B.** All existing arts and cultural uses and uses of cultural significance will be protected and proposals for enhancement will be supported in principle. Proposals for new arts and cultural uses will be supported in:

1. Strategic Cultural Areas when they complement the existing cultural offer; and
2. The town centre hierarchy; and
3. Commercial areas of the CAZ.

Outside of the CAZ, new arts and cultural uses will be of a scale and nature appropriate to the local context and of benefit to the local community.

- C.** Commercial developments associated with an arts or cultural use should be clearly ancillary, maintain its core arts or cultural function which could not otherwise be achieved, and be of clear and lasting benefit to that use.

- D.** In the exceptional circumstances where it is necessary to redevelop a theatre or cinema, a replacement of equivalent size and standard will be required. Proposals to improve theatres and cinemas will be encouraged and should have particular regard to their heritage designation.

EVENTS IN THE PUBLIC REALM

- E.** Events in the public realm will benefit the city, its people and enterprises. They should support the character and function of the area in which they take place and must be organised in ways that minimise the impact on the long-term access to open space, amenity of residents, businesses and others, and maintain the quality of the public realm.

HOTELS AND CONFERENCE FACILITIES

- F.** Existing hotels will be protected, except where the proposal is in a predominantly residential area and would re-instate an original residential use, or where the existing use has significant negative effects on residential amenity.

- G.** New hotels and conference facilities will be directed to:

1. Commercial areas of the CAZ; and
2. Town centres that are District Centres or higher in the town centre hierarchy.

- H.** Applications for extensions and upgrades to existing hotels 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.

PUBLIC TOILETS

- I.** Safe, secure and publicly accessible toilets will be required in proposals that generate a large amount of visitors including large retail, leisure and entertainment developments, tourist attractions and transport interchanges.

19.1 / The visitor industry forms an important part of Westminster's economy, creating a significant number of jobs. Growth in this sector must be balanced with the need to protect the liveability of the city and enhance participation of local communities in cultural activities.

Arts and cultural uses

19.2 / Attractions, events, businesses and institutions in Westminster attract visitors from around the world and contribute to the appeal of the city. These include uses that represent a major part of the nation's cultural heritage, such as the Westminster World Heritage Site, London Zoo and Lord's Cricket Ground.

19.3 / There are many parts of the city that have a distinct cultural focus or present a more localised cultural offer. These include Soho for film and visual effects, Church Street for art and antiques, and Covent Garden for street entertainment. We seek to protect both those uses of national and international significance as well as those that serve particularly local communities. Developments that enhance the visitor experience and provide interesting activities for residents will be supported in appropriate locations.

19.4 / The designated Strategic Cultural Areas contain a number of renowned arts and cultural uses, which we seek to promote, protect and enhance. The West End Strategic Cultural Area (SCA) has one of the largest clusters of cultural and entertainment uses in the country, including

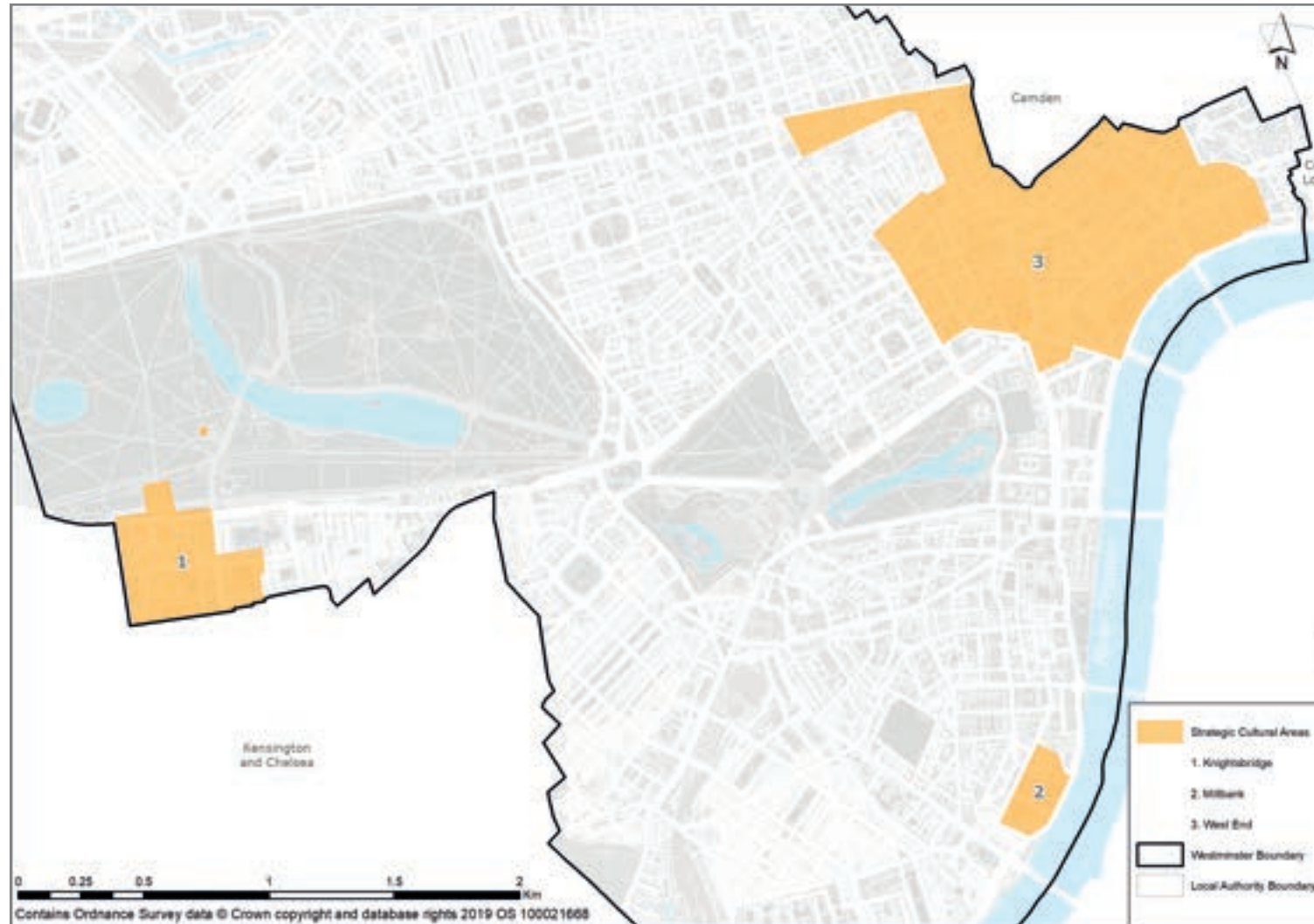


Figure 25: Strategic Cultural Areas

Theatreland, Trafalgar Square, the National and National Portrait galleries and Somerset House. The Millbank SCA along the River Thames includes Tate Britain and the Chelsea College of Art and Design. In the Knightsbridge SCA a concentration of institutions of international importance includes the Royal Albert Hall, the Serpentine Gallery, the Royal College of Art and the Royal College of Music.

19.5 / We recognise that commercial activities, such as cafés and restaurants, can help arts and cultural facilities to attract additional visitors and generate income to fund their core activities. However, these activities should not dilute the primary arts or cultural function of the venue, harm the character of the use or compromise its operation. We only support these ancillary activities when they are part of a long-term strategy to maintain and enhance the arts or cultural value of the venue. Management plans may be required to mitigate any potential negative impacts of these activities.

19.6 / Given their valuable economic and reputational contribution to Westminster as a cultural centre, replacement theatres and cinemas may be required to be provided within a stated period to ensure the continuity of the use. Any replacement theatre or cinema should seat at least the same number of people as the original and be fully equipped to cater for live theatrical productions. A reduction in seating capacity may be allowed as part of cinema or theatre refurbishments, if this is necessary to improve

accessibility or visibility, or other improvements relating to the operation of the theatre.

19.7 / We recognise the difficulties faced in upgrading theatre facilities to meet the needs of theatregoers and the standards they expect, while minimising adverse effects on theatrical heritage. We will continue to work closely with the theatre industry and other agencies to seek to resolve these issues, whilst ensuring that Westminster's unique heritage is maintained. We will continue to consult with The Theatres Trust and the Society of London Theatres on applications relating to theatres.

Events in the public realm

19.8 / The public realm is an important arena for an increasingly diverse range of functions, experiences and cultural activities for the nation as a whole. These range from international sporting events, bespoke art installations, Armed Forces commemorative events, to the Lord Mayor's annual procession, Royal celebration events, Pride London and a rich variety of other commercial, civic and cultural events.

19.9 / Although many events will not require formal planning permission, we intend to ensure our planning functions are aligned with other powers and responsibilities in managing events safely and effectively, with any negative impacts on the built environment minimised and mitigated.⁸

⁸ Our emerging Active Events Protocol should be consulted

19.10 / Management plans are required to set out how the event will be managed; the length of time necessary for set-up and dismantling of any structures or equipment required; and how the organisers will cover the cost of, and contribute to any clean-up of public areas and return of functionality of space required after the event.⁹ They should also set out arrangements to work with the police, fire and ambulance services as part of the event, where appropriate.

19.11 / Proposals for temporary events will be assessed based on the short-term impacts of the event itself, but also the cumulative impacts of all events in the local area – including road closures and residential amenity.

Hotels and conference facilities

19.12 / Any significant decline in the extent of visitor accommodation in Westminster would have significant impacts on strategically important central London activities and levels of employment. Therefore, a strong level of protection is given to existing hotels.

19.13 / 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 and conference

⁹ The Royal Parks and Westminster's Paddington Recreation Ground utilise management plans for temporary events which could be used as a template for other management plans.

facilities 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, hotel extensions and conference facilities, 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. 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.

19.14 / There is a need to ensure a balance between hotel and residential uses so that they can all function well, while also ensuring a good quality of life for residents. Particularly large or intensively used hotels or conference facilities are often not compatible with predominantly residential streets, because the amount of activity they generate can cause amenity problems.

19.15 / The change of use of hotels to residential use will be encouraged where the existing hotel is not purpose built and is demonstrated to be causing adverse effects on residential amenity.

Public toilets

19.16 / Publicly-accessible toilets provide an important facility for residents, workers and visitors. They contribute to keeping London's streets clean, and reduce the risk of anti-social behaviour. They are especially important for some groups, such as the elderly, families with children, or those with certain health conditions.

19.17 / For the purposes of this policy, large retail developments are those having 1,000 sq m of gross floorspace or more. Large entertainment uses are those having 500 sq m of gross floorspace or more. The toilets should be maintained at the applicant's expense as part of the overall maintenance of any development. Toilets accessible to the public should be clearly sign-posted within developments to ensure they are easily located and the needs of less mobile people must be taken into account in the design of new toilets. Facilities should be well-managed, and their opening hours should reflect the needs of the area.

20. Food, drink and entertainment

A. Proposals for food and drink and entertainment uses will be of a type and size appropriate to their location. The over-concentration of those uses will be further prevented where this could harm residential amenity, the vitality and character of the local area or the diversity that defines the role and function of the town centre. Applications for entertainment uses will need to demonstrate wider benefits for the local community, where appropriate.

PROTECTION OF PUBLIC HOUSES

B. 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. 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.

HOT FOOD TAKEAWAYS AND DELIVERIES

C. Proposals for hot food takeaways within 200m walking distance from the entrance of a primary or secondary school will not be supported.

- D. Provision for food deliveries from restaurants or cafés, including facilities for platform-based delivery, will only be supported where it is demonstrated that the facilities do not result in a change of use to hot food takeaway or other uses including composite / *sui generis* uses.
- E. Purpose-built facilities for platform-based deliveries will only be supported when they are purposely designed to limit the adverse impacts of this type of delivery mechanism.

SHISHA SMOKING

- F. The use of premises and outdoor areas for shisha smoking 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.

20.1 / 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. Given the recent changes in the Use Classes Order we 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. 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. 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.

20.2 / The impacts of food, drink and entertainment uses on the surrounding area need to be carefully managed. Proposals for food, drink and entertainment uses should be accompanied by an assessment of development impacts, which should be proportionate to the likely impact of the proposal. This is based on the principle that larger scale proposals, and those with later opening hours, will be likely to have disproportionately larger impacts on surrounding areas. These impacts will also be felt more strongly within smaller commercial areas, given their role and function. The type of use proposed, as well as the concentration of uses in proximity, will also be taken into account. Applicants will be required to produce a management plan

setting out the steps identified as a result of the assessment. Implementation of management plans will be secured by planning condition and / or legal agreements as appropriate.

20.3 / The cumulative impact of multiple food, drink and entertainment uses in a particular area can have a negative impact on the functioning and use of an area and can negatively impact residential amenity. We will therefore prevent the over-concentration of these uses and require proposals to make sure any negative impacts are managed (applying the Agent of Change principle).

20.4 / Applicants proposing new entertainment uses will set out in their planning statements the benefits that the local community will gain from these uses. Arrangements may be formalised through a legal agreement, where appropriate. Local community functions provided by new entertainment uses could include discounted access to space for community functions, or the provision of learning and training for the local community associated with the use.

Protection of public houses

20.5 / While we acknowledge 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, public houses can play an 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 None¹⁰ status. The protection of public houses is supported by both national policy and the London Plan.¹¹

20.6 / 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 LGBTQI+), the decline of which we seek to halt through the introduction of this policy and by working in partnership with community groups, landlords, the Mayor of London and other partners. 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

¹⁰ Best Bar None is an accreditation scheme promoting responsible management and operation of alcohol related premises.

¹¹ See paragraph 92 of the NPPF; and Policy HC7 Protecting public houses of the London Plan.

compromise the viability or function of the public house.

Hot food takeaways and deliveries

20.7 / Reducing health inequalities is a priority for us. Although being overweight has different causes, evidence¹² shows a link between the consumption of hot food takeaways and obesity. We resist new hot food takeaways opening up around schools, to protect our children from the negative consequences of consuming junk food. Due to the high density of schools in Westminster, a buffer of 200m is appropriate to allow some growth in the sector in the right locations.

20.8 / In recent years there has been significant growth in mobile technology-based platforms used to order hot food. This often leads to negative impacts on the amenity of residents and businesses arising from the noise and other disturbance from large numbers of delivery agents outside food premises or elsewhere. Hot food takeaways fall under a different use class to restaurants and cafés and by their nature, can result in increased disturbance as a result of motor vehicles, mopeds and motorbikes taking deliveries of food to customers. It is becoming increasingly commonplace for restaurants and cafés to offer takeaway services with the rise of platform-based delivery options. We recognise the convenience of delivery platforms, however, we will ensure that any

¹² London Plan topic paper: Hot food takeaways, Mayor of London, 2018

negative impacts are minimised and managed. We will therefore seek to control numbers and hours of operation of food deliveries through planning conditions to ensure any such services are ancillary to the primary use of the premises and will seek to promote use of sustainable delivery options.

20.9 / Westminster's dense pattern of development means that it is unlikely that there will be anywhere within its boundaries that are suitable for stand-alone food preparation facilities supporting these platforms given their likely amenity impacts, particularly in terms of noise and odour.

Shisha smoking

20.10 / 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. 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. We are committed to managing the concentration and impacts of any uses detrimental to public health throughout the city.

20.11 / An increased amount of outdoor shisha premises are emerging in the city, often as ancillary uses within cafés and restaurants that then incrementally expand. Estimates indicate that from the period 2010 – 2013, the number of premises more than doubled, from 60, to more than 130.¹³ Such premises are distributed across the city, with notable concentrations in Edgware Road.

20.12 / The use of premises and outdoor areas for shisha smoking is a *sui generis* use, meaning that where an applicant seeks to change the use of premises or outdoor areas for shisha smoking, planning permission will be required.

20.13 / In addition to its direct health impact, outdoor shisha smoking, which often occurs late at night, can harm amenity through increased noise, odour and fumes, particularly in areas with large concentrations of these uses. This, in turn, can also have an impact on quality of life and public health. A loss of retail units for shisha smoking can result in a change of character and 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

¹³ Reducing the Harm of Shisha: towards a strategy for Westminster, 2017

will use planning conditions to seek to control the positioning and the numbers of tables and chairs used for outdoors shisha smoking, the opening hours of the premises and the management of waste disposal. Management arrangements will be required to safeguard residential amenity, minimise disturbance and negative impacts on the operational requirements of existing businesses in the vicinity and manage any negative impacts in the environment. 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. Given the amenity and public health impacts of shisha smoking, we are lobbying for increased licensing powers to control the proliferation of shisha bars.

21. Community infrastructure and facilities

NEW INFRASTRUCTURE

A. New community infrastructure and facilities will be supported where there is an identified present or future need. The council will use its Infrastructure Delivery Plan alongside other strategies to plan for and deliver new infrastructure. New facilities will be of a nature and scale to

meet identified need and be sufficiently flexible to meet the requirements of providers as they may change over time.

B. Where new facilities are provided they should be designed to accommodate a range of community uses wherever possible. The council will strongly encourage the co-location of facilities and access for appropriate organisations and the local community.

EXISTING INFRASTRUCTURE

C. Existing community facilities and floorspace will be protected other than where it can be demonstrated that either:

1. The loss or relocation is necessary to enable service provision to be reconfigured, consolidated, upgraded, or delivered more effectively as part of a published strategy to improve services and meet identified needs; or
2. There is no demand for an alternative social and community use for that facility or floorspace, evidenced by vacancy and appropriate marketing for at least 18 months.

D. Where a reduction in community floorspace is deemed acceptable, other ancillary uses

will be permitted where they support the continued function of the main community use.

- E.** Within designated town centres, where the loss of community facilities is deemed acceptable, replacement uses with an active frontage will be prioritised. For other sites in the CAZ, other town centre uses will be supported in principle. In all other cases, residential use will be preferred.

21.1 / Community infrastructure and facilities are integral to supporting people's everyday lives, being used by residents, workers and visitors, and are a vital resource to support successful places and communities. Community infrastructure and facilities consist of:

- Health facilities e.g. hospitals, GP surgeries.
- Education facilities e.g. schools, nurseries, universities and colleges.
- Sports and leisure facilities e.g. leisure centres, swimming pools, outdoor playing pitches and Multi-Use Games Areas.
- Cultural facilities e.g. theatres, museums and art galleries.
- Social facilities e.g. meeting halls, public houses, libraries and places of worship.

21.2 / Community facilities and infrastructure can be either publicly or privately owned and/or operated. Wherever possible, they should have shared or extended use to serve the wider community, for example, the use of school sports facilities beyond the school day for the wider community. Shared use of facilities can encourage active lifestyles, help ensure the effective use of resources and land, reduce maintenance and management costs, and encourage joined-up and coherent service delivery.

21.3 / Westminster's community infrastructure needs will be kept under review to ensure they continue to be met. We will work with providers of local services to review existing provision, to identify future needs, and ensure the most efficient use of land and other assets across the public estate in delivering services, with particular use made of the Infrastructure Delivery Plan (IDP). We will utilise other council strategies to inform the IDP and deliver required infrastructure including our existing Active Westminster Strategy, our emerging Playing Pitches and Built Facilities Strategies, School Organisation and Investment Strategy and the Health and Wellbeing Strategy, as well as documents prepared by other infrastructure providers such as the NHS and Thames Water.

New community infrastructure

21.4 / New development will place pressure on existing community infrastructure and facilities and these must continue to be provided to meet the

changing needs of the city, and to mitigate impacts on existing services, as Westminster grows and changes. We also want to be sure that new facilities are only provided where they are really needed to avoid facilities being developed where there is not an identified need, resulting in development sites being under-optimised. We will take into account the role of the proposed facility beyond just local need – some facilities have a wide range of functions including at a regional, national or even international level, for example, certain educational or medical institutions.

Existing community infrastructure

21.5 / We accept that demands change over time and this may result in changes to the pattern of service delivery. To be resilient to such changes, community facilities need to operate in buildings that meet the modern needs of the service and those who use them. This may mean that co-location of a number of different community facilities within a single site or building is appropriate, alongside rationalisation of floorspace to facilitate this. A good example of this is the recent refurbishment of Seymour Leisure Centre in Marylebone, which has combined swimming facilities with a gym, sports hall and climbing centre. There are also plans to co-locate a library facility at the site to create a community hub.

21.6 / Nevertheless, we will only accept a rationalisation of community floorspace if it is part of a published strategy and brings overall benefits to the local community or is necessary to deliver a

new or improved facility. It should not compromise the core function of any part of the facility. We will encourage (and where appropriate, lead) coordinated joint work by public service providers to ensure the most effective use of landholdings, identifying shared opportunities to improve the range and efficiency of services through a “One Public Estate” approach.

21.7 / There may be some cases where commercial uses operating alongside community infrastructure will help the function and viability of the facility, such as an on-site café. Such uses will be supported where they are ancillary to the main community use and the requirements of clause C are met.

21.8 / There may be cases where there is no continued need or demand for the provision of community facilities. Where this may be the case, the early marketing of vacant community floorspace to assist in identifying any alternative occupiers who could make a good public service use of the site is strongly encouraged. A comparable market value when undertaking a marketing exercise will be based on the facility being public, regardless of whether it has most recently been occupied by a private social / community occupier.

22. Education and skills

- A.** The council will support the provision of new or expanded primary and secondary schools and further education facilities, to meet the needs of a changing population and enhance education provision.
- 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.
- C.** Where new and additional educational facilities are provided, proposals for their use outside of core operation hours for community or recreational use will be supported in principle.
- D.** Major developments will contribute to improved employment prospects for local residents. In accordance with the council’s Planning Obligations and Affordable Housing SPD, this will include:
 - 1. Financial contributions towards employment, education and skills initiatives; and

- 2. For larger schemes, the submission and implementation of an Employment and Skills Plan.

Education

22.1 / Current pupil projections¹⁴ indicate a decline in demand for primary school places, and a growing demand for secondary school places in Westminster. However, demand will continue to fluctuate over the Plan period as the population grows, children move through the school system, families move in and out of the city, and schools are expanded or contracted. In the short term, our school expansion programme, along with additional capacity being created through the relocation of Marylebone Boys Sixth Form to Paddington, will meet demand for additional secondary school places in the city.¹⁵ Beyond this, demand will continue to be monitored as pupil projections are updated, and additional capacity planned for in accordance with our annual School Organisation and Investment Strategy.

¹⁴ Greater London Authority, 2018

¹⁵ See School Organisation and Investment Strategy and Infrastructure Delivery Plan

22.2 / Currently there is a lack of suitable and available land for the construction of new schools within the city, though there may be opportunities to adapt the existing school portfolio in response to changing demands for different age groups. Further unidentified opportunities could also emerge over the Plan period.

22.3 / The presence of world-class higher educational institutions, including London School of Economics, Imperial College London, and King's College London, form an integral part of the character of central London. They provide a significant source of employment, contribute towards a highly skilled workforce, support the clustering of the knowledge economy, and are internationally recognised for their research reputations. Such benefits help London compete on a global stage as a location of choice for business.

22.4 / To maintain and enhance their international standing, and continue to attract the best talent to London, higher educational institutions are likely to need to upgrade, and / or provide additional teaching and research facilities over the Plan period. Such investment is supported in principle – in recognition of the benefits this will bring to the wider economy.

22.5 / To maximise the community benefits of new educational uses, applicants are encouraged to make facilities available and adaptable for public use, where this does not compromise their primary purpose and operational needs. Multiple purpose use of such facilities can help make efficient use of scarce space and overcome any deficiencies in dedicated community space within a locality.

Skills

22.6 / Whilst Westminster has the highest number of jobs of any London borough, it relies heavily on in-commuting of skilled workers.¹⁶ As the heart of a world city, this will continue to be the case over the Plan period – as new job opportunities continue to attract workers from across the south east and beyond. However, alongside this, it is important that Westminster residents, particularly those from disadvantaged backgrounds, fully benefit from the diverse range of opportunities economic growth brings. Removing barriers to local employment can improve resident's life chances, help support continued business growth, and reduce traffic movements.

22.7 / We will therefore use the opportunities offered by new development, in both the construction and operational phases, to improve residents' access to skills, training and employment. This will include seeking financial contributions towards employment, education and skills initiatives, and on larger schemes, requiring apprenticeships and job placements in accordance with targets set out in an agreed Employment and Skills Plan. Securing job placements within the end use of a development, rather than solely in the construction phase will be important to ensure residents fully benefit in the long term from the diverse opportunities economic growth brings. The Westminster Employment Service¹⁷ will provide a key point of contact to assist developments in

¹⁶ Local Economic Assessment, 2014

¹⁷ westminster.gov.uk/employment

delivering benefits to local residents. Further details of how financial contributions will be calculated, when Employment and Skills Plans will be sought and what they should include, [will be](#) provided in our Planning Obligations and Affordable Housing SPD [2024](#).

23. Digital infrastructure, information and communications technology

- A.** Investment in digital and telecommunications infrastructure will be supported. The public benefits of proposals for new infrastructure will be weighed against impacts on local character, heritage assets, or the quality of the public realm.
- B.** Major new developments and infrastructure projects will be designed to enable the installation of the most up-to-date standards of digital connectivity and ensure easy maintenance and future upgrading as technologies and standards improve.
- C.** Major commercial developments will provide a communal chamber on-site for telecommunications equipment or make an appropriate contribution to the cost of providing one nearby.

D. Opportunities for co-location, shared facilities and innovations such as smart street furniture should be explored where new digital and telecommunications infrastructure is proposed and proposals for standalone apparatus should demonstrate that such opportunities have been exhausted. Proposals on the highway should also demonstrate that it is not feasible to locate on existing buildings or other structures.

23.1 / The last twenty years have seen huge technological advances resulting in a shift in ways of working and significant growth in technology-based sectors of employment. Access to high quality digital infrastructure and information and communications technology (ICT) are increasingly viewed as a vital component of modern life – by residents, visitors, and a wide range of businesses. The government’s UK Digital Strategy sets out the importance of providing world class digital infrastructure to improve connectivity, and the government is investing £1 billion to accelerate investment in, and roll-out of, next generation digital infrastructure, including 5G and full fibre broadband.¹⁸

¹⁸ UK Digital Strategy, 2017

23.2 / The continued growth and success of Westminster’s economy is dependent on securing access to digital infrastructure and ICT services of the highest specification available that is future-proofed to enable upgrades as technologies and standards improve. To ensure end users can exercise choice regarding technologies and suppliers, applicants are encouraged to engage with a range of providers in the design of major developments. To minimise disruptive street works, major commercial development will provide or contribute towards communal entry chambers that enable the quick and easy installation of new ICT services to meet occupiers’ needs.

23.3 / Although future investment in digital infrastructure and ICT is vital and of clear public benefit, it must be provided and coordinated in a manner that respects Westminster’s rich heritage. New apparatus such as boxes that enable the roll out of 5G should be sited away from listed buildings wherever possible, but applicants should also seek to minimise unnecessary and visually obtrusive clutter of the public realm.

23.4 / Proposals for new standalone apparatus will only be supported where all reasonable options for sharing existing facilities, or the use of less obtrusive locations, have been ruled out as impracticable. It is recognised that there are some forms of telecommunications infrastructure where co-location or sharing of facilities may not be an option.

23.5 / Equipment that is no longer required should also be removed in accordance with Ofcom’s Electronic Code of Practice, to reduce clutter and improve the experience of pedestrians and other highway users and the quality of the public realm.

24. Soho Special Policy Area

- A.** Development in the Soho Special Policy Area will reflect its unique character and function and demonstrate how it respects, protects and enhances the existing scale and grain of the built environment and the unique mixture of uses present there.
- B.** The following uses will be supported:
1. Small and medium enterprise (SME) workspace, particularly in the creative industries;
 2. Specialist retailing;
 3. Housing that meets the needs of those working in the area;
 4. LGBTQI+ venues;
 5. New live music venues;
 6. Physical, social and green infrastructure;
 7. Small-scale hotels; and
 8. Food, drink and entertainment uses, subject to clause C.

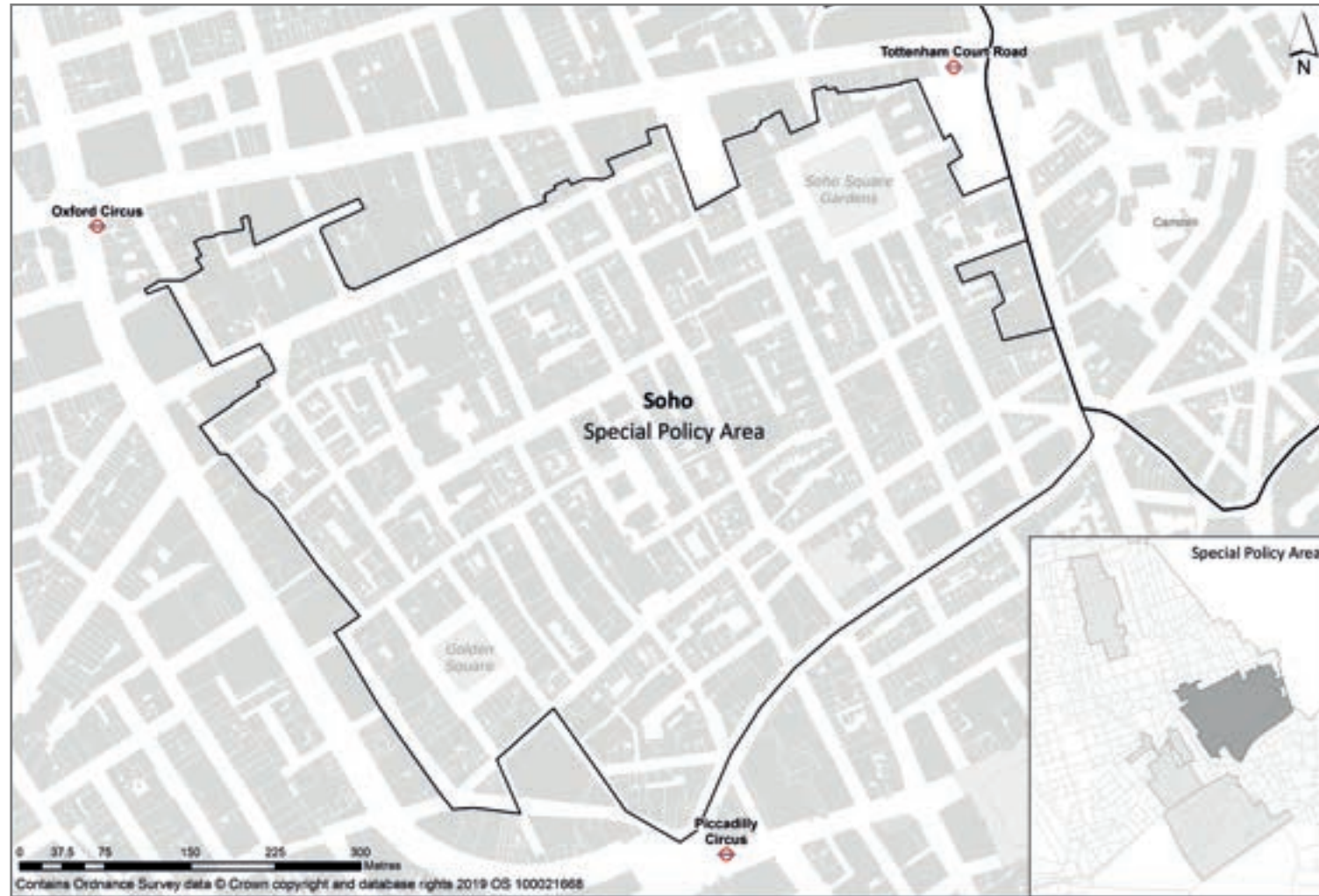


Figure 26: Soho Special Policy Area

- C. Proposals for new drinking establishments will be considered with regard to their cumulative impact on the character of Soho's streets and mix of uses.
- D. The scale and setting of Soho and Golden squares will be protected. The function of these squares and of St. Anne's Churchyard as green spaces will also be protected and enhanced. Other opportunities to improve the public realm should be explored in development proposals.

24.1 / Soho has been a mixed residential and commercial district since the mid-18th century, when it was popular with artisans, traders and immigrants, often fleeing conflict in continental Europe.¹⁹ In the 19th and 20th centuries, Soho further developed as a centre for the creative arts, particularly the British film industry. By the 1960s, Soho had become a focal point of London's music scene, alongside its boutique shops and other bohemian culture, and has become a home for London's LGBTQI+ community. The area was designated a conservation area in 1969. Since the 1960s, Soho has become a major tourist attraction and has become more commercialised. It still has a unique role to play within the wider West End and it is important that its distinctive qualities are conserved and enhanced.

¹⁹ Soho Heritage and Character Assessment, 2018

24.2 / Soho Special Policy Area (SPA) has a cosmopolitan character, density and diversity of uses. It functions as a place to live, work and visit, with all these roles taking place within its dense network of narrow streets, and often within the same buildings. Soho has a distinctive scale of uses, typically smaller than elsewhere in the West End, typified by the small scale of its individual commercial units at street level. The dense nature of the urban fabric lends itself to smaller floorplates, which typically support tenants from specialist and smaller scale industries, particularly the cultural, creative and visitor sectors and for SMEs. Smaller units and flexible workspaces to encourage this type of use will be supported.

24.3 / Where development proposals involve the amalgamation of units behind retained façades, particularly at ground floor level, they will be considered in the context of Soho's existing scale and grain of development. Where proposals seek to reduce the duplication of cores in adjoining buildings, for example to improve energy efficiency, they may be justified provided the ability of the commercial floorspace to be let to several individual occupiers is not inhibited.

24.4 / It is important to maintain the mix of uses present in Soho to protect local character. This policy aims to promote a range of uses that reflect Soho's cosmopolitan and varied nature. Soho has a diverse range of retailers, many of which form specialist clusters within the area, such as: fashion and tailoring; music and the arts; food; and those catering to the LGBTQI+ community.

24.5 / Changes of use to new 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 these 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.

24.6 / Applicants should address this issue in their Planning Statement and should consider both the surrounding uses at ground floor level and the existing servicing arrangements in the vicinity of the site. Noise and amenity impacts will also be carefully considered, especially where there are residential uses on upper floors in the immediate vicinity of the site.

24.7 / 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. We consider small-scale hotels, in a Soho context, to be those of fewer than 100 rooms.

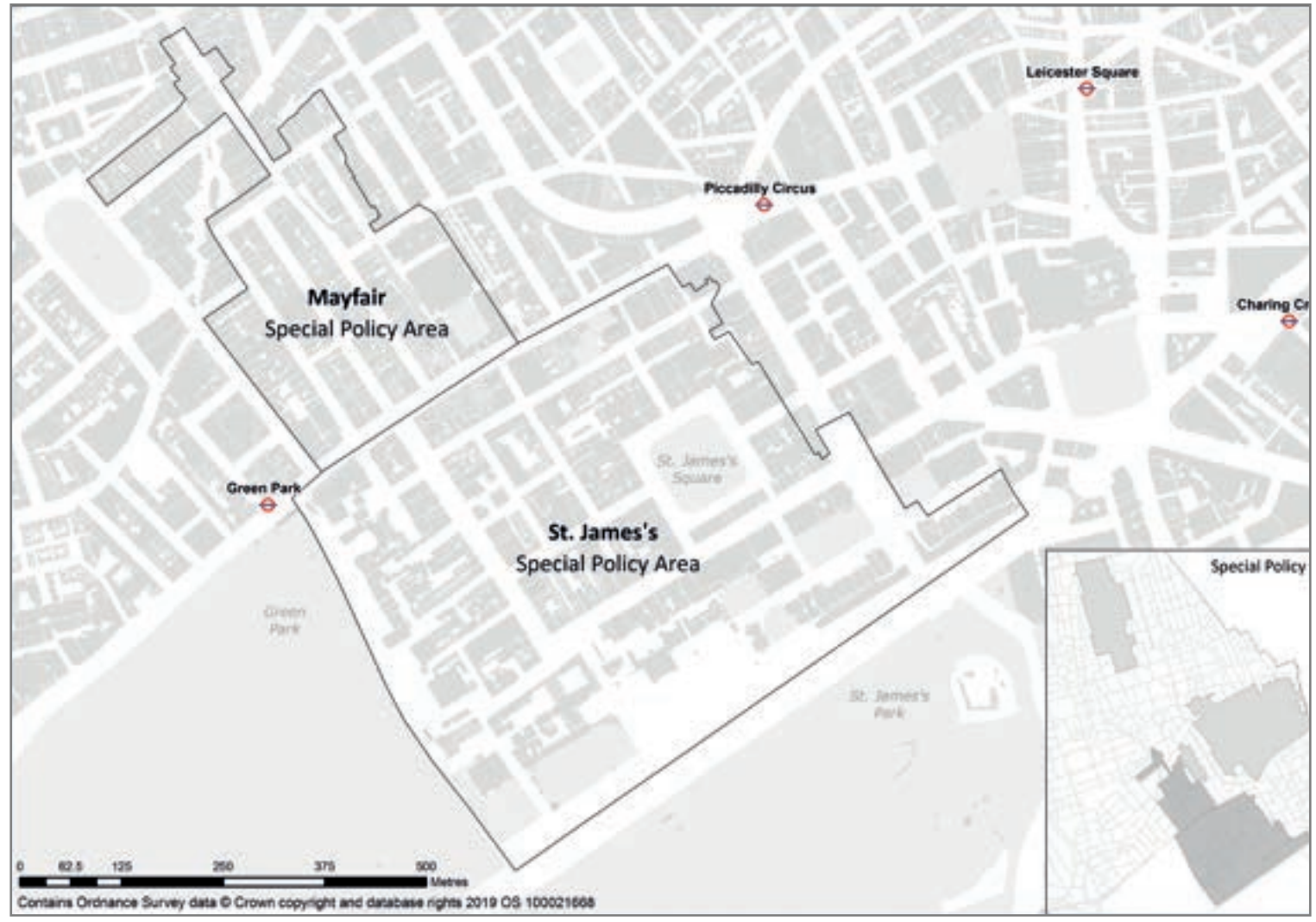


Figure 27: Mayfair and St. James's Special Policy Area

24.8 / Soho has a range of housing stock, meaning it is a place where people can both live and work. Proposals for new housing in Soho will demonstrate that they are able to meet the needs of those working in the area by contributing to the range of stock including through the provision of affordable housing.

24.9 / Soho is also a centre with a high concentration of LGBTQI+ venues and they remain an important aspect of its character. The number of LGBTQI+ venues in Westminster has declined by 46% between 2006 and 2018, representing a loss of 16 unique venues.²⁰ It is therefore important that we seek to retain existing, and encourage new, LGBTQI+ venues so that Soho remains a centre for the LGBTQI+ community. Existing LGBTQI+ venues will be protected through this plan and new venues are explicitly encouraged within the SPA to ensure Soho retains its status as a centre of LGBTQI+ culture, retail and nightlife.

24.10 / Soho's green spaces are rare and formalised green space only exists in Soho Square, Golden Square and St Anne's Churchyard. It is therefore important that their function as green spaces is protected and enhanced where possible, with further opportunities explored for providing green infrastructure and enhanced public realm in new development. Public realm improvements should implement the findings and recommendations of the Soho Public Realm Study (2014). Furthermore, Soho

²⁰ LGBTQ+ Cultural Infrastructure in London: Night Venues, UCL Urban Laboratory, 2006-present

Square and Golden Square are designated London Squares that perform an important heritage function. As a result, their setting and scale should be respected in development proposals.

24.11 / 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.

25. Mayfair and St. James's Special Policy Areas

A. Developments in the Mayfair and St. James's Special Policy Areas (SPAs) that enhance the character and function of both areas as centres for the art trade and luxury retail, through the provision of additional floorspace for use as art galleries, antique trading or luxury retail, is encouraged.

25.1 / Together Mayfair and St. James's are prestigious locations with long standing international recognition, and a distinctive pattern of specialist uses including art galleries, antiques traders, and luxury retail. They also have a rich visual townscape and history, with grand formal buildings including palaces and formal open spaces. While their heritage value is recognised through wider conservation area designations, the pattern of land use within the SPAs acts as an

attraction for international visitors and investors and have a broader significance for London's economy.

25.2 / Both areas are home to niche and bespoke retailers. Examples can be found on Jermyn Street and the arcades linking it to Piccadilly. Jermyn Street is renowned for shirt makers, grooming products and accessories including hatters and shoe makers amongst other uses, which are also found in the neighbouring streets and arcades, such as wine merchants, tobacconists and other niche uses.

25.3 / Mayfair is the historic centre of the art market in London and the UK. It is home to many commercial art galleries, the internationally renowned Sotheby's and Bonham's auction houses on New Bond Street, and the Royal Academy of Arts on Piccadilly. Most of the retail galleries are now found in the southern part of Mayfair, with clusters on Cork Street and parts of nearby Bruton, Bond and Albermarle streets. The areas character and function are highly influenced by the art trade, with galleries being a long-standing feature and draw of the area – attracting collectors from all over the world.

25.4 / Art galleries have also been in existence in St. James's for several hundred years. Today the area contains a number of small independent businesses employing specialist and skilled workers, that attract clients from all over the world. The internationally renowned Christie's Auction House is located in the centre of St James's, surrounded by commercial art galleries.

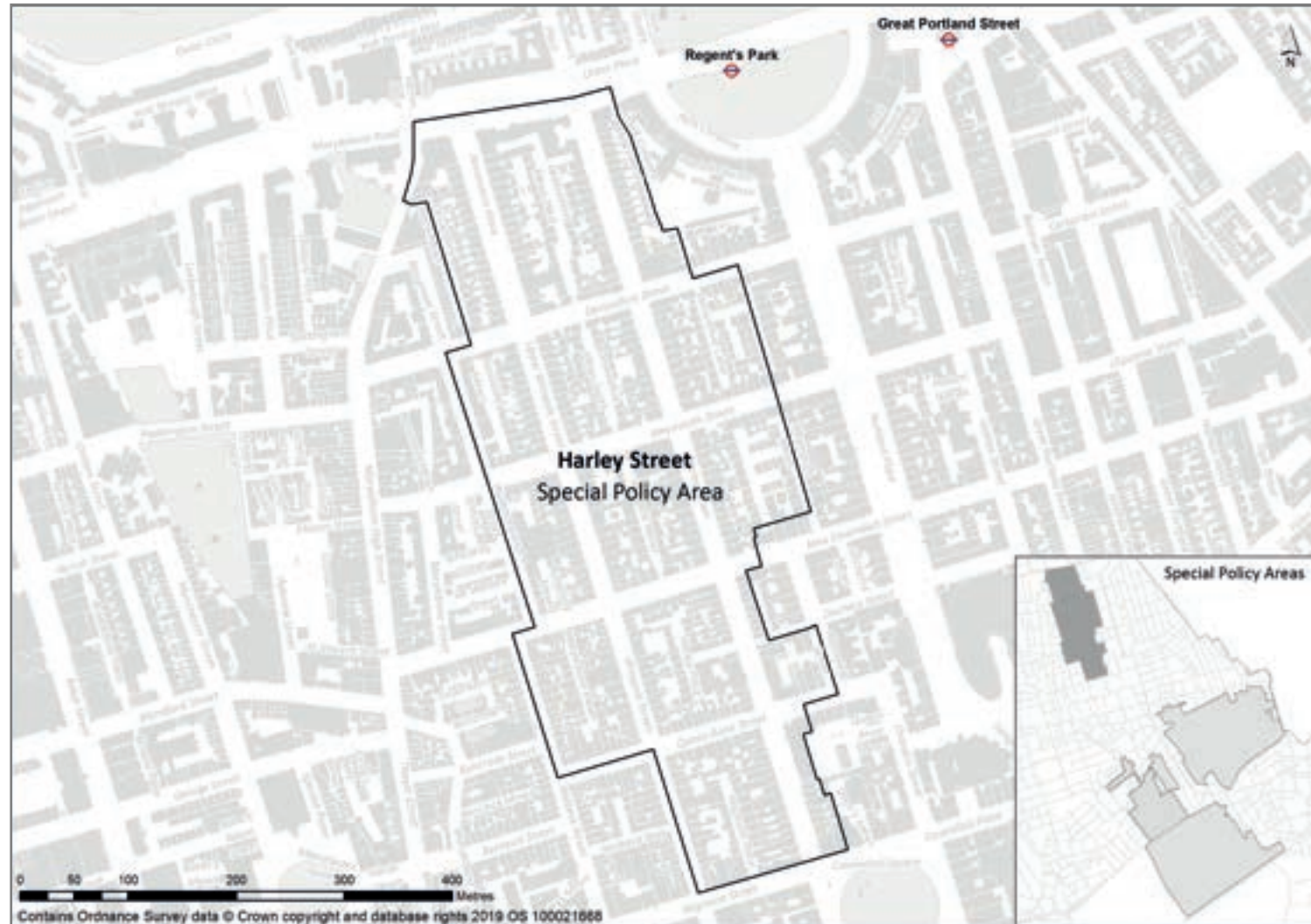


Figure 28: Harley Street Special Policy Area

25.5 / Proposals for new development in either area should demonstrate that it respects and complements the area's character and 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 galleries and antique trading uses may be able to change to a range of Class E (commercial, business and service) uses without planning permission.

26. Harley Street Special Policy Area

- A.** Development in the Harley Street Special Policy Area will support and enhance its continued role as an international centre of medical excellence, complemented primarily by residential use.
- B.** Proposals for additional floorspace to upgrade or provide new medical facilities, patient care and patient accommodation, will be supported subject to impact on townscape and heritage.
- 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:

1. 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.

26.1 / Harley Street is a national and international centre for medical excellence and has been the home to a wide range of medical disciplines for nearly 200 years. It has more than 5,000 medical practitioners,²¹ adds to the economic diversity of the city, and provides education and training services. The clustering of medical uses in the area is specifically recognised in the London Plan and its proximity to, and links with, the medical research cluster around Euston gives it a particular strategic significance.

26.2 / The townscape and heritage value of the area is recognised through the wider conservation area designation. As such, the impact of development proposals on this setting will be an important consideration. The continued evolution of the Special Policy Area (SPA) to meet the needs of modern medical practices is supported to ensure the area continues to attract the world's best medical talent.

²¹ harleystreetmedicalarea.com/aboutus

26.3 / We will seek to protect existing and support new medical floorspace and complementary facilities in the area to ensure continuation and extension of the benefits of the clustering of these uses. Complementary facilities include physiotherapy and health training services. The nature of treatments provided in Harley Street means that ancillary patient and family accommodation is sometimes required within or near medical institutions. Therefore accommodation specifically for patients and their families may also be considered a complementary facility, but will be restricted to such occupancy through use of legal agreements.

26.4 / In common with many parts of the CAZ, the area is also home to some residential properties. Where it can be demonstrated through appropriate marketing evidence (see the glossary) that space is no longer needed for medical or support services, residential use may therefore be acceptable. Legal agreements will be used to ensure any accommodation cannot be converted to general purpose short-term accommodation, to ensure the area's existing function and character is not eroded.

27. Savile Row Special Policy Area

- A.** Development in the Savile Row Special Policy Area (SPA) will complement and enhance its continued role as an



Figure 29: Savile Row Special Policy Area

international centre of excellence for bespoke tailoring, supported by complementary Class E (commercial, business and service uses) floorspace that respects townscape and heritage value.

- B.** New bespoke tailoring uses will be supported throughout the SPA, particularly at lower floor levels. Proposals for other uses that would result in the net loss of tailoring floorspace from the SPA will be resisted, unless this relates to floorspace benefiting from temporary consent for tailoring purposes.
- C.** Where new Class E (commercial, business and service uses) development 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.

27.1 / 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 *sui generis*. To the west of Savile Row 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, meaning alongside its tailoring function, the area includes a range of Class E (commercial, business and service uses), reflecting its location within the CAZ. The rich townscape and heritage value of the area is recognised through conservation area designations.

27.2 / The clustering of uses and floorspace within Savile Row results in agglomeration benefits for established businesses that contribute to the character of the area, a diverse economy within the city and the UK tailoring industry. The numbers of tailors employed within existing premises are increasing, including through a growing number of apprenticeships that is helping to ensure the continued long-term success of this specialist cluster and the tailoring industry more widely.

27.3 / 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 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.

27.4 / New retail development within the SPA that is small scale, in the fashion industry and offers bespoke services, will complement the role and character of the area, 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 14. 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. Conditions will be used to restrict the extent to which any new Class E (commercial, business and service uses) development can be occupied by large format retail. 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. 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.

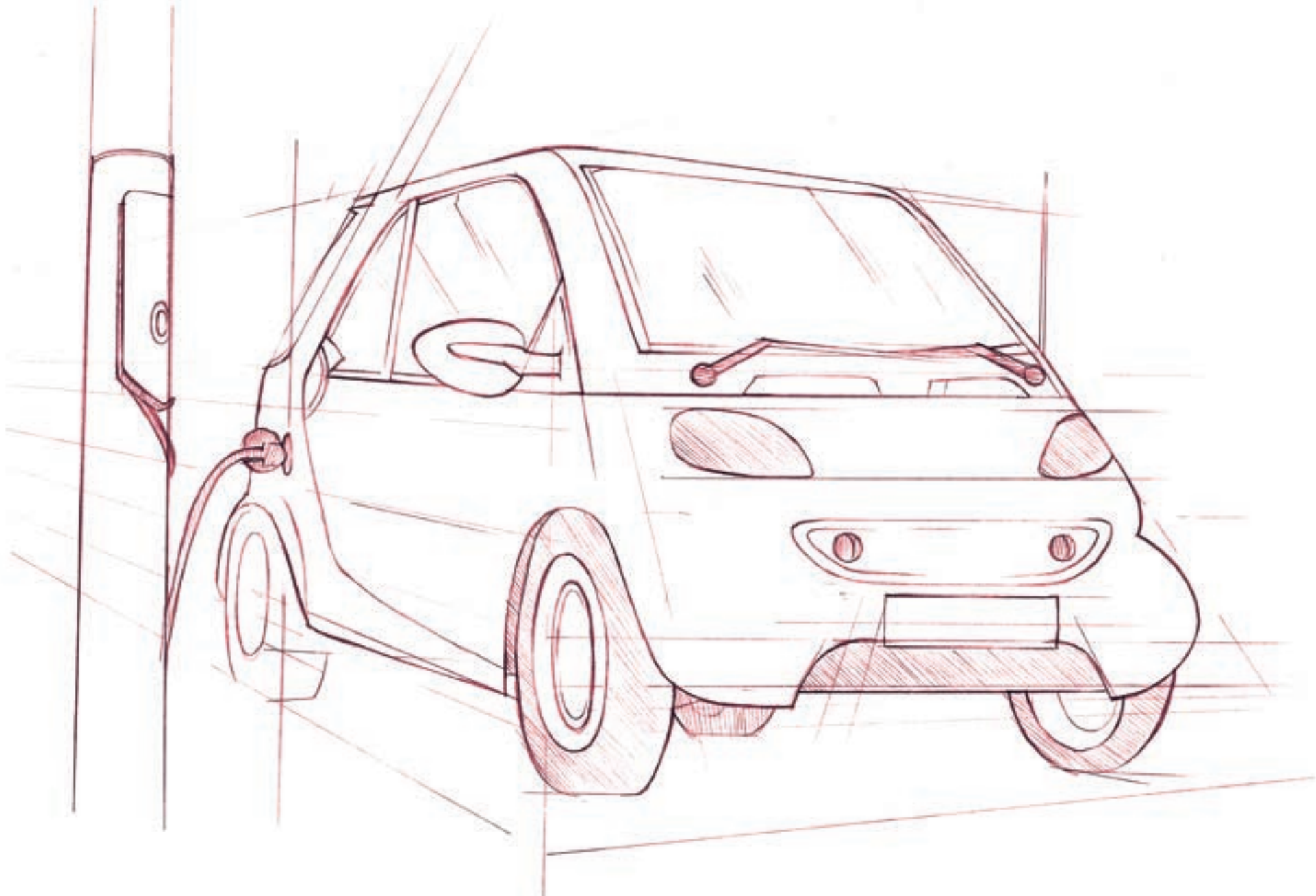
CONNECTIONS

Connecting with a healthier way of life

A growing city puts growing pressure on our transport system, which in turn presents us with a greater environmental challenge. As we move towards 2040, we move towards more sustainable travel. More ‘joined-up’ public transport options and greater use of our waterways will become a more attractive choice to people than driving around Westminster.

But it’s the area of ‘active travel’ where we’ll see the real difference, as a greener city with more accessible pedestrianised areas, even in the very centre of our busiest West End streets, to make Westminster a truly walkable city.

A city that connects us to healthier living.



28. Sustainable transport

- A.** The council will support a sustainable pattern of development which maximises trips made by sustainable modes, creates safer streets for all, reduces traffic, improves air quality and reflects the objectives in Westminster's Transport and Public Realm Programme and Local Implementation Plan 2019/20 to 2021/2022.
- B.** New development and the connected transport modes should contribute towards maintaining and enhancing Westminster's places and streets as one of the most attractive and liveable areas in London.
- C.** Development must:
1. Positively contribute towards the improvement of its public transport nodes in terms of accessibility and legibility and the improvement and delivery of walking and cycling routes that serve a site in order to create an environment where people actively choose to walk and cycle as part of everyday life.
 2. Support the reallocation of road and development space to promote walking, cycling and the use of public transport where appropriate.

3. Positively contribute to the reduction of the dominance of private motor vehicles both in terms of traffic and congestion, whilst not worsening the excessive levels of on street parking and tackling poor air quality.
4. Contribute to the London Plan's *Healthy Streets* approach to improve air quality, reduce congestion and make Westminster's diverse communities become greener, healthier and more attractive places in which to live, work or visit.
5. Major development should provide or financially contribute towards creating well-connected, high-quality, convenient, safe infrastructure and routes where necessary to mitigate its impacts.

28.1 / We are committed to improving the quality of life for people who live and work in or visit the city. A key element of this is creating a more joined up and integrated transport system which positively supports the existing and future built environment, its relationship with the public realm and which encourages healthier living and active travel.

28.2 / This policy reflects this aim and embodies Westminster's 2019/20 to 2021/2022 Local Implementation Plan objectives which are to:

- deliver sustainable development for growth
- deliver safer roads for us all
- deliver better air quality for future generations
- prioritise the transport network for pedestrians
- promote better health and inclusivity
- deliver a sustainable future network
- implement the 'pay for your impact' principle.

28.3 / There is a strong connection between our aim of promoting sustainable transport, the city's existing urban structure and character and the need to guide development in a manner which responds to the needs of a 21st century city. To achieve this, active, efficient and sustainable travel should be a key element considered in new developments. This responds to the need to create an integrated transport network that minimises the impact that motorised traffic has on growth by directly designing in more pedestrian and cycle measures.

Road safety

28.4 / Transforming road safety for all road users and ensuring that all future road safety schemes and projects steadily reduce casualties will deliver upon our emerging 2019 Road Danger Reduction Strategy and the Mayor’s Vision Zero ambition.¹ Creating safer environments will promote active travel which in turn is supported by our other strategies such as the Walking Strategy² and initiatives such as the emerging City Kerbside Hierarchy which calls for calmed traffic and improved and safer facilities for walking and cycling. These aims are also reflected in localised initiatives such as in the Oxford Street District.

Public realm and Healthy Streets

28.5 / A fundamental instrument in delivering a sustainable pattern of development and sustainable transport is development’s relationship with an improved public realm.

28.6 / Approximately 1.1 million visitors step into Westminster each weekday so ensuring that all highways and public realm projects prioritise the needs of the pedestrian is essential. This aligns with the Mayor’s Transport Strategy and its headline outcome to deliver Healthy Streets for London and the objectives of our Health and Wellbeing Strategy which identifies a high prevalence of childhood obesity within Westminster. Our Greener City Action

1 Vision Zero Action Plan (2018)

2 Westminster’s Walking Strategy (2017)

Plan 2015-2025 indicates that parts of the city are among the worst performers in air quality tests in Europe. Seeking to reduce NOx emissions by discouraging motor vehicle use will contribute to reducing the exposure of children and vulnerable people to transport-related air pollution and to delivering Westminster’s Air Quality Strategy and Action Plan.

Growing demand

28.7 / There is a wider need to deliver a sustainable future network by recognising that as central London grows the transport network will need to be developed in a manner that meets the demands of the majority in terms of encouraging more use of active travel options, like walking and cycling along with use of the bus, underground and national rail networks.

28.8 / The emphasis towards more sustainable modes of transport is supported by Westminster having one of the lowest car ownership rates in London³ and is rated above the London average in terms of walking activity.⁴

3 74% of English households have a car, and 58% of London households. Westminster has the fifth lowest car ownership rates in London (at the time of the Census) at 37% (Census, 2011)

4 67% of residents walk for 30 mins at least three times a week while the London average is 60% ranking Westminster 5th of 33 London boroughs (Active People Survey by Sport England, 2015/16)

28.9 / The “pay for your impact” principle recognises that as central London grows it is imperative that we work with applicants, land owners and other stakeholders to grow the city in a more sustainable manner where active transport modes and co-ordinated delivery and servicing of buildings is delivered on the street through a greater use of developer funded Community Infrastructure Levy (CIL) contributions.

28.10 / Related to this is the need to cater for the proper consideration of a proposal’s transport impact. As a result, applicants of major developments are urged to engage with our pre-application process at the earliest possible stage to discuss the potential need for the submission of either a Transport Assessment and Travel Plan, or a Transport Statement and Local Level Travel Plan.

28.11 / The submitted information should be sufficiently detailed and accurate to enable us to fully assess the development proposal. This may include traffic modelling to demonstrate that development proposals will not have an impact (individually or cumulatively) on the flow of traffic. A road safety audit/assessment may also be necessary on specific schemes.

29. Walking and cycling

- A.** Development must promote sustainable transport by prioritising walking and cycling in the city.

WALKING

- B.** Development must:

1. Prioritise and improve the pedestrian environment and contribute towards achieving a first-class public realm particularly in areas of kerbside stress, including the provision of facilities for pedestrians to rest and relax (including seating) and high-quality and safe road environments and crossings, where needed.
2. Contribute towards improved legibility and wayfinding including signage to key infrastructure, transport nodes, green spaces and canal towpaths (such as through TfL's Legible London).
3. Be permeable, easy and safe to walk through, enhance existing routes which are adequately lit, creates step-free legible access and entrance points whilst providing direct links to other pedestrian movement corridors and desire lines.
4. Facilitate the improvement of high-

quality footpaths to Department for Transport minimum standards⁵ with regard to existing street furniture and layout including through the provision of land for adoption as highway.

5. Enable footway widening, re-surfacing and de-cluttering where increased footfall is expected, to be suitable for vulnerable road users including older people, people suffering from dementia and disabled people.

CYCLING

- C.** Development should contribute to improvements to deliver a first-class public realm which supports cycling by improvements to legible signage, provision of access and facilities that do not conflict with the needs of pedestrians or compromise safety and addresses risks posed to cyclists from other transport modes.
- D.** To promote cycling and ensure a safe and accessible environment for cyclists, major development must:

1. Provide for and make contributions towards connected, high quality,

⁵ Local Transport Note 1/12 DfT 2012

convenient and safe cycle routes for all, in line with or exceeding London Cycle Design Standards;

2. Enable and contribute towards improvements to cycle access, including the delivery of current and planned cycle routes identified in the council's Local Implementation Plan and existing and potential Cycle Permeability Schemes;
3. Meet the cycle parking and cycle facilities standards in the London Plan. 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;
4. Provide links to public transport nodes;
5. Contribute towards improved wayfinding; and
6. Promote and contribute towards the introduction and expansion of cycle hire facilities.

29.1 / We will continue to improve conditions for pedestrians and cyclists through a variety of interventions including the development of our cycle network, upgrading the public realm, managing parking demand, reducing severance, pro-actively place shaping, junction improvements and introducing traffic calming measures.

Walking

29.2 / Pedestrians, particularly those with mobility difficulties, are the most vulnerable of all users of the highway and their personal safety can be compromised by poorly designed developments. National policy states that priority should be given to pedestrian movement as a sustainable mode of transport, and the London Plan emphasises the need to secure a significant increase in walking in London.

29.3 / Prioritising pedestrians has multiple benefits, including easing the pressure on the public transport and road networks, encouraging healthier lifestyles, and making places feel safer through increased natural surveillance. ‘Healthy Streets’ that provide attractive walking environments is a key pillar of the Mayor of London’s Transport Strategy which we support.

29.4 / It is also more space efficient than other forms of transport enabling development to make the best use of the available land whilst reducing the environmental and health impacts of motor vehicles, which is of particular importance in Westminster which has a dense urban pattern.

29.5 / These interventions will contribute to achieving the ambitions of our Walking Strategy to increase the percentage of daily trips that resident’s make on foot from the current 84% to more than 92% by 2027. This means that Westminster’s people would have the highest walking levels in London.

29.6 / New development can facilitate change to people’s walking habits by providing permeable spaces with direct, safe and attractive walking routes. These spaces should both minimise the conflict between pedestrians and competing uses such as servicing or car parking and ensure movement and the quality of the public realm is not impeded by street clutter whilst catering for the specific needs of pedestrians with mobility issues. The emerging Site Allocations Development Plan Document will provide further detailed guidance on design principles that can help achieve these aims, whilst further guidance on how the needs of pedestrians can be met is set out in Westminster’s Walking Strategy.

Cycling

29.7 / Similarly to walking, cycling has multiple benefits. It enables people to lead healthier, more active lives, can help to reduce the pressure on highway capacity and public transport, facilitate improvements to the public realm and enable greater numbers of people to use the existing road space.

29.8 / Through co-ordinated efforts to improve the environment for cyclists, cycling can become a more attractive transport option resulting in an increased shift from the motor car. This will contribute towards a reduction in harmful emissions leading to better air quality, as well as improving health by enabling an active lifestyle.

Cycle routes

29.9 / There are now more than 730,000 cycling trips per day in London and cycling in central London has increased by 8.9% since 2014. Within Westminster, a number of strategic cycle routes exist, including the London Cycle Network, Cycle Superhighways, Quietways, and the Thames Cycle Route. Along with our Cycle Permeability Scheme, which seeks to immediately improve upon the safety and permeability of other key sections across the Westminster highway network, these form an important element of London’s cycle network. These routes will continue to be improved through further investment to ensure they are intuitive, visible and safe, and are well integrated with existing infrastructure.

Facilities for cyclists

29.10 / Provision of cycle parking and storage facilities, as well as facilities for cycle hire, are essential in order to encourage this mode of transport. 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). Therefore, the needs of cyclists should be given careful consideration during the design of new developments as provision of cycle parking and storage space as well as supporting cycle facilities is intrinsically linked to the quality of the public realm.

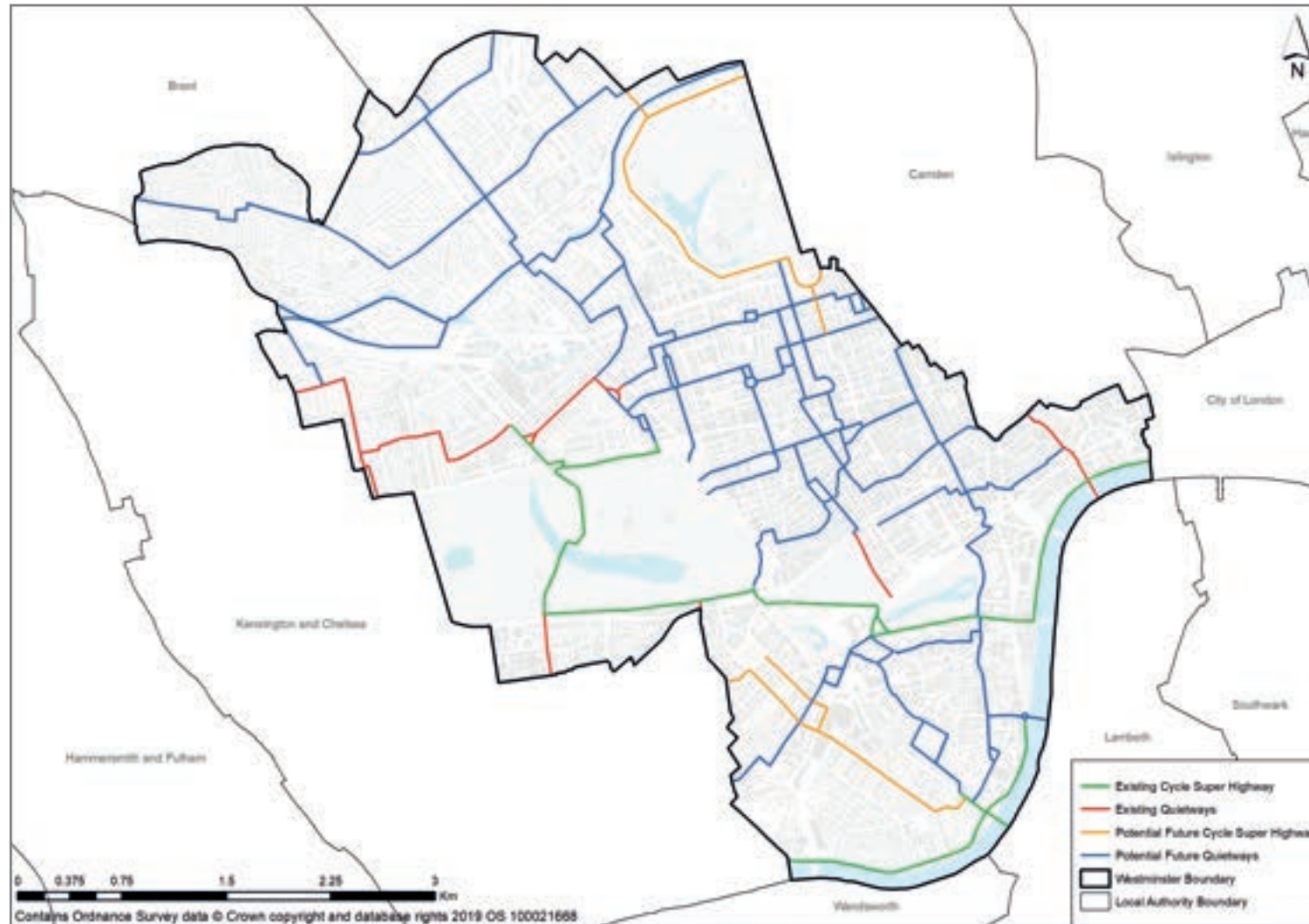


Figure 30: Cycle Routes

29.11 / However, pressure from competing uses, high PTAL values across the city and the limited space on offer within Westminster's fine grain urban environment mean that provision of short-stay cycle spaces will not always be appropriate. This approach is reflected in Westminster's travel pattern that suggests people don't generally cycle to visit areas like the Central Activities Zone (CAZ) and many of Westminster's town centres.

29.12 / Major developments may also need to provide new cycle docking facilities for cycle hire, in addition to parking facilities. Applicants should seek pre-application advice to determine these requirements and refer to Westminster's 2014 Cycling Strategy which has further information.

30. Public transport and infrastructure

- A.** The council seeks better connectivity, legibility, quality, usability and capacity in public transport. Therefore development should help to support the:
1. Investment in strategic transport infrastructure including the Elizabeth Line and Crossrail 2, HS2, mainline termini and key underground stations;
 2. Streamlining of bus services and the relocation of standing facilities to less intensively used areas of the city;

3. Management of coach routes stops and stands whose use may be intensified subsequent to the relocation or redevelopment of Victoria Coach Station.

B. Development must improve the accessibility to, and legibility of existing and proposed public transport by creating and improving walking and cycling links to stops or stations.

C. Major development must:

1. Facilitate improvements to the operation of all sustainable transport modes through improvements to the public realm;
2. Support car clubs, cycle hire facilities and other sustainable transport initiatives such as electric vehicle charging infrastructure where they do not detrimentally impact upon public realm improvements and pocket parks; and
3. Improve access to public transport facilities by promoting walking and cycling and through their design improve the legibility of transport nodes and interchanges.

30.1 / A high-quality public transport system is essential to our strategy to promote sustainable travel patterns in the city, with less reliance on private cars and increasing use of other modes. As a result, there is a need to continue to upgrade public transport infrastructure and its relationship with the public realm in locations such as railway stations where a large number of people congregate and busy transport nodes exist.

30.2 / As most of Westminster's built environment has a fine urban grain and space is limited, improvements to the accessibility and quality of public transport infrastructure are required in order to maximise use of these modes, especially by disabled people, the elderly, young children and others for whom public transport accessibility is a barrier. Improvements to routes to and from public transport nodes (bus stops and stations) are critical in persuading more people to use buses and trains.

30.3 / Major investment will be necessary during the lifetime of the Plan to improve the efficiency and effectiveness of the transport infrastructure serving Westminster and to ensure it remains fit for purpose. This includes a package of measures to increase the capacity and reliability of public transport.

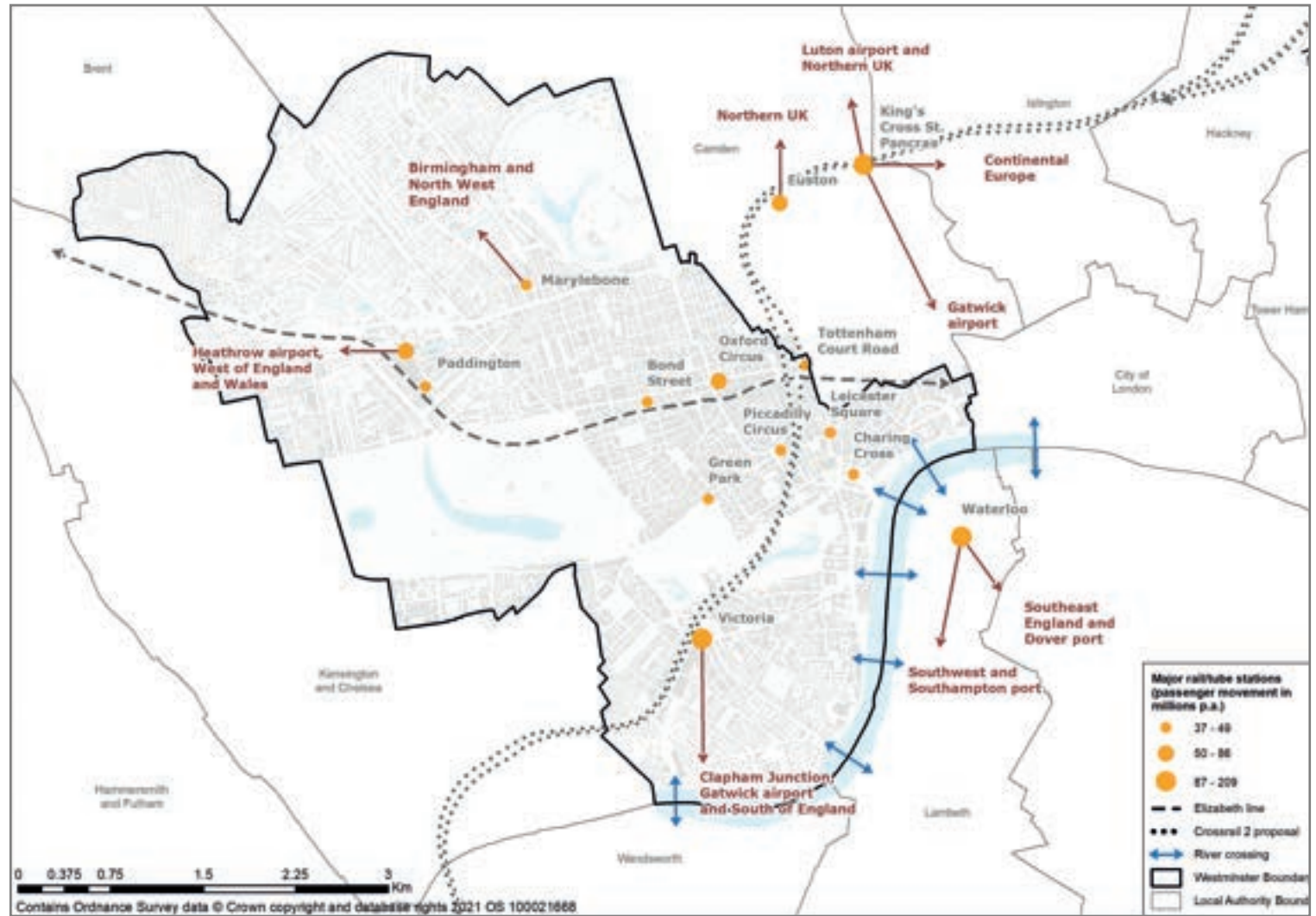


Figure 31: Strategic Transport Infrastructure



Figure 32: Edgware Road Safeguarding Area

30.4 / As resident, worker and visitor numbers continue to rise, improvements to rail infrastructure are needed to increase capacity and connectivity, reduce overcrowding and improve rail's attractiveness as a sustainable mode of transport. It is therefore essential to ensure that consideration is given to how rail passengers continue their onward journeys and the impacts this has on other parts of the transport network and public realm. As a result, we will work with Network Rail, TfL and other agencies involved in planning rail services to ensure these synergies are taken into account at the earliest stages.

Coach travel

30.5 / Victoria Coach Station (VCS) is the country's largest and is considerably exceeding its original built capacity, resulting in substantial congestion and environmental and amenity concerns. We will continue to work with TfL and National Express to find an appropriate strategy to relieve these impacts in the short-term. In the long-term we support the closure of VCS and relocation of new coach terminal provision. 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.

Highways

30.6 / Local road improvements may sometimes be necessary, particularly in areas of substantial regeneration or development activity. Edgware Road is expected to experience development activity along the road frontage over the Plan period, but narrow sections of it currently cause congestion. As a result, we will continue to safeguard this location in conjunction with any redevelopment proposals that may allow or require the acquisition of land affected by the safeguarding.

31. Parking

- A.** The parking standards in the London Plan will apply to all developments. All new parking spaces should provide active provision for electric charging vehicles.
- B.** Where on-site parking is delivered applicants will:
1. Provide car club membership for all residents and provision of car club spaces;
 2. Ensure that all outdoor and open parking areas are designed to a standard which accommodates the need for safe pedestrian and vehicle movement and creates permeable links through the site;

3. Prioritise the issue of parking spaces within development to families with young children; and
 4. Let, rather than sell, parking spaces to residents of new developments on a short-term basis, with spaces allocated to individual addresses or property numbers.
- C.** The council will apply the maximum non-residential car parking standards set out in the London Plan.
- D.** When considering parking impacts, the council will prioritise alternative kerbside uses (such as car club spaces, cycle parking and electric vehicle charge points) ahead of parking for private vehicles.
- E.** For major developments, contributions will also be required for on-street provision of electric vehicle and other low emission vehicle infrastructure.
- F.** Where sites are redeveloped, existing parking provision must be reduced to meet the parking standards in the London Plan unless there is site specific justification to re-provide an element of the existing parking. On housing renewal schemes, parking provision may be retained or

re-provided where it can be demonstrated that:

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.

G. Proposals for the redevelopment of existing car parks for alternative uses will be supported. The removal of boundary treatments and gardens to provide vehicle crossovers and on-site parking will be resisted (where permitted development rights do not exist).

H. Proposals for, or including, new public car parks (and other motor vehicle public parking, including for coaches) will be assessed against the objective of reducing motorised travel.

31.1 / The effective management of parking spaces will influence transport mode choice and will be an important tool for improving health and tackling congestion and local pollution in the city.

31.2 / The management of parking spaces is particularly important in an area like Westminster which, for the most part, has a dense and fine grain built environment where considerable pressure on public space and in particular kerbside space exists.

31.3 / By minimising parking provision, space for other uses is released and facilitates better integration with a new development scheme. This in turn precipitates the more efficient use of land which has a positive impact on the public realm particularly in areas of kerbside stress and will benefit sustainable travel modes such as walking and cycling.

On-site parking

31.4 / 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. 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.

31.5 / 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. 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 and other measures agreed with us.

31.6 / 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.

31.7 / Where parking is provided in new residential developments, free membership to a Carplus accredited car club will be secured for the occupiers of all residential units. The demand for car club bays arising from this requirement should be assessed as part of the Transport Assessment or Statement. If necessary, off-street parking will be provided by the applicant in a publicly accessible location.

Cycle and motorcycle parking

31.8 / 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.

Cycle facilities

31.9 / 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 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).

Car clubs and car sharing

31.10 / The use of car clubs can contribute to a reduced need for car ownership and hence reduce parking stress, and as such they are encouraged. Where provision is made for car clubs, they should provide a range of vehicle types and sizes, including low emission and family sized vehicles. This can help broaden the appeal of membership to a range of households. Doing so can improve take-up thus reduce demand for car ownership and parking stress.

On-street parking

31.11 / On-street parking is a limited resource and demand can exceed supply in parts of the city, meaning that the loss of such space will not normally be supported. On-street parking spaces can cater for a wide range of users including residents, short stay (visitor) parking, and to facilitate loading and servicing requirements at various times of the day. Balancing these needs requires careful management, and we will therefore work with the full range of user groups to ensure their needs are met as far as possible. This could include reviewing existing parking zones and controls as circumstances change over the Plan period.

31.12 / Our approach in recent years has been to minimise the number of resident cars parked on-street, where on-street facilities are under pressure, by seeking off-street parking in new residential development to cater for those that want or need to own a car. This allows residents to own cars but does not necessarily encourage

them to use them. Residents have also been able to acquire a resident's parking permit to park on-street, but only in the zone in which they live.

31.13 / Although the policy encourages car-free residential development, residents will still be able to apply for on-street parking permits. The eligibility criteria for on-street residents' parking permits will be kept under review.

31.14 / Given the increasing demand on kerbside space in the city, proposals seeking exclusive access to the kerbside through measures such as dedicated parking bays, permits or Parking Identifier Boards for exclusive parking will be resisted. This will ensure the free-flow of vehicular traffic and allow all users of the highway to access the kerbside in compliance with existing restrictions. Exceptional circumstances such as an overriding national security, NHS or other emergency services needs, or where it can be demonstrated that any restrictions will not adversely impact on traffic flow, highway safety or parking conditions, will be considered on a case-by-case basis. If granted, such concessions will be regularly reviewed.

Off-street parking

31.15 / The creation of additional off-street public parking can undermine efforts to encourage use of more sustainable modes of transport, which is necessary to reduce congestion and improve air quality and road safety. New parking provision for the public should therefore only be made where it is replacing existing off-street public parking, and

should include provision for disabled people's parking, electric vehicle spaces as well as car club spaces and cycle parking to encourage more sustainable travel choices.

31.16 / There are some exceptions where the essential operational needs of the proposed use may require dedicated off-street parking. Such uses include hospitals, medical centres, and the key emergency services. In addition, hotels, leisure, entertainment, and education uses can increase demand for coaches, minibuses or taxis, and parking facilities. Meeting the needs of these vehicles should be considered although parking should only be provided where it is needed for the essential operation of the use.

31.17 / Housing renewal schemes will be expected to attain an overall reduction in car parking provision over time.

32. Highway access and management

- A.** Given the increasing demands on existing highway space, the council will resist the loss of highway land, particularly footways. In cases involving the setting back of buildings, the council will seek the designation of resulting frontage land as highway.
- B.** New highway accesses should minimise the amount of footway, cycling space and kerb space lost for parking and / or

servicing and should ensure no loss of street furniture.⁶

- C.** Development will only be allowed access onto the strategic road network where it can be demonstrated that:
 1. There is no reasonable alternative to direct access;
 2. The number of individual new access points will be minimised;
 3. There is no adverse impact on the strategic road network including impact on the local neighbourhood network;
 4. The proposed access is not in close proximity to road junctions; and
 5. The provision of access does not adversely affect the safety and free flow of traffic and pedestrians, including through provision of adequate visibility splays.
- D.** New development likely to attract large visitor numbers should ensure that proportionate provision is made for taxis, coaches and other tourist vehicles, where necessary, particularly where it is in close proximity to major tourist destinations and transport hubs.

⁶ Street furniture is considered to be distinct from street clutter which is defined as unnecessary structures such as signs, railings, street lighting, road markings and advertising hoardings.

32.1 / The road network plays a vital role in the life and work of Westminster, enabling trips by residents, businesses and visitors. It also enables public transport to deliver staff and customers to businesses and provides for their servicing needs. All these demands mean that highway space in Westminster is under particular stress and there is a pressing need for a strategic approach to its management.

Loss of highway land

32.2 / 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. However, we recognise that there may be circumstances where a minor loss of highway land may be appropriate to deliver benefits. 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.

New highway access

32.3 / Footway will not be reduced as a result of changing building lines following redevelopment to allow adequate space for pedestrians. Likewise, 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 and not result in loss of footway or cycling space.

The Strategic Road Network and Westminster's road hierarchy

32.4 / Westminster has a defined road hierarchy setting out the different types of roads and their distinctive roles:

- Transport for London Road Network (TLRN) is considered most suitable for through traffic.
- The Westminster Strategic Road Network (WSRN) distributes traffic within Westminster and to neighbouring boroughs.
- Local Roads give priority to pedestrians and cyclists over motor traffic, providing access to residential areas and local centres.

32.5 / Direct vehicular access onto the strategic parts of the network (TLRN and WSRN) from new development is likely to lead to increased congestion and compromise its function and therefore should be avoided wherever possible. When considering development proposals, this principle will be used to discourage traffic from using unsuitable streets in order to minimise the negative impacts of traffic on local residents and local amenity and to improve road safety.

Provision for taxis, coaches and tourist vehicles

32.6 / Developments that are likely to generate large visitor numbers or those in close proximity to major tourist attractions or transport hubs should ensure that adequate space is made available for

taxis, coaches and other tourist vehicles, such as sightseeing buses. This could include dedicated parking, layovers, pick up and set down points, minicab offices, and taxi ranks. The benefits of provision should, however, be balanced against the need to protect residential amenity (given potential noise disturbance and impacts on air quality) and allow sufficient parking and circulation space for other vehicles.

Unadopted highways

32.7 / To ensure consistency across Westminster in terms of quality of design, materials and maintenance, housing estate roads which are not publicly adopted highways should accord with the policies and standards in this plan.

33. Freight and servicing

- A.** The council will strongly support the provision of consolidated facilities for freight, servicing and deliveries in new development in accordance with emerging London Plan policy. The net loss of existing off-street facilities will be resisted.
- B.** Servicing, collection and delivery needs should be fully met within a development site and applicants will produce Delivery and Servicing Plans which encourage provision for low-emission, consolidation and last mile delivery modes.

C. Provision for servicing, collection and deliveries within developments will be:

1. Located behind new or converted buildings, or below street level;
2. Appropriate in size, type and anticipated frequency of arrival of vehicles; and
3. Capable of being shared with other businesses.

D. Where it is not possible to fully meet the servicing, collection and delivery needs within a development site they must be met in such a way that minimises adverse effects on other highway and public realm users, and other residential or commercial activity. In this instance, the council will seek planning obligations in the form of a commuted sum for both the cost of implementation and maintenance of any loading bay as well as the opportunity cost of lost kerbside space.

E. For major developments where construction related activities may lead to a significant impact on the surrounding public highway, the transport and environmental impacts of development construction must be minimised and mitigated through Constructions and Logistics Plans (CLPs) incorporating adherence to the Construction and Logistics

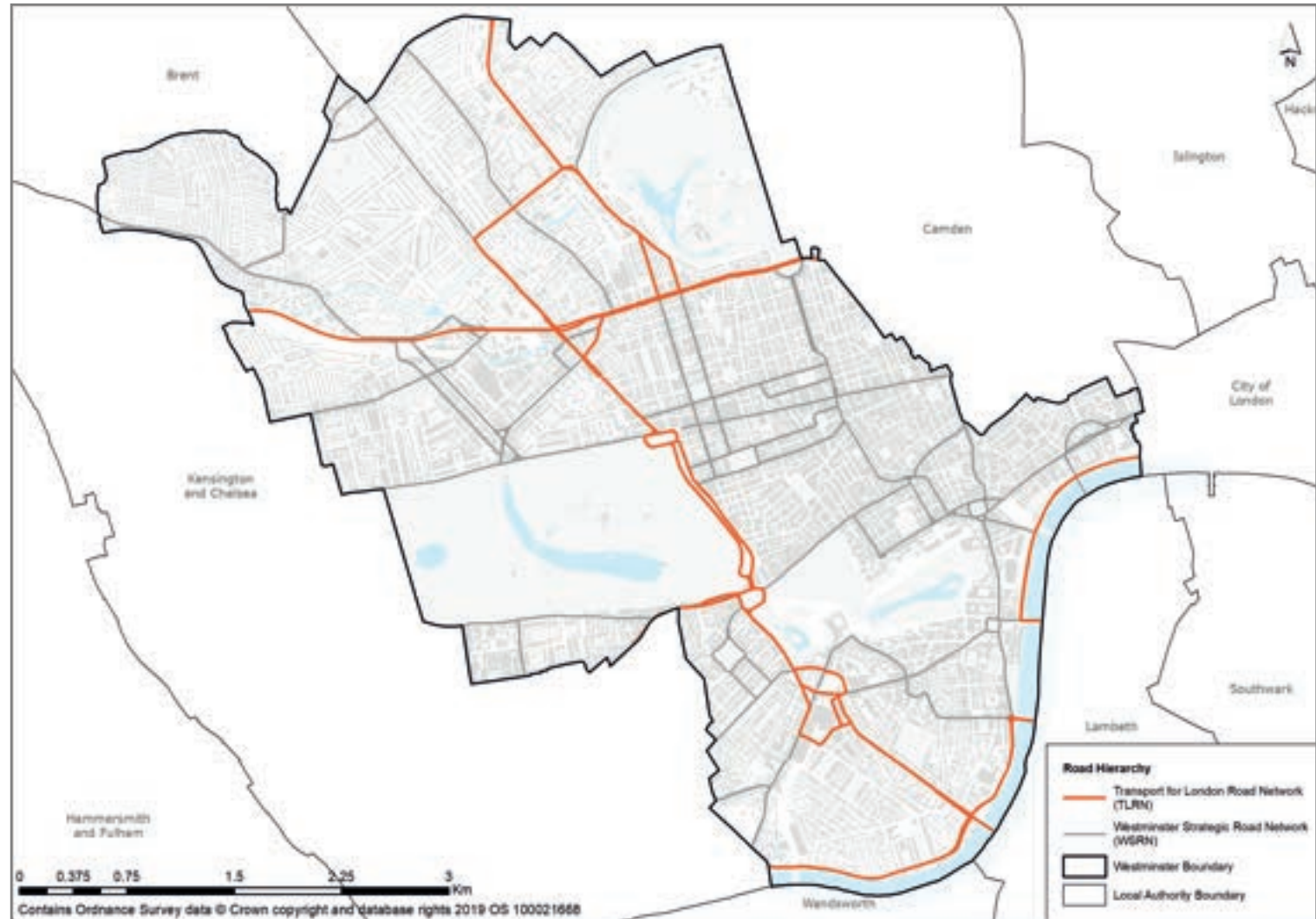


Figure 33: Westminster's Road Hierarchy

Community Safety Scheme (CLOCS) and the Freight Operator Recognition Scheme (FORS). On-site machinery and vehicles used should comply with industry best-practice emission standards contributing to the council's air quality objectives.

Freight

33.1 / Westminster has a high level of demand for freight, servicing, delivery and collection services (including personal delivery and 'click and collect'), that must be managed to allow residents to access the goods and services they need and to enable businesses to continue to grow. The high concentration of commercial activity interspersed with residential development is a particular characteristic of Westminster's dense, historic urban fabric. This is especially the case in the CAZ including the West End, which creates particular challenges for the movement, re-modelling and re-timing of freight, servicing and deliveries.

33.2 / Consequently, we support the West End Partnership's (WEP) Freight & Servicing Strategy which seeks to go beyond the Mayor's target by reducing overall numbers of delivery and servicing vehicles in the West End by 10%, rising to 80% at peak visitor times where key public realm and highway interventions are planned.

33.3 / The re-timing of deliveries, collections and servicing to avoid the busiest times of the day will bring significant safety, environmental and social benefits to residents, businesses and visitors. By spreading movements evenly throughout the day and reducing their noise impact, the efficiency and road safety of on-street loading areas will be improved, through reducing collisions and congestion. In addition, air quality improvements will occur as smoother traffic flow is enabled thereby freeing capacity on the road network to absorb more growth.

33.4 / Delivery and Service Plans associated with a development proposal should address the final stage in the movement of goods between a transport hub such as a distribution centre and the end destination, commonly known as the 'last mile'.⁷ This stage of the delivery process should be viewed as an important part of the supply chain where significant environmental and efficiency gains can be made. Utilising electric vehicles for the last mile or consolidating loads are just a couple of examples of how the last leg can be made in a more sustainable way. This stage of the delivery process should be informed by the Mayor of London's Freight and Servicing Action Plan.⁸

⁷ The 'last mile' delivery term does not imply a strict measurement of distance but rather the last stage in the delivery process from a transport node such as a distribution centre.

⁸ tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy

33.5 / New development can contribute to the management of freight traffic through the provision of sufficient, dedicated off-street space for servicing, deliveries and collections particularly where multiple developments can share the same facility so as to ensure the most efficient use is made of scarce space, where this does not compromise businesses' operational needs. This includes the provision of appropriately sized ground floor holding areas for deliveries and refuse bins. Such provision of off-street space takes delivery activity off the highway, avoiding obstructing other road users, including pedestrians. It can also help minimise residents' exposure to noise if such areas are underground or sited away from residential properties. This is more likely to enable the re-timing of deliveries to 'shoulder hours', or other times when residents' amenity will be less affected.

33.6 / The use of freight and micro-consolidation facilities can also help to reduce the number of vehicle movements and enable the use of lighter vehicles or more sustainable options to make deliveries or carry out servicing that cause less disturbance and environmental impact. We are keen to promote facilities of this kind.

Servicing

33.7 / Servicing provision is essential to the viability of commercial developments in order to facilitate the timely and practical delivery and pick up of goods and for the maintenance and care of the building. Servicing, including waste collection facilities, must be provided on-site and vehicles must be able to pull clear of the public highway without causing obstruction, unless it is clearly demonstrated that it cannot be accommodated and adequate justification is provided for this. If servicing is to be undertaken on street, it must be demonstrated that it would not lead to adverse safety implications, for pedestrians and / or vehicles, or the obstruction of traffic.

33.8 / This is particularly important in mixed-use developments including residential uses where adequate areas for servicing must be designed in a way which does not conflict or cause adverse amenity impacts. Therefore, servicing should be integrated into the development at the early design formulation stages and not after the scheme has been designed.

33.9 / Cycle safety measures should be included in construction logistics plans for new developments, particularly to provide safe routes for cyclists during the construction period.

34. Technological innovation in transport

A. Technological innovation in transport designed to improve mobility, reduce congestion and improve air quality will be supported where it does not compromise highway safety and other amenity and environmental concerns. The council will work with applicants, infrastructure providers and other stakeholders to minimise any negative impacts of these new technologies.

REFUELLING

B. Existing refuelling stations will be protected, unless demonstrated to be operationally unviable. Opportunities for new refuelling technologies, such as hydrogen refuelling and electric vehicle charging facilities, should be fully explored before a change of use is considered. New or replacement refuelling facilities will be directed to accessible locations on the strategic road network.

ELECTRIC VEHICLE CHARGING FACILITIES

C. The council will support the continued roll out of on-street electric charging points for use by the general public across Westminster.

D. New development must incorporate vehicle charging facilities with a high level of active provision in line with the council's parking policy.

34.1 / Technological advances and innovations will change the way people travel and the operation of the transport network over the Plan period. We will embrace the opportunities such changes offer, whilst ensuring that the introduction of new technologies do not compromise the safety or security of people living in, working in, or visiting Westminster.

34.2 / New modes of travel will help to improve mobility by offering a wider choice of travel options, including dockless cycle hire, electric scooter hire and autonomous vehicles. Other technological changes will help to reduce congestion by removing vehicles from the road, particularly in terms of deliveries and collections. This includes the use of unmanned aircraft or 'drones', and other self-driving delivery vehicles that operate on the highway. Nonetheless, the opportunities represented by technological change may sometimes have unintended negative impacts in terms of amenity and the local environment, such as noise, street clutter and on local character, as well as potential safety and security concerns. We will therefore work with applicants and a range of stakeholders to avoid or mitigate any negative impacts and to 'design in' facilities in new development where required.

Refuelling

34.3 / New fuel types will help reduce air pollution; however, during the transition from fossil fuels traditional refuelling stations will remain essential, particularly in the first half of the Plan period. There are limited such facilities within Westminster and a lack of coverage could lead to unnecessary detours for refuelling purposes, cause additional traffic and congestion, and undermine economic competitiveness. We will therefore protect existing refuelling facilities in Westminster unless it is robustly demonstrated that the station is unused or operationally unviable.

34.4 / For refuelling sites identified as suitable for hydrogen refuelling, protection is justified by their scope to facilitate the more widespread use of innovative energy technologies, in accordance with the London Plan. Where provided, alternative lower emission fuel and recharging points should be in addition to, rather than instead of, traditional refuelling facilities. Options for incorporating these facilities alongside traditional refuelling should be considered prior to any proposed change of use.

34.5 / Where redevelopment is proposed, refuelling stations should be re-provided, preferably on-site, or in an appropriate location nearby where this is not possible, unless it can be clearly demonstrated that there are viable alternatives for refuelling already in the vicinity. New or replacement facilities will be directed to accessible locations on the strategic road network (TLRN or WSRN). As these routes still include sensitive land uses, impact on local amenity will be

considered through appraisals such as noise and air quality assessments.

Electric vehicle charging

34.6 / 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 27. 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.

35. Waterways and waterbodies

- A.** Proposals alongside or affecting water should support the creation of a network of high-quality water spaces which promotes biodiversity and the use of Westminster's waterways and waterbodies for sport, leisure, recreational and educational uses as well as for water-based transportation.
- B.** Development along waterways or adjacent to waterbodies and within the Thames Policy Area must address their waterfront location in terms of access and design. Water-related and waterfront enhancing uses will be encouraged and the loss of such existing uses resisted. Access for pedestrians and cyclists will be improved through enhancements to waterside towpaths and footpaths.

DEVELOPMENT AFFECTING WATERWAYS AND WATERBODIES

- C.** Development that builds into or over waterways will only be acceptable if it is a water-related or water dependant use at appropriate locations.⁹ Transport

⁹ Appropriate locations are defined in Clause F

related structures, projects of strategic importance to London, or major water related infrastructure will be supported only where an overriding strategic case for such development can be demonstrated.

- D.** In assessing development proposals affecting Westminster's waterways and waterbodies, the council will have regard to the Thames River Basin Management Plan, the Marine Policy Statement and the emerging South East Marine Plan.

PIER FACILITIES

- E.** Improvements to pier facilities will be encouraged as part of new development along the River Thames. Proposals for new or enlarged piers should improve accessibility for passengers, and not impact adversely on other land-side functions.

MOORINGS

- F.** Residential and commercial moorings and facilities for boaters on Westminster's canals will be encouraged in appropriate locations as long as:
1. They do not negatively impact on navigation, water quality, the openness and character of the water space and the amenity of surrounding residents;

2. They will not hinder navigation; and
3. They can be satisfactorily serviced by utility services and the road network.

- G.** Proposals for permanent moorings on the River Thames will:

1. Enhance the character and appearance of the riverside and be open to the public;
2. Not compromise views of the river, the World Heritage Site and other heritage assets and their settings;
3. Not hinder navigation or jeopardise the long-term use of pier recesses;
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
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.

35.1 / Westminster's blue infrastructure of waterways and waterbodies is of strategic importance to London and forms part of the open space network that is essential to quality of life in such a dense city.

35.2 / The open aspect of Westminster's waterways is important for several reasons. They offer respite from the built-up nature of the city, supply important habitats for wildlife, and provide the setting for significant heritage assets. The River Thames provides the setting for the Palace of Westminster and other historic buildings, and many of London's most iconic views include the Thames and the lakes in the Royal Parks.

35.3 / Waterways and waterbodies are also important for providing habitat and wildlife corridors, providing for recreational activity and public enjoyment, fulfilling environmental functions such as drainage, and in some cases supporting sustainable transport. They therefore merit strong protection, and opportunities to enhance their use are encouraged.

Development affecting waterways and waterbodies

35.4 / Where development proposals are adjacent to rivers or canals, buildings should orientate towards the water, and allow for continuous public access along the waterside. Water-related and waterfront enhancing uses are encouraged at waterside locations and at sites within the Thames Policy Area¹⁰ in order to enrich the waterfront.

¹⁰ The Thames Policy Area is a London Plan tool for ensuring Planning co-ordination. The boundary of the Thames Policy Area has been informed by the London Plan maps encompassing the Westminster area.

35.5 / If development detrimentally affects the usability and accessibility of the associated water spaces, such as where there is an existing riverside path or canal towpath, development will facilitate the extension, widening and improvement of these paths including the provision of appropriate safety features such as riparian lifesaving equipment (e.g. grab chains, access ladders, life buoys as appropriate).

35.6 / Existing paths must not be removed, narrowed or otherwise adversely affected. Where no such paths exist, provision of these will be required, but they should not narrow the waterway by creating boardwalks or other solid overhanging projections. Public access to existing riverside steps will be maintained and improved where necessary.

35.7 / Development that encroaches over or into waterways will normally be resisted due to impacts on openness, unless it demonstrates overriding strategic benefits such as water quality improvements (such as the Thames Tideway), enhanced flood defences, or increased river transportation.

35.8 / This approach means that as a matter of principle we do not favour proposals for new river crossings in Westminster. Any proposals for new or replacement crossings that do come forward will be required to demonstrate that they meet a robustly evidenced strategic transport need on a scale sufficient to outweigh the importance of protecting our waterways' open character. Where a

new bridge meets land it will make a positive contribution to existing open space and the urban and environmental fabric such as conservation areas and listed buildings and protected trees and parks. Where this need is evidenced, proposals should be designed for pedestrians and cyclists only, and link to the public transport network to incentivise sustainable travel. Proposals should be designed to respect the strategic importance of the setting and ecological value of the Thames, the important character and amenity of surrounding residential areas, and reflect aspirations to increase the use of the river by passengers and freight.

Pier facilities

35.9 / Enhanced pier provision in the right locations can help broaden the choice of transport modes and reduce congestion elsewhere, particularly where it is well linked to public transport, pedestrian and cycle routes. Enhancements should be focused on improving access to the water. Proposals located downstream of Westminster Bridge should make use of the existing purpose-built pier recesses along the Embankment Wall, where these are compatible with heritage and environmental concerns.

Moorings

35.10 / A range of moored vessels and other floating structures along the city's waterways can add to Westminster's diversity and vibrancy; however, the riverfront is a finite resource, and the River Thames is a strategically important and iconic feature of London, as set out in the London Plan. Permanent

moorings on the River Thames therefore need careful management to protect the character of the river, including its views and as part of the setting to important heritage assets, to protect its role as a continuous wildlife corridor and to avoid impeding river navigation.

35.11 / To manage these impacts, moorings along the Thames should be restricted to uses that encourage public use of the river, rather than private uses such as residential or offices. Uses such as galleries, exhibition areas, or recreation and education will be supported in principle, although impact on the character of the river and the listed Embankment Wall (and impacts on the setting of other listed buildings) may limit opportunities for ancillary structures such as ticket kiosks.

35.12 / To support the use of the city's other waterways, moorings and facilities for boaters are supported in principle where they do not disrupt main navigation routes. Likely suitable locations include Paddington Basin, Little Venice, and Lisson Grove.

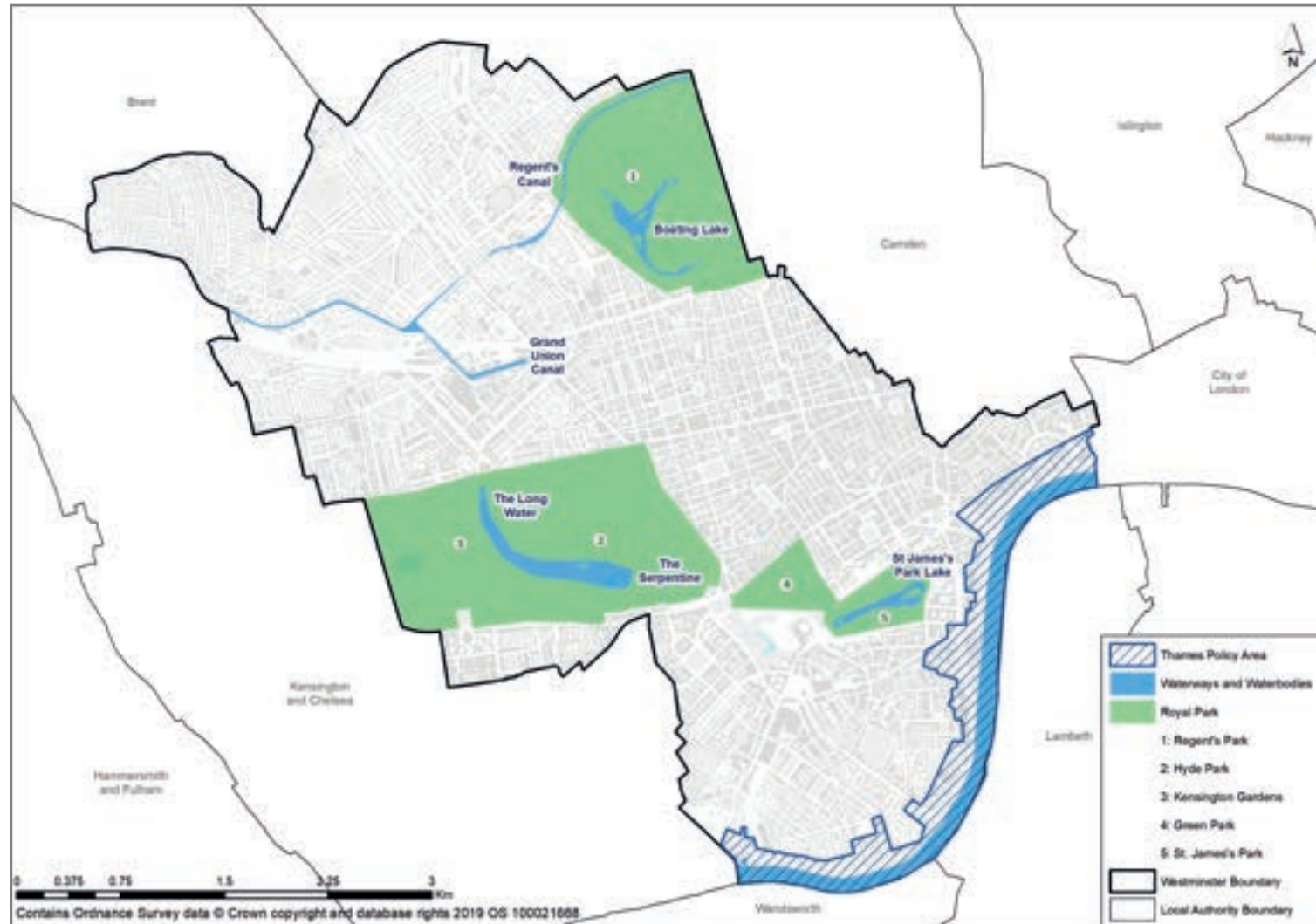


Figure 34: Westminster's blue infrastructure network

ENVIRONMENT

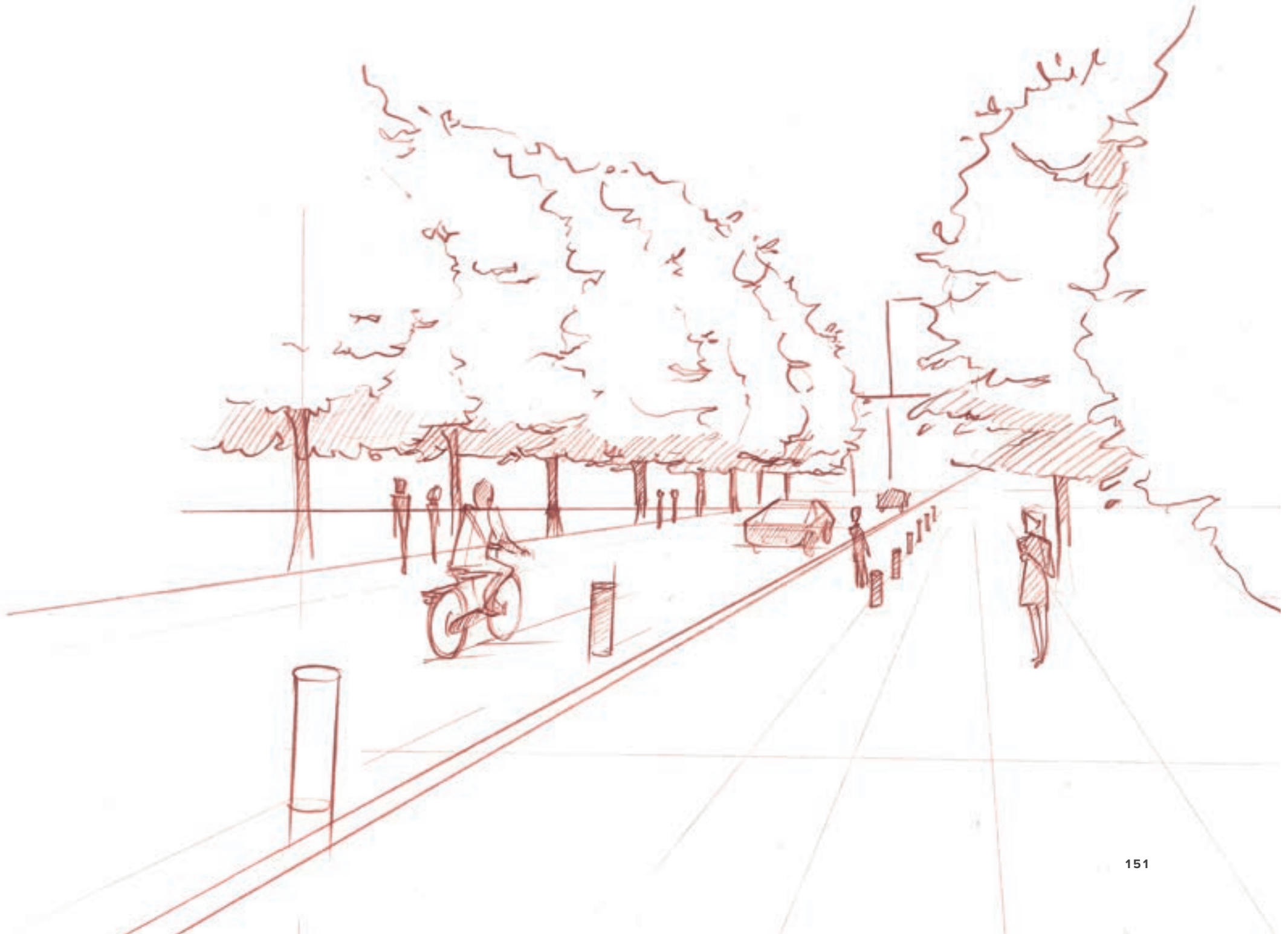
A healthy environment created by everyone, for everyone

Our environment is crucial to how we perform as a city. Tackling climate change head on is the only way we can continue to grow and prosper as a healthy and resilient city.

For the past two decades Westminster has been designated an Air Quality Management Area, and reducing our CO₂ emissions remains a top priority. A bold approach to traffic management and greener travel options is already helping us ease congestion and reduce pollution.

The urban heat island effect has called for even greater consideration in everything we build. Energy efficiency isn't just desirable, but fundamental.

By taking measures to lower our environmental footprint, we give people in our city the highest quality of life.



36. Air quality

- A.** The council is committed to improving air quality in the city and expects development to reduce exposure to poor air quality and maximise opportunities to improve it locally without detriment of air quality in other areas.

AIR QUALITY NEUTRAL AND POSITIVE

- B.** Major developments and developments incorporating Combined Heat and Power (CHP) should be at least Air Quality Neutral.
- C.** Major developments in Opportunity Areas and Housing Renewal Areas and those subject to an Environmental Impact Assessment must additionally demonstrate how local air quality can be improved across the proposed development as part of an air quality positive approach.

AIR QUALITY ASSESSMENTS

- D.** Air Quality Assessments will be required for:
1. Major developments;
 2. Proposals that include potentially air pollution generating uses or combustion-based technologies;

3. Proposals incorporating sensitive uses; and
4. All residential developments within Air Quality Focus Areas.

36.1 / Air pollution causes significant detrimental health, environmental and economic impacts in Westminster. Air quality is among the top environmental concerns for our residents¹ and improving it is a particular priority for us. The whole of the city has been declared an Air Quality Management Area (AQMA) for nearly two decades. Air pollution levels in large areas of the city exceed current EU and World Health Organisation (WHO) Standards. While EU standards for Particulate Matter (PM) are met across Westminster, we are continuing to work to reduce PM levels as far as possible.

36.2 / 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 (2019-2024) and those set out in the Mayor's London Environment Strategy, this will support the ambitions and actions in the Government's Clean Air Strategy (2019).

Air Quality Neutral and Positive

36.3 / We have adopted the air quality positive and neutral approach as set out in the London Plan. Large masterplanned developments in particular have the potential to include methods to improve local air quality, which is reflected in the policy requirement for an air quality positive approach.

36.4 / All other major developments should not make air quality worse and are encouraged to achieve an overall improvement to air quality. The Air Quality Neutral requirement also applies to developments incorporating CHP due to the potential impact of these technologies on air quality.

36.5 / If air quality neutral status cannot be achieved, the Mayor's Sustainable Design and Construction SPG sets out the actions that should be considered. 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 are set out in Section 5 of the GLA's Air Quality Neutral Planning Support Document (AQNPSD). We will set out updated guidance in a forthcoming supplementary planning document following an expected review of the AQNPSD.

¹ Air Quality Manifesto (WCC), March 2018

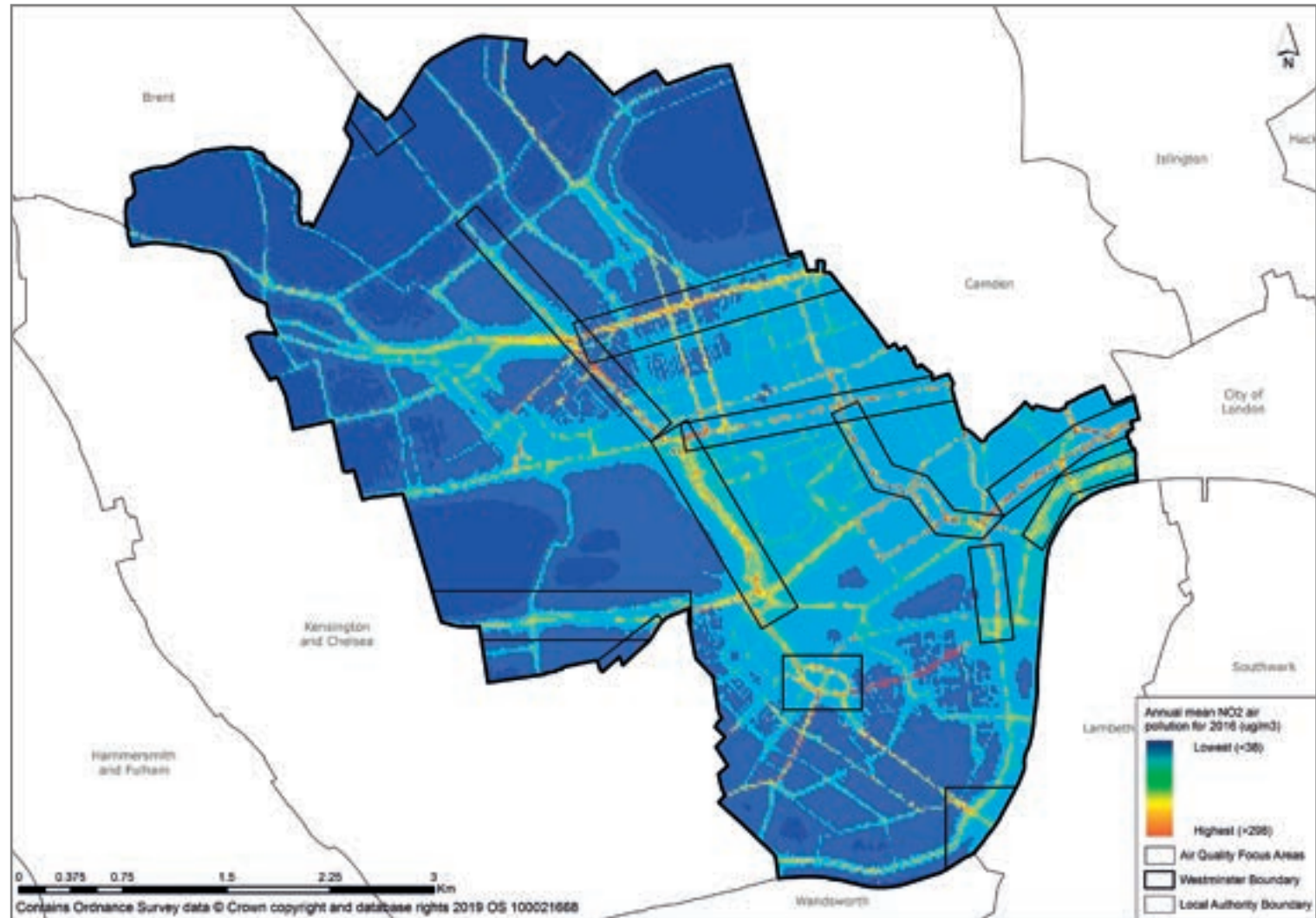


Figure 35: NO₂ Pollution and Air Quality Focus Areas

Air Quality Assessments

36.6 / Air Quality Assessments (AQAs) should identify the potential for air quality to impact on, or be caused by, new development and demonstrate how these impacts are being appropriately minimised and mitigated.

36.7 / Consideration must be given to the impact of improvements on air quality elsewhere. For instance, traffic reductions could improve local air quality but push traffic-related air quality impacts to other areas. Early engagement with us is encouraged to assess how development could avoid this unintended consequence.

36.8 / Where AQAs show that emissions or exposure should be reduced, this should be done on-site. Off-site measures to improve local air quality may be acceptable where it can be demonstrated that on-site provision is impractical or inappropriate, and equivalent air quality benefits to the local area will be achieved.

36.9 / Development proposals that include potential air pollution generating uses or combustion based technologies, could comprise, for example, those which generate extensive traffic such as from deliveries or customer arrivals and departures, car parking proposals or those which include CHP or biomass boilers. Consideration must be given to how these will be designed so as to not worsen local air quality to ensure their acceptability.

36.10 / The exposure of poor air quality to vulnerable people is a particular concern which development should reduce or avoid. Sensitive uses include many types of social and community infrastructure, including schools, hospitals and nursery facilities, as well as types of specialist housing such as elderly housing and care homes.

36.11 / There are eight Air Quality Focus Areas (AQFAs) in Westminster, which are designated by the Mayor of London.² These areas not only exceed air quality limits but are also locations with high human exposure. Due to the existing poor air quality in these areas, developments incorporating new residential units in these areas will be required to submit an AQA to demonstrate air quality is not made worse and where possible, improved. AQFAs and their environments will be prioritised for air quality offset projects, including those funded through contributions made in accordance with this policy.

² The London Datastore provides the most up to date information on Air Quality Focus Areas in Westminster

37. Local environmental impacts

A. The council will make sure that quality of life and health and wellbeing of existing and future occupiers, and the natural environment are not adversely affected by harmful pollutants and other negative impacts on the local environment.

LIGHT POLLUTION

B. Developments must be designed to minimise the detrimental impact of glare and light spill on local amenity, biodiversity, highway and waterway users.

NOISE AND VIBRATION

C. Development should prevent adverse effects of noise and vibration and improve the noise environment in compliance with the council's Noise Thresholds, with particular attention to:

1. Minimising noise impacts and preventing noise intrusion to residential developments and sensitive uses;
2. Minimising noise from plant machinery and internal activities;
3. Minimising noise from servicing and deliveries; and
4. Protecting the relative tranquillity in and around open spaces.

ODOUR

- D.** Development will effectively address the adverse impact of odour through the incorporation of appropriate mitigation measures using a precautionary approach.

LAND CONTAMINATION

- E.** Applicants are required to carry out contaminated land assessments and take appropriate remediation measures for development on or near a site which is potentially contaminated.

CONSTRUCTION IMPACTS

- F.** Developments are required to minimise demolition and construction impact by complying with Westminster's Code of Construction Practice (CoCP).
- G.** Modern methods of demolition and construction that minimise negative local environmental impacts will be encouraged.

37.1 / The many varied activities in Westminster create a vibrant city, but in the wrong locations or at the wrong time these activities can be of nuisance. We aim to maintain high standards of life in the city and protect health and well-being, particularly of vulnerable groups. We therefore seek to manage impacts that negatively affect the local environment. We apply the Agent of Change

principle which places the burden on the applicant to mitigate negative environmental impacts and ensures development does not cause existing nearby uses from having to curtail their activities.

37.2 / A range of measures can improve the quality of the local environment, including the management of land use, the design and location of buildings, incorporation of green infrastructure, and management of transport infrastructure. We will publish technical guidance that provides detail on the assessments, standards and other requirements that should be met.

Light pollution

37.3 / We seek to make sure artificial lighting uses the right light, in the right place and at the right time. Lighting helps to keep our public realm accessible, legible and safe after dark. Artificial lighting can also help to extend the use of sports facilities for communities. We will use the relevant professional standards³ as a guide to assessing light impacts. Applications for physical activity, leisure, sport and/or play facilities should follow Sport England's Artificial Lighting Guidance. It is also important to retain subtly-lit and dark spaces to protect biodiversity from light spill – for instance along canals. The desire to minimise wasted energy should also be considered. Where relevant, we will require lighting assessments to demonstrate compliance with this policy.

³ E.g. standards set out by the Institute of Lighting Professionals

Noise and vibration

37.4 / People come to the city for work, culture, education and entertainment, and noise and vibration are inevitable by-products of these activities. Some of these activities are focused in areas, such as the Central Activities Zone, and as a result the noise environment changes significantly across different parts of the city. However, not all noise and vibration can be attributed to city living and if uncontrolled, can be of nuisance and severely impact on health and quality of life. Defra's Noise Action Plan and our noise data show that ambient noise levels in Westminster are higher than national and regional averages. We therefore not only seek to avoid adverse noise impacts, but also reduce noise in the city.

37.5 / Developments should ensure that any noise and vibration impacts are mitigated. They should be constructed and operated to achieve appropriate noise levels and ensure that any cumulative effects of new noise sources (for example additional plant machinery or music) does not contribute to the existing background noise level. Careful consideration must be given to the design and location of schemes that could impact or be impacted by noise from development that includes: plant machinery, internal activities, amplified noise, transport (including servicing and deliveries) and other noise generating activities.

37.6 / Our Noise Strategy (2010-2015) sets out our overarching framework for controlling noise in the city. Our Noise Technical Guidance Note sets out the Noise Thresholds developments are expected to meet and shows where existing tranquil spaces exist.

Odour

37.7 / Some uses and activities in Westminster will create odour, smells or fumes which can be sources of nuisance. It is important that activities that create odour do not impact on the amenity of surrounding buildings or the adjoining highway. Where appropriate, we will require odour assessments to make sure potential impacts are appropriately mitigated. Permitted development rights mean that some developments can accommodate a wide range of uses without the need for planning permission to change between them. Proposals for such uses, such as hot food premises, will require mitigation measures to be incorporated to prevent unacceptable odour issues arising in the future.

Land contamination

37.8 / Developable land is scarce in Westminster, which means that development will take place on or adjacent to land that potentially may be contaminated. In order to ensure that occupiers or users are not exposed to health risks and environmental impact is avoided (e.g. on soil, watercourses or waterbodies) the history of the land uses need to be identified and if required used as a basis for any proposed remediation measures.

Construction impacts

37.9 / Development activity in the city often results in additional traffic and related detrimental vibration, noise and dust impacts. To protect the environment and the community whilst the demolition and

building works take place, our Code of Construction Practice (CoCP) sets out the standards and measures that applicants and construction firms will need to adhere to. We expect applicants and contractors to mitigate the construction impact as much as possible, to implement good site management and communication, and proactively engage with the local community and affected residents. Innovative methods of construction to reduce nuisance and emissions from construction should be implemented where possible.

38. Green infrastructure

A. The council will protect and enhance the city's green infrastructure to maximise its environmental, social and economic value.

CITY GREENING

B. Developments will, wherever possible, contribute to the greening of Westminster by incorporating trees, green walls, green roofs, rain gardens and other green features and spaces into the design of the scheme.

OPEN SPACE

C. All open spaces and their quality, heritage and ecological value, tranquillity and amenity will be protected.

D. Major developments will be required to provide new or improved public open space and space for children's active play,

particularly in areas of open space or play space deficiency.

E. Development affecting the Royal Parks should enhance their quality and range of uses.

BIODIVERSITY AND ACCESS TO NATURE

F. Sites of Importance for Natural Conservation (SINCs), priority habitats and other ecological features outside of the SINCs network will be protected.

G. Developments should achieve biodiversity net gain, wherever feasible and appropriate. Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. Developments within areas of nature deficiency should include features to enhance biodiversity, particularly for priority species and habitats.

TREES

H. Trees of amenity, ecological and historic value and those which contribute to the character and appearance of the townscape will be protected.

I. The planting of trees to optimise the city's canopy cover will be encouraged in new developments.

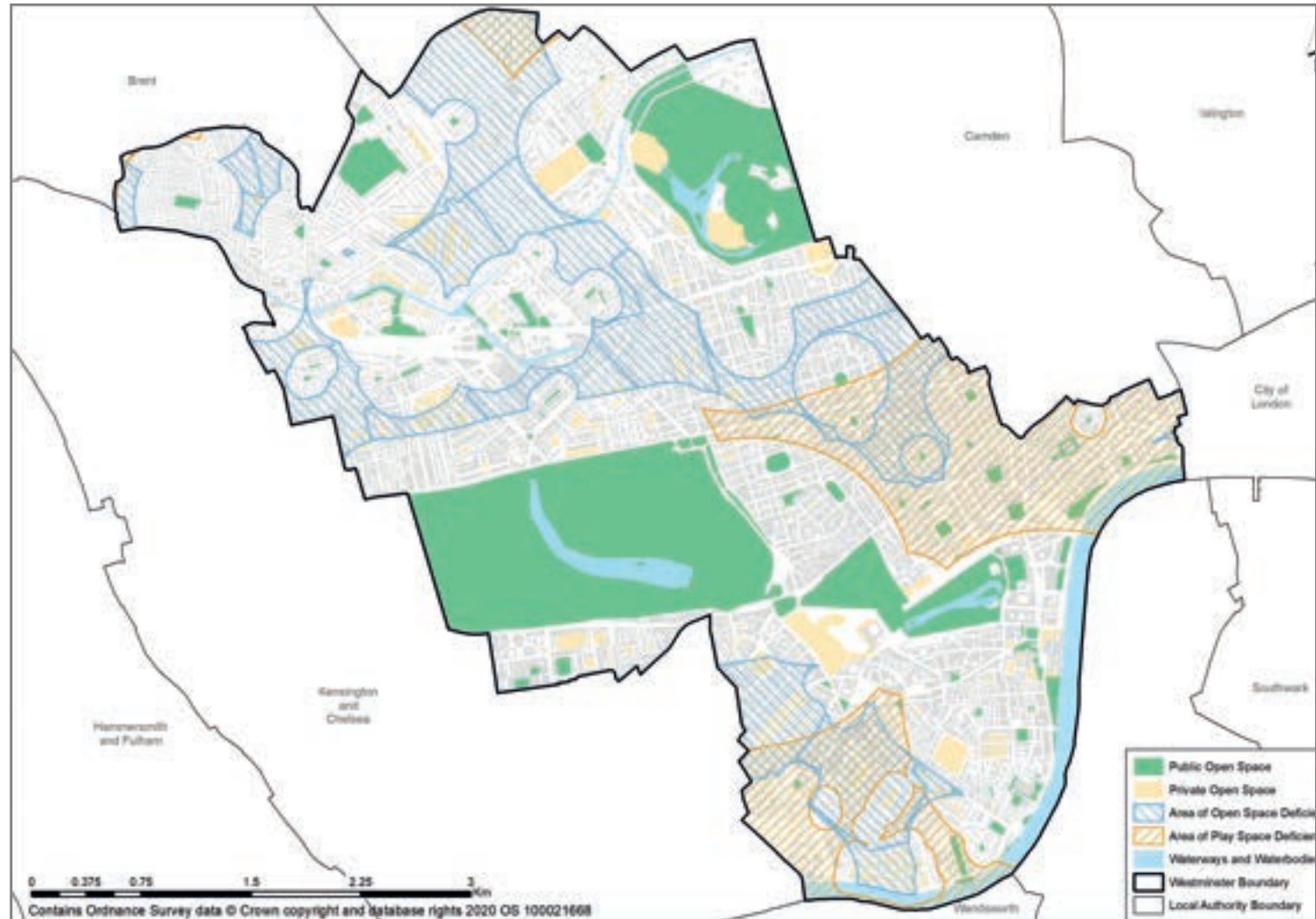


Figure 36: Open space and deficiencies

38.1 / We are proud of our green infrastructure. Almost one quarter of Westminster is open and green space, and the number and range of other green assets such as green walls and roofs is increasing. Over half of the city's open spaces have a heritage designation, and many provide an important function for wildlife and biodiversity. The functions and benefits that our green and blue assets bring are diverse and include climate change adaptation, health and well-being, improving air quality, sport, leisure, recreation and play, landscape and heritage conservation, education, biodiversity and ecological resilience.

38.2 / An integrated approach is required to get the most out of our green infrastructure network to maximise its benefits. Challenges such as flood risk, poor air quality, and the heat island effect can often effectively be addressed by nature-based solutions, which can bring wider benefits when fully integrated into the green infrastructure network. Our strategy 'A Partnership Approach to Open Spaces and Biodiversity in Westminster' (2019) describes how we will work with partners to enhance our green infrastructure network. Further detail on our approach to green infrastructure will be set out in our emerging Green Infrastructure Strategy. We will also prepare a supplementary planning document on the application of this policy.

City greening

38.3 / All developments have opportunities to contribute to the further greening of the city. The type and scale of measures that will be suitable will

depend on the specific type, scale and context of the development. Examples of greening measures include green roofs and walls, rain gardens, planting, grassland, vegetated sustainable drainage systems and trees. Applicants should ensure appropriate management and maintenance arrangements for relevant green spaces and features are in place for the lifetime of the development.

Open space

38.4 / Currently not all of our open spaces are publicly accessible or inclusive for wheelchair users and people with physical disabilities. We encourage applicants to work with us and our partners to improve accessibility and the quality of our open spaces. Public access to privately owned open spaces will be secured via legal agreement.

38.5 / Development on open space must be essential and clearly ancillary to maintaining or enhancing the values of the open space. Development adjacent to or underneath open spaces must safeguard the functions of the open space. In the case of temporary events on open space, the land should be fully remediated to restore the function and different values of the open space following the event.

38.6 / Despite the number of high-quality open spaces there is an overall deficiency in the city. In areas of open space deficiency every opportunity to increase the supply of open spaces by focussed 'small open spaces' and 'pocket parks' through new

development should be explored. These spaces are an important element of our green infrastructure and when developed and managed appropriately can make a positive contribution to nature conservation, amenity and recreation amongst other functions.

38.7 / There is a deficiency of play space in the city which will increase if we do not ensure that future developments provide sufficient opportunities for children and young people.⁴ We are committed to providing accessible and active play space that caters for the needs of all children and young people in the city as well as their parents and carers. Major residential development should provide the quantum of play space in accordance with the Mayor of London's Shaping Neighbourhoods Plan and Informal Recreation SPG (2012) or any subsequent replacement document.

38.8 / 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. 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.

⁴ See emerging Playing Pitch and Built Facilities Strategies

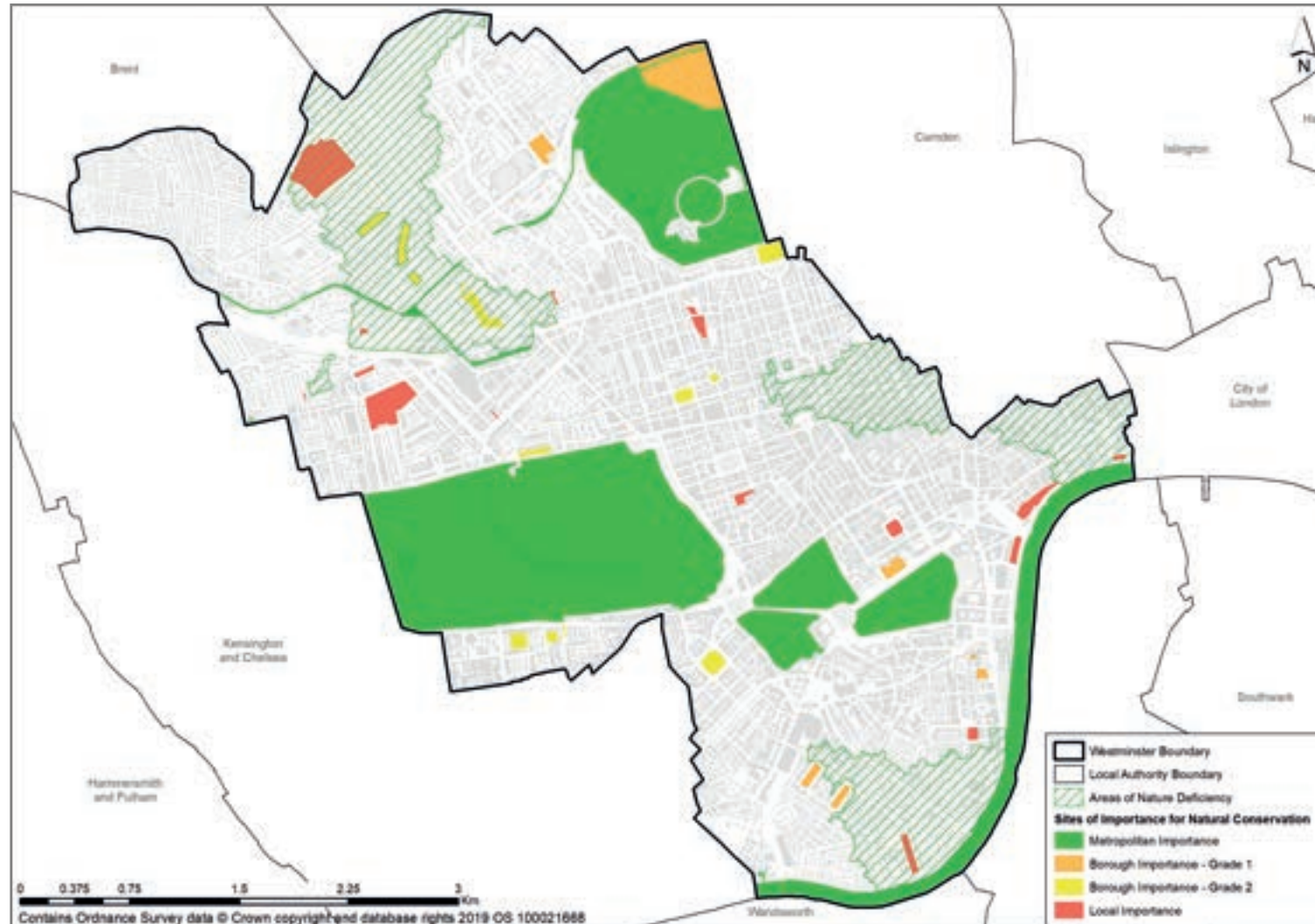


Figure 37: Sites of Importance for Nature Conservation

Biodiversity and access to nature

38.9 / There are 33 Sites of Importance for Natural Conservation (SINCs) in the city, which account for more than 3,000 hectares. This includes eighteen Metropolitan SINCs, which have regional importance and national significance. SINCs provide important habitats for a range of species and make it possible for residents and visitors to access nature.

38.10 / It is important to utilise all opportunities to enhance biodiversity in the city. Despite the large number of SINCs, there are still significant areas of nature deficiency in the city. Development will be expected to take all opportunities to improve access to nature - bringing nature to residents' doorstep.

38.11 / Development should aim to create net gains in biodiversity, leaving the natural environment in a better state than before. There are a growing number of tools and good practice guides available which can help developments achieve measurable biodiversity net gain.

38.12 / Developments impacting on biodiversity should follow the Mayor of London's mitigation hierarchy of avoid, minimise and compensate. The emerging Green Infrastructure Strategy and a supplementary planning document will set out additional information on how biodiversity can be protected and enhanced, including for priority habitats and species.

Trees

38.13 / Westminster's trees, whether on the streets, in parks, public open spaces or in private gardens, make a significant contribution to London's reputation as one of the world's greatest cities. They are an integral and historic component of Westminster's townscape and bring an enormous amenity value. Trees provide additional functions as vital parts of the green infrastructure network: trees shade buildings and streets, provide a drainage function, form green corridors and contribute to tackling poor air quality. Many trees also provide a heritage function as an integral part of historic townscapes and landscapes. Their loss should therefore be prevented.

38.14 / Proposals for new trees should have regard to the wider context, consider their contribution to biodiversity and follow the guidance in our Trees and the Public Realm SPD (2011) or any replacement document. All tree planting strategies should be submitted as part of a landscaping, tree or biodiversity strategy.

39. Flood risk

- A.** All developments should be safe for their lifetime from the risk of flooding, complying with the council's Strategic Flood Risk Assessment (SFRA), Surface Water Management Plan (SWMP), Local Flood Risk Management Strategy (LFRMS) and the Mayor of London's Regional Flood Risk Appraisal (RFRA).
- B.** A site-specific Flood Risk Assessment (FRA) must be submitted for:
 1. Developments of 1 hectare or greater;
 2. All developments in Flood Zones 2 and 3; and
 3. All developments within a Surface Water Flood **Risk Hotspot Management Zone**.

VULNERABLE USES

- C.** Highly Vulnerable Uses will not be allowed within Flood Zone 3; in Flood Zone 2 they will be required to pass the Exception Test and should as far as possible be located outside of the Surface Water Flood **Risk Hotspots Management Zone**.
- D.** Proposals for Essential Infrastructure and More Vulnerable Uses within Flood Zone 3

will be required to pass the Exception Test. Within the Rapid Inundation Zone, basement dwellings and basement extensions to existing dwellings will not be acceptable.

- E. More Vulnerable Uses should, as far as possible, be directed away from Surface Water Flood [Risk Hotspots Management Zone](#).
- F. A Flood Warning and Evacuation Plan will generally be required for More Vulnerable Uses within the areas at risk of tidal breach flooding, especially if the land use is within the Rapid Inundation Zone.

FLOOD MANAGEMENT INFRASTRUCTURE

- G. All existing flood management infrastructure will be protected, including access for maintenance. Wherever possible, an undeveloped buffer zone of 16m should be maintained around flood defence structures, including buried elements of the flood defence.
- H. Improvements to flood defences will be secured through planning conditions and / or legal agreements where the size, type and / or location of development impacts on flood risk. Development should not limit future raising of flood defences outlined in the Thames Estuary 2100 Plan.

- 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.

SUSTAINABLE DRAINAGE

- J. New development must incorporate Sustainable Drainage Systems (SuDS) to alleviate and manage surface water flood risk. Development should aim to achieve greenfield run-off rates and demonstrate how all opportunities to minimise site run-off have been taken.

39.1 / As our climate changes the risk of flooding in the city increases. Sources of flood risk include tidal flooding (from the Thames), sewer flooding (foul water from the sewer system) and surface water flooding. Increased levels of development have the potential to increase risks of surface water flooding. However, redevelopment provides the opportunity to reduce flood risk by the incorporation of flood resilience and resistance and drainage measures.

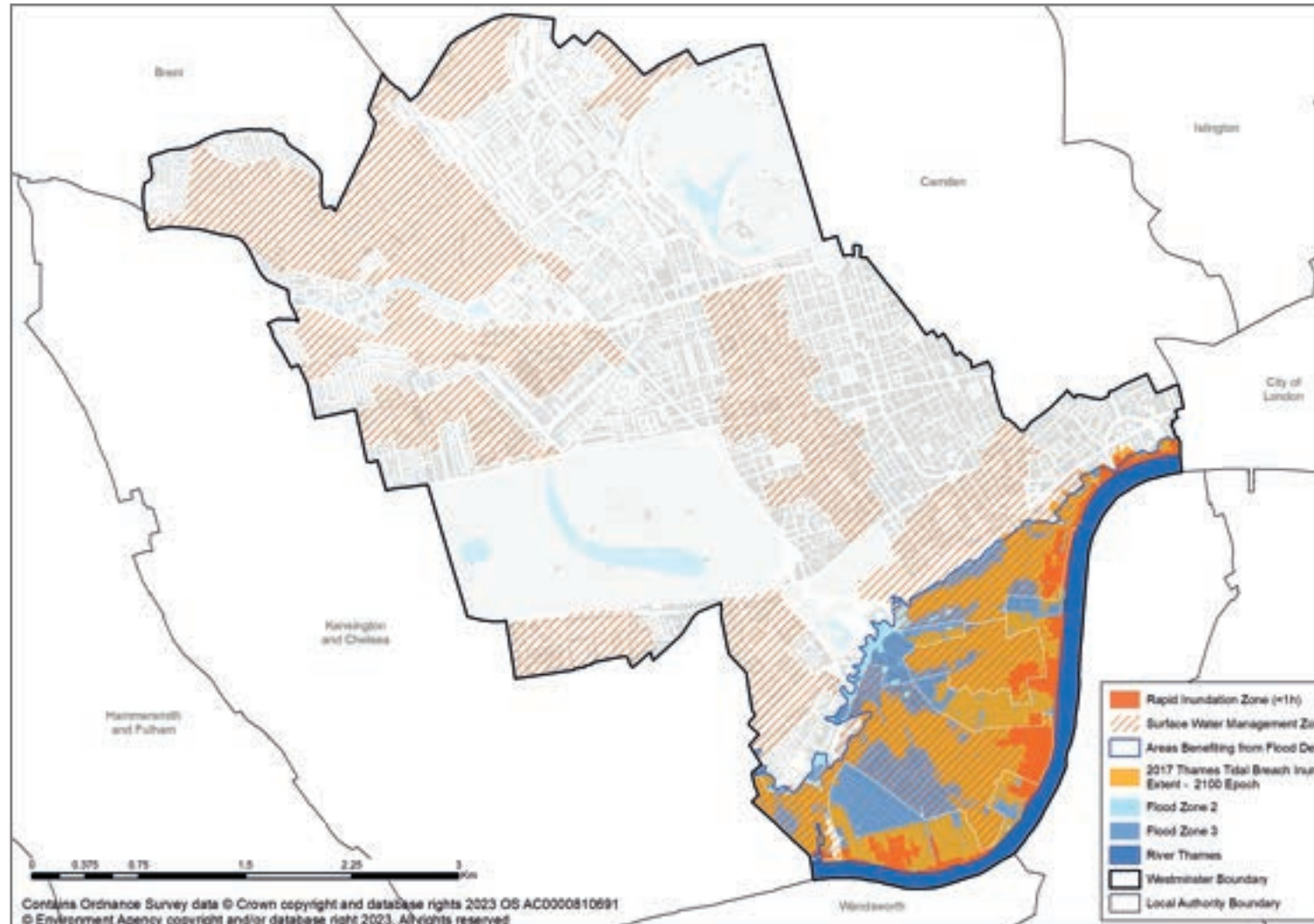
39.2 / With the Strategic Flood Risk Assessment (SFRA), Surface Water Management Plan (SWMP), Local Flood Risk Management Strategy (LFRMS) and the Mayor of London's Regional Flood Risk Appraisal (RFRA), we have a strong framework in place to manage flood risk in the city that applicants should comply with.

39.3 / Our requirements for site-specific Flood Risk Assessments (FRAs) are aligned with the SFRA. Proposals should be accompanied by a signed Flood Risk and Sustainable Drainage pro forma.

39.4 / 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.

Vulnerable uses

39.5 / Development should be steered to the areas with the lowest probability of flooding, as set out in the National Planning Policy Framework (NPPF). Given the dense built-up nature of Westminster, it will not be possible to direct all development outside of the Flood Zones and Surface Water [Flood Risk Hotspots Management Zone](#). Depending on vulnerability, some developments within Flood Zone 2 and 3 will therefore be required to satisfy the Exception Test set out in the NPPF. This approach gives consideration to the type of development, as some uses are more vulnerable to the impacts of flooding than others. The approach to vulnerable uses is derived from the SFRA.



New Figure 38: Flood Zones

Flood management infrastructure

39.6 / Besides the Thames Barrier, Westminster is protected from tidal and fluvial flooding by Thames Tidal Flood Defences including the Embankment wall. We will protect flood management infrastructure to ensure the risk of flooding is minimised. Development within 16m of a tidal flood defence will only be acceptable if it can be demonstrated that the defences can be raised and maintained for the lifetime of the development. Access to defences for maintenance and emergency purposes must be retained, and their improvement will be sought as a condition or via legal agreement where appropriate.

39.7 / The Thames Estuary 2100 Plan (TE2100) is the strategic flood management plan for London and the Thames Estuary. Its primary focus is tidal flooding, and Westminster is located in the London City Zone. We will work with our partners to make sure the Thames Flood Defences remain strong and the recommendations of the TE2100 Plan are implemented. We will also continue to work with partners to support the timely implementation of the Thames Tideway Tunnel including the combined sewer outflows in the city.

Sustainable drainage

39.8 / Sustainable Drainage Systems (SuDS) incorporate a range of measures which help drain surface water, reduce pollution of water entering the watercourse, reduce surface water flooding and attenuate surface water run off. Examples of SuDS include permeable paving, green / blue roofs and rainwater harvesting systems.

39.9 / SuDS can be a multifunctional asset to the city, not only helping to reduce flood risk from surface water flooding but also provide an ecological value and improve air quality and amenity while increasing resilience to climate change. Our canals can also play a role in managing surface water drainage from adjacent development. Engagement with the Canal & River Trust is encouraged for development adjacent to canals to explore opportunities.

39.10 / A Sustainable Drainage Strategy should be submitted with major developments and when advised by us, setting out how SuDS will be incorporated into the development and how peak flow volumes will be reduced. Where it is not possible to deliver greenfield run-off rates, applicants should demonstrate how all opportunities to minimise site run-off have been taken to get it as close to greenfield standard as possible. Applicants should follow the Mayor of London's drainage hierarchy and set out the proposed SuDS maintenance schedule in the strategy.

Wastewater infrastructure

39.11 / 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, we 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.

40. Energy

A. The council will promote zero carbon development and expects all development to reduce on-site energy demand and maximise the use of low carbon energy sources to minimise the effects of climate change.

CARBON REDUCTION

B. All development proposals should follow the principles of the Mayor of London's energy hierarchy. Major development should be net zero carbon and demonstrate through an energy strategy how this target can be achieved.

C. Where it is clearly demonstrated that it is not financially or technically viable to achieve zero-carbon on-site, any shortfall in carbon reduction targets should be addressed via off-site measures or through the provision of a carbon offset payment secured by legal agreement.

HEAT NETWORKS

D. Developments should be designed in accordance with the Mayor of London's heating hierarchy. Major developments must connect to existing or planned local heat networks, or establish a new network, wherever feasible.

OVERHEATING

- E. All developments should be designed and operated to minimise the risk of internal overheating. Major development proposals will include a cooling strategy in line with the Mayor of London's cooling hierarchy.

40.1 / 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 net zero carbon emissions. Net zero carbon means reducing operational emissions from all regulated uses (i.e. space heating, lighting, hot water and ventilation), and minimising both annual and peak emissions. Developments should also explore routes towards net zero carbon across the development life-cycle, to avoid a legacy of emissions to be addressed in the future.

40.2 / 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. Applicants should refer to our latest guidance on sustainable retrofitting.

40.3 / The challenge of zero carbon development will be achieved through a range of measures and taking advantage of technical innovation. We will work with applicants, industry and local and regional partners to share knowledge in achieving this target and we will prepare a supplementary planning document to share best practice and draw attention to successful approaches to dealing with these issues in Westminster's unique circumstances. We expect major developments to install appropriate energy monitoring equipment to demonstrate on-going effective energy monitoring and management over the lifetime of the development in accordance with London Plan policy.

Carbon reduction

40.4 / The Mayor of London's energy hierarchy sets out the criteria to maximise the sustainability and efficiency of energy systems in developments. Carbon emissions can be reduced via a range of measures, including the design and orientation of buildings, incorporation of green infrastructure, use of light and sustainable materials, as well as active measures such as heating, cooling and energy efficient lighting systems. Where developments and retrofitting projects do not utilise standard construction methods and / or incorporate new and emerging technologies, applicants should discuss their proposal in our pre-application process prior to the submission of the planning application.

40.5 / [Technical reasons for being unable to reach net-zero operational emissions can include the use of lower carbon building materials, which would lead to lower whole-life carbon emission. Where](#)

[applicants exceed the reductions in embodied carbon emissions required by Policy 43, these can be accounted for in the total amount of carbon to off-set.](#)

40.6 / Developments that are unable to achieve the carbon targets set out in policy on-site will need to calculate their emissions shortfall in tonnes of carbon, [subtract any reductions in embodied carbon achieved below the minimum requirements of Policy 43](#) and offset via a cash in lieu payment. 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. Carbon offset funding will then be allocated to projects that will reduce carbon emissions elsewhere in Westminster. Details of how the Westminster Carbon Offset Fund contribution will be calculated and administered, [including how embodied carbon will be accounted for are](#) set out in the Planning Obligations and Affordable Housing SPD [2024](#).

40.7 / 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.

Energy networks

40.8 / Decentralised energy generates power at the point of use, increasing efficiencies by utilising generated heat that would otherwise be wasted. Decentralised energy can be distributed to buildings over a larger area via an underground network of pipes, avoiding the need for buildings to have individual heating equipment. In areas

of high density and heat demand, such as Westminster, heat networks can provide a viable energy solution for new developments.

40.9 / Westminster contains one of the UK’s first heat networks at the Pimlico District Heat Undertaking (PDHU) and there is opportunity for new or expanded networks in locations including Victoria, east of Oxford Street, Soho, Paddington Basin, Church Street and across the city border to South Kilburn in Brent.

40.10 / The Decentralised Energy Masterplan for Westminster (DEM) explores the technical potential of decentralised energy in the city and the opportunity areas for future network development. We will review this document to better reflect future network opportunities and the current policy context. In addition, we will publish a supplementary planning document to assist applicants in meeting the requirements of this policy.

Overheating

40.11 / Incorporating low energy and passive design measures that manage the risk of a building overheating is central to adapting to future climate changes. We want to ensure that all who live and work in the city occupy buildings which are not overheated as this can lead to detrimental health effects. Applicants should perform internal temperature modelling as part of the cooling strategy and prioritise low-energy measures to mitigate overheating e.g. orientation, solar shading and use of green infrastructure.

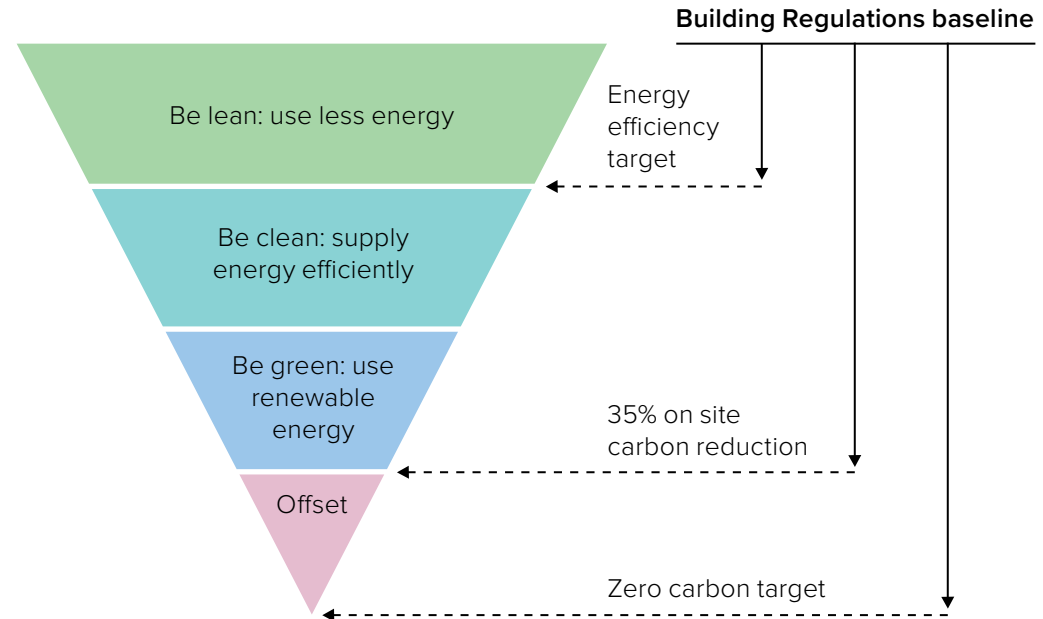


Figure 39. Energy hierarchy

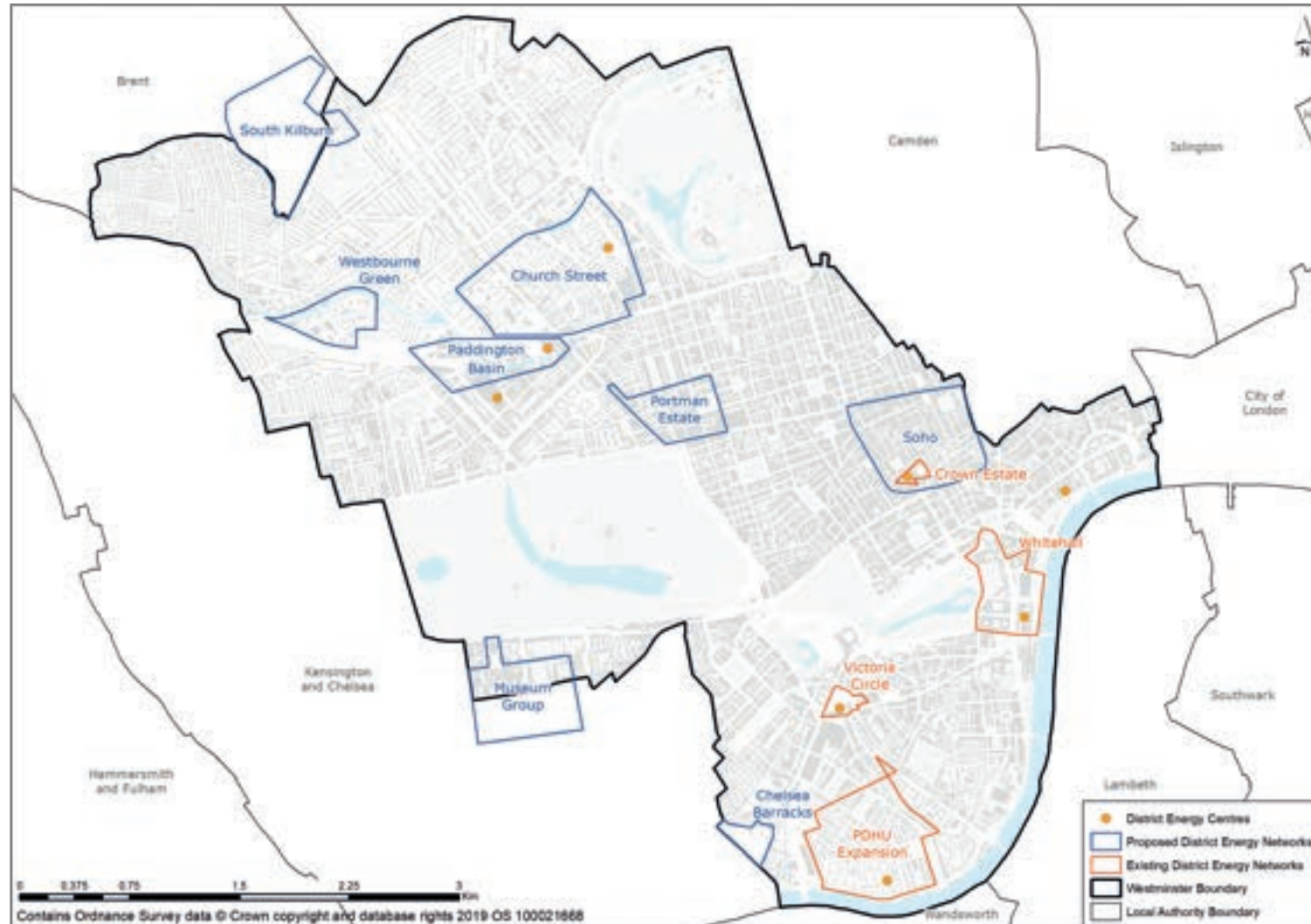


Figure 40: District energy centres and networks

41. Waste management

- 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.
- B. All new developments (including extensions and change of use) must provide appropriate facilities for the storage of separate waste streams which are safe and convenient to access for deposit and collection, with sufficient capacity for current and projected future use.
- C. Developers are required to demonstrate through a Circular Economy Statement ([and where appropriate a pre-demolition and redevelopment audit](#)), 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 (CoCP).
- D. Existing waste management facilities shown on Figure 32 will be protected. Any proposals for new waste management facilities will be assessed against the criteria set out in the London Plan and national policy.

- E. The council will continue to collaborate with other Waste Planning Authorities in the management of its waste and monitor its waste exports.

41.1 / Waste management is one of the greatest challenges for a growing city, which is also transitioning to a circular economy. Westminster produces more than 180,000 tonnes of waste per year. Households, businesses, institutions and building projects all generate waste in Westminster and we have 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.

41.2 / We will contribute to the London Plan target of net self-sufficiency by 2026 by planning for Westminster's apportionment targets. We have 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 Plan⁵. This arrangement has been informed by a Waste Data Study (2020) which provides an

⁵ Table 9.2 in Policy SI8 of the London Plan

understanding of the city's waste need and has been formalised in a Statement of Common Ground which is included in an appendix to the study. We have 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.

41.3 / We 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 city, we continue 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.

41.4 / 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.

41.5 / Westminster has no industrial land suitable 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. Any proposals for waste management facilities will be assessed against the criteria set out in London Plan Policy SI8 and National Planning Policy for Waste Appendix B.

41.6 / Developments should provide adequate segregated waste storage facilities that are fully integrated into the design of the scheme, both for individual units and communal storage areas ready for collection. Our Recycle and Waste Storage

Requirements guide (April 2019)⁶, provides applicants with guidance on how it expects this to be done including the installation of balers and compactors within the development as required. This also supports the requirements for the amalgamation of facilities in locations that demand an area specific approach to waste collection. Where uses generate specialist types of waste, appropriate facilities to manage these waste types should be provided on-site.

41.7 / 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.

⁶ westminster.gov.uk/waste-storage-planning-advice

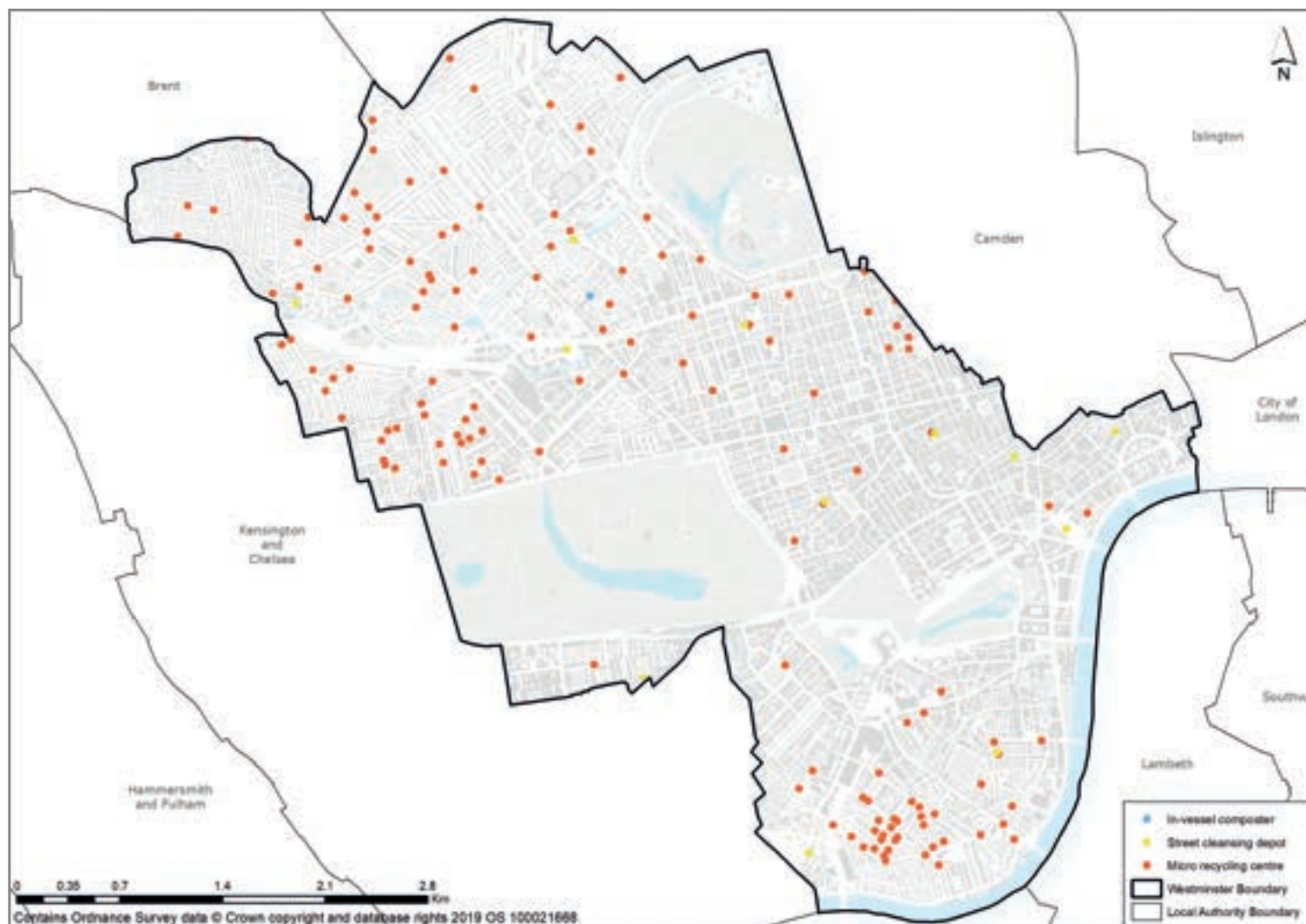


Figure 41: Waste management facilities

DESIGN AND HERITAGE

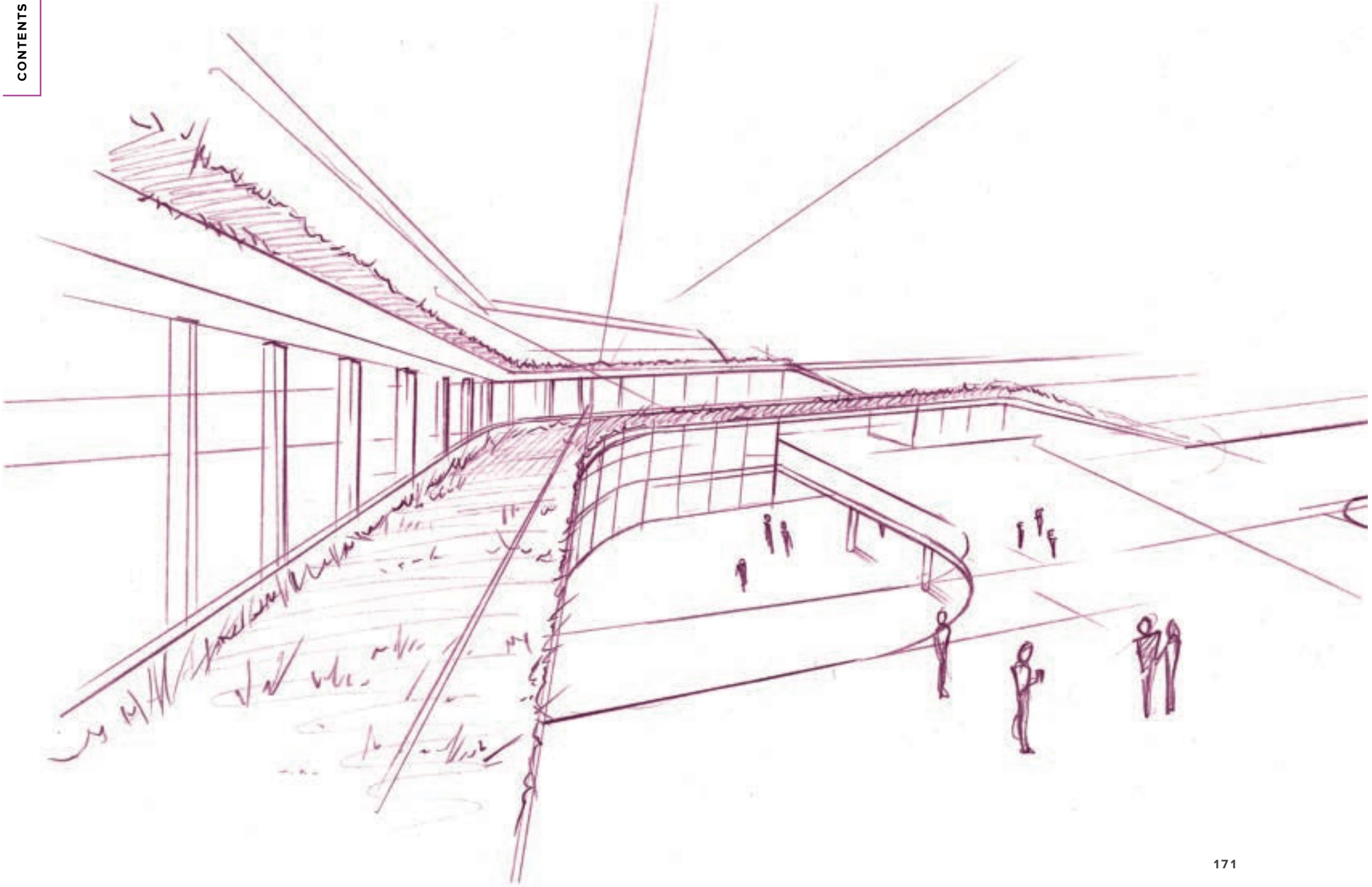
A design for life

Westminster is a city of contrasts. A place where the historic heart of London stands shoulder to shoulder with the contemporary heart of business.

It's a city that means different things to different people, but has to work for everyone.

For us, the only design that works is design that's people-centred. Design that strives to enhance not just our environment, but the health and well-being of those in it. Design that adds to our heritage and character for generations to come. Design that brilliantly exemplifies the very best in sustainable, urban living.

By placing the people at the heart of the design process, we improve the quality of life for everyone.



42. Design principles

- A.** New development will incorporate exemplary standards of high quality, sustainable and inclusive urban design and architecture befitting Westminster's world-class status, environment and heritage and its diverse range of locally distinctive neighbourhoods.

RESPONDING TO WESTMINSTER'S CONTEXT

- B.** All development will positively contribute to Westminster's townscape and streetscape, having regard to:
1. The character and appearance of the existing area, adjacent buildings and heritage assets, the spaces around and between them and the pattern and grain of existing streets, squares, mews and passageways;
 2. Materials, building lines, scale, orientation, access, definition, surface treatment, height and massing;
 3. The form, character and ecological value of parks, gardens and other open spaces;
 4. Westminster's waterways and waterbodies; and
 5. The preservation and enhancement of the surrounding tree population.

PEOPLE-CENTRED DESIGN

- C.** All development will place people at the heart of design, creating inclusive and accessible spaces and places, introducing measures that reduce the opportunity for crime and anti-social behaviour, promoting health, well-being and active lifestyles through design and ensuring a good standard of amenity for new and existing occupiers.

SUSTAINABLE DESIGN

- D.** Development will enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design, including:
1. Use of high-quality durable materials and detail;
 2. Providing flexible, high quality floorspace;
 3. Optimising resource and water efficiency;
 4. Enabling the incorporation of, or connection to, future services or facilities; and
 5. Minimising the need for plant and machinery.
- E.** Applicants will demonstrate how sustainable design principles and

measures have been incorporated into designs, utilising environmental performance standards as follows:

1. Non-domestic developments of 500 sq m of floorspace (GIA) or above will achieve at least BREEAM "Excellent" or equivalent standard.
2. Residential conversions and extensions of 500 sq m (GIA) of residential floorspace or above, or five or more dwellings will aim to achieve "Excellent" in BREEAM domestic refurbishment or equivalent standard.

PROMOTING EXCELLENCE IN CONTEMPORARY DESIGN

- F.** Imaginative approaches to contemporary architecture and use of innovative modern building techniques and materials will be encouraged where they result in exemplary new buildings and public realm which incorporate the highest standards of environmental sustainability, that respect and enhance their surroundings and are integrated with and better reveal Westminster's heritage and existing townscape.

42.1 / Central to delivering the right kind of growth that underpins this plan is ensuring that new development embodies the highest quality of design that will deliver sustainable development and a successful future for our city.

42.2 / Given the exceptional quality of Westminster's built environment, it is essential to ensure equally high-quality architecture and urban design in all new developments. Westminster's unique built environment, spacious parks and river frontage are known throughout the world and include some of central London's best loved historic areas, buildings and landmarks, as well as lesser known residential areas; most are characterised by their human scale. These qualities underpin the city's attractiveness as a place to live, work and visit and contribute to a high quality of life for everyone. To achieve our growth targets sustainably, we expect a design-led approach which will optimise capacity of sites in the most appropriate way, based on an understanding of context.

42.3 / We will prepare supplementary guidance on the application of this and other design policies.

Responding to Westminster's context

42.4 / Design should always respond to local context and distinctiveness, including Westminster's differing roles as a place to live, the heart of national life and government, as a business and commercial centre and a tourist destination. It should show how it will improve the quality of existing residential neighbourhoods and, where appropriate, provide a successful foundation for new communities.

42.5 / Applicants should demonstrate that design proposals are based on a thorough analysis and understanding of the site, its setting, context and character, taking account of the qualities of the built and natural environment, streetscape, open spaces, trees, green infrastructure and canal and riverside settings. This analysis should include the area's physical form, its morphological and historical development, its uses, the nature and quality of the public realm, the relationship between different parts of the city and the patterns of movement and activities.

People-centred design

42.6 / We promote a city that works for everyone, [a city for all a fairer Westminster](#). Placing people at the heart of the design process means that the users of the buildings and spaces are considered throughout all design stages. We encourage applicants to engage with local communities early in the design process and will support collaborative and participatory design approaches.

42.7 / Architecture and urban design can help promote good physical and mental health by creating streets, spaces and buildings which allow and encourage healthy lifestyles and take into account the amenity of occupiers, considering issues such as noise, access to open space and air quality. Applicants should demonstrate how development will contribute to improving health and well-being and refer to Sport England's Active Design Guidance for further information on the principles of Active Design.¹

¹ Active Design Guidance, Sport England

42.8 / Buildings and the spaces which adjoin them should be fully accessible and inclusive for all, including people of all ages and those with mobility and sensory impairment or other health concerns or disabilities. In addition to physical access to buildings and places, this will include improving wayfinding, to making the public realm easier, more pleasant and safe. Access to existing buildings, especially historic buildings, may present additional challenges, but there will almost always be scope to make improvements. In some locations this may not just be about physical access but should also consider the ways in which services and information can be managed and provided to meet the needs of all users. In all cases, applicants will be required to demonstrate that access provision has been considered effectively.

42.9 / Well-designed environments can help to minimise the opportunities for crime, anti-social behaviour and reduce the fear of crime. New developments should make every effort to contribute to increasing safety and security in the built environment through proactive design solutions to reduce crime and anti-social behaviour (including counter-terrorism measures) providing active frontages, avoiding recesses, promoting natural surveillance and defining private and public space to ensure a clear sense of ownership and responsibility. These should be integral to the design from the outset or where added to existing buildings, must be sensitively designed and sited.

Sustainable design

42.10 / We want to encourage durable buildings to leave our generations' mark for generations to come. Applicants should demonstrate that they have taken into account principles of sustainable design and that measures to improve environmental performance and mitigate and adapt to climate change have been integrated into the design. This may include strategic design considerations, such as the orientation of buildings and spaces, design of façades to capitalise on solar gain, whilst minimising risks of overheating and other measures, for example incorporation of green infrastructure, flood resilience and sustainable drainage measures. Excellence in design quality and floorspace adaptability should support the lifespan of buildings.

42.11 / 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, [public benefit](#), resource and energy use, when compared to the existing building [including refurbishment and retrofit options](#). All development should ensure the reduction, reuse or recycling of resources and materials, including water and waste and minimise energy use and emissions that contribute to climate change. 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.

42.12 / Connectivity to future services can include digital networks and sustainable energy or district energy networks. Connection to nearby energy networks or shared provision for plant and machinery should be explored to maximise efficiencies and minimise the need for new plant. Consideration should be given to how buildings and spaces will be managed by either private or public owners and managers, to ensure they remain of high quality over the lifetime of the development.

42.13 / BREEAM (Building Research Establishment's Environmental Assessment Method) is the most commonly used methodology for assessing, rating and certifying the sustainable design and construction of buildings. Applicants will demonstrate how they will meet BREEAM or equivalent standards.

Promoting excellence in contemporary design

42.14 / We welcome creative approaches to contemporary, high quality architecture and state of the art building technology in appropriate locations, optimising densities and making the most of the opportunities they present to celebrate, enhance and reveal the existing built and historic environment.

New Policy 43. Retrofit First

PRIORITISING RETROFITTING OVER DEMOLITION

A. Development should adopt a retrofit-first approach, where options for retrofitting and retention of existing buildings are considered before demolition. Where substantial or total demolition is proposed, this should be fully justified through an appraisal of the construction options, assessing the carbon cost and public benefits of refurbishment, retrofit, deep retrofit or newbuild options. Development involving total demolition of a building which has more than a single storey will generally be resisted, unless demonstrated through the appraisal that:

1. The proposed development will deliver public benefits which could not be delivered through a suitably comparable retrofit option; and
2. The whole-lifetime carbon of a new building would be less or similar to a suitably comparable retrofit option; or
3. The proposed development has bespoke operational requirements which could not be provided through the repurposing, adaptation and/or extension of the existing building(s); or

4. It is demonstrated that a retrofitting option is not possible or achievable due to structural constraints, demonstrated through an independently verified structural engineers report.

REDUCING EMBODIED CARBON EMISSIONS

- B.** All development involving total or substantial demolition of a building which has more than a single storey, and all major developments are required to:
1. Submit a Whole Life-Cycle Carbon assessment, which demonstrates how the development will achieve:
 - a. For new non-residential buildings a target upfront embodied carbon equivalent of London Energy Transformation Initiative (LETI) band “A”, with an absolute minimum rating of “B”.
 - b. For new residential buildings, including mixed-use over 18 metres in height, a target upfront embodied carbon equivalent of LETI band “C”, with an absolute minimum rating of “D”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land,

and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.

- c. For new residential buildings, including mixed-use below 18 metres in height, a target upfront embodied carbon equivalent of LETI band “B”, with an absolute minimum rating of “C”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.
- d. For developments involving the construction of bespoke buildings which do not have a recognised LETI benchmark, or self-build or custom-build homes, applicants should achieve the maximum reductions in upfront embodied carbon deliverable, and these should be fully justified.

- e. In exceptional circumstances where there are site specific constraints which make the benchmarks undeliverable, any shortfall against the minimum embodied carbon targets will be offset through a financial contribution towards the council’s carbon offset fund.

2. Where substantial or total demolition is proposed, applicants must:
 - a. Submit a Circular Economy Statement including a pre-redevelopment, and pre-demolition and reclamation audit which demonstrates how materials will be reused and repurposed; and
 - b. Design any new structures to ensure the longevity of the building, easy adaptation, and with easily re-usable materials.

UNLOCKING AND PROMOTING RETROFITTING

- C.** Proposals involving responsible retrofitting, which result in energy, performance, and climate adaptation upgrades, will be supported in principle.
- D.** When considering the townscape, heritage or design impacts of extensions or alterations, which are demonstrated through the appraisal

of the construction options as necessary to viably achieve a wider retrofit of a building, regard will be had to the desirability of securing the retention and retrofit of the building, including improvements to its environmental performance, building longevity and climate change adaptation. Applicants should demonstrate in a Sustainable Design Statement or Retrofit Plan how technical risks have been addressed and how harm to heritage assets has been avoided or minimised.

43.1 / We recognise that the expected level of growth in the city will have associated emissions from embodied carbon. As the grid moves towards decarbonisation during the lifetime of the City Plan, operational emissions will play a less important role in carbon emissions from development, and the embodied carbon associated with development will become a greater source of emissions. It is essential that developments utilise every opportunity to reduce embodied carbon now to limit the extent of future climate change. Our priority is for development to achieve a reduction in embodied carbon to meet the council's target of a net-zero City by 2040, and supports the UK transition towards net zero carbon emissions.

43.2 / The most effective way to reduce embodied carbon from development is to maximise the re-use of existing buildings and the materials they are

composed of through retrofitting. Retrofitting buildings should prolong their useful life and reduce operational carbon emissions. The council recognise that demolition of some buildings will continue to play an important part of renewing and upgrading the city's building stock, however given the higher amounts of embodied carbon associated with demolition and rebuild schemes, development should explore all options for retrofitting first. Any proposals for demolition need to be fully justified and should demonstrate that a new building would be the most sustainable outcome.

The tests for demolition

43.3 / Where whole-life carbon assessments are relied upon to justify demolition and construction of a new building, these must follow the most up to date RICS methodology and the Mayor of London's Whole Life Carbon London Plan Guidance (LPG) and be presented as an appraisal of the construction options for reuse, refurbishment, retrofit, deep retrofit and demolition. When presenting comparisons between retrofit and newbuild options, a realistic whole life cycle for a retrofit scheme should be used which accounts for the extended life of a building resulting from a high-quality retrofit; and how the material choices for a retrofit option and a newbuild both aim to deliver the lowest embodied carbon achievable. Where retrofitting is unfeasible due to structural or safety concerns, applicants should demonstrate this through a structural statement from a suitably qualified engineer. Where structural reinforcement is possible, but the extent of which would make the

development unviable to retrofit, this should be supported by a viability report. Some purpose-built structures may pose technical challenges for retrofitting, such as multi-storey car parks, and single storey garages – and redevelopment may be acceptable in these instances, provided that all options for material re-use from the existing structure are utilised through a pre-demolition audit.

43.4 / Newbuilds can bring opportunities for significant public benefits, such as the delivery of new public infrastructure, the provision of affordable workspace, significant uplifts in jobs, affordable housing and estate regeneration. Applicants for developments incorporating such benefits as a result of demolition should demonstrate how these benefits could not practicably or viably be realised through a retrofit scheme. In recognition of the global, national and local economic importance of the West End Retail and Leisure Special Policy Area (WERLSPA), the Paddington and Victoria Opportunity Areas and North West Economic Development Area (NWEDA), optimising the site capacity to achieve significant employment, jobs and investment opportunities may also be considered a public benefit justifying the replacement of a building. Any economic benefits would need to be fully justified and the applicant must demonstrate to the council's satisfaction why they could not be achieved through a retrofit option through a meaningful and honest comparison.

43.5 / Applicants should fully assess the suitability of a site for a proposed use when justifying operational requirements which could not be met through retrofit. Where bespoke operational requirements are relied upon to support demolition, these should be demonstrated as unachievable through a retrofit, alteration or extension to an existing building. Operational requirements may include: development phasing in order to maintain an important public service, and necessary design requirements without which the proposed use could not function. Where a change of use is proposed that requires bespoke design requirements, applicants should demonstrate the suitability of the site through a Site Selection Statement and set out why those design requirements are integral to the proposed use or operations of the building, providing evidence of any technical requirements or standards.

Embodied Carbon

43.6 / To respond to the climate emergency, development should be innovative in design and incorporate low carbon materials. The lowest carbon materials available are those which can be re-used from existing buildings through retrofitting. Where the demolition of an existing building occurs and where the development is a major scheme, development should aim to meet the relevant target embodied carbon benchmark. Where the target benchmark is not possible, a minimum embodied carbon benchmark will still apply to limit the overall carbon footprint of the development. The most up to date RICS methodology should be followed to

calculate embodied carbon. Where subsequent benchmarks are established by other bodies, for example the UKGBC, these may be used where they have been aligned to LETI benchmarks. At the time of writing, the benchmarks recommended are based off guidance published by LETI in 2020.

43.7 / Where there are site specific constraints that make a benchmark unachievable, applicants should provide robust justification of the building design, and should include a breakdown of the embodied carbon in the structure, façade and MEP, demonstrating how these align with the relevant benchmark, and providing justification for features which cannot meet the benchmark.

43.8 / Following completion, major schemes will be required to publicly display the total embodied carbon associated with the development, ensuring the information is visible to visitors and occupants of a building.

| Building type | LETI band equivalent |
|---|--|
| Non-residential buildings | Target A Minimum B |
| Residential (including mixed-use) under 18 metres in height | Target B Minimum C |
| Residential (including mixed-use) over 18 metres in height | Target C Minimum D |
| Exceptions (site constraints, fast track affordable housing schemes, custom-build and self-build homes) | Lowest deliverable embodied carbon without affecting provision of affordable housing |

Use of targets and absolute minimums

43.9 / The use of LETI Band A is the current stretch target for non-residential schemes. The use of LETI Band B is the current stretch target for residential and mixed-use schemes below 18 metres. LETI Band C is the current stretch target for residential and mixed-use schemes above 18 metres. The targets differentiate heights buildings which include residential development to reflect the wider range of low-carbon materials that are available for use in residential buildings below 18 metres.

43.10 // It is expected that these benchmarks will likely become business as usual during the City Plan period as building standards improve and the push for sustainable development gains greater momentum. The Whole Life-Cycle Carbon assessment should provide detail on the measures taken to lower embodied carbon, including an assessment of the design performance against the target benchmarks.

Carbon offset payments in lieu

43.11 / Where applicants fully demonstrate the embodied carbon benchmark is undeliverable due to site specific constraints or justified bespoke design parameters, payments are to be made to the carbon offset fund in lieu of meeting embodied carbon targets on site. Applicants will also be able to credit embodied carbon reductions below the minimum benchmarks to the total carbon offset payment calculated in their energy statement. Further details are provided in Policy 40 (Energy). Further details on how this is to be calculated will be provided in the Planning Obligations and Affordable Housing Supplementary Planning Document (2024).

Circular Economy Statement, pre-redevelopment, pre-demolition and reclamation audits

43.12 / For all developments where the principle of demolition has been agreed, a Circular Economy Statement shall be prepared in accordance with the London Plan Guidance on Circular Economy Statements (2022). As part of this guidance,

pre-redevelopment and pre-demolition audits are required which should identify potential materials which could be reused, and a strategy for their reclamation.

Alterations and extensions

43.13 / 8.13 / Securing extensions alongside newly retrofitted buildings will enable continued sustainable growth across the city. Where applicants can demonstrate that an extension or external alteration is required to deliver a viable retrofit, we will consider the benefits of securing a lower carbon development when considering its design impacts – in particular, where buildings may otherwise meet the tests for demolition. Applicants should demonstrate how any harm identified from the development has been avoided, mitigated, or minimised, and identify the potential carbon reduction benefits that the development will deliver, considering both embodied carbon and operational carbon.

Sustainable Design Statement or Retrofit Plan

43.14 / All applications for development which create new floorspace and/or proposals which involve extensive works to retrofit existing buildings to improve their environmental performance must be supported by a Sustainable Design Statement. This requirement forms an important component of demonstrating consideration of retrofit options for new developments. A Retrofit Plan will be required in line with the Sustainable Design Statement to summarise how the retrofit policy has been complied with and any issues relevant to the proposal.

44. Westminster's heritage

- A.** Westminster's unique historic environment will be valued and celebrated for its contribution to the quality of life and character of the city. Public enjoyment of, access to and awareness of the city's heritage will be promoted.
- B.** Development must optimise the positive role of the historic environment in Westminster's townscape, economy and sustainability, and will:
1. Ensure heritage assets and their settings are conserved and enhanced, in a manner 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 and mitigate and adapt to climate change;
 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.

WESTMINSTER WORLD HERITAGE SITE

- C.** The Outstanding Universal Value (OUV), authenticity and integrity of the Westminster World Heritage Site will be conserved and enhanced. The setting of the site will be protected and managed to support and enhance its OUV.
- D.** Development will protect the skyline, prominence and iconic silhouettes of the Palace of Westminster and Westminster Abbey and will protect and enhance identified views out of, across and towards the World Heritage Site.
- E.** The council will work with partners to promote the use, management and interpretation of the site in ways that protect, enhance and better communicate its OUV. The council will commit to lead the production and review of an updated World Heritage Site Management Plan.
- F.** Applicants will be required to demonstrate that any impacts of their proposals on the World Heritage Site or its setting have been fully assessed, informed by Heritage Impact Assessment methodology and that any harm, including cumulative harm, has been avoided or justified.

LISTED BUILDINGS

- G.** Works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting or, where appropriate, restoring original or significant detail and historic fabric.
- H.** Changes of use to listed buildings will be consistent with their long-term conservation and help to restore, retain and maintain buildings, particularly those which have been identified as at risk.
- I.** Development within the settings or affecting views of listed buildings will take opportunities to enhance or better reveal their significance.
- J.** Demolition of listed buildings will be regarded as substantial harm and will be resisted in all but exceptional circumstances.

CONSERVATION AREAS

- K.** Development will preserve or enhance the character and appearance of Westminster's conservation areas. Features that contribute positively to the significance of conservation areas and their settings will be conserved and opportunities taken to enhance conservation areas and their settings, wherever possible.

- L.** There will be a presumption that unlisted buildings that make a positive contribution to a conservation area will be conserved, unless it has been demonstrated that the relevant tests in national policy have been met. Buildings which make a negative or neutral contribution may be replaced or refurbished where this will result in a high quality building which will improve their appearance in the context of the conservation area and their environmental performance.
- M.** The contribution of existing uses to the character, function and appearance of conservation areas will be considered and changes of use supported where they make a positive contribution to conservation areas and their settings.

ARCHAEOLOGY

- N.** Westminster's Scheduled Monuments and their settings will be preserved, and opportunities taken to enhance and communicate their significance, where appropriate.
- O.** Applicants for development which involves excavation or ground works in Westminster's Archaeological Priority Areas or other areas suspected of having

archaeological potential will demonstrate that they have properly evaluated the archaeological potential and significance of the site and assessed and planned for any archaeological implications of proposals.

- P.** Archaeological deposits will be preserved in situ wherever possible. Where it has been demonstrated that the conservation of archaeological remains in situ is impossible or deposits are considered to be of lesser significance, full investigation, recording and an appropriate level of publication and archiving will be required, including public display and interpretation, where appropriate.

REGISTERED HISTORIC PARKS AND GARDENS

- Q.** Proposals affecting Westminster's registered historic parks, gardens and open spaces will safeguard their special historic interest, integrity, character and appearance, and protect their settings and significant views from and towards these spaces.

NON-DESIGNATED HERITAGE ASSETS

- R.** Non-designated heritage assets (including local buildings of merit, archaeology and open spaces of interest within and outside

conservation areas) will be conserved. When assessing proposals affecting non-designated heritage assets, a balanced judgement will be made regarding the scale of any harm or loss of the asset and the benefit of the proposed development.

44.1 / Westminster's historic environment is one of its greatest assets. The unique character of the city derives in large part from the concentration and importance of its heritage assets, many of which are of national and international importance. Given its immense contribution to the character, economy and quality of life of our city, it is vital that the historic environment is valued, maintained, and refurbished in ways appropriate to its significance and as an integral part of good growth.

44.2 / Applicants should ensure the significance of heritage assets and impact of proposals have been fully assessed and understood. In the first instance, harm to their significance should be avoided. Any harm will require full justification, taking into account the significance of the asset, its designation, the degree of harm caused (whether substantial or less than substantial), alternatives which have been considered, any public benefits (which may include heritage benefits) and the circumstances of the case. A heritage statement is usually required where development will affect heritage assets. Information submitted should be proportionate to the asset's significance and the scale and potential impact of proposals.

44.3 / The retention, regeneration and reuse of our historic building stock can help in the fight against climate change by avoiding the higher carbon footprint associated with new construction, but to have a sustainable future, heritage assets also need to adapt to meet changing needs. There will also almost always be scope to find sensitive solutions to improve access to the historic environment and upgrade facilities and environmental performance. Proposals for retrofitting historic buildings will only be supported where a sensitive and tailored approach to design and specification is taken which recognises modern and historic buildings function differently and ensures that their significance is not compromised, having regard to impacts on historic fabric, traditional construction, siting, visibility, design and advice set out in Historic England's and our Retrofitting guidance. We will encourage creative design approaches to the upgrading of historic buildings where they enhance their significance.

Westminster World Heritage Site

44.4 / The inscription of the Palace of Westminster and Westminster Abbey, including St Margaret's Church, as a World Heritage Site recognises its Outstanding Universal Value (OUV). As a designated heritage asset of international importance, it is of the highest level of significance and must be afforded the highest level of protection and maximum weight possible in the planning process.



Figure 42: Westminster World Heritage Site

44.5 / Where development will affect the site or its setting, applicants will demonstrate proposals will conserve, enhance or better reveal its OUV. Sufficient information should be provided to demonstrate impacts have been considered and depending on the scale and nature of proposals in addition to the heritage statement, this will include a Heritage Impact Assessment using the methodology set out by ICOMOS.² Applicants should refer to the Statement of Outstanding Universal Value for a summary of what makes the site significant and the key attributes of OUV identified in the management plan.

44.6 / A number of significant projects will affect the World Heritage Site during the Plan period, in particular the Restoration and Renewal of the Palace of Westminster. We will work with partner organisations to ensure potential for the positive contribution of such projects to the conservation, enhancement and communication of OUV of the site and its setting is realised. Enhancements to the spaces within and immediately adjacent to the site, including improvements to public realm and approaches and ceremonial routes to the site, security measures and visitor experience, will be encouraged and initiated where possible. We will support production of conservation management plans for the Palace of Westminster and Westminster Abbey to ensure the protection of the key buildings within the site and are working with the World Heritage Site steering group to update

² Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS, 2011

the management plan for the site, which is a key tool for the long-term sustainable management of the site and its setting.

44.7 / The striking silhouettes and iconic views of the Palace of Westminster and Westminster Abbey contribute significantly to an understanding of its Outstanding Universal Value. The site's prominence and riverside location means that development at some distance, including outside the City of Westminster, can affect it. We will continue to work to protect views towards the site and its wider setting and ensure the cumulative impacts of development within its setting are understood and managed.

Listed buildings

44.8 / Our 11,000 listed buildings and structures range from well-known landmarks to small items of street furniture; together these provide an irreplaceable physical record of the city's development.

44.9 / We expect alterations and extensions to listed buildings to safeguard important or original fabric and relate sensitively to the architectural detail, materials and style of the original building and any later phases of work which contribute to significance. Applicants should identify and protect those elements which contribute to special interest. This may include internal features such as plan form, location and hierarchy of rooms, historic floor levels, the structure of the building (including foundations), as well as patterns of openings, chimney breasts,

staircases and roof structures. Historic fixtures and fittings can be at risk of damage or theft when buildings are vacant, undergoing work or on the market and applicants should consider how this risk will be managed. If such features are damaged or stolen, we will require their reinstatement.

44.10 / In general, the best use for a listed building will be that for which it was built, and this will very often be part of its significance. However, most listed buildings need to remain economically viable to be conserved in the long-term, and suitable and sensitive changes of use can help secure this. Where a change of use is proposed, the building should, so far as possible, be capable of being converted into the new use without harmful extensions or modifications, with particular consideration given to issues such as fire protection, sound proofing, floor loadings, servicing and access.

44.11 / Where listed buildings are at risk through neglect, decay or other threats, including those on Historic England's Heritage at Risk Register, we will support development which will enable necessary repair works and bring buildings back into active uses consistent with their heritage value. In finding the optimum viable use for a listed building, other development plan policies may be applied flexibly to achieve the long-term conservation of the building. The total or substantial demolition of listed buildings which will result in substantial harm will only be considered where exceptional circumstances have been demonstrated, as set out in the National Planning Policy Framework (NPPF).

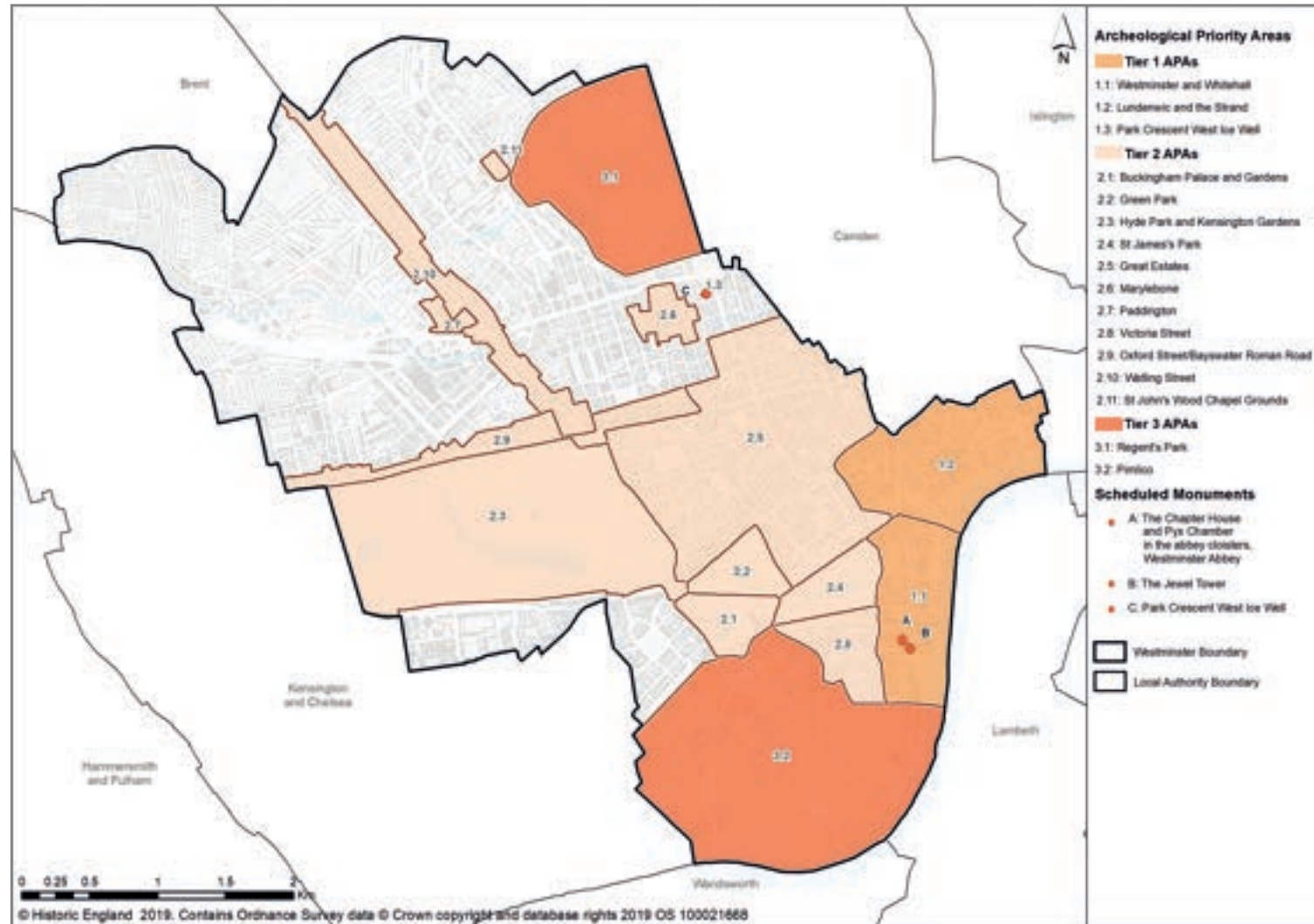


Figure 43: Archaeological Priority Areas and Scheduled Monuments in Westminster

44.12 / Even development at some distance which doesn't physically affect a listed building may harm its setting. Applicants should demonstrate they have assessed impacts upon setting and where it can be sustainably achieved, development within the setting of a listed building should take opportunities to enhance or better reveal its significance.

Conservation areas

44.13 / Westminster's exceptional range of conservation areas are designated for their special historic or architectural interest. Many have a high proportion of listed buildings and some contain townscape of more than local significance. It is particularly important that development in conservation areas is of the highest architectural quality and responds positively to their character and appearance.

44.14 / We will not accept outline planning applications for development in, or affecting the setting of, conservation areas. Applicants should demonstrate a full understanding of the significance of the area, explaining how its key characteristics have informed proposals and identifying those elements which contribute positively to character and appearance. These may include buildings, landmarks, views, trees, open spaces, historic plot widths, street layouts and land use patterns or other features of architectural or historic interest which contribute to local distinctiveness.

44.15 / Opportunities should be taken to enhance conservation areas wherever possible, for

example through the redevelopment or improvement of buildings or features which detract from the area, reinstatement of original detail or historic plot widths and original urban grain, where appropriate.

44.16 / 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 proposal, 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 façades can provide a way to protect façades 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 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.

44.17 / Conservation area audits provide additional guidance for applicants and identify buildings and features which contribute to or detract from individual areas across Westminster. We will review and update these where necessary and keep conservation area boundaries under review.

Archaeology

44.18 / Westminster's archaeology is an irreplaceable and fragile asset. Investigation has revealed evidence of prehistoric, Roman, Saxon medieval and post medieval archaeology.

44.19 / Westminster's three Scheduled Monuments (the Chapter House and Pyx Chamber next to the abbey cloisters, Westminster Abbey; the Jewel Tower; and a subterranean commercial ice-well, Park Crescent West) will be afforded the highest levels of protection.

44.20 / The Greater London Archaeological Advisory Service (GLAAS) identify Archaeological Priority Areas (APAs) based on evidence held in the Greater London Historic Environmental Record (GLHER). Each APA is assigned to a tier reflecting their archaeological sensitivity and significance. APAs are non-designated heritage assets, but as set out in the NPPF (Footnote 63) where these are found to include sites or archaeology of national importance equivalent to Scheduled Monuments, these sites or archaeological findings should be accorded the same weight as designated heritage assets.

44.21 / Applications for development which involves ground works in APAs in Tiers 1-3 must be accompanied by an archaeological desk-based assessment and, where appropriate, field evaluations to demonstrate that potential impacts of proposed development on archaeological significance have been fully considered. All land outside APAs is treated as being in Tier 4 but major

developments in these areas sometimes require the same archaeological evidence as higher tiers.

44.22 / The design of development should make provision for incorporation, safeguarding and preservation in situ of archaeological remains wherever possible and there will always be a presumption in favour of the retention of nationally-important archaeology in situ. Where we agree that conservation of archaeological remains in situ is impossible or deposits are of lesser significance, investigation, recording and an appropriate level of publication and archiving will be required.

Historic Parks and Gardens

44.23 / Westminster's rich legacy of historic parks and gardens are a cherished part of Westminster's heritage and an intrinsic part of the city's character. These include garden squares, designed landscapes, public parks, churchyards and private gardens.

44.24 / The Royal Parks and several other parks, gardens and squares are included on Historic England's Register of Parks and Gardens of Special Historic Interest and as such are recognised as designated heritage assets. Proposals that will have a harmful impact on their significance will be required to meet the relevant tests set out in the NPPF.

44.25 / Most London Squares in Westminster are protected by the *London Squares Preservation Act 1931* and many other gardens and open spaces, although not designated heritage assets, are of

local interest and contribute to the character and setting of conservation areas and listed buildings.

44.26 / Proposals affecting the layout, design, character, use and function of historic parks and gardens should retain and enhance their significance and should not prejudice their future restoration. Features such as original planting layout, garden buildings, statuary, railings, steps and fountains should be identified and protected. Views from and towards historic open spaces can also be particularly significant and the impact of development on views and the setting of open spaces should be carefully managed to maintain the character and enjoyment of these spaces.

Non-designated heritage assets

44.27 / Although the highest level of protection will be afforded to designated heritage assets, non-designated heritage assets also contribute positively to Westminster's historic environment. These may include local buildings of merit, parks and gardens, street furniture or archaeological deposits. Unlisted buildings and other features and spaces of merit may be identified by us and local communities in conservation area audits, supplementary planning documents, specific studies or in made neighbourhood plans or any future local list. In some circumstances, they may come to light as part of the development management process.

44.28 / Some non-designated heritage assets are subject to other legislation and guidance, including London Squares and Archaeological Priority Areas, as set out above. We will work with local

communities and other stakeholders to improve understanding of local heritage of interest and develop criteria to ensure a consistent approach is taken to the future identification and conservation of our local heritage.

45. Townscape and architecture

- A. Development will be sensitively designed, having regard to the prevailing scale, heights, character, building lines and plot widths, materials, architectural quality and degree of uniformity in the surrounding townscape.
- B. Spaces and features that form an important element in Westminster's local townscapes or contribute to the significance of a heritage asset will be conserved, enhanced and sensitively integrated within new development, including important architectural details, boundary walls and railings, historic roof forms or structures, open lightwells, historic or characteristic shopfronts and street furniture, as well as squares, parks and gardens. Where possible, lost or damaged features will be reinstated or restored.

EXTENSIVE DEVELOPMENTS

- C. Extensive development will maximise opportunities to enhance the character,

quality and functionality of the site and its surroundings, including creating new compositions and points of interest, and high-quality new streets and spaces, linked to the surrounding townscape to maximise accessibility.

ALTERATIONS AND EXTENSIONS

- D.** Alterations and extensions will respect the character of the existing and adjoining buildings, avoid adverse visual and amenity impacts and will not obscure important architectural features or disrupt any uniformity, patterns, rhythms or groupings of buildings and spaces that contribute positively to Westminster's distinctive townscape.

ROOF EXTENSIONS

- E.** Roof extensions will be supported in principle where they do not impact adversely on heritage assets and should:
1. Where part of a terrace or group already characterised by roof additions or alterations, be of appropriate design which follows an established form and would help to unify the architectural character of the existing terrace or a group;
 2. Where part of a terrace with an existing roof line unimpaired by roof extensions,

take a coordinated approach, adding roof extensions of consistent and appropriate design to each property across the terrace;

3. In other locations, be of appropriate design sympathetic to the architectural character of the existing building.

WESTMINSTER VIEWS

- F.** New development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible.

45.1 / The densely developed townscape and concentration of heritage assets in Westminster means that most development opportunities involve the infilling of small sites or extensions to existing buildings within areas of established townscape. We will seek to ensure the design of such development will respond positively to the character of Westminster's diverse and distinctive neighbourhoods and celebrate and build upon the legacy of high-quality architecture in the city.

45.2 / It is important that what makes different parts of Westminster special and unique is not lost as our city grows and develops. Our varied townscapes

include highly uniform residential terraces, squares and crescents which form architectural set-pieces, relatively modest workers' housing and mews and in contrast, areas of varied townscape characterised by architecture from a wide variety of eras and in a variety of styles.

45.3 / We recognise that there will be greater potential for modern intervention, regeneration and change in certain areas of Westminster, where the quality of the existing built environment may be lower or character more varied. In other areas, the quality and / or uniformity of existing townscape demands a different architectural response and a greater degree of integration with the existing context. In general, the more uniform the townscape, the greater the degree of coherence with the original scale, form and materials of the existing townscape that should be shown by new development.

45.4 / A variety of distinctive spaces and features contribute to the character and appearance of townscapes across the city. The layout and pattern of development in Westminster, much of which was developed in the Georgian and Victorian eras, gives rise to certain locally distinctive building forms, rhythms and patterns of architectural detail within the townscape. Where such characteristic architectural detailing, features and spaces contribute to the townscape, these should be retained, enhanced and integrated within new designs, where appropriate. The protection and /or restoration of such features and spaces is particularly important when heritage assets are affected.

Extensive developments

45.5 / Extensive development covers a large site area and has some independence of character which differentiates it from the surrounding townscape. Such sites are relatively uncommon in Westminster and most are likely to be covered by site briefs or design guides providing further guidance. Where they do exist or become available, their potential to improve the quality and functionality of the area must be fully realised. A comprehensive and integrated approach to urban design will be required, including consideration of building layouts, creation of new public realm, streets and spaces, incorporation of landscaping and infrastructure to maximise the opportunities for positive change. Designs will build in capacity for future needs, promoting legibility and ensuring good connections, while also taking into account the wider setting.

Alterations and extensions

45.6 / Given the densely developed character of the city, extensions to existing buildings (both upwards and outwards) have an important role to play in meeting the growth ambitions of this plan. They can provide room for expanding families, may provide additional housing units, and can allow businesses to grow, as part of single or mixed-use development.

45.7 / Works to alter and extend existing buildings will be supported where they are successfully integrated with their surroundings. To achieve this, extensions

should be subordinate to the host building, respecting the scale, detailing and materials of both existing buildings and adjoining townscape. Care should always be taken not to disfigure buildings or upset their proportions and to ensure good standards of amenity as set out in Policy 7.

45.8 / Roof extensions can be a practical way to create additional floorspace but can also have a significant impact on the character and appearance of buildings and the wider townscape, and a sensitive approach and highest standards of design will be required.

45.9 / National and London Plan policy identifies the potential for building upwards to increase housing supply. Where upwards extensions will allow the creation of additional residential floorspace to provide family housing or new self-contained residential units and they are sympathetic to the townscape context, they will be supported.

45.10 / Many of Westminster's residential areas are characterised by terraced housing of consistent design. On terraced houses of the Georgian and Victorian eras, mansards will very often be the most appropriate form of roof extension. However, this will depend on the age and style of the building. Where mansards or other roofs are an established feature within a group of buildings, roof extensions which follow the established pattern will usually be considered acceptable, but they should respect existing architectural features such as chimneys, party wall upstands, parapets and cornices.

45.11 / 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 with a uniform roofline. 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 legal agreement. Upwards extension will usually be inappropriate where a mansard or other later roof extension already exists.

45.12 / While one additional storey will often be most appropriate, larger extensions of more than one storey may be appropriate in certain locations, particularly in commercial locations with more varied townscape character including the Opportunity Areas, 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 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.

45.13 / The creation of larger extensions to existing buildings may also lead to additional challenges and the capacity to support additional loading will be an important factor in determining the feasibility of delivering such rooftop development. Where substantial demolition of existing buildings will be required to allow for additional height this will be considered having regard to the criteria set out in heritage policy.

45.14 / Even small-scale alterations and additions can have a cumulative impact on townscape character. The design of new doors, windows or shopfronts should be carefully considered to relate sensitively to the existing building and adjoining townscape. Additions such as plant, balustrades, fire escapes routes, telecommunications equipment, cameras and alarms, micro-generation equipment, any associated cables and fixings, as well as air conditioning units, flues and water tanks should always be carefully designed, sited and detailed or screened where appropriate.

Westminster views

45.15 / Westminster's unique townscape gives rise to some of the most familiar and cherished views of London. These include views of the River Thames and its frontages, the Royal Parks, as well as many other 'picture postcard' views of famous London landmarks.

45.16 / There is a hierarchy of protected views in terms of their significance, sensitivity and status in the planning system. Strategic views are those which are considered to help define the character of London and are identified in the London Plan – eighteen of these affect Westminster. Several of these are protected vistas and have geometrically defined viewing corridors, subject to specific protection and height limits. Several designated townscape views and river prospect views are focused on the Palace of Westminster and protect its silhouette. Guidance on these views is set out in the London View Management Framework.

45.17 / Local views are valued for their contribution to Westminster's distinctive character areas. These may contribute to the appreciation of important listed and other landmark buildings or distinctive skylines or groupings of buildings, historic parks and gardens, and views along or across the River Thames and Westminster's canals. Recognising the national importance of Westminster's heritage and townscape, we have also identified certain 'metropolitan views' of major landmarks and the most significant river views and areas of townscape in the city. We will publish a list of views of

metropolitan importance and prepare guidance on their management. Other views are important at a local level and may be identified by us or local communities in conservation area audits, made neighbourhood plans or other area-based studies.

45.18 / New development should make a positive contribution to the characteristics and composition of significant views, both strategic and local, and improvement to significant views will be encouraged. This may include a proactive approach to view enhancement by repairing past damaging development. For example, opportunities should be taken to reduce the scale and impact of existing harmful buildings in the foreground or middle ground of protected vistas. Careful consideration of building materials and finishes can make proposals more sympathetic in long distance views. A proportionate approach to view protection will be taken, taking into account the significance of the view and magnitude of impact of proposals.

45.19 / We will work with adjoining boroughs to ensure the impact of development in Westminster on protected views in other boroughs (and vice-versa) is understood and managed carefully and sensitively. Potential impacts on views should be identified through visibility analysis, supported wherever possible by the use of accurate 3D digital modelling.

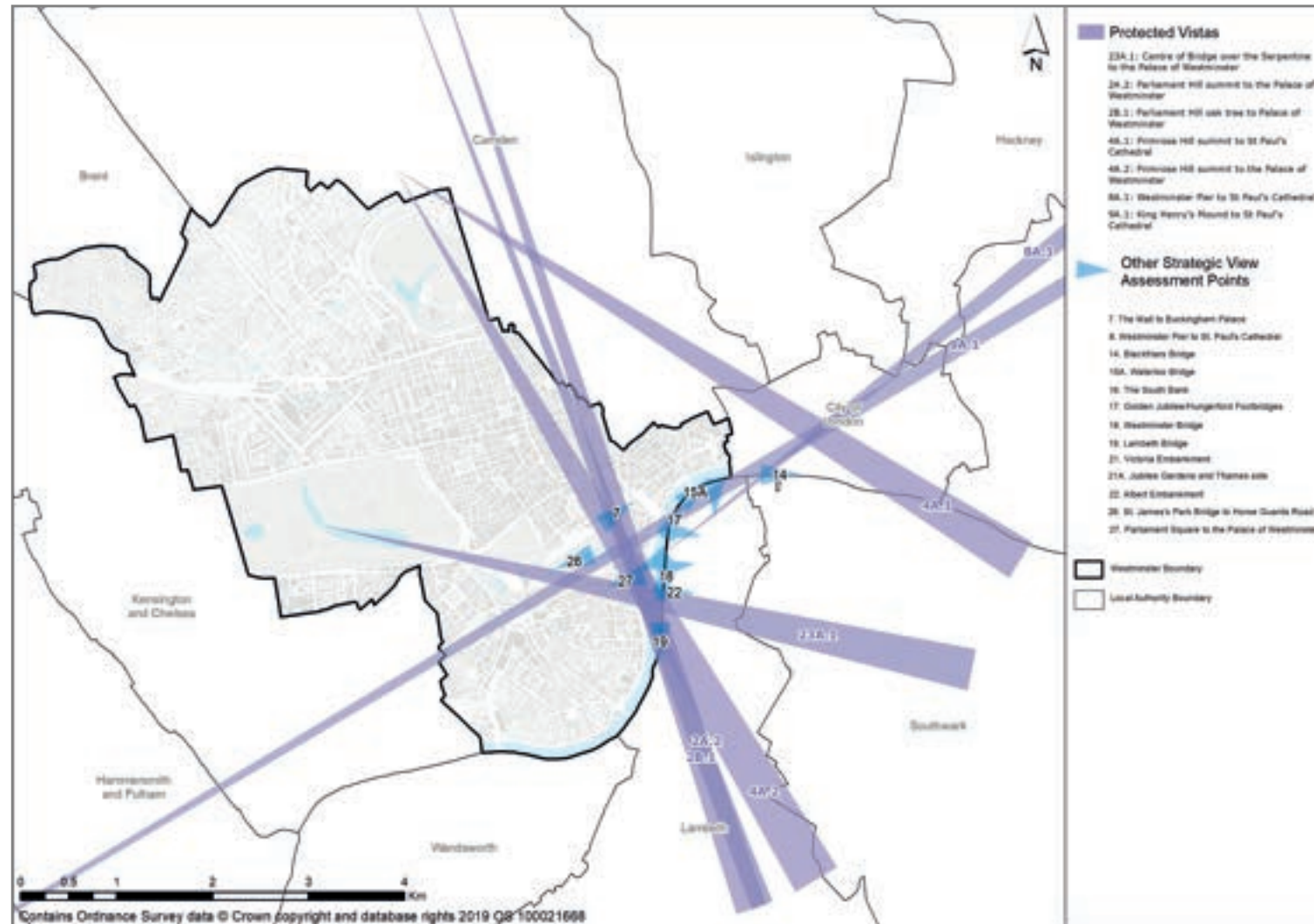


Figure 44: Protected Vistas and Other Strategic Views

46. Building height

- 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 42).

GENERAL PRINCIPLES

- B.** Proposals for tall buildings will be required to:
1. Be proportionate to the role, function and importance of the location in terms of height, scale, massing and form; and
 2. Achieve exceptional architectural quality and innovative and sustainable building design from all viewpoints and directions; and
 3. Create an attractive and legible streetscape that takes account of the use of the public realm for a variety of uses and includes active uses at ground floor level; and
 4. Enhance the character and distinctiveness of an area without negatively affecting valued townscapes

and landscapes, or detracting from important landmarks, heritage assets, key views and other historic skylines and their settings; and

5. Mitigate negative impacts on the microclimate and amenity of the site and surrounding area; and
6. Avoid unacceptable impacts on aviation and telecommunications; and
7. Provide publicly accessible viewing platforms at the roof of the building (for any exceptionally tall buildings).

LOCATIONAL PRINCIPLES

- C.** 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 the general principles under clause B. These principles need to be cross-referenced against the area specific design principles set out below, and for the Housing Renewal Areas, policy 42 and with site-specific guidance set out in the [forthcoming Site-Allocations Development Plan Document site allocation policies](#):

PADDINGTON OPPORTUNITY AREA

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.

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.

MARYLEBONE FLYOVER / EDGWARE ROAD JUNCTION

Tall buildings may be appropriate at 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.

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.

The prevailing context height in this area is 6 residential storeys (20m) but as it sits within a

varied context. Tall buildings of 2 to 3 times the context height may be appropriate.

VICTORIA OPPORTUNITY AREA

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.

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 and registered parks and gardens.

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.

- D. Proposals for tall buildings outside of the areas identified in clause C will not generally be acceptable, and will need to demonstrate how they (in addition to the general principles under clause B):
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; and

2. Will not undermine the prominence and / or integrity of existing landmark buildings and tall building clusters.

46.1 / Westminster has a diverse and historic townscape that is already densely developed. Height is mainly concentrated in the Victoria and Paddington Opportunity Areas, but this does not come close to the height of some of the tall buildings in neighbouring boroughs. The historic position was, and remains, that Westminster is not generally suitable for tall buildings. However, we also recognise that in some locations – and when well-designed – tall buildings can make a positive contribution to our townscape and can help deliver the growth and regeneration objectives of this plan. We therefore set a positive strategy for building height in the city.

46.2 / Building densely does not always mean building high. There are many ways to deliver on our growth targets with high density developments without adding significant height. Outside the areas identified as having potential to accommodate tall buildings, proposals incorporating buildings significantly higher than their surroundings are likely to be resisted and should therefore provide evidence that other options have been explored to make efficient use of the site without adding significant additional height.

46.3 / 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 to tall buildings, which considers the prevailing height of the surrounding areas impacted by the development. The prevailing context height sets a baseline against which the impacts of any proposals for tall buildings will be considered.

46.4 / It is necessary to define what a tall building is as their impact is greater than that of other large-scale 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.

General principles

46.5 / The appropriate height of a building is influenced by many factors. In addition, the height of a building is not the only aspect that determines the impact or suitability of a tall building. The general principles that all tall building applications will need to comply with make sure they are of exceptional design and make a positive contribution to our townscape, including by being of appropriate height.

46.6 / Tall buildings should fulfil a clear function. They can mark an important location, improve legibility and enhance the character of an area. Tall buildings can also provide public benefits, such as publicly accessible viewing platforms which we require for any buildings that are exceptionally tall, standing out in the townscape. The potential benefits of tall buildings will be balanced with the need to mitigate their potential adverse impacts.

Locational principles

46.7 / The Westminster Building Height Study (2019) identifies five areas that may have capacity for additional tall buildings as they have fewer constraints than other parts of the city, could make a contribution to growth and regeneration and are well connected. The study also informed the design principles for tall buildings in those locations.

46.8 / The prevailing context heights identified in the policy set a baseline for the consideration of any tall building proposals in the relevant areas. As there is a lot of variation in height in these areas, there is greater scope for increased height than if the areas were of uniform height. The height ranges have been tested as part of the Westminster Building Height Study (2019). The appropriate height of each individual scheme is subject to its impacts. Any deviation from the identified height ranges must be robustly justified by demonstrating the general principles in this policy have been met in full.

46.9 / The Westminster Building Height Study (2019) did not identify further opportunities for tall buildings outside the five areas and tall buildings are therefore not generally acceptable outside of these areas. However, there may be instances where a tall building of a local scale elsewhere in the city may be appropriate as it strengthens the role of the place in the townscape and does not affect the function of other tall buildings or tall building clusters. We therefore set additional criteria to assess any proposals for tall buildings outside of the areas identified in the policy.

47. Building height in the housing renewal areas

A. Delivering large scale public estate regeneration comes with viability challenges that are different to private developments, such as decanting of existing residents and a higher affordable housing requirement. While the design principles for these estates remains paramount and any scheme must adhere to the general building height principles in Policy 41 B, what is considered an appropriate height must be balanced against the wider public benefits the scheme is able to viably deliver.

B. The Church Street / Edgware Road Housing Renewal Area and Ebury Bridge Estate Housing Renewal Area 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:

1. On Ebury Bridge Estate respect the setting and views from the surrounding Georgian and Victorian terraces within the adjacent conservation areas; have the tallest element towards the northern end of the area marking Ebury Bridge and the crossing of the railway line, with building heights stepping down from this location.
2. On Church Street / Edgware Road Housing Renewal Area are at 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.



Figure 45: Victoria Opportunity Area, Ebury Bridge Estate Housing Renewal Area



Figure 46: Paddington Opportunity Area, Marylebone flyover / Edgware Road junction, Church Street Housing Renewal Area

47.1 / 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 Housing Renewal Area and Ebury Bridge Estate Housing Renewal Area, 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 and B of Policy 41.

47.2 / At present only Church Street/Edgware Road Housing Renewal Area and Ebury Bridge Estate Housing Renewal Area have been identified for housing renewal, however, other housing estates may be identified as suitable for renewal in future.

48. Public realm

A. Development will contribute to a well-designed, clutter-free public realm with use of high quality and durable materials capable of easy maintenance and cleaning, and the integration of high-quality soft landscaping as part of the streetscape design.

AN INCLUSIVE AND ACCESSIBLE PUBLIC REALM

B. The public realm will be safe, attractive and accessible to all. Development should contribute to improving connectivity, legibility and permeability of the public realm and the network of public spaces in the city through:

1. Helping to provide a network of connected and defined frontages and spaces such as pocket parks;
2. Optimising active frontages towards public streets and spaces particularly in areas identified as appropriate for tall buildings;
3. Ensuring that soft landscaping is maximised to soften the streetscape and provide visual and environmental relief from hard landscaping, buildings and traffic;
4. Using high quality new, or reinstated paving materials whose colour and texture underline a sense of place and

consistency of materials and have an appropriately engineered surface that is fit for purpose;

5. Creating clear sight lines, improve lighting and following the principles of designing out crime;
6. Creating new quiet routes;
7. Resisting the creation of gated communities which do not promote socially inclusive and cohesive neighbourhoods or connectivity between places.

COMMERCE IN THE PUBLIC REALM

C. Additional kiosks or other structures for the display and sale of goods outside of a market will be resisted. The replacement and relocation of existing structures will be designed and sited to:

1. Respect local context and not detract from any heritage asset;
2. Minimise obstruction to pedestrian movement and street cleansing arrangements;
3. Minimise energy consumption;
4. Ensure they are capable of quick removal.

D. Proposals for trading from premises extending into the street (including provision of tables and chairs on the highway) will be supported where they would not:

1. Harm local amenity;
2. Compromise pedestrian movement or traffic conditions;
3. Impede refuse storage and street cleansing arrangements.

PUBLIC ART, STATUES AND MONUMENTS

- E.** Applicants will be encouraged to provide high quality public art as an integral part of the design of new major developments, particularly around gateway locations and where they benefit legibility.
- F.** New statues, monuments or memorials in the public realm will be directed outside of the Monument Saturation Zone.

SIGNS AND ADVERTISEMENTS

- G.** Signs and advertisements will make a positive contribution to amenity or public safety by being sensitively designed in terms of their size, location and degree of illumination, their impact on the building on which they are displayed, local context, street-scene and wider townscape.

H. Pedestrian signage will be consistent with Legible London or any subsequent successor standards.

48.1 / The public realm refers to all the physically and visually public, accessible space which form the setting for human interaction, such as streets, pavements, forecourts, squares, parks, open spaces and building façades. The cross-cutting impacts of public realm on strategic permeability, legibility and connectivity of the city's public realm means that it is intrinsically linked to the City Plan's 10 objectives and contributes to the delivery of other core policy strands such as sustainable travel, design, green infrastructure and town centres. Addressing improvements to the public realm from a strategic viewpoint is essential, while placing public realm considerations at the heart of individual development schemes and establishing the critical measures an applicant needs to consider when going through the planning process.

48.2 / All such spaces must be carefully designed, using high quality materials and detailing which respect and enhance the existing character of areas within the city. The public realm will be carefully managed and maintained, with the principle of decluttering advocated whilst discouraging graffiti and deterring anti-social behaviour and crime to ensure the amenity, well-being and health of residents and visitors.

48.3 / The public realm should be distinctive and attractive and positively contribute to the City Plan objective of creating and enhancing successful places. It should offer opportunities to meet, congregate and socialise, as well as provide opportunity for quiet enjoyment. Wherever possible, development should make the most of opportunities to green the urban realm through new planting and vegetation in order to soften the townscape. Ongoing maintenance of the public realm is a key consideration and will be secured through planning conditions and/or legal agreements where appropriate.

An inclusive and accessible public realm

48.4 / Given the pressures on space in Westminster, in order to ensure an inclusive public realm a particular priority must be given to the needs of pedestrians, with a special focus on disabled people, those with dementia, children and others with particular mobility requirements.

48.5 / To facilitate this objective whilst recognising that pedestrian movement will increase through new infrastructure projects, such as Crossrail, pavement widening will be promoted. This approach and the need to connect with planned public realm and transport enhancement projects may require the loss of some ground floor space within a development site's red line boundary in order to make a scheme acceptable.

48.6 / The installation of seating will be encouraged where appropriate and where it adds to the peaceful enjoyment of the public realm.

48.7 / It is important to distinguish between private and public space in order to create a more cohesive and defined street scene whilst aiding delineation of ownership. Boundary treatments which help to green parts of Westminster are promoted in an attempt to soften the built environment particularly in public spaces where people gather.

Commerce in the public realm

48.8 / Commerce in the public realm can add to the diversity and vibrancy of city life and support economic development. However, it can also hinder pedestrian movement, cause traffic congestion, undermine the character of historic areas, result in adverse impacts on nearby residential amenity, and compromise city management functions such as street cleansing and refuse collection.

48.9 / Given the intense pressures on much of the city's kerb space, and the need to prioritise safe pedestrian movement, commercial activity of this nature must be carefully managed to balance its benefits and adverse impacts.

48.10 / Therefore, a net growth in semi-permanent kiosks (i.e. those that cannot be removed without the need for dismantling) will be avoided. Where replacement facilities are proposed (including those in alternative locations to the existing), they should deliver net benefits by being designed and

constructed in a manner that makes a positive contribution to their proposed setting and wider energy efficiency goals. Their location should not impede pedestrian movement through an area and between buildings, and any arrangements for street cleaning. This includes being designed to avoid stock spreading onto the pavement.

48.11 / It is considered that a single, well designed and located structure could have less negative impacts than clusters of smaller stalls, and as such may be preferable where it can be used to house several separate functions. Quick removal of structures may be necessary to facilitate highways works, street cleansing, or other works for special events in the public realm.

48.12 / Extending trading onto the street, including through outdoor seating, can help sustain businesses such as cafés and restaurants by adding to their offer. Where well-managed, such use of outdoor space can also enhance the utilisation of the public realm as a space for social interaction. However, this needs to be carefully balanced against the need to facilitate movement of pedestrians and other highways users.

48.13 / The noise associated with such development can also cause disturbance to residential occupiers of upper floors. Where schemes are supported, they will be required to store temporary street furniture off-street outside of trading hours, so as not to impede refuse storage and street cleaning. City management powers will

also be used alongside planning powers to limit the number of tables and chairs, hours of use, and secure suitable management arrangements. Permission will generally be granted only for a temporary period in order to allow the impact of the tables and chairs to be monitored and re-assessed. Further guidance on the effective management of these issues will be forthcoming in the form of a supplementary planning document.

Public art, statues and monuments

48.14 / Public art demonstrates a shared commitment by us and applicants to high quality public places and a public affirmation of pride in new development projects. It contributes to creating a sense of place and a visually stimulating environment, which adds to public enjoyment of the public realm.

48.15 / Westminster has an outstanding heritage of more than 300 statues and memorials. Many of these were by the leading artists of their day and are major works of art in their own right. Almost half of all memorials, 47%, are situated in the royal and governmental heart of Westminster – a relatively small area centred on Whitehall and in the Royal Parks. It is not possible to continue to accommodate new statues and monuments in Westminster on the same scale as in the past, and the most central areas are already saturated. However, new statues and monuments are strongly encouraged in other areas of Westminster, where public art is under-represented.

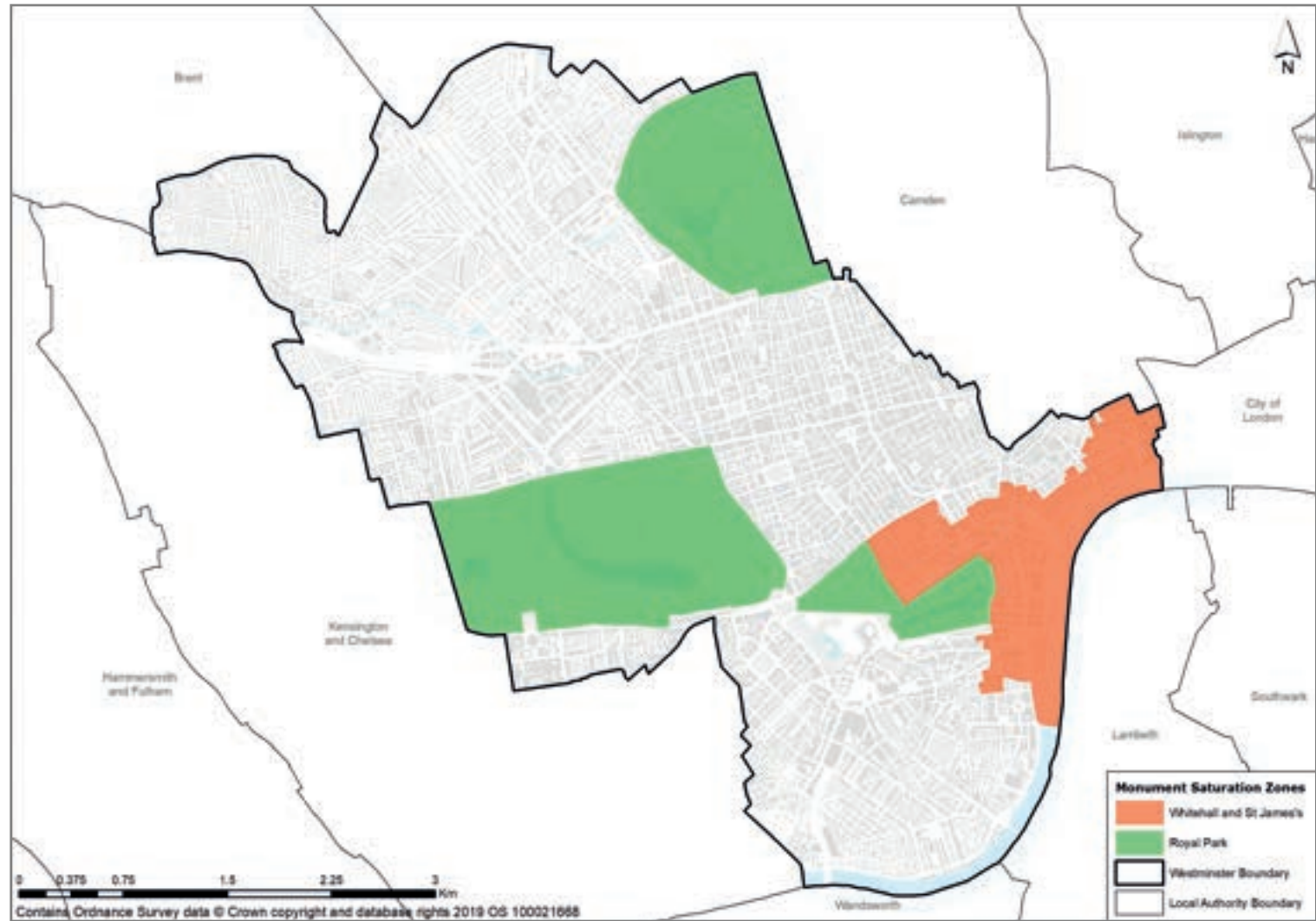


Figure 47: Monument saturation zones

Signs and advertisements

48.16 / Signs and advertisements are common features in many parts of Westminster, in particular in the more commercial areas of the West End. Although they play a role in providing information, control of signs and advertisements is important as they can have significant impacts on the quality and appearance of the street scene and upon the building on which they are displayed. They may also affect amenity and public safety, including highway safety, and can damage the appearance of the streetscape and the architectural integrity of our built environment. On the other hand, properly planned, executed and managed, advertising can enhance peoples' experience of the public realm. We will work with the industry to find ways of ensuring the most is made of the positive aspects. Careful consideration will be given to the size, location, materials, details, and method of illumination of proposed signs and advertisements together with the impact they will have on the architectural features of the building upon which they are fixed. It is recognised that commercial advertising on shrouds and hoardings along with high level and temporary advertisements may cause substantial injury to visual amenity and can have a particularly detrimental effect on surrounding townscape.

48.17 / Legible London provides a pedestrian signage system that has been installed at more than 1,700 locations across the capital (450 within Westminster) to aid effective wayfinding. The uniform nature of these signs is critical to their successful interpretation (particularly across borough boundaries), and as such all future pedestrian signs should be consistent in design and quality.

49.1 / Westminster attracts millions of visitors as an international tourist destination, the centre for the UK government and the location for many other institutions, businesses as well as educational, medical and cultural venues. For these reasons it has places and uses that are terrorist targets – as shown by recent attacks. It is a priority to ensure and maintain a safe and secure environment for people visiting, residing and working in Westminster.

49. Security measures in the public realm

- A.** Development will provide an integrated approach to the security of the site including buildings and any associated public or private spaces.
 - B.** Development and or public realm improvement proposals will be required to incorporate appropriate counter terrorism measures advised by the Metropolitan Police and / or the council. Where appropriate, the retrofitting of existing buildings and spaces may be required.
 - C.** All security measures will be designed and implemented to take account of the functionality of the area and the needs of its users, and will be sensitively designed to respect the surrounding context and public realm.
- 49.2** / Building and public realm schemes will be assessed as part of the planning application process to ensure their resilience against emergencies including terrorism and related hazards. This assessment will be based on advice from the relevant authorities, in particular the Metropolitan Police. Applicants for major development should undertake a Security Considerations Assessment process. This will ensure that potential security-related vulnerabilities have been identified, assessed and, where necessary, addressed in a manner that is appropriate and proportionate. Where there is a clear threat from terrorism and to ensure security and counter-terrorism measures can be incorporated into higher risk developments and public spaces, applicants are encouraged to contact the Metropolitan Police's Designing Out Crime Officers who will make contact with Counter Terrorism Security Advisors for further advice. Architects and engineers are also encouraged to seek advice from the Metropolitan Police's Counter Terrorism Security Advisors on appropriate counter-terrorism measures that can be incorporated in high risk developments and public spaces.

49.3 / Developments that achieve Secured by Design accreditation will help to make Westminster safe and sustainable, a place where people want to visit and stay. Therefore, as a minimum the basic principles of Secured By Design, including counter-terrorism, should be incorporated into new developments to minimise potential physical risks, deter terrorism, detect terrorist activity and help mitigate its effects. Incorporating security features can be costly if it is thought about too late and have to be retrofitted into schemes. They should therefore be considered at the outset of the design process.

49.4 / Security measures and surveillance equipment must, wherever possible, be sensitively designed and positioned to avoid detrimental visual effects, as Westminster's historic townscapes are sensitive to visual intrusion. Measures should provide effective protection and embrace good design.

49.5 / In light of a significant vulnerability to terrorism, we will use planning conditions where appropriate and request legal agreements to ensure design and other measures required under this policy are incorporated and maintained, including effective management of access to both private space and spaces that are accessible to the public. Legal agreements may make provision for long-term management and maintenance of security measures at the expense of the applicant.

50. Basement developments

A. Basement developments should:

1. Incorporate measures recommended in the structural statement or flood risk assessment to safeguard structural stability, and address surface water and sewerage flooding;
2. Be designed and constructed to minimise the impact at construction and occupation stages on the surrounding area;
3. Protect heritage assets, and in the case of listed buildings, not unbalance the building's original hierarchy of spaces where this contributes to its significance; and
4. Conserve the character and appearance of the existing building, garden setting and the surrounding area, ensuring lightwells, plant, vents, skylights and means of escape are sensitively designed and discreetly located.

EXTENT AND DEPTH OF BASEMENTS

B. Basement developments will be supported where they:

1. Do not extend beneath more than 50% of the garden land – on small sites where the garden is 8m or less at its longest point, basements may extend up to 4m from the original building in that direction;
2. Leave a margin of undeveloped garden land proportionate to the scale of the development and the size of the garden around the entire site boundary;
3. Not comprise more than one storey beneath the lowest original floor level – exceptions may be made on large sites with high levels of accessibility for construction;
4. Provide a minimum of one metre of soil depth (plus minimum 200mm drainage layer) and adequate overall soil volume above the top cover of the basement; and
5. Not encroach more than 1.8m under any part of the adjacent highway and retain a minimum vertical depth below the footway or carriageway of 900mm between the highway surface and vault structure.

50.1 / Basement extensions have become an increasingly common form of development in Westminster in recent years. Although often hidden from public view, basement excavation can have significant impacts on the amenity of neighbouring occupiers and may affect ground conditions, biodiversity, heritage assets, local character and garden settings. This policy seeks to make sure that basement developments are appropriately designed and applies to new basements as well as extensions to existing basements.

Basement development principles

50.2 / Excavation in a dense urban environment is more complex than many standard residential extensions and has the potential to damage existing and neighbouring structures and infrastructure, and irreversibly alter ground conditions. Basement developments should therefore safeguard the structural stability of the existing building, nearby buildings and other infrastructure including highway and railway lines/tunnels. Applications for basement development should be accompanied by a structural methodology statement and appropriate self-certification from a suitably qualified engineer to demonstrate the impacts of the proposed development have been understood.

50.3 / Given their nature, basements can be vulnerable to flooding from a number of sources including the overflowing of drains and nearby watercourses, groundwater flooding and surface water flooding. A site-specific Flood Risk Assessment (FRA) and a structural statement will be required for basement developments located in flood zone 2 or 3, or surface water flood risk hotspots. Flood risk considerations are also addressed in the structural methodology statement required for all basement developments. Measures to be incorporated include Sustainable Drainage Systems (SuDS) and positive pumped devices or equivalent to address sewerage flooding, and other measures recommended in the FRA.

50.4 / The construction works associated with basement excavation can often have a serious impact on the quality of life of neighbours and cause disruption. Applicants for basement development must therefore demonstrate that reasonable consideration has been given to potential impacts of construction in line with our adopted Code of Construction Practice. A signed pro forma Appendix A of the Code of Construction Practice should be submitted as part of basement development applications. Applicants for basement excavation works are strongly encouraged to consult with neighbouring occupiers prior to submitting an application. Evidence of engagement with neighbouring occupiers, including a schedule and timetable of works may be requested as supporting information with planning applications.

50.5 / Westminster's heritage may be sensitive to the impact of basement development. Listed buildings and archaeology can be especially vulnerable to damage when excavation takes place. The internal hierarchy of buildings could also be unbalanced by basement developments, negatively impacting on the architectural and historic interest and significance of historic buildings.

50.6 / When poorly designed, basements can negatively affect the character and appearance of buildings and the wider townscape. Private gardens also make a significant contribution to Westminster's character as an important part of our green infrastructure network. A satisfactory landscaping scheme should be provided that incorporates soft landscaping, planting and permeable surfacing as appropriate.

Extent and depth of basements

50.7 / Limiting the extent and depth of basement development can help reduce both the risks associated with basement development and mitigate negative environmental and amenity impacts.

50.8 / Standards for extent of the garden (site area excluding the footprint of the original building) are intended to strike a balance between allowing development, while ensuring a substantial area remains undeveloped (without any impermeable surfacing installed) to ensure adequate drainage and preserve the garden setting.

50.9 / The most appropriate form of basement development will be no more than one storey (approximately 2.7m floor to ceiling height) below the lowest part of the original floor level. In some cases, an exception could be made for large sites when they are able to accommodate plant and machinery and include appropriate access (e.g. rear or side access) to enable construction without an adverse impact on neighbouring uses or occupiers. The definition of large sites will depend on individual circumstances.

50.10 / Sufficient soil depth will be required to support sustainable planting. In some circumstances a soil depth of up to 1.5m (plus drainage layer) may be required to support tree growth. Applicants should provide detail of soil profile and composition.

50.11 / Work to basement vaults can restrict the space available for services in the highway and may make it difficult to access cables, pipes, sewers, etc. for maintenance and to provide essential items of street furniture. In order to ensure that services and essential street furniture can be provided, adequate space must be available between the highway and any excavation proposed under the highway. Applications adjacent to or affecting the Transport for London Road Network (TLRN) or public transport infrastructure should seek advice from Transport for London.

IMPLEMENTATION AND MONITORING

The City Plan, the London Plan and any made neighbourhood plans make up Westminster's Development Plan. It is also supported by a suite of national planning policies and other local planning documents – illustrated by this diagram.



Figure 48: Westminster's Development Plan

Supplementary Planning Documents

We have, or will prepare additional information including technical notes and Supplementary Planning Documents (SPDs) to explain more detail on how to implement the City Plan policies effectively, support the efficient use of land and the delivery of the right kind of growth in the city. These are will be published on our website and provide more detailed guidance that should be taken into account when designing developments and determining planning applications.

The SPDs will cover the follow topic areas, among others:

- Planning Obligations and Affordable Housing
- **Heritage**
- **Design and** Public Realm
- **North Bank**
- Environment
- **Local Enforcement**
- **West End:**

Neighbourhood planning

Neighbourhood plans are written by the local community - they are an important tool that gives Westminster's communities statutory powers to shape how their local area develops.

Neighbourhood plans must have regard to national policies and guidance and be in general conformity with the strategic policies in this City Plan to ensure they directly contribute to the delivery of the City Plan objectives. Appendix 2 sets out a schedule of which policies in this plan are strategic to help guide neighbourhood forums in developing their plans. Neighbourhood plan policies and spatial designations can differ from the non-strategic policies, but they need to be in general conformity with strategic City Plan policies. General conformity is judged on the neighbourhood plan as a whole, so absolute conformity on every detail of strategic policy is not required.

Westminster City Council offers bespoke guidance and support for the delivery of neighbourhood plans across the city - our website includes helpful guidance, information on data sources and contact details.¹

¹ westminster.gov.uk/neighbourhood-planning

Implementation

Westminster's Development Plan policies and national planning policies will be implemented through Westminster's Development Management process. Legal agreements including Section 106, Community Infrastructure Levy (CIL), Carbon and Air Quality Offset funds will also be used to help deliver the City Plan. We will allocate council resources (including capital funding) and use funding from other sources e.g. Greater London Authority, Department for Environment Food and Rural Affairs and lottery grants to implement the City Plan. We will only use compulsory purchase powers where it is demonstrated that there is a compelling case that it will enable the acquisition of land to help deliver our planning and regeneration objectives.

Viability

Applicants should factor in the costs of delivering the City Plan objectives when considering potential development proposals or site purchases. Where proposals meet the policies in this plan, it will be assumed that they are viable.² It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at application stage. Such circumstances could include:

- where further information on infrastructure or site costs is required;
- where the type of development proposed is significantly different from standard models of development e.g. build to rent; and
- where economic circumstances have significantly changed since the Plan was adopted.

When it is demonstrated to the council's satisfaction that all policy requirements cannot viably be met (including through the use of planning obligations), we will ensure a balanced assessment of all the requirements is carried out. We may apply priority to affordable housing and necessary public transport improvements over other requirements.

Land use swaps

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

² The policies in this plan have been independently viability tested

to another site as part of estate management or dual site developments. 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. Therefore, a system of land use swaps may be appropriate in the following circumstances to enable better development outcomes:

1. the sites are in the vicinity of each other;
2. there is no net loss of floorspace which is protected by other policies in the Plan across the sites taken as a whole;
3. the uses are appropriate within each area;
4. any residential accommodation is of a higher quality than could have been achieved without the land use swap.

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:

- a. the floorspace of each use (Gross Internal Area) proposed for each site, and for all of the sites taken as a whole;
- 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

c. calculations of any floorspace shortfalls being met by a payment in lieu.

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.

Transition of existing mixed-use credits

Mixed use residential credits registered under the 2016 City Plan policy S1 may continue to be used to offset the affordable housing requirements of Policy 9.13 in the Central Activities Zone where the floorspace registered is affordable housing.

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.

Early delivery of off-site affordable housing

As set out in paragraph 9.13.9, the early delivery of affordable housing floorspace may in some circumstances count towards future requirements for affordable housing triggered by Policy 9.13. 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.

Legal agreements will be used to:

- 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;
- ensure the market housing cannot be occupied until the affordable housing is complete and transferred to a Registered Provider, where applicable.

Enforcement

Planning enforcement is part of the end to end process of development, from policy to the granting of permission through to monitoring and achieving compliance with the development which our policies seek to achieve. We will investigate all reported breaches of planning control in a transparent and proportionate manner and will pursue enforcement action where it is considered expedient to do so. In determining whether it is relevant to pursue enforcement action regard will be given to national, regional and local policy and to any other material considerations. When pursuing enforcement action we give priority to prevention and harm to residential amenity; the effective functioning of lawful business premises; preventing the loss of permanent residential accommodation and other priority uses; and the preservation or enhancement of our heritage assets and any harm to visual amenity. All breaches of planning control will be considered on their individual merits. We will prosecute offenders under the relevant legislation where it is considered expedient and in the public interest to do so.

Infrastructure delivery

The Infrastructure Delivery Plan (IDP) sets out the key locations, sites and infrastructure, which are essential for the successful implementation of the City Plan's strategic policies. It also details the timescales for delivery and funding mechanisms. The Infrastructure Delivery Statement (IDS) will monitor delivery of the IDP and will be updated regularly.

Working with partners and stakeholders

We will work with neighbouring authorities, agencies and partner organisations including the GLA and community groups to deliver a range of services and realise the benefits of an integrated approach to development and to ensure the realisation of shared objectives. We will continue to utilise our [Open Forum Westminster Together](#) network to liaise with resident groups and the designated neighbourhood forums on planning issues, where appropriate.

Monitoring

We 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.

The table overleaf sets out Westminster's key monitoring indicators which will be used to monitor success towards meeting the objectives in this plan. If the trigger points are reached this does not necessarily mean the policy is failing. All key Performance Indicators will be reviewed annually through the Authority Monitoring Report (AMR) to ascertain trends in how the policies are operating and if the Plan and spatial objectives are being achieved.

Review

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.

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 delivery is lower than the annual target or air quality objectives are not achieved this may indicate amendments to policy are required.

Monitoring Framework

| Key Performance Indicators | | City Plan objectives | Data source | Trigger for review / review mechanism |
|----------------------------|---|----------------------|--------------------------|--|
| 1 | Delivery of new homes (floorspace, units by size, type and tenure) against target of 985 new homes per year and 20,685 homes overall up to 2040 | 1, 9 | Westminster City Council | Delivery is 10% 15% below target for three consecutive years Review the SHMA for delivery of all accommodation types within five years |
| 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 three years |
| 3 | Delivery of homes through the Affordable Housing Fund (floorspace and units) | 1, 9 | Westminster City Council | |
| 4 | Number of family sized homes delivered | 1 | Westminster City Council | Less than 25% across the city |
| 5 | Net change in Class E floorspace across CAZ, Opportunity Areas, and town centre hierarchy | 2, 3, 9 | Westminster City Council | |
| 6 | Delivery of C1 Hotel floorspace | 2, 3, 9 | Westminster City Council | Net reduction in floor space |
| 7 | Loss of public houses | 3, 4 | Westminster City Council | 15% loss of current number over 5 years |
| 8 | Hot food takeaways permitted within 200m of a school | 9 | Westminster City Council | Any permissions granted |

| Key Performance Indicators | | City Plan objectives | Data source | Trigger for review / review mechanism |
|----------------------------|--|----------------------|--------------------------|--|
| 9 | Change in land uses in the Special Policy Areas (SPAs) | 3, 4, 6, 9 | Westminster City Council | |
| 10 | Delivery of social and community floorspace | 4, 6, 9 | Westminster City Council | Review against IDP |
| 11 | 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 |
| 12 | Employment, skills and training opportunities secured through Section 106 contributions | 2, 3, 4 | Westminster City Council | Regular review with Westminster City Council employment service |
| 13 | Delivery of walking and cycling infrastructure schemes | 5, 9 | Westminster City Council | Review against IDP |
| 14 | Installation of electric vehicle charging points by type | 5, 9 | Westminster City Council | Review against IDP |
| 15 | Number of applications approved for residential development without on- or off-site car parking in an area of existing high parking stress | 5, 9 | Westminster City Council | |
| 16 | Delivery of cycle parking spaces | 5 | Westminster City Council | |
| 17 | Number of developments of thresholds set out in policy achieving BREEAM excellent (or equivalent) Standard | 6, 7, 8 | Westminster City Council | |
| 18 | Noise complaints received | 7, 8 | Westminster City Council | |

| Key Performance Indicators | | City Plan objectives | Data source | Trigger for review / review mechanism |
|----------------------------|---|----------------------|--------------------------------|---|
| 19 | Applications that include renewable technologies | 7, 8 | Westminster City Council | |
| 20 | Applications granted planning permission against Environment Agency advice on flood risk | 7, 8 | Environment Agency | No more than 1% of applications permitted |
| 21 | Reduction of NOx and particulate matter (PM2.5 and PM10) concentration against national and regional Air Quality targets | 7 | DEFRA | |
| 22 | Reduction of carbon dioxide emissions (total end user and per capita) by local authority area, as reported by Department of Business Environment and Industrial Strategy (BEIS) | 3 | Westminster City Council | Strategic net reduction |
| 23 | 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 |
| 24 | Delivery of play space in areas of play space deficiency | 6, 8, 9 | Westminster City Council | |
| 25 | Improvements to parks, play areas and other open spaces | 6, 8, 9 | Westminster City Council | Review against IDP |
| 26 | Number of open spaces awarded the Green Flag Award | 8 | Green Flag Awards Website | |
| 27 | Applications incorporating living walls and roofs | 8, 9 | Westminster City Council | |

| Key Performance Indicators | | City Plan objectives | Data source | Trigger for review / review mechanism |
|----------------------------|--|----------------------|--|---|
| 28 | Capacity of new waste and recycling facilities | 7, 8 | Westminster City Council | |
| 29 | Amount, type and destination of waste exported from Westminster | 6, 7, 9 | 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 | An increase in waste exports by the following amounts will trigger engagement with recipient waste planning authority: <ul style="list-style-type: none"> – 5,000 tpa non-hazardous waste (LACW and C&I) – 10,000 tpa inert waste (CD&E) – 100 tpa hazardous waste |
| 30 | Delivery of public realm schemes | 5, 8, 9 | Westminster City Council | Review against IDP |
| 31 | Number of designated heritage assets completely demolished/lost | 10 | Westminster City Council & Historic England | No loss |
| 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 or its setting | 10 | Westminster City Council | Database of applications impacting on the World Heritage Site |
| 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 or its setting | 10 | Westminster City Council | Applications called in |

| Key Performance Indicators | | City Plan objectives | Data source | Trigger for review / review mechanism |
|----------------------------|---|----------------------------------|--|--|
| 34 | Number of heritage assets at risk and removed from the register or with solution agreed | 10 | Historic England | Less than 1% of total number of listed buildings on register and no conservation areas identified as at risk |
| 35 | Effective policy for the World Heritage Site through production of updated Management Plan as 'living document' with regular review mechanism | 10 | World Heritage Committee | Production of updated Management Plan as 'living document' with regular review mechanism and removal of the World Heritage Site from the annual reporting requirements of the World Heritage Committee |
| 36 | Utility infrastructure improvements and development | 8, 9 | Westminster City Council | Review against IDP |
| 37 | Reported embodied carbon associated with development | 1, 7, 8 & 10 | Westminster City Council | |
| 38 | Housing and jobs delivered through retrofit and new build | 1, 2, 3, & 7 | Westminster City Council | Two consecutive years of new buildings providing more than half of total new homes or jobs |
| 39 | Applications for responsible retrofit | 1, 7, 8 & 10 | Westminster City Council | |

APPENDICES

Appendix 1: Westminster's Housing Trajectory

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 Includes development of the following site: – North Wharf Road |
| | Developable | 6-10 | 501 |
| | | 11-15 | 400 |
| Victoria Opportunity Area | Deliverable | 1-5 | 385 Includes development of the following sites: – New Scotland Yard – Stockley House |
| | Developable | 6-10 | 75 |
| | | 11-15 | 330 |

| Area | Type | Delivery Phase | Net housing Units | |
|---------------------------------------|-------------|----------------|---|-----|
| Tottenham Court Road Opportunity Area | Deliverable | 1-5 | 87 Includes development of the following site: – Tottenham Court Road Elizabeth Line Station (Oxford Street/ Dean Street) | |
| North West Economic Development Area | Deliverable | 1-5 | 429 Includes development of the following sites: – Warwick Community Hall, Harrow Road – Westmead, Tavistock Road – Jubilee Sports Centre, Caird Street | |
| | | Developable | 6-10 | 176 |
| | | | 11-15 | 341 |

| Area | Type | Delivery Phase | Net housing Units |
|---|-------------|----------------|--|
| Church Street / Edgware Road Housing Renewal Area | Deliverable | 1-5 | 1,216 Includes development of the following sites: – 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 Estate Housing Renewal Area | Deliverable | 1-5 | 96 |
| | Developable | 6-10 | 326 |
| | | 11-15 | |

| Area | Type | Delivery Phase | Net housing Units |
|---------------------|-------------|----------------|--|
| North Westminster | Deliverable | 1-5 | 1,089 Includes development of the following sites: <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 |
| | | 6-10 | 216 |
| | | 11-15 | 280 |
| Central Westminster | Deliverable | 1-5 | 765 Includes development of the following sites: <ul style="list-style-type: none"> – Park Crescent/ Portland Place – 22 Hanover Square – Aybrook Street Car Park – 87-89 Cleveland Street |
| | | 6-10 | 29 |
| | | 11-15 | 70 |

| Area | Type | Delivery Phase | Net housing Units |
|--|-------------|----------------|--|
| South Westminster | Deliverable | 1-5 | 1,531 Includes development of the following sites: <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 |

Appendix 2: Schedule of strategic policies

Schedule of Strategic Policies

The policies within the City Plan are made up of both strategic and non-strategic elements. Strategic policies are those policies which address the strategic priorities of the area and any relevant cross-boundary issues, whereas non-strategic policies deal more with more localised issues. Where neighbourhood plans are being prepared, neighbourhood forums should ensure policies within them are in general conformity with these strategic policies.

This table sets out which policies in the City Plan are considered strategic and non-strategic based on national guidance and will guide groups in the development of their neighbourhood plans.

| Policy Number | Policy clause |
|--|---------------------------------|
| 1 Westminster's Spatial Strategy | Whole policy – strategic |
| 2 WERLSPA | Whole policy – strategic |
| 3 Paddington OA | Whole policy – strategic |
| 4 Victoria OA | Whole policy – strategic |
| 5 NWEDA | Whole policy – strategic |
| 6 Church Street / Edgware Road and Ebury Bridge Estate Housing Renewal Areas | Whole policy – strategic |
| 7 Managing development for Westminster's people | Whole policy – strategic |
| <u>8 St Mary's Hospital</u> | <u>Whole policy – strategic</u> |
| <u>9 Westbourne Park Bus Garage</u> | <u>Whole policy – strategic</u> |
| <u>10 Land adjacent to Royal Oak</u> | <u>Whole policy – strategic</u> |
| <u>11 Grosvenor Sidings</u> | <u>Whole policy – strategic</u> |

| Policy Number | Policy clause |
|---|--|
| 12 Housing delivery | Whole policy – strategic |
| 13 Affordable housing | Whole policy – strategic |
| 14 Housing for specific groups | Whole policy – strategic |
| 15 Innovative housing | Whole policy – non-strategic |
| 16 Housing quality | A, C – strategic B, D, E – non-strategic |
| 17 Supporting economic growth | A, B, D, E – strategic C – non-strategic |
| 18 Town centres, high streets and the CAZ | A, B, C, D, G, H, J – strategic E, F, I – non-strategic |
| 19 Visitor economy | Whole policy – strategic |
| 20 Food, drink and entertainment | Whole policy – strategic |
| 21 Community Infrastructure & facilities | Whole policy – strategic |
| 22 Education & Skills | A, B, D – strategic C – non-strategic |
| 23 Digital infrastructure and information and communications technology | A, B – strategic C, D – non-strategic |
| 24 Soho Special Policy Area | Whole policy – strategic |

| Policy Number | Policy clause | |
|---------------|--|---|
| 25 | Mayfair & St James's Special Policy Area | Whole policy – strategic |
| 26 | Harley Street Special Policy Area | Whole policy – strategic |
| 27 | Savile Row Special Policy Area | Whole policy – strategic |
| 28 | Sustainable Transport | Whole policy – strategic |
| 29 | Walking and Cycling | Whole policy – strategic |
| 30 | Public Transport and infrastructure | Whole policy – strategic |
| 31 | Parking | Whole policy – strategic |
| 32 | Highway access and management | Whole policy – strategic |
| 33 | Freight and servicing | Whole policy – strategic |
| 34 | Technological innovation in transport | Whole policy – strategic |
| 35 | Waterways and waterbodies | A,B,C,D – strategic E, F, G –non strategic |
| 36 | Air quality | Whole policy – strategic |
| 37 | Local environmental impacts | Whole policy – strategic |
| 38 | Green infrastructure | Whole policy – strategic |
| 39 | Flood risk | Whole policy – strategic |

| Policy Number | Policy clause |
|---|--|
| 40 Energy | Whole policy – strategic |
| 41 Waste management | Whole policy – strategic |
| 42 Design principles | Whole policy – strategic |
| <u>43</u> Retrofit First | <u>Whole policy – strategic</u> |
| 44 Westminster’s heritage | A - Q – strategic R – non-strategic |
| 45 Townscape & architecture | Whole policy – strategic |
| 46 Building height | Whole policy – strategic |
| 47 Building height in the housing renewal areas | Whole policy – strategic |
| 48 Public realm | Whole policy – strategic |
| 49 Security measures in the public realm | Whole policy – strategic |
| 50 Basement development | A – strategic B – non-strategic |

Appendix 3: Schedule of superseded policies

Table 1: Westminster City Plan (2016)

| City Plan Strategic Policies (November 2016) | Superseded by policy |
|--|---|
| S1 Mixed Use in The Central Activities Zone | Deleted Policy 21 Mayfair and St James SPA |
| S2 Special Policy Areas | Policy 22 Harley St SPA Policy 23 Savile Row SPA |
| CM2.1 Harley Street Special Policy Area | Policy 22 Harley St SPA |
| CM2.2 Portland Place Special Policy Area | Deleted |
| CM2.3 Savile Row Special Policy Area | Policy 23 Savile Row SPA |
| CM2.4 St. James's Special Policy Area | Policy 21 Mayfair and St James SPA |
| CM2.5 Mayfair Special Policy Area | Policy 21 Mayfair and St James SPA |
| S3 Paddington Opportunity Area | Policy 3 Spatial Development Priorities: Paddington Opportunity Area Policy 41 Building Height |
| S4 Victoria Opportunity Area | Policy 4 Spatial Development Priorities: Victoria Opportunity Area Policy 41 Building Height |

| City Plan Strategic Policies (November 2016) | Superseded by policy |
|---|--|
| S5 Tottenham Court Road Opportunity Area | Policy 2 Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area |
| S6 Core Central Activities Zone | Deleted N.b. designation removed |
| S7 West End Special Retail Policy Area | Policy 2 Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area |
| S8 Marylebone And Fitzrovia | Policy 14 Town centres, high streets and the CAZ Policy 16 Food, drink and entertainment |
| S9 Knightsbridge | Policy 15 Visitor economy |
| S10 Pimlico | Policy 14 Town centres, high streets and the CAZ |
| S11 Royal Parks | Policy 34 Green infrastructure Policy 40 Townscape and architecture |
| S12 North Westminster Economic Development Area | Policy 5 Spatial Development Priorities: North West Economic Development Area |
| S13 Outside the CAZ And NWEDA | Policy 14 Town centres, high streets and the CAZ Policy 16 Food, drink and entertainment |
| S14 Optimising Housing Delivery | Policy 8 Housing delivery |
| S15 Meeting Housing Needs | Policy 10 Housing for specific groups |
| S16 Affordable Housing | Policy 13 Affordable housing |

| City Plan Strategic Policies (November 2016) | Superseded by policy |
|---|---|
| S17 Gypsies and Travellers | Policy 10 Housing for specific groups |
| S18 Commercial Development | Policy 13 Supporting economic growth |
| S19 Inclusive Local Economy and Employment | Policy 18 Education and skills |
| S20 Offices and Other B1 Floorspace | Policy 13 Supporting economic growth |
| S21 Retail | Policy 14 Town centres, high streets and the CAZ |
| S22 Tourism, Arts and Culture | Policy 15 Visitor economy |
| S23 Hotels and Conference Facilities | Policy 15 Visitor economy |
| S24 Entertainment Uses | Policy 16 Food, drink and entertainment |
| S25 Heritage | Policy 39 Heritage |
| S26 Views | Policy 40 Townscape and architecture Policy 41 Building height Policy 42 Building height in the housing renewal areas |
| S27 Buildings and Uses of International and National Importance | Policy 1 Westminster's spatial strategy |
| S28 Design | Policy 38 Design principles |
| CM28.1 Basement Development | Policy 45 Basement developments |

| City Plan Strategic Policies (November 2016) | Superseded by policy |
|--|---|
| S29 Health, Safety and Well Being | Policy 7 Managing development for Westminster's people Policy 33 Local environmental impacts Policy 38 Design principles Policy 12 Housing quality |
| S30 Flood Risk | Policy 35 Flood risk |
| S31 Air Quality | Policy 32 Air quality |
| S32 Noise | Policy 7 Managing development for Westminster's people Policy 33 Local environmental effects |
| S33 Delivering Infrastructure and Planning Obligations | Implementation and monitoring chapter |
| S34 Social and Community Infrastructure | Policy 17 Community infrastructure and facilities |
| S35 Open Space | Policy 34 Green infrastructure |
| S36 Sites of Importance for Nature Conservation | Policy 34 Green infrastructure |
| S37 Westminster's Blue Ribbon Network | Policy 31 Waterways and waterbodies |
| S38 Biodiversity and Green Infrastructure | Policy 34 Green infrastructure |
| S39 Decentralised Energy Networks | Policy 36 Energy |
| S40 Renewable Energy | Policy 36 Energy |

| City Plan Strategic Policies (November 2016) | Superseded by policy |
|--|--|
| S41 Pedestrian Movement and Sustainable Transport | Policy 24 Sustainable transport Policy 25 Walking and cycling |
| S42 Servicing and Deliveries | Policy 29 Freight and servicing |
| S43 Major Transport Infrastructure | Policy 26 Public transport and infrastructure |
| S44 Sustainable Waste Management | Policy 37 Waste management |
| S45 Flood Related Infrastructure | Policy 35 Flood risk |
| S46 Thames Tunnel | Policy 35 Flood risk |
| S47 Presumption in Favour of Sustainable Development | Deleted |
| CM47.1 Land Use Swaps and Packages | Implementation and monitoring chapter |
| CM47.2 Credits | Implementation and monitoring chapter |

Table 2: Unitary Development Plan (2007) (saved policies)

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|--|--|
| STRA25 Parking control | Policy 27 Parking |
| STRA34 Pollution: Air, water and land | Policy 32 Air quality Policy 33 Local environmental impacts |
| COM7 Diplomatic and allied uses | Deleted |
| COM8 Retention of light industrial uses in creative Industries SPA | Deleted N.b. Creative Industries SPA deleted |
| COM9 Provision of new light industrial floorspace | Policy 13 Supporting economic growth Policy 21 Mayfair and St James SPA |
| COM10 Retention of small-scale industrial uses | Policy 13 Supporting economic growth Policy 20 Soho Special Policy Area |
| COM11 Provision for general industry and commercial warehouse storage and distribution | Policy 29 Freight and servicing |
| COM12 Retention of wholesale showrooms | Deleted N.b. East Marylebone SPA deleted |
| H2 Preventing the use of housing by non-permanent residents | Policy 8 Housing delivery |
| H3 To encourage the provision of more housing | Policy 8 Housing delivery |
| H4 Provision of affordable housing | Policy 13 Affordable housing |
| H5 Providing a range of housing sizes | Policy 10 Housing for specific groups |
| H6 Hostels and Special Needs Housing | Policy 10 Housing for specific groups |

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|--|--|
| H7 To protect Houses in Multiple Occupation | Policy 8 Housing delivery Policy 10 Housing for specific groups |
| H8 Provision of homes for long term needs | Policy 12 Housing quality Policy 11 Housing for specific groups |
| H10 Provision of gardens and community facilities | Policy 12 Housing quality Policy 17 Community infrastructure and facilities Policy 34 Green infrastructure |
| H11 Controlling housing density | Policy 8 Housing delivery |
| TRANS1 Protecting the environment from the effects of transport activities | Policy 24 Sustainable transport |
| TRANS2 Road safety | Policy 24 Sustainable transport Policy 28 Highway access & management |
| TRANS3 Pedestrians | Policy 25 Walking and cycling |
| TRANS4 Bus service provision and improvement | Policy 26 Public transport and infrastructure |
| TRANS5 Surface, Underground railways and trams | Policy 26 Public transport and infrastructure |
| TRANS6 Coaches | Policy 26 Public transport and infrastructure |
| TRANS7 Taxis and mini-cabs | Policy 26 Public transport and infrastructure Policy 28 Highway access & management |

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|--|--|
| TRANS8 Improved public transport access | Policy 26 Public Transport and infrastructure |
| TRANS9 Cycling | Policy 25 Walking and cycling |
| TRANS10 Cycle parking standards | Policy 25 Walking and cycling Policy 27 Parking |
| TRANS11 Motorcycles (including all powered two-wheelers) | Deleted |
| TRANS12 Water-based transport | Policy 31 Waterways and waterbodies Policy 24 Sustainable transport |
| TRANS13 Helicopters | Policy 41 Building height |
| TRANS14 Transport assessments | Policy 24 Sustainable transport |
| TRANS15 Traffic reduction | Policy 24 Sustainable transport Policy 25 Walking and cycling |
| TRANS16 The road hierarchy | Policy 28 Highway access and management |
| TRANS17 Protecting filling stations | Policy 30 Technological innovation in transport |
| TRANS18 Road improvements | Policy 28 Highway access and management |
| TRANS19 Development under the highway | Policy 45 Basement developments |
| TRANS20 Off-street servicing, deliveries and collection | Policy 29 Freight and servicing |
| TRANS21 Off-street parking | Policy 27 Parking |

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|--|---|
| TRANS22 Off-street parking: non- residential development | Policy 27 Parking |
| TRANS23 Off-street parking: residential development | Policy 27 Parking |
| TRANS24 Off-street parking: mixed development | Policy 27 Parking |
| TRANS25 Off-street parking: public off-street parking | Policy 27 Parking |
| TRANS26 Off-street parking in forecourts and front gardens | Policy 27 Parking |
| TRANS27 Disabled access to buildings | Policy 38 Design principles |
| PSPA4 Controlling new hotel and conference facilities | Policy 3 Spatial Development Priorities: Paddington Opportunity Area Policy 15 Visitor economy |
| NWW1 Small scale business development | Policy 5 Spatial Development Priorities: North West Economic Development Area |
| NWW2 Large-scale mixed-use development | Deleted |
| NWW3 Townscape and public realm enhancements | Deleted |
| SOC1 Community facilities in general | Policy 17 Community infrastructure and facilities |
| SOC2 Childcare facilities | Policy 17 Community infrastructure and facilities |
| SOC3 Education facilities - Part A Education facilities - Part B | Policy 18 Education and skills Policy 10 Housing for specific groups |

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|---|--|
| SOC4 Health care facilities | Policy 17 Community infrastructure and facilities |
| SOC6 Children's play provision | Policy 34 Green infrastructure |
| SOC7 Indoor leisure and libraries | Policy 17 Community infrastructure and facilities |
| SOC8 Public toilets | Policy 15 Visitor economy |
| SOC9 Telecommunications equipment | Policy 19 Digital infrastructure, information and communications technology; |
| SS3 Enhancing shopping in the International Centres' Primary Shopping Frontages | Policy 14 Town centres, high Streets and the CAZ |
| SS4 New retail floorspace in the CAZ and the CAZ Frontages | Policy 14 Town centres, high Streets and the CAZ |
| SS5 Seeking an appropriate balance of town centre uses in the West End International Centre and elsewhere in the CAZ and CAZ Frontages – outside the Primary Shopping Frontages | Policy 14 Town centres, high Streets and the CAZ |
| SS6 District Centres | Policy 14 Town centres, high Streets and the CAZ |
| SS7 Local Centres | Policy 14 Town centres, high Streets and the CAZ |
| SS8 Shops and services outside the District and Local Centres | Policy 14 Town centres, high Streets and the CAZ |
| SS9 Long-term vacant shop units in peripheral locations | Policy 14 Town centres, high Streets and the CAZ |
| SS10 New retail floorspace in development schemes | Policy 14 Town centres, high Streets and the CAZ |
| SS11 Superstores, Supermarkets and other major retail developments | Policy 14 Town centres, high Streets and the CAZ |
| SS12 The location of minicab and motorcycle courier offices | Deleted |

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|---|--|
| SS13 Street markets and individual trading pitches | Policy 14 Town centres, high Streets and the CAZ Policy 43 Public realm |
| SS14 (Clause 1) Character and appearance of conservation areas | Policy 39 Westminster's heritage |
| SS14 (Clause 2) Convenience and safety of pedestrians | Policy 25 Walking and cycling Policy 43 Public realm |
| SS14 (Clause 3) Residential amenity | Policy 7 Managing development for Westminster's people |
| SS14 (Clause 4) Traffic circulation in the street and neighbouring streets | Deleted |
| SS14 (Clause 5) Increase in number of people using the street | Policy 25 Walking and cycling |
| SS14 (Clause 6) Creating a positive social environment | Deleted |
| SS14 (Clause 7) Access requirements of emergency and refuse vehicles and bus services | Policy 26 Public transport and infrastructure Policy 28 Highway access and management Policy 29 Freight and servicing (Refuse vehicles); Policy 27 Parking (Emergency vehicles) |
| SS14 (Clause 8) The Servicing needs of local businesses | Policy 29 Freight and servicing |
| SS14 (Clause 9) The needs of cyclists | Policy 25 Walking and cycling |
| SS14 (Clause 10) Recycling facilities | Policy 37 Waste management |

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|--|---|
| SS16 Pavement shops | Policy 43 Public realm |
| SS17 Window displays | Deleted |
| TACE 1 Existing hotels | Policy 15 Visitor economy |
| TACE 2 New hotels and extensions to existing hotels | Policy 15 Visitor economy |
| TACE 3 Temporary sleeping accommodation and permanent residential use | Policy 8 Housing delivery |
| TACE 4 Conference and related facilities | Policy 15 Visitor economy |
| TACE 5 Arts and cultural uses | Policy 15 Visitor economy |
| TACE 6 Theatres | Policy 15 Visitor economy |
| TACE 7 Arts, Culture and Education Special Policy Area | Policy 15 Visitor economy |
| TACE 8 Entertainment uses which will generally be permissible | Policy 16 Food, drink and entertainment |
| TACE 9 Entertainment uses which may be permissible | |
| TACE 10 Entertainment uses which will only be permissible in exceptional circumstances | |
| TACE 11 Tables and chairs on the footway | Policy 43 Public realm |
| TACE 12 Amusement arcades and Centres | Policy 16 Food, drink and entertainment |
| TACE 13 Sex-related uses | Policy 16 Food, drink and entertainment |

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|--|---|
| ENV2 Environmental appraisal | Policy 32 Air quality Policy 33 Local environmental impacts |
| ENV3 Vacant and under-used land | Deleted |
| ENV4 Planting around and on buildings | Policy 34 Green infrastructure |
| ENV5 Air pollution | Policy 32 Air quality |
| ENV6 Noise pollution | Policy 33 Local environmental effects |
| ENV7 Controlling noise from plant, machinery and internal activity | Policy 33 Local environmental effects |
| ENV8 Contaminated land | Policy 33 Local environmental effects |
| ENV10 Light pollution | Policy 33 Local environmental effects |
| ENV12 Waste and recycling storage | Policy 37 Waste management |
| ENV13 Protecting amenities, daylight, sunlight and environmental quality | Policy 7 Managing development for Westminster's people Policy 12 Housing quality Policy 34 Green infrastructure |
| ENV14 Metropolitan Open Land | Policy 34 Green infrastructure |

| | |
|---|---|
| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
| ENV15 Public and private open space | Policy 34 Green infrastructure |
| ENV16 Trees and shrub cover | Policy 34 Green infrastructure |
| ENV17 Nature conservation and biodiversity | Policy 34 Green infrastructure |
| DES1 Principles of Urban Design and Conservation | Policy 38 Design principles |
| DES3 High buildings | Policy 41 Building height Policy 42 Building height in the housing renewal areas |
| DES4 Infill development | Policy 40 Townscape and architecture |
| DES5 Alterations and extensions | Policy 40 Townscape and architecture |
| DES6 Roof level alterations and Extensions | Policy 40 Townscape and architecture |
| DES7 Townscape Management Part (a) Public Art | Policy 43 Public realm |
| DES7 Townscape Management Part (b) Street Furniture and flood lighting | Policy 43 Public realm Policy 40 Townscape and architecture |
| DES7 Townscape Management Part (c) Boundary walls and railings | Policy 40 Townscape and architecture |
| DES7 Townscape Management Part (d) Off street parking and hard standing | Policy 27 Parking |

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|---|--|
| DES7 Townscape Management Part (e) Paving | Policy 43 Public realm |
| DES8 Signs and advertisements | Policy 43 Public realm |
| DES9 Conservation areas | Policy 39 Heritage Policy 40 Townscape and architecture |
| DES10 Listed buildings | Policy 39 Heritage |
| DES11 Scheduled Ancient Monuments; Areas of archaeological priority and potential | Policy 39 Heritage |
| DES12 Parks, gardens and squares | Policy 39 Heritage Policy 34 Green infrastructure |
| DES13 Canals | Policy 31 Waterways and waterbodies |
| DES14 Strategic views | Policy 40 Townscape and architecture |
| DES15 Metropolitan and local views | Policy 40 Townscape and architecture |
| DES16 World Heritage Site | Policy 39 Heritage |
| RIV1 The design of development | Policy 38 Design principles Policy 31 Waterways and waterbodies |
| RIV2 Views | Policy 40 Townscape and architecture |

| UDP Policies (January 2007) | Superseded by policy (in whole or part) |
|---|---|
| RIV3 Environment, open space and wildlife | Policy 34 Green infrastructure |
| RIV4 Promoting activity | Policy 31 Waterways and waterbodies |
| RIV5 Development built into or over the river | Policy 31 Waterways and waterbodies |
| RIV6 River crossings | Policy 31 Waterways and waterbodies |
| RIV7 Piers | Policy 31 Waterways and waterbodies |
| RIV8 Permanently moored vessels | Policy 31 Waterways and waterbodies |
| RIV9 The Thames Path | Policy 31 Waterways and waterbodies |
| RIV10 Encouraging access to the river and its foreshore | Policy 31 Waterways and waterbodies |
| RIV11 Safety issues | Policy 31 Waterways and waterbodies |
| RIV12 Flood defences | Policy 35 Flood risk |

GLOSSARY

Unless provided in the table below, definitions detailed in the National Planning Policy Framework and the London Plan apply.

Accessibility

The ability of all people, including elderly and disabled people, those with young children and those carrying luggage and shopping, to reach, move around and use places and facilities.

Active frontages

A ground floor frontage which generates passing trade and provides a ‘shop-type’ window display with interest at street level.

Affordable housing

Housing for sale or rent, for those whose needs are not met by the market. In Westminster this is split into ‘social’ and ‘intermediate’ types.

Air Quality Neutral

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 NO_x 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

Ambient noise

Ongoing sound in the environment such as from transport and industry, as distinct from individual events, such as a noisy all-night party. Unless stated otherwise, noise includes vibration.

Amenity spaces

Private, communal or public external spaces that provide opportunities for informal activities which contribute to the appearance of developments or localities. Private external amenity space is exclusively used by a single household; common forms are balconies and gardens. Communal external amenity space is exclusively used by the residents of a residential development; common forms are communal gardens, terraces and roof gardens. Public amenity spaces are normally small spaces where workers or visitors can relax, are used for dog walking, play, rest or quiet enjoyment, or merely to provide visual amenity in densely built-up developments.

Appropriate marketing

Where a use has been prominently marketed for the existing use, with reasonable terms and

conditions, as certified by an appropriately qualified professional, independently verified by the council at the applicant’s expense.

Carbon Neutral / Zero Carbon

Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.

Central Activities Zone (CAZ)

A diverse area covering much of central London and extending across 10 London boroughs, as designated by an indicative boundary in the London Plan.

CAZ retail clusters

Clusters of retail activity within the CAZ that have been designated through the London Plan or the City Plan.

Character

The distinctive or typical quality of a building or area, as described by historic fabric, appearance, townscape and land uses.

Civic amenity spaces

Includes civic and market squares and other hard surfaced community areas designed for pedestrians with the primary purpose of providing a setting for civic buildings, and urban spaces for public congregation and public events.

Combined Heat and Power

The combined production of electricity and usable heat is known as Combined Heat and Power (CHP). Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

Commercial use / development / floorspace

Comprises all Class E uses and commercial *sui generis* uses in accordance with the Town and Country Planning (Use Classes) Order and its subsequent amendments.

Community facilities / infrastructure

Facilities / infrastructure available to the local community. These consist of buildings and external spaces and can be publicly or privately run. They include health facilities, education facilities, social services uses, sports and recreation facilities, community meeting halls, youth centres, local arts facilities, and public toilets.

Comparison goods

Predominantly durable goods and services where customers may wish to compare prices / quality / type of product sold, with other similar products sold in other shops. Comparison goods retail use falls within A1 Retail use class.

Context height

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.

Convenience goods

Basic goods or services which people may need on a weekly, if not daily, basis. Convenience goods retailers include grocers and newsagents and fall within A1 Retail use class.

Creative industries

Generic term for the following sub-groups:

- Creative Content: includes enterprises that produce intellectual property, usually copyright protected, distributed to customers and audiences through sales, advertising or subscription to earn revenue e.g. broadcasters, record companies, and all kinds of publishers including software, computer games and electronic publishing.
- Creative Experience: includes enterprises whose core business model is based around selling the right for consumers to witness or experience specific activities, performances or locations e.g. live theatre, music, opera and dance.
- Creative Originals: includes enterprises based on the manufacture, production or sale of physical artefacts, the value of which derive from their perceived creative or cultural value and exclusivity e.g. designer fashion, bespoke tailoring, craft-based activities such as jewellery and arts and antiques.
- Creative Services: includes enterprises based around providing Creative Services for clients earning revenues in exchange for giving up

their time and intellectual property e.g. architects, advertising agencies, graphic design, new media design and post production.

Custom build

Custom build homes are where an individual or group work with a specialist developer to help deliver their homes and they can input in the design of their home or customise elements of it. The developer may help to find a plot, manage the construction and arrange the finance for the project.

Deep retrofit

Development involving the re-use of as much of the existing building as possible, but may involve substantial demolition and replacement of parts of (but not all of) the façade, core, floor and slab, and which results in significant energy, performance, and climate adaptation upgrades, comparable to those in a new building, dramatically reducing carbon emissions from the building compared to the existing structure and prolonging its usable lifespan.

Designing out crime

Using the design of the built environment to minimise opportunities for criminal and anti-social behaviour, through matters such as provision of appropriate layout, active frontages, suitable lighting etc.

District Heating Network (DHN)

A network of pipes that connects energy production equipment with energy customers. They can range from several metres to several kilometres in length.

District centre

Service centre, usually with up to one hundred commercial premises of various kinds, with a predominantly retail function.

Embodied carbon

[The carbon emissions emitted producing a building's materials, their transport and installation on site as well as their disposal at end of life.](#)

Entertainment uses

Uses predominantly or partly used for entertainment purposes: it includes D2 uses including live music venues and *sui generis* uses including nightclubs, casinos, amusement arcades and shisha premises. The entertainment uses that are not considered within this definition are sports halls, swimming baths, gymnasiums, skating rinks, other indoor or outdoor sports or recreation areas, concert halls, cinemas and theatres.

Essential infrastructure

Essential transport and utility infrastructure (including mass evacuation routes, electricity generating power stations and water treatment works) and wind turbines. As set out in the Technical Guidance to the National Planning Policy Framework.

Evening economy

Economic activity where main business hours are between 6pm and midnight (e.g. restaurants, theatres, public houses).

Family housing

A housing unit with between three and five bedrooms. For affordable housing, units with two bedrooms may be considered suitable for families, but this will be at the discretion of the council based on need on the council's waiting lists and the size of the unit.

Flood-related infrastructure

Includes infrastructure to defend against and manage flooding from a number of sources including tidal, fluvial and surface water flooding, such as the Embankment Wall and Thames Tideway Tunnel.

Freight consolidation centre

A facility for the collection of goods from a number of recipients, that are then sorted into fewer vehicles for the final leg of the journey, in order to reduce the overall number of freight movements.

Greenfield run off rates

The runoff (due to rainfall) that would occur from a site in its undeveloped and undisturbed states.

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.

Highly vulnerable uses

Relating to flood risk. Uses include:

- police stations, ambulance stations and fire stations and command centres and telecommunications;
- installations required to be operational during flooding;
- emergency dispersal points;
- basement dwellings;
- caravans, mobile homes and park homes intended for permanent residential use; and
- installations requiring hazardous substances consent as set out in the Technical Guidance to the National Planning Policy Framework.

Highway

An area of land to allow the public to move along a route. Includes the carriageway (for vehicles) and the footway (for pedestrians). The council (and in places the Royal Parks and Transport for London) are the highway authority, responsible for maintaining the highway.

Historic fabric

Surviving original and historic fabric in the form of buildings, their structure, details and decoration.

Host scheme

The development is the one which forms the original application which triggers a requirement for affordable housing and which is first assessed for whether it can provide on-site affordable housing in whole or part.

Human scale development

Development of a scale and form suitable for people to interact with and where pedestrians feel comfortable by the scale and massing of buildings and open spaces making up the public realm.

Idling

Unnecessarily running a motor vehicles engine when the vehicle is not in motion.

Infill development

The insertion of one or more new buildings within a continuous street façade or frontage.

Intermediate housing

~~Homes for private rent provided at a cost at least 20% below market rents (including service charges where applicable) or low-cost homes for sale as defined in the NPPF, provided to households who meet the council's income thresholds.~~

In line with the NPPF, homes provided at a cost at least 20% below market rents (including service charges where applicable) that are available to rent or buy at levels that are discounted from open market values. Intermediate homes should meet the needs of households on the council's Intermediate Housing Register and be in line with any up to date council evidence on local housing needs. Eligibility is determined with regard to incomes and any other council published eligibility criteria. It includes housing types like London Living Rent as defined in the London Plan, Discounted Market Rent or other low-cost sale homes.

International centre

Town centre at the top of London's town centre hierarchy of international reputation and attracting global visitors.

In-vessel composting

An industrial form of composting biodegradable waste within an enclosed container, where conditions such as air flow, temperature and emissions are controlled.

Land use swaps and packages

Where two (land use swap) or more (land use package) sites are considered as a single application for the purposes of determining a planning application. These are used to meet the policy objectives required over more than one site.

Legibility

The degree to which a place can be easily understood and moved through.

Linear open spaces

Open spaces and towpaths alongside the Thames, canals and other waterways, paths, disused railways, nature conservation areas, and other routes that provide opportunities for informal recreation. Often characterised by features or attractive areas which are not fully accessible to the public but contribute to the enjoyment of the space.

Local distinctiveness

The positive features of a place and its communities which contribute to its special character and sense of place.

Local service provider

Westminster City Council, the National Health Service or related organisations such as a Primary Care Trust, the Metropolitan Police, Registered Provider and other public sector services such as job centres and courts, and voluntary sector organisations operating within the city. These are public social and community uses.

Local centre

Small town centre, usually containing convenience goods shops, local service uses, restaurants, cafés and pubs, mainly providing facilities for people living or working nearby.

Major development

Development greater than or equal to:

- 10 residential units; or
- 0.5 hectares site area (residential) or 1 hectare (non-residential); or
- gross floorspace of 1,000 sq m (GIA).

Major centre

Predominantly retail centre providing a range of services to a wide catchment area.

Meanwhile use

Short-term use of temporarily empty buildings such as shops until they can be brought back into commercial use.

Metropolitan Open Land

Strategically important open space defined in the London Plan. In Westminster, this comprises the Royal Parks – St James’s Park, Hyde Park, Kensington Gardens, Green Park and Regent’s Park. Metropolitan Open Land is afforded the same protection as green belt land.

Modular homes

Pre-engineered building units that are delivered and assembled as large or volumetric components or as substantial parts of a building. These can include whole rooms, parts of rooms, or separate highly serviced units such as toilets or lifts. Off-site construction refers to buildings, structures or parts manufactured (and wholly or partially assembled) away from the site before installation in their final position.

Neighbourhood forum

A community group of residents and / or businesses that has been established to prepare a neighbourhood plan for their designated area.

Night-time economy

Economic activity that occurs between midnight and 7am, e.g. late-night bars, casinos, night-clubs.

Noise sensitive receptors

Comprises residential use, educational establishments, hospitals, hotels, hostels, concert halls, theatres, law courts, and broadcasting and recording studios.

Non-self-contained homes

A home with some shared space or facilities e.g. with a private bedroom but shared bathroom, kitchen and / or living room.

Off-street parking

Dedicated parking that is provided away from the street, which can include garages, driveways, surface level and multi-storey or basement car parks.

On-street parking

Parking that is permitted on the street as opposed to within a designated car park.

Open space

All land in Westminster that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. It includes a broad range of types of open space within the city, in public or private ownership and whether public access is unrestricted, limited or restricted. Includes all parks and gardens, regardless of size (whether public or private); the River Thames and the canals and their towpaths; civic spaces; children’s playgrounds, including school playgrounds; ballcourts and other outdoor sports facilities; amenity green spaces, such as open spaces on housing estates; churchyards; and community gardens.

Operational emissions

The greenhouse gas emissions arising from all energy consumed by a building in use, over its life cycle once construction is completed.

Opportunity Areas

Areas defined in the London Plan with good public transport accessibility that provide London’s principle opportunities for accommodating large-scale development. The areas will provide substantial numbers of new employment and housing opportunities.

Original building

In relation to a building existing on 1 July 1948, as existing on that date and in relation to a building built on or after 1st July 1948, as so built.

Parking stress area

Area where annual parking surveys indicate 80% and higher usage throughout the day / night, in compliance with any restrictions that exist. Parking surveys address daytime and weekday overnight parking, and include bays that residents’ permits can be used during the day (i.e. residents’ and shared use bays only) and all other spaces that can be parked in without paying overnight (i.e. all visitor bays and single yellow lines that are not otherwise restricted).

Pedestrian clear zone

The area available for the pedestrians (including users of wheelchairs, prams and buggies) to walk without obstruction. Also known as the ‘clear footway width’. The useable zone accommodates the flow of pedestrians between the street furniture zones (and space to use the street furniture) at the back of footway (if any) and that placed adjacent to the kerb (if any). The minimum width for any new design should be two metres but may need to be greater when foot traffic is

more intense. In intensely used locations it may have to be the full width available, even if this is less than the desirable width for the peak time foot traffic if it were being designed today.

Platform based delivery

Delivery of goods ordered via the internet or mobile applications; e.g. Just Eat, Deliveroo etc.

Pocket parks

Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment, with a size guide of under 0.4 hectares.

Predominantly commercial neighbourhoods

Areas of the Central Activities Zone where the majority of ground floor uses comprise of a range of commercial activity.

Protected species

Certain plant and animal species protected to various degrees in law, particularly the *Wildlife and Countryside Act, 1981 (as amended)*.

Public realm

The parts of the city in either public or private ownerships which are available free for everyone to use or see, including streets, squares and parks.

Rapid inundation zone

Low-lying areas close to the River Thames which would rapidly inundate (flood) to significant levels if the Embankment Wall was breached.

Registered providers

Registered Providers are owners and managers of affordable housing whom are regulated by Government. Most operate on a not-for-profit basis and use any trading surplus to maintain existing homes and to help finance new ones. Registered Providers can include the council, housing associations, housing trusts and cooperatives, registered charities, or non-profit making provident societies or companies.

Responsible retrofit

Responsible retrofitting is an informed and integrated attitude to retrofit in a way that enables people to reduce the operational carbon of a building, improve energy efficiency, and/or improve a building's resilience to the impacts of climate change. Responsible retrofit will take into account the building's location, context, design, construction, materials and use, to ensure retrofit measures perform well and avoid adverse impacts to health, heritage and the natural environment.

Retail frontage

A street level frontage characterised by a predominance of shop-type premises.

Retrofit

Development involving the re-use of at least 50% of the existing building in-situ (by mass or volume), retaining as a minimum the foundations, core, and floor slabs, and which results in energy, performance, and climate adaptation upgrades, which will reduce carbon emissions from the building compared to the existing structure and prolong its usable lifespan.

Self-build

Self-build projects are defined as those where someone directly organises the design and construction of their own home. This covers a wide range of projects from a traditional DIY self-build home to projects where the self-builder employs someone to build their home for them. Community-led projects can also be defined as self-build.

Sense of place

The unique perception of a place created by its local buildings, streets, open spaces and activities. The more distinctive the place the greater the sense of it being special. A character which is greater than the sum of the constituent parts.

Shoulder hours

Those hours that book-end peak times e.g. 6am–7am or 10am–11am for the morning peak.

Sites of Importance for Nature Conservation (SINCs)

The Greater London Authority designated SINCs to highlight areas of ecological value that are rich in wildlife within the city. The sites are graded as being of Metropolitan, Borough or Local Importance. Sites of Metropolitan Importance are those which contain the best examples of London's habitats and rare species that are of significance to London. Sites of Borough Importance are those identified to have an importance to Westminster and any damage would mean a significant loss to the city. A site of Local Importance is identified because of its value to the nearby community, especially in areas that are deficient in wildlife sites.

Small open spaces

Gardens, sitting-out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas, with a size guide of under two hectares.

Social housing

~~This includes housing owned by local authorities and other registered providers for which the rent is set in accordance with the Government's rent policy for social rent or London Living Rent (as defined in the London Plan). It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with Homes England.~~

In line with the NPPF, this includes housing owned by local authorities and other registered providers for which the rent is set in accordance with the Government's rent policy for Social Rent or London Affordable Rent (as defined in the London Plan).

Soundscape

The overall quality of an acoustic environment as a place for human experience. Soundscape design might include preserving, reducing or eliminating certain sounds or combining and balancing sounds to create or enhance an attractive and stimulating acoustic environment.

Specialist housing

Affordable housing, hostels, Houses in Multiple Occupation, housing for those with special needs including elderly people, students, people with

learning or physical disabilities, or mental health problems, or other supported accommodation. These fall within the C2 and C3 Use Classes, or are classified as *sui generis* uses.

Specialist housing for older people

Housing that is intended specifically for occupation by older people. It may not necessarily fall into the C3 Use Class and can include sheltered accommodation where the occupants have no, or a low level of support; extra-care catering for old or vulnerable people who have an existing or foreseeable physical, sensory, cognitive or mental health impairment – a range of facilities may be provided e.g. 24-hour access to emergency support, resident's lounge, a guest room, laundry room, day centre activities, a restaurant or some kind of meal provision, fitness facilities and classes and a base for health care workers, domiciliary care; residential / nursing care providing non-self-contained residential accommodation for people who by reason of age or illness have physical, sensory or mental impairment, including high levels of dementia. A scheme manager and in-house care team provide a consistent presence, meals and personal services are routinely provided to all residents and personal or nursing care is a critical part of the accommodation package.

Substantial Demolition

Development consisting of the demolition of 50% or more of existing above ground structures, by area or volume, but not constituting total demolition.

Sustainable drainage systems

Sustainable drainage techniques and measures that manage surface water run-off from buildings and hardstandings in a way that reduces the total volume, flow and rate of surface water that runs directly into drains and sewers.

Sustainable transport modes

Walking, cycling and other non-vehicular means of movement; public transport including rail, underground, buses, coaches, passenger ferry, light rail / tram and licensed cabs; and high occupancy and electric vehicles.

Tall building

Buildings of twice the prevailing context height or higher or those which make a significant change to the skyline.

Tidal breach flood level

Predicted depth to which flooding will occur for a breach in the tidal flood defence walk. These have been modelled in Westminster's Strategic Flood Risk Assessment.

Total demolition

The removal, deconstruction or demolition of an existing building, which will entail the removal of all of its fit out, superstructure, cores, and basement slab(s), but may involve the retention of the facade.

Waterfront enhancing uses

Uses that do not necessarily require a waterfront location, but that can attract people to the waterside e.g. restaurants, cafés, museums, galleries and parks.

Water related uses

Uses that require a waterside location to function e.g. boat moorings, piers and watersports facilities.

West End Partnership (WEP)

A partnership between the public and private sector, and resident communities, that seeks to secure further investment in the West End, so it continues to attract businesses, talent and visitors.

Windfall development

Development that has not been planned for and is not included in the housing trajectory.

Visibility splays

Feature of an access or junction that allows traffic on a minor road to see cyclists, vehicles and pedestrians on the main road.

Vulnerable people

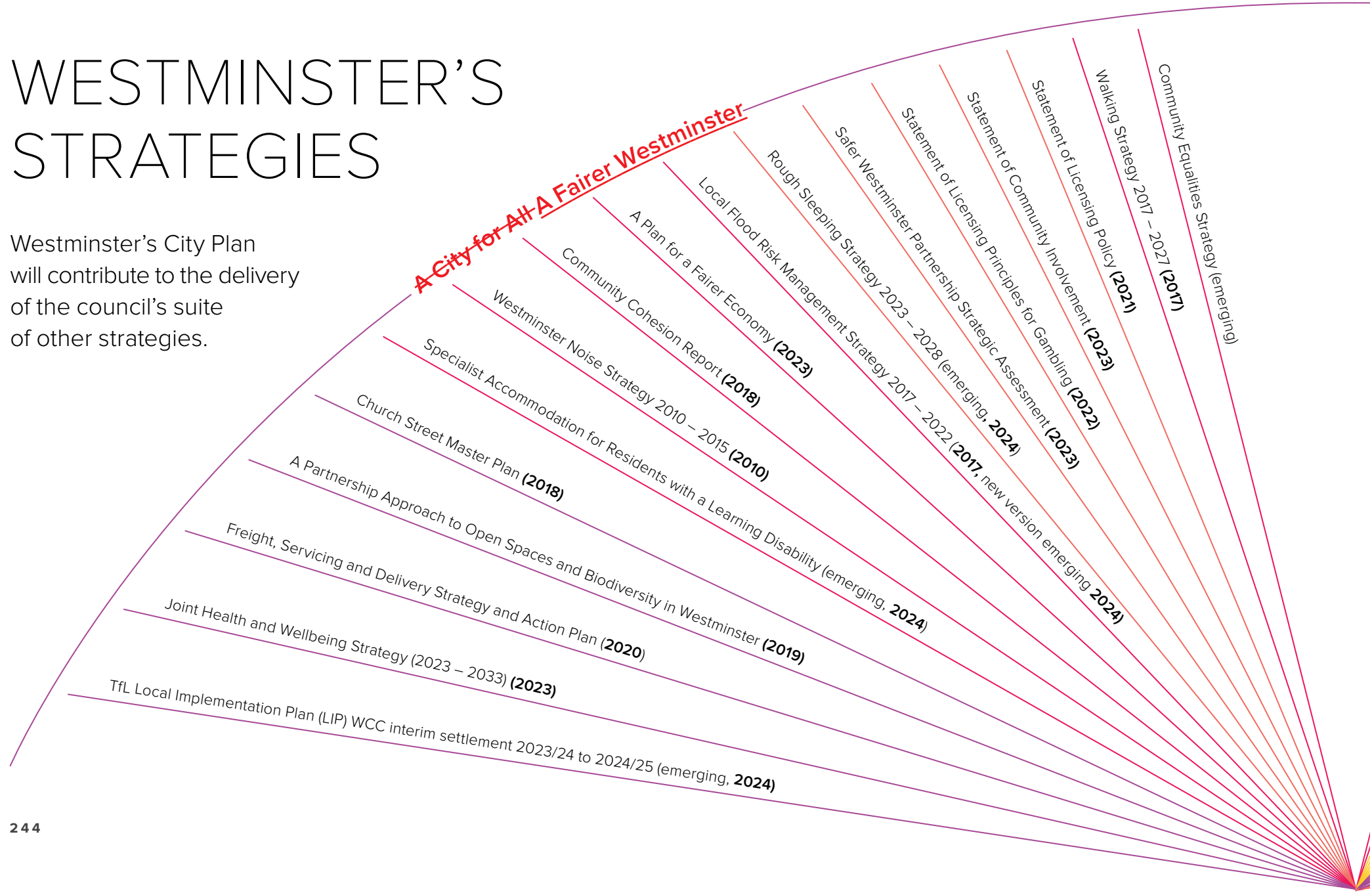
Someone who is or may be in need of care and / or support by reason of disability, age or illness; and is, or may be unable to look after themselves against significant harm or exploitation.

Zero emissions

Activity that causes no release of air pollutants and carbon dioxide or other greenhouse gases.

WESTMINSTER'S STRATEGIES

Westminster's City Plan will contribute to the delivery of the council's suite of other strategies.



A City for All - A Fairer Westminster

- Private Rented Sector Strategy 2020 – 24 (2021)
- Active Westminster Strategy (2018 – 2022) (2018, new version emerging 2024)
- Climate Adaptation & Resilience Plan (emerging, 2024)
- Municipal Waste Management Strategy 2016 – 2031 (2014)
- Cycling Strategy (2014)
- Bi-Borough Extra Care Housing Strategy (2014)
- Markets Strategy (2023)
- Homelessness Strategy (2019)
- Strategic Flood Risk Assessment (2023)
- Electric Vehicle Strategy 2020 – 2025
- Air Quality Action Plan 2019 – 2024 (2019)
- Local Area Energy Plan for Westminster (emerging, 2024)
- Cultural Strategy 2021 – 2025
- Climate Emergency Action Plan (2021, new version emerging 2024)
- Local Football Facilities Plan (2021)
- Playing Pitch Strategy (2021)
- Built Facilities Strategy (2021)
- Dementia Plan (2020)
- Lighting Master Plan 2020–2024 (2020)

CITY PLAN 2019 – 2040



City of Westminster