



Document title: Revised Schedule of Modifications (including amendments agreed through Statements of Common Ground and the council's response to the Inspector's MIQs) (Sept 2020)

Document code: CORE_025_V4

Revised Schedule of Modifications (including amendments agreed through Statements of Common Ground and the council's response to the Inspector's MIQs – updated in response to document INSP8)

(Sept 2020)

Introduction

This schedule contains all modifications proposed when Westminster's City Plan 2019-2040 was submitted to the Planning Inspectorate in November 2019 consolidated with all post-submission modifications previously scheduled in CORE_025_V2, and CORE_025_V3.

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

Modifications proposed at submission have 'M' at the start of their reference; post-submission modifications have 'PS' at the start of their reference. Some modifications in the table below include pre- and post-submission changes to the same paragraph. Where this is the case, the modification reference given at submission has been kept. Modifications previously proposed post-submission as set out in [CORE 025 V2](#) and [CORE 025 V3](#) may have been superseded by further modifications in this version of the schedule. Where this is the case, it is noted in the 'Notes' column.

The following format has been used to denote the modifications:

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

INTRODUCTION

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
PS/I/01	Introduction, Page 4, "How to use this plan", Step 2	Step 2: Consult the 'policies map' that goes with this plan. It shows where the policies apply. You can use this to find the policies that relate to your site or area of interest. The map also shows 'key development sites' and Appendix 1 provides further guidance on the types and scale of use that we expect to see on these sites.	For consistency with changes to Appendix 1 (PS/A1/01).	Main	Justified Effective	
M/I/01	How to use this plan, page 4	While each of the policies hold equal weight, particular attention should be paid to Policy 7. As this policy is concerned with neighbourly development and primarily managing amenity impacts, it is important to read this policy alongside all other policies in the Plan when determining impacts and potential mitigation on these sites.	For clarity that all policies have equal weight.	Main	Effective	
M/I/02	Foreword, page 3	Greener living must inform the choices we make – sometimes literally. Soft landscaping and streets lined with trees, bring natural beauty and mitigate against the harmful effects of CO ₂ <u>to help achieve our carbon neutral ambition.</u>	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		
PS/I/02	Contents, page 7	Appendix 1 Key Development Sites <u>Westminster's Housing Trajectory</u>	For consistency with changes to Appendix 1 (PS/A1/01).	Main	Justified Effective	

CONTEXT

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
M/Cx/01	Timeline, page 9	2020/21 <u>19 Elizabeth Line Crossrail</u> due to open	Correction.	Minor		
M/Cx/02	Timeline, page 9	Add <u>Crossrail 2</u>	Correction.	Minor		
M/Cx/03	Purple infographic, page 21	3 4 passenger River bus terminals	Correction.	Minor		
M/Cx/04	Paragraph 2, page 20	The structure of our city is also a major contributor to CO ₂ emissions. In the UK, buildings are responsible for around 40% of CO ₂ emissions. In Westminster that figure is more than double at around 90%. This not only wastes energy but amplifies the Urban Heat Island affect. <u>In September 2019 the City Council declared a Climate Emergency and set an ambitious target for Westminster to be carbon neutral by 2040 – ten years in advance of Government and Mayor of London targets. This target will inform everything we do as we strive to meet the challenges of climate change and deliver a carbon neutral city. cont...</u>	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		
M/Cx/05	Our Approach, page 22	Climate change is changing the way we do things. Design will prioritise sustainable construction materials, with energy-efficiency on an equal footing as aesthetic appeal. We will be a world leader in sustainable design <u>and zero carbon development. cont...</u>	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		
M/Cx/06	Our Approach, page 23	Over the course of the next 20 years Westminster's air quality will improve dramatically, <u>and our CO₂ emissions will be near zero.</u>	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		

OBJECTIVES

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
M/O/01	Objective 10	Make the most of our unique heritage and historic environment, though its conservation and enhancement, while and encouraging world class new buildings which sensitively integrate with the historic environment innovations in building technology and improve ing sense of place.	For clarity that what we mean by 'make the most of our heritage' includes conserving it and in response to representation from Historic England.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002).
M/O/02	Objective 6	Improve quality of life, climate resilience and tackle environmental challenges by encouraging innovations in building technology and protecting, enhancing, expanding our valuable network of parks and open spaces.	For clarity, and in response to representation from Historic England, moved from Objective 10, as this more clearly related to Objective 6.	Minor		

SPATIAL STRATEGY

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
M/S/01	Chapter introduction, Page 28	To respond to our growth we need to develop; the challenge is to optimise maximise our limited space	For consistency with other policies in the plan regarding appropriate development.	Minor		
PS/S/14	Policy 1 A 1	Supporting intensification and optimising densities in high quality new developments that integrate with their surroundings and showcase the best of modern architecture and integrate with their surroundings, to make the most efficient use of land, including through developments that showcase the best of modern architecture.	For clarity in response to Historic England's MIQ response.	Main	Consistent with national policy	In response to Matter 1, question 18.
M/S/02	Policy 1 A 2	Delivering at least 22,22220,685 homes, of which at least with 35% will be of new-homes as affordable	For clarity and in response to representations from Shaw Corporation.	Main	Consistent with national policy	This modification clarifies that the council are aligning to the London Plan housing target.
PS/S/15	Policy 1 A 3	Halting the loss, and s 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	To reflect impacts of changes to the Use Classes Order.	Main	Effective	In response to Matter 1, question 18.
PS/S/01	Policy 1 A 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.	For completeness and in response to representations by the Marylebone Cricket Club.	Main	Effective	Statement of Common Ground between WCC and Marylebone Cricket Club (SCG_008).
M/S/03	Policy 1 A 7	Protecting and enhancing the city's unrivalled heritage assets (including their settings). and townscape value	For completeness and in response to representations from Historic England.	Main	Consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002).
PS/S/05	Policy 1 A 8	Adapting to and mitigating the effects of climate change, and S securing enhancements to the natural environment and public realm, including supporting the delivery of a new North Bank river front destination.	For consistency with the plans vision and objectives.	Main	Effective Consistent with	In response to Matter 3, question 2.

					national policy	
PS/S/06	Policy 1 B	B. Growth will <u>primarily</u> be delivered through the: 1. Intensification of the CAZ, West End, and our town centre hierarchy <u>with commercial-led and mixed-use development to provide significant growth in office, retail and leisure floorspace, alongside new homes</u> ; 2. Continued <u>major mixed-use</u> redevelopment <u>within identified the</u> Opportunity Areas to <u>achieve London Plan growth targets of 13,000 new jobs and 1,000 new homes in Paddington Opportunity Area</u> ; <u>4,000 new jobs and 1,000 new homes in Victoria Opportunity Area</u> ; and <u>3,000 new jobs and 150 new homes in Tottenham Court Road Opportunity Area</u> ; 3. Renewal of Church Street/ Edgware Road and Ebury Bridge Estate Housing Renewal Areas to <u>collectively provide 2.750 new homes alongside increased local job opportunities</u> ; 4. <u>Commercial-led rR</u> egeneration of the North West Economic Development Area <u>including the commercial-led intensification of areas of commercial and mixed-use character, to increase local job opportunities alongside residential growth</u> ; and 5. Realisation of the <u>development</u> potential of <u>our the</u> identified <u>key development</u> sites <u>listed in (see Appendix 1)</u> .	To provide a clearer indication of the scale and nature of growth in different parts of Westminster; in response to representations from the Church Commissioners for England; and for consistency with changes to Appendix 1 (PS/A1/01).	Main	Positively prepared Justified Effective	In response to Matter 3, question 10. Also incorporates previous modifications M/S/04 and PS/S/02.
M/S/05	Paragraph 1.5	Like the rest of London, demand for new housing across all tenures in Westminster is very high. We have therefore set an ambitious housing target that exceeds the London Plan target in the first ten years of the Plan to deliver levels of housing consistent with the government's standard methodology for calculating housing need. The affordable housing target will ensure that <u>in addition to meeting the demands from the private housing market</u> , delivery <u>also</u> meets identified need in the affordable sector <u>and conforms with the Mayor's strategic target of 50% affordable housing across all of London, as well as demand from the market</u>	For clarity that the policy is in general conformity with the London Plan and in response to representations from the GLA and the Cathedral Area Residents Group.	Main	Effective Consistent with national policy	This modification clarifies that the approach to affordable housing is in line with the London Plan.
PS/S/16	Paragraph 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 <u>and clustering in key growth sectors, the modernisation of office stock alongside other commercial uses that contribute to an attractive working environment and support wider jobs growth, is supported.</u> 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.	To reflect impacts of changes to the Use Classes Order.	Minor		In response to Matter 1, question 18.
M/S/06	Paragraph 1.8	As the heart of a world city, Westminster's portion of the CAZ includes the functions of monarchy and government, a variety of cultural, educational, professional and religious institutions, world class retail, headquarters of national and international businesses, embassies, <u>high quality hotels</u> , leisure and entertainment.	For completeness and in response to representations from 4C Hotel Group.	Minor		
PS/S/17	Paragraph 1.9	The future growth and intensification of the CAZ in a manner that balances its many competing functions is supported. <u>This includes ensuring pressure for new hotels and residential development does not compromise the function of the CAZ as a global office centre the protection and intensification of office clusters, and supporting a growth and diversification in the retail and leisure industries in a manner activity</u> 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.	To reflect impacts of changes to the Use Classes Order.	Minor		In response to Matter 1, question 18.
M/S/07	Figure 7 Key Diagram	<i>Amendment to extent of Paddington Opportunity Area, Victoria Opportunity Area and West End Retail and Leisure Special Policy Area boundaries as shown in section 3.2 and 3.3 of the Schedule of Changes to the Policies Map (November 2019) (CORE_005)</i>	See Section 3.2 and 3.3 of the Schedule of Changes to the Policies Map (CORE_005).	Main	Justified Effective	
PS/S/07	Figure 7 Key Diagram	<i>Amend CAZ boundary as shown in response to Matter 3, question 9, and Post-submission Draft Policies Map (WCC, June 2020) (CORE_027_V2) and the Addendum 1 - Post-submission Schedule of Changes to the Policies Map (WCC, June 2020) (CORE_026_V2)</i>	To reflect the character and strategic functions of the CAZ	Main	Justified Effective	In response to Matter 3, question 9.

PS/S/08	Policy 2 A and B	<p>A. Significant jobs growth through a range of commercial-led developments including retail, leisure, offices, and hotel use. <u>Additional commercial floorspace will be provided in a manner that respects its setting, through:</u></p> <ul style="list-style-type: none"> <u>Increased scale and massing in Tottenham Court Road Opportunity Area, to achieve London Plan targets of 3,000 new jobs and 150 new homes, and;</u> <u>The sensitive refurbishment and extension, or replacement of existing buildings across the WERLSPA.</u> <p>B. The realisation of growth targets for the area as identified in the London Plan.</p> <p><i>(Then rename clauses C – G accordingly).</i></p>	To clarify the scale and nature of development expected.	Main	Effective	In response to Matter 3, question 23.
PS/S/18	Paragraph 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. <u>The concentration of commercial activity in the WERLSPA, including a range of retail, leisure, cultural and employment uses, make it distinct from the CAZ: which while also home to such uses, covers a much wider area of Central London that is also interspersed with wholly residential areas and large open spaces.</u>	For clarity in response to London First MIQ response.	Minor		In response to Matter 1, question 18
PS/S/09	Paragraph 2.5	The London Plan sets out indicative growth targets of 6,000 additional jobs and 300 new homes over the period 2016-2041 <u>and 300 new homes over the period 2019-2040</u> 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 made on upgrading the station environs, a substantial contribution towards these targets has already been made <u>through the implementation of planning permissions for schemes that provide increased scale and massing.</u> <i>Cont...</i>	To clarify recent progress towards growth target for Tottenham Court Road Opportunity Area, and for consistency with changes to Appendix 1 (PS/A1/01)	Minor		In response to Matter 3, question 24. Updated as part of responses to Matter 1, question 18
M/S/08	Paragraph 2.10	This activity will help ensure <u>a balanced and well managed</u> the evening and night-time economy <u>that</u> is not dominated by the consumption of alcohol, which can lead to issues of anti-social behaviour and deter those who do not drink from visiting central London outside of the daytime.	For completeness and in response to representations from Longmartin Properties and Shaftesbury Plc.	Minor		
M/S/09	Sub-heading above Paragraph 2.11	Freight and servicing <u>and the public realm.</u>	Correction and in response to representations from WPA.	Minor		
PS/S/10	Policy 3	Development in the Paddington Opportunity Area over the Plan period will deliver the following priorities:	For clarity.	Main	Effective	In response to Matter 3, question 30.
		A. The achievement of <u>the</u> growth targets for the area <u>of 1,000 new homes and 4,000 additional jobs</u> identified in the London Plan. <i>(cont.)</i>				
M/S/10	Policy 3 F	Enhanced job opportunities and <u>community</u> facilities for the residents of <u>Paddington and</u> the neighbouring areas of Church Street and the NWEDA.	For clarity and in response to representations from NHS London Healthy Urban Development Unit/Central London and West London Clinical Commissioning Groups.	Main	Effective	
PS/S/11	Paragraph 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 <u>between 2016 and 2041</u> and 1,000 new homes over the period 2016 <u>2019</u> -2041 for the Paddington Opportunity Area. Over the Plan period, we will continue to facilitate the further intensification of this area including through the delivery of remaining <u>key identified</u> development sites set out in Appendix 1.	Correction and for consistency with changes to Appendix 1 (PS/A1/01)	Minor	Justified	In response to Matter 3, question 30.

M/S/11	Paragraph 3.8	Key-dDevelopment sites <u>A number of identified development sites within the area have the potential to contribute significantly to the delivery of the policy priorities. Paddington station is a key-development site within the area with capacity for expanded transport provision and a mix of commercial uses. Two other key development sites remain in the area. Cont...</u>	For completeness and in response to representations from Travis Perkins.	Main	Justified Effective	Supersedes proposed modification M/S/11 as set out in Revised Schedule of Modifications, CORE_025_V2.
PS/S/12	Policy 4	Development in the Victoria Opportunity Area over the Plan period will deliver the following priorities: A. The achievement of <u>the</u> growth targets for the area <u>of 1,000 new homes and 4,000 additional jobs</u> identified in the London Plan. <i>(cont.)</i>	For clarity.	Main	Effective	In response to Matter 3, question 38.
M/S/12	Policy 4 C	Improvements to and integration between public transport modes.	For clarity and in response to representations from Network Rail, Victoria BID and Victoria Westminster BID, Victoria Gardens Development Ltd/Stockley House, Landsec, Grosvenor, WPA.	Minor		
PS/S/13	Paragraph 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 policy .	For clarity	Minor		
PS/S/03	Paragraph 4.3	The London Plan sets out indicative growth targets of <u>at least</u> 4,000 additional jobs <u>between 2016 and 2041</u> and 1,000 new homes over the period 2016 2019-2041 for the Victoria Opportunity Area. Over the Plan period, we will continue to facilitate the further intensification of the Opportunity Area according to the principles of sustainable development, including through the delivery of <u>the key development</u> sites with potential for mixed-use intensification identified as set out in Appendix 1, and the development of Crossrail 2 safeguarded sites either alongside or after necessary infrastructure works.	For consistency with changes to Appendix 1 (PS/A1/01)	Main	Justified	Supersedes proposed modification PS/S/03 as set out in Revised Schedule of Modifications, CORE_025_V2. In response to Matter 3, question 38
M/S/13	Figure 10	<u>Amend map - see Submission Policies Map (CORE_004) and the Schedule of Changes to the Policies Map (CORE_005).</u>	Correction in response to representations from Thane Freehold, Cathedral Area Residents Group (CARG), Diana C C Colvin (individual), Thorney Island Society, Graeme Cottam, Belgravia Society.	Main	Justified Effective	
M/S/14	Paragraph 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 <u>several conservation areas</u> , the Grade II Listed station, Grade I listed Westminster Cathedral and is in close proximity to the Royal Parks, the Thames and the Westminster World Heritage Site.	For completeness and in response to representations from Pimlico Neighbourhood Forum.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002).
M/S/15	Paragraph 4.8	The area also lacks a coherent sense of place and of urban quality. Visual clutter and the absence of <u>many</u> key landmarks add to this.	To correct an error – modification M/S/15 inserted the word 'very' in error.	Minor		Supersedes proposed modification M/S/15 as set out in Revised Schedule of Modifications, CORE_025_V2.
M/S/16	Paragraph 4.10	Key-dDevelopment sites	In response to representations from Network Rail, Victoria BID	Main	Justified Effective	

		A number of key development sites exist within the Victoria Station environs, which Victoria Station represents a key opportunity to achieve our targets deliver our priorities for the area, including an improved transport provision, modal 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 while ensuring a coordinated approach to development is taken to integrate sites together and deliver successful places designed around people. <i>cont...</i>	and Victoria Westminster BID, Victoria Gardens Development Ltd/Stockley House, Landsec, Grosvenor, WPA.			
M/S/17	Paragraph 5.4	The canal is a significant underutilised asset that offers opportunities to provide an attractive walking and cycling environment – both to job opportunities in nearby Paddington, <u>the Kensal Area</u> and Old Oak Common, and to high quality open space at Regent's Park. ... We will work with TfL and the Canal & Rivers Trust to facilitate the Paddington to West Drayton Quietway.	In response to representations from RBKC and Canal & River Trust.	Minor		
M/S/18	Paragraph 5.5	Redevelopment in the Woodfield Road area represents an opportunity to improve the pedestrian environment in this part of the NWEDA and to address the issues of severance identified above. The developments <u>of key sites</u> at <u>Royal Oak</u> , Harrow Road/Elmfield Way and at Westbourne Park Bus Garage among others over the plan period will <u>deliver a mix of uses including housing</u> , will help to improve pedestrian permeability and provide better connections both within and beyond the NWEDA as well as delivering the land use priorities of the NWEDA...	For completeness and in response to representations from NHS and TfL Commercial Development.	Main	Justified Effective	
PS/S/04	Paragraph 6.4	The Edgware Road Circle & District Line station site, together with the adjacent Capital House and Griffith House, together represent a redevelopment opportunity to enable further connectivity between the Church Street / Edgware Road Housing Renewal Area, the Paddington Opportunity Area and the rest of the CAZ. They have therefore been designated as a key development site (see Appendix 1) to co-ordinate their development and ensure benefits are brought to this housing renewal area.	For consistency with changes to Appendix 1 (PS/A1/01).	Main	Justified Effective	
M/S/19	Paragraph 6.7	... There will also be improved facilities for Church Street Market, including a new layout, higher quality public realm, <u>and</u> parking and storage facilities <u>for traders</u> .	For clarity.	Minor		
M/S/20	Policy 7 A	Protecting and where appropriate enhancing amenity, by <u>normally</u> preventing unacceptable impacts in terms <u>material losses</u> of daylight and sunlight, <u>and preventing significant increases in</u> sense of enclosure, overshadowing, <u>loss of</u> privacy and overlooking.	Correction in response to representations from Whitbread, John Lewis Partnership, 4C Hotel Group, Church Commissioners, Grosvenor and WPA.	Main	Effective	This modification materially affects the application of the policy.
M/S/21	Policy 7 D	Ensuring that sufficient local infrastructure is provided to support growth. Net-overburdening the capacity of local infrastructure.	For clarity in response to representations from Shaftesbury and NHS London Healthy Urban Development Unit/ Central London and West London Clinical Commissioning Groups.	Main	Effective	
M/S/22	Paragraph 7.1	Westminster is already densely developed. As the city grows, detrimental impacts on existing users of the area must be avoided <u>in order to protect residents' health and wellbeing</u> .	For completeness in response to representations from NHS London Healthy Urban Development Unit/ Central London and West London Clinical Commissioning Groups.	Minor		
M/S/23	Paragraph 7.2	The principles of neighbourly development contained in this policy apply to all <u>planning</u> applications.	For clarity.	Minor		
M/S/24	Paragraph 7.3	Provision of good indoor daylight and sunlight levels is important for health and wellbeing and to decrease energy consumption through reduced need for artificial heating and lighting. <u>While it is acknowledged that it may not always be possible to meet standards set out in the Building Research Establishment (BRE) Guidelines¹ due to the specific constraints of each site, the Guidelines will be used as a starting point to</u>	For clarity in response to representations from Throphaeum Asset Management, 4C Hotel Group, Land Securities, GIA Chartered Surveyors,	Main	Effective	

		<u>assess proposals.</u> <u>New footnote 1 'Site layout planning for daylight and sunlight' (1991) Building Research Establishment (BRE)</u>	Marks & Spencer PLC, Capco Capital & Counties and The Portman Estate.			
M/S/25	Paragraph 7.3 (last sentence)	Even when there may be no material loss of daylight or sunlight, new developments should prevent unacceptable <u>significant adverse</u> increases in the sense of enclosure.	For clarity.	Minor		
M/S/26	Paragraph 7.4	Polluted air, excessive smells, noise and strong vibrations are examples of environmental impacts <u>associated with the operation of development</u> that have an adverse impact on quality of life and health and well-being.	For clarity.	Minor		
M/S/27	Paragraph 7.7	Development must therefore protect and <u>where appropriate</u> enhance the green infrastructure in the city. <i>cont...</i>	For clarity in response to representations from Shaftesbury.	Minor		

HOUSING

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
PS/H/18	Policy 8 policy name	Stepping up housing delivery	To reflect changes to the policy set out in subsequent modifications.	Main	Justified Effective	
PS/H/01	Policy 8 A	The number of new homes built in Westminster will exceed 22,222,068 <u>22,222,685</u> over the Plan period. Housing delivery will be 'stepped up' over the first 10 years of this plan to deliver 1,495 new homes each year. This will be achieved by: 1. optimising site densities on Key Development Sites , including those in Housing Renewal Areas;	To align with the London Plan housing target.	Main	Justified Consistent with national policy	
M/H/01	Policy 8 C	All existing residential <u>units</u> , uses, floorspace and land will be protected, except where:	For clarity.	Minor		
PS/H/02	Paragraph 8.2	The London Plan sets all London boroughs an annual housing target based on the GLA's estimate of land capacity through the Strategic Housing Land Availability Assessment (SHLAA). The target allocated to Westminster in the <u>Draft New</u> London Plan is 1,010 <u>1,010,985</u> homes per year over ten years. This figure is based on capacity of land to deliver new homes and considers existing local plan policy to estimate capacity.	To reflect changes to the draft London Plan through its examination in public.	Main	Justified Effective Consistent with national policy	
PS/H/03	Paragraph 8.3	The National Planning Policy Framework requires local planning authorities to use a standard methodology to calculate the number of homes needed unless exceptional circumstances exist to justify using a different methodology. The 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.	To align with the London Plan housing target.	Main	Justified Consistent with national policy	
PS/H/04	Paragraph 8.4	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. We therefore consider we can deliver above the London Plan target of 1,010 per year in the first 10 years of the Plan period, to meet the housing need figure derived from the standard methodology. Through this approach, we expect to exceed the London Plan derived target of 22,222,068 <u>22,222,685</u> homes across the Plan period. Setting a higher housing target in the first 10 years of this plan is part of our pro-growth and ambitious narrative and sets a strong foundation for delivering more homes to meet actual need rather than just satisfying assumed capacity based on a previous policy approach.	To align with the London Plan housing target.	Main	Justified Consistent with national policy	

PS/H/05	Figure 14	<i>Replace with updated trajectory</i>	Reflects changes to the evidence - detail is set out in the Appendix below.	Main	Justified Effective Consistent with national policy	
PS/H/06	Paragraph 8.5	We can demonstrate at least five years of housing land supply to satisfy the requirement to identify a five-year supply of deliverable housing sites available to achieve the housing target of 1,495 homes per year over this period. Our Housing Trajectory (Figure 14) demonstrates that Westminster will be able to meet the housing target, taking account of a range of sources of supply. This includes an allowance for small sites (below 25 units) in line with the Draft London Plan small sites target for Westminster, which also takes account of both non-self-contained homes and vacant properties returning to use, which we strongly support – particularly those on Historic England's 'Heritage at Risk' register.	To align with the London Plan housing target.	Main	Justified Consistent with national policy	
PS/H/07	Paragraph 8.7	Historically more than 80% of Westminster's housing delivery has come forward as windfall. Through our key development sites housing trajectory and the future production of a Site Allocations Development Plan Document we are taking a more proactive approach to planning for growth in Westminster. Nevertheless, high existing use values in Westminster mean that it is not always possible to predict when land will come forward for redevelopment. This means that large sites will inevitably continue to come forward as windfalls and therefore we continue to include a large windfall allowance in our housing trajectory. These 'windfall' developments are not included as allocated land in the Plan, but consistent past trends in windfall development and future projections are used to estimate the future scale of windfall delivery from such schemes .	To reflect changes to Appendix 1 (PS/A1/01) and the council's analysis of windfalls.	Main	Justified Effective	
PS/H/08	Paragraph 8.8	Historically, housing in Westminster has been developed at relatively low densities. This cannot continue in the face of very high demand for housing and projected population growth. Therefore, as developable land is scarce, to deliver our housing targets, higher density development will be required. Our key development sites in Appendix 1 have been modelled at higher densities than in their existing form, to maximise their potential for new homes.	For consistency with changes to Appendix 1 (PS/A1/01).	Main	Justified Effective	
M/H/02	New Paragraph 8.10	<u>Existing Housing</u> <u>The high cost of land in Westminster and its limited availability mean that all existing housing uses must be protected. The acute shortage of affordable housing and the continued need to provide for family-sized homes mean that the only exceptions where the loss of residential uses or floorspace may be acceptable is where they are being reconfigured to better meet these needs. Where existing supported or affordable housing is being reconfigured or redeveloped it will be assessed against the latest evidence of need, either through the council's Annual Affordable Housing Statement or up-to-date evidence specific to Westminster.</u>	For clarity on the application of the policy and in response to representations from the Mayor of London and Maida Hill Neighbourhood Forum.	Main	Effective	
M/H/04	Paragraph 8.10	<u>Re-numbered to Paragraph 8.12</u>	Correction	Minor		
M/H/03	New Paragraph 8.11	<u>To help meet the continued need for family sized housing in Westminster, the council will allow the loss of one existing non-family sized home where this is being reconfigured or merged with another to provide larger units (de-conversion), provided other options to extend the building to create larger units have first been explored. Properties that are de-converted to create family-sized homes should not exceed the 200sq m maximum unless it is demonstrably impracticable to do so.</u>	For clarity and in response to representations from Mayor of London.	Main	Effective	This modification changes how the policy operates by clearly setting out how loss of existing residential will be assessed and improves its effectiveness as a result.
PS/H/09	Policy 9 A	<u>At least</u> 35% of all new homes will be affordable across Westminster.	For clarity and in response to representations from the Mayor of London.	Main	Justified Effective	Statement of Common Ground between WCC and Mayor of London

						(SCG_007).
M/H/05	Policy 9 H	The council will maximise provision of additional affordable housing through renewal of its housing assets, particularly in designated housing renewal areas. Proposals for re-provision of existing affordable housing will be at an equivalent or better quality than existing and will maximise the amount of affordable housing floorspace. Proposals involving the demolition of existing affordable housing will not be permitted unless it is replaced by at least an equivalent amount of affordable housing floorspace. Additional affordable housing will be maximised in such redevelopment proposals.	For clarity and in response to representations from the Mayor of London.	Main	Effective Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
M/H/06	Paragraph 9.1	...The shortage of land, its high price and current funding mechanisms mean that to exceed the strategic 35% affordable housing target threshold and contribute to the Mayor's strategic target of 50% affordable homes across London , it is essential to require affordable housing contributions from private housing developments. All major developments are therefore expected to provide at least 35% of new homes as affordable housing . Developments which fall short of provision of 35% this requirement will be subject to post-permission viability assessment and reviews in line with the Mayor's threshold approach to viability .	For clarity that the policy is in general conformity with the London Plan in response to representations from the Mayor of London.	Main	Effective Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
M/H/07	Paragraph 9.2	To maintain our stock, where affordable homes are redeveloped at least an equivalent amount of affordable housing floorspace must be re-provided. We will seek an uplift in the amount of affordable housing provided where existing affordable housing is redeveloped as part of mixed tenure or mixed-use schemes. Such proposals will be expected to submit a viability assessment to maximise the amount of additional affordable housing provided. ¶ There will be no overall net loss of floorspace and re-provision must be in the vicinity of the original home(s) to maintain mixed tenure communities...	For clarity and in response to representations from the Mayor of London.	Main	Effective Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
M/H/08	Paragraph 9.3	All affordable housing requirements from residential development will be calculated based on the total gross residential floor space development proposed (Gross Internal Area). All developments that include the re-development of affordable housing will be assessed in line with the Mayor's threshold approach to viability. On estate regeneration schemes we will maximise the amount of affordable housing, seeking to deliver 50% affordable housing on public land where viable. On these schemes, ¶ to facilitate large-scale estate renewal and deliver mixed communities, better quality homes and a more appropriate mix of unit sizes, on estate renewal schemes the 35% affordable housing requirement will apply across the regenerated estate, taking account of any affordable homes that have been re-provided. cont...	For clarity that the policy is in general conformity with the London Plan in response to representations from the Mayor of London.	Main	Effective Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
PS/H/10	Paragraph 9.3	...This is in recognition of the wider benefits brought about for residents of affordable accommodation by estate regeneration beyond just an increase in numbers. Maximising affordable housing on estate regeneration schemes and securing affordable housing through certain commercial developments in the CAZ (see policy 10), will both help contribute to the Mayor's strategic 50% affordable housing target.	For clarity and in response to representations from the Mayor of London.	Minor		Statement of Common Ground between WCC and Mayor of London (SCG_007).
PS/H/11	Paragraph 9.9	Registered Provider (RP) owned affordable homes delivered through section 106 agreements may change to market tenure provided the unit is vacant, the affordable homes are re-provided in Westminster and are of an equal or higher quality elsewhere in the city, in terms of size, location, and design quality , and the change is part of a transparent asset management process. All receipts from the sale of affordable homes to market tenure housing should be re-invested in affordable housing re-provision. The mechanisms for achieving this will be set out in a forthcoming planning obligations and affordable housing SPD.	For clarity and in response to representations from the Mayor of London.	Minor		Statement of Common Ground between WCC and Mayor of London (SCG_007).
PS/H/19	Paragraph 9.14	Where payments in lieu are accepted, they will be at a level of broadly equivalent value to actual provision so there is no financial benefit from providing a payment rather than delivery of actual units. Payments will be based on a fixed rate per sqm of floorspace that would have been provided as affordable housing. They will be equivalent to the uplift in value resulting from the floorspace that would have been provided as affordable housing being delivered as private housing. This approach will ensure a cost neutral impact on the developer. The value of the payment in lieu, including indexation , is set out in the Planning Obligations and Affordable Housing Supplementary Planning	To clarify the approach to calculating payment in lieu.	Main	Justified Effective	In response to Matter 4, question 26.

		Document.				
PS/H/20	Policy 10	<p>Delete entire policy and supporting paragraphs 10.1 – 10.10 and replace with:</p> <p><u>10. Affordable housing contributions from commercial development in the CAZ</u></p> <p>A. <u>Commercial development delivering 1,000sqm or more net additional floorspace within the Central Activities Zone (CAZ) will be expected to contribute towards the provision of affordable housing.</u></p> <p>B. <u>Affordable housing contributions from commercial development will take the form of a financial contribution to the city's Affordable Housing Fund. The charge will be calculated on the Gross Internal Area (GIA) of the additional relevant floorspace on a £/sqm basis. The rate is set according to the council's Community Infrastructure Levy (CIL) Charging Zones for commercial development.</u></p> <p><u>10.1 The CAZ has an international, national and London-wide role. Westminster's CAZ hosts nationally and internationally significant office, retail and leisure clusters and a unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions. These different roles and functions result in a unique agglomeration and mix of land uses, which provide national benefits. In order to support the continued commercial growth of the CAZ, adequate social infrastructure, including the provision of affordable housing, is required to support the workers that allow the area to operate successfully. This objective is supported by the London Plan. Many of those in need of affordable housing in Westminster work in the CAZ in key worker and service industry functions and are unable to access market housing within easy travelling distance of their place of work.</u></p> <p><u>10.2 To balance the need to deliver affordable housing in all parts of Westminster alongside supporting the economic role and functions of the CAZ, rather than requiring mixed-use development we will seek financial contributions towards the provision of affordable housing from commercial development delivering 1,000sqm or more additional new-build floorspace. This will ensure that affordable housing continues to be provided within reasonable travel distance of the CAZ without compromising its strategic economic functions. It will allow appropriate flexibility for the council and the opportunity to maximise the provision of affordable housing. Mixed-use developments providing both commercial and residential floorspace will be expected to comply with the requirements of both Policy 9 and this policy, where applicable. This will maintain an appropriate supply of affordable housing coming forward on-site within the CAZ alongside market housing. For the avoidance of doubt, commercial development is as described in the council's Community Infrastructure Levy (CIL) Charging Schedule.</u></p> <p><u>Commercial Development</u></p> <p><u>10.3 Commercial development is described in the council's CIL Charging Schedule as: offices, hotels, nightclubs and casinos; and all 'A' class and 'sui generis' retail. Under the Use Classes Amendment Regulations 2020, retail and office uses principally fall within new Class E. Applications for Class E development will therefore require an affordable housing contribution in line with this policy, unless the commercial floorspace is specifically conditioned for use as a medical, health or childcare facility and will not be used for any other use falling within Class E.</u></p> <p><u>Contributions</u></p> <p><u>10.4 The rates at which contributions will be sought reflect the different land values of</u></p>	To simplify the approach to affordable housing contributions from commercial development in response to changes to the Use Classes Order.	Main	Positively prepared Justified Effective Consistent with national policy	Supersedes modifications M/H/09, PS/H/12, PS/H/13, M/H/10, M/H/11, PS/H/14, M/H/12 as set out in CORE_025_V3. In response to Matter 1, question 18. Paragraph 10.4 contains a placeholder for the proposed rates to be charged under this policy. The council has commissioned further viability evidence from BNP Paribas in order to set rates that will not prejudice the overall viability of development. It is anticipated that the proposed rates and the evidence supporting them will be in place prior to the hearing sessions taking place. The examination library will be updated to reflect this new evidence once finalised.

		<p><u>different parts of the CAZ for commercial development, in accordance with the council's CIL Charging Schedule. Therefore, a rate of £x per sqm in the 'Prime' areas of the CAZ, and £x per sqm in the 'Core' areas is sought. The small parts of the CAZ classed as 'Fringe' commercial areas will attract a nil rate. The tariff will be subject to indexation in the same way as CIL, using the RICS CIL Index. The charge will not be sought on developments of less than 1,000sqm net additional floorspace. For development above this threshold, the charge will be calculated on the gross internal area (GIA) of the total new-build floorspace proposed and will not apply to changes of use of existing floorspace.</u></p> <p><u>Individual Scheme Viability</u></p> <p><u>10.5 Where individual development proposals do not meet the requirements of this policy, they will be required to submit detailed supporting viability evidence in a standardised and accessible format, in line with the Mayor's Viability Tested Route as part of the Threshold Approach to planning applications set out in the London Plan. Developments will be subject to viability review in line with this approach.</u></p>				
M/H/13	Policy 11 B	New build homes will be designed with growing families in mind and 25% of all new homes <u>across Westminster</u> will be family sized.	For clarity that the family-sized housing requirement is.	Main	Justified	This changes the meaning of the policy to show that 25% is a strategic target. The evidence for a strategic target is fully justified.
M/H/14	Policy 11 D	The council supports the provision of well-managed new housing which meets an identified specialist housing need. All existing specialist and supported housing floorspace which meets a specific local housing need will be protected from changing to non-specialist or supported residential use except where it is demonstrated that:	For clarity.	Minor		
M/H/15	Policy 11 D	3. it is surplus to requirements as any form of specialist or supported housing and is being replaced by affordable housing ; or	For clarity that it is possible to redevelop such sites for a mix of housing types.	Main	Justified Effective	
M/H/16	Policy 11 H	At least 35% A proportion of the purpose-built student accommodation will be secured as affordable student housing accommodation as defined in accordance with the London Plan. All accommodation should include a proportion of units that are adaptable to meet specialist needs.	For clarity and to demonstrate general conformity with new London Plan Policy H17.	Main	Effective Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
M/H/17	Policy 11 J	Permission for g Gypsy and traveller sites may be granted permitted where it is demonstrated that there is a need in Westminster, and that they are well- appropriately designed developments that and will not have adverse unacceptable impacts, particularly on traffic or parking.	For clarity and to improve wording.	Main	Effective	This modification improves the effectiveness of the policy and clarifies that such developments have impacts beyond traffic and parking.
M/H/18	Paragraph 11.1	Westminster has a broad range of housing needs and we support delivery of a range of housing types and sizes to meet those needs. The provision of specialist housing and accommodation will contribute to the council's overall housing target of at least 22,222, 20,685 homes over the plan period.	To clarify that provision of specialist housing will contribute to the council's overall housing targets.	Main	Effective Consistent with national policy	Altered to clarify overall target is now in line with the London Plan.
M/H/19	Paragraph 11.19	Student accommodation must be affordable, well-managed and a sufficient proportion must be adaptable to meet specialist needs. Thirty five per cent of accommodation must be provided as affordable student accommodation in line with the London Plan A <u>proportion of purpose-built student accommodation must be provided as affordable student accommodation, as defined in the London Plan and associated guidance. The Mayor's threshold approach to viability will be used to assess the appropriate proportion of affordable student accommodation in accordance with London Plan Policy H17.</u>	To demonstrate general conformity with new London Plan Policy H17.	Main	Effective Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
PS/H/15	Policy 12 A	A. The council welcomes applications for innovative models of high-quality housing <u>that contribute to providing a range of housing options to Westminster's residents.</u> –	To acknowledge that different types of housing	Main	Justified	In response to Matter 4, question 45.

		particularly where the new homes are provided at rental levels equal to or less than Westminster's intermediate rents, or enable access to more affordable homes than market housing.	schemes will contribute to affordable housing in different ways.		Effective	
PS/H/16	Policy 12 B (new)	<u>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.</u>	To explain how different types of schemes will contribute to affordable housing in line with the City Plan and the New London Plan.	Main	Justified Effective	In response to Matter 4, question 45.
PS/H/17	Policy 12 B	<u>Re-numbered to clause C</u>	To recognise that there is a new clause B (as set out in PS/H/16)	Minor		In response to Matter 4, question 45.
M/H/20	Paragraph 12.2	... This requirement may be waived if the rents charged are at a level comparable to Westminster's intermediate rent and these rental levels are secured by legal agreement in perpetuity. We will expect 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.	For clarity and in response to representations from Unite Students. To explain how different types of schemes will contribute to affordable housing in line with the City Plan and the New London Plan.	Main	Justified Effective	Supersedes proposed modification M/H/20 as set out in Revised Schedule of Modifications, CORE_025_V2 In response to Matter 4, question 45.
M/H/21	Paragraph 13.1	Housing plays an important role in the safety, health and well-being of individuals and communities and in the shaping of <u>inclusive</u> 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. <u>We will expect all new developments to be tenure blind and maximise tenure integration.</u>	In response to representations from the Church Street Ward Neighbourhood Forum and Achim Von Malotki.	Minor		
M/H/22	Paragraph 13.4	The policy requirements Part A of the policy apply applies to: all new homes (across all tenures); residential extensions; when flats are being merged; or when a change of use results in new homes.	For clarity.	Main	Effective	
M/H/23	Paragraph 13.6	... The Nationally Described Space Standards (NDSS), are therefore adopted in Westminster <u>in accordance with the London Plan (see Policy D6 Housing quality and standards)</u> and will ensure residents have access to a suitable amount of space in their <u>self-contained</u> homes. <u>It is recognised that it is sometimes impracticable to meet them within heritage assets. However, we expect the standards to be met when converting or extending homes where possible.</u>	For clarity and in response to representations from the Church Commissioners for England. To explain how the standards will be applied in Westminster in line with the New London Plan.	Main	Justified Effective	Supersedes proposed modification M/H/23 as set out in Revised Schedule of Modifications, CORE_025_V2. In response to Matter 4, question 50.

ECONOMY AND EMPLOYMENT

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
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PS/EE/24	Policy 14A	<p>A. New and improved office and B4 floorspace across the plan period will be supported to provide capacity for at least 63,000 new jobs over the plan period, enabling the continued growth and clustering of the creative, knowledge, and research-based sectors. Additional floorspace that meets the needs of modern working practices, including <u>through</u> the provision of co-working space <u>and a range of Class E (commercial, business and service) uses on site</u>, is supported in principle in the:</p> <ol style="list-style-type: none"> <u>Parts of the</u> Central Activities Zone (CAZ) <u>with a commercial or mixed-use character</u>, including the West End Retail and Leisure Special Policy Area (WERLSPA) and Opportunity Areas; North West Economic Development Area (NWEDA) and Church Street / Edgware Road Housing Renewal Area; and Town centre hierarchy. <p><u>B. Where new office floorspace is secured, conditions may be applied to secure its long-term use for such purposes.</u></p> <p><i>(renumber subsequent policy clauses)</i></p>	In response to changes to the Use Classes Order, and MIQ responses from Pimlico Neighbourhood Forum and Knightsbridge Neighbourhood Forum	Main	Effective	In response to Matter 1, question 18.
PS/EE/25	Policy 14D	<p>DE. Proposals involving the net loss of office floorspace from the CAZ will only be acceptable in the following exceptional circumstances: <u>The net loss of office floorspace from the CAZ:</u></p> <ol style="list-style-type: none"> <u>1. to residential development will only be permitted in those parts of the CAZ that are predominantly residential in character and where the proposal would reinstate an original residential use;</u> <u>2. to hotel use will only be permitted where there is no interest in its continued use for office or any other Class E (commercial, business and services), education or community use, as demonstrated by vacancy and appropriate marketing for a period of at least 12 months.</u> <p>1. the proposal is in a predominantly residential area and would re-instate an original residential use; or</p> <p>2. any loss of floorspace is necessary as part of the renewal of outdated stock to secure a high-quality office development with ancillary facilities that meets the needs of modern working practices; or</p> <p>3. there is no interest in the continued use of the site for office purposes, as demonstrated by vacancy and appropriate marketing for a period of at least 18 months, and the replacement use is for educational, community or hotel use.</p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18. Supersedes earlier modifications PS/EE/04 and M/EE/01
PS/EE/05	Paragraph 14.1	... and to adapt to modern working practices. <u>Furthermore, the provision of new, refurbished, and remodelled business space, alongside wider investment in a healthier physical environment, can all help enhance the health and wellbeing of those working in Westminster and ensure it remains an attractive place to do business.</u>	To clarify that new developments should contribute to a healthy working environment.	Minor		In response to Matter 5, question 5.
PS/EE/26	Paragraph 14.1	<i>Insert additional paragraph at end of existing 14.1 to read:</i>	In response to changes to the Use Classes Order.	Main	Effective	In response to Matter 1, question 18.

		<u>14.2 Where new office floorspace is secured, under recent revisions to the Use Classes Order, this could be converted to a range of other class E commercial, business and servicing uses without planning permission. While it is recognised that such flexibility can enable landlords and developers to adapt space to changing working practices and provide a range of complementary uses on site, it is important to ensure any such loss of office space does not compromise central London's global office function, and the differing servicing and amenity impacts of other class E uses are fully considered. Where necessary, conditions may therefore be attached to permissions for new office floorspace to ensure the impacts of any later conversion of such space are properly considered.</u>				
PS/EE/27	Paragraph 14.6	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 some small-scale changes of use that are <u>is</u> deemed permitted development. <u>14.7 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.</u> <i>Renumber subsequent paragraphs accordingly</i>	In response to changes to the Use Classes Order, and MIQ responses from Pimlico Neighbourhood Forum and Knightsbridge Neighbourhood Forum	Main	Effective	In response to Matter 1, question 18.
PS/EE/28	Paragraph 14.8	Offices are identified in national planning policy as a town centre use, and recent changes to the Use Classes Order <u>increase flexibility for change of use between a wider range of uses typically found in town centres to enable them to evolve as multifunctional places to work, shop, and spend leisure time.</u> treats some loss of retail and other town centre uses to office floorspace as permitted development, provided certain criteria are met. Additional office floorspace provision will therefore be supported across our highly accessible network of town centres as they continue to evolve as multi-functional areas of commercial activity.	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18.
M/EE/02	Paragraph 14.11 – 14.12	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 B4 offices to C3 residential continue to require planning permission. Given past levels of loss, and the national <u>importance, international and London significance</u> of <u>the</u> central London's office market, the further <u>net</u> loss of <u>total</u> office floorspace from the CAZ <u>to residential or hotel use</u> will normally be resisted, <u>subject to some exceptions.</u> 14.12 There are however some exceptional circumstances where the loss of some office space from the CAZ may be deemed acceptable. Some parts of ... (cont.)	For completeness and in response to representations from the Mayor of London, and changes to the Use Classes Order.	Main	Effective	This modification clarifies that policy resists an overall net loss of office floorspace from the CAZ - recognising criteria within the policy offers scope for some loss from individual sites in certain circumstances. It has been updated to reflect changes to the Use Classes Order, in

						response to Matter 1, question 18.
PS/EE/29	Paragraph 14.13	The upgrading and refurbishment of outdated existing stock within commercial areas may require some net loss of dedicated office floorspace as they adapt to meet the needs of modern working practices. This could include the provision of ancillary facilities for workers such as cycle parking and changing facilities, but also other uses that improve the working environment such as an on-site café or gymnasium. Within the town centre hierarchy, it could also include provision for retail at ground floor.	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18.
PS/EE/30	Paragraph 14.14	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, <u>or for other uses that fall within Class E of the Use Classes Order</u> . In such circumstances, its redevelopment or re-purposing for educational uses such as new teaching and research facilities can provide economic benefits in terms of improving skills and contributing to the further growth and clustering of knowledge-based industries. Community uses such as new health facilities can help address needs arising from a growing population, and provide significant employment opportunities. <u>Where there is also no interest in these uses, well designed and managed hotels can meanwhile, 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.</u>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18.
PS/EE/01	Paragraph 14.16	As the principle of redeveloping such sites has been established through their <u>inclusion identification</u> as <u>key development identified</u> sites <u>in Appendix 1</u> , proposals for them will not be required to provide evidence of vacancy and marketing.	For consistency with changes to Appendix 1 (PS/A1/01).	Main	Effective	
PS/EE/06	Policy 15 A	<u>The intensification of town centres, high streets and the CAZ to provide additional floorspace for main town centre uses is supported in principle, subject to impact on townscape and heritage.</u> Proposals in existing town centres and high streets will enhance and diversify their offer as places to shop, work and spend leisure time.	To clarify the expectation that designated town centres will be an area of growth and intensification.	Main	Positively prepared Consistent with national policy	In response to Matter 5, question 7.
PS/EE/31	Policy 15 B	B. <u>Uses that provide active frontages and serve visiting members of the public will be required at the ground floor throughout the town centre hierarchy. Uses serving visiting serving members of the public will also be supported</u> A1 retail will remain the priority use at ground floor throughout the town centre hierarchy, and at first floor level within centres characterised by large format, multi-level stores. It will be supported by complementary town centre uses (including standalone units and subsidiary uses within larger stores) that increase customer dwell time, and enhance town centre vitality and viability. The use of upper floors for residential use is supported in principle across all parts of the town centre hierarchy except the International Centres.	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18
PS/EE/32	Policy 15 C	C. All <u>Development within the town centre hierarchy will:</u> 1. <u>be of a scale, type and format that reflects and enhances the role and function of the centre within which it is proposed.</u> <u>1. The International Centres of the West End and Knightsbridge will provide a focal point for large format comparison retail, supported by complementary town centre uses that increase customer dwell time, and new office floorspace;</u> <u>2. The WERLSPA will provide a wide mix of commercial uses that support the West End's role as a retail, employment and cultural hub, and as a centre for the visitor, evening and night-time economy;</u> <u>3. CAZ Retail Clusters will provide further large format retail and complementary town centre uses to meet the needs of residents, workers, and visitors;</u>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18

		<p><u>4. Major, District and Local Centres will provide a mix of commercial and community uses to meet resident's day to day shopping needs, provide local employment opportunities, and support opportunities for community interaction.</u></p> <p><u>D. Where new retail floorspace is provided, conditions may be applied to secure its long-term use for such purposes.</u></p> <p>; and 2. maintain an active frontage; and 3. not result in two or more non-A1 uses consecutively in the ground floor frontage of an International Centre, or three or more non-A1 uses consecutively in the ground floor frontage of a CAZ Retail Cluster, Major, District or Local Centre.</p>				
M/EE/03	Policy 15 D	<p>In addition to clause C above, proposals for the permanent change of use of an A1 retail unit will be supported by evidence that there is no reasonable prospect of its continued use for A1 retail purposes, as evidenced by appropriate marketing of at least 18 months. This includes proposals involving the sub-division and loss of A1 floorspace, but not the inclusion of subsidiary uses within an A1 store as part of a diversified offer. It also does not apply to proposals within the WERLSPA, unless the site is also designated as part of the West End International Centre or a CAZ Retail Cluster.</p>	In response to changes to the Use Classes Order	Main	Effective	<p>Supersedes modification M/EE/03 as set out in Revised Schedule of Modifications, CORE_025_V3.</p> <p>In response to Matter 1, question 18.</p>
PS/EE/33	Policy 15 H	<p>H. Town centre uses will also be supported in principle throughout the <u>parts of the CAZ with a commercial or mixed-use character, having regard to the existing mix of land uses and neighbourhood plan policies.</u> In the <u>parts of the CAZ that are commercial or mixed-use in character, the loss of town centre uses from the ground floor will be resisted,</u> where they do not cause significant harm to local character or residential amenity.</p>	In response to issues raised in Pimlico Neighbourhood Forum and Knightsbridge Neighbourhood Forum MIQ responses.	Main	Effective	In response to Matter 1, question 18.
PS/EE/34	Policy 15 I	<p>I. Only sites that fall outside of the CAZ and the town centre hierarchy will be required to pass the sequential test set out in the National Planning Policy Framework (NPPF). Retail impact assessments will only be required for proposals of more than 2,500 sq m of <u>(gross) new retail floorspace outside the town centre hierarchy, including proposals for Class E (commercial, business and service uses) that would enable at least 2,500 sq m of (gross) floorspace to be occupied by retail use.</u></p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18.
PS/EE/35	Policy 15 J	<p>J. Within largely residential areas not well served by the town centre hierarchy, <u>conversion of existing shops to residential use will be resisted. Alternative uses that maintain an active frontage, provide opportunities for employment, or serve local community needs, will be supported where any negative impacts on residential amenity are fully mitigated.</u> A1 convenience stores will be protected.</p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18.
PS/EE/07	Paragraph 15.2	<p>...in terms of mix of uses, levels of vacancies, and their boundaries. <u>The intensification of these centres, through a combination of the repurposing and extension of, and replacement of, existing buildings, will be necessary to secure their long-term sustainability. High quality new developments that respond to their surroundings and are supported by investment in a healthier physical environment will be vital in ensuring key commercial centres in Westminster remain attractive to a full range of users as places to shop, work, and spend leisure time.</u></p>	To clarify the expectation that designated town centres will be an area of growth and intensification, and that such growth occurs in a manner that supports a healthy environment for workers and visitors.	Main	<p>Positively prepared</p> <p>Consistent with national policy</p>	In response to Matter 5, question 7.

M/EE/04	Paragraphs 15.3 – 15.5	<p><u>Growth and diversification-Retail growth</u></p> <p>15.3 GLA forecasts based on a range of scenarios indicate that despite the growing use of online shopping and increased space efficiency within stores, over the period from 2015 to 2041, there will be a need for between 375,468 284,693 sq m and 467,814 399,021 sq m (net) additional comparison retail floorspace in Westminster, assuming base expenditure levels continue. Over the Plan period, this equates to 229,944 – 322,286 sqm.</p> <p>15.4 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 <u>and other town centre uses</u>. This is also key to why Westminster is anticipated to absorb a significant proportion London's future retail growth. Furthermore, the Town Centre Health Check 2018 indicated that town centres and high streets across Westminster largely buck the trend of nationwide struggles - with healthy, diverse centres that have relatively low levels of vacancy.</p> <p><u>15.5 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.</u></p> <p><u>Complementary town centre uses</u></p> <p>15.5 <u>15.6 Development across the town centre hierarchy Where new A1 retail and complementary town centre uses are proposed, they</u> should be of a scale, type, and nature that reflects the role of the centre within which it is located (see explanation of each type of centre below). This will ensure the town centre hierarchy is not compromised. Proposals should <u>also</u> demonstrate how they will enhance the existing centre and mitigate any potential negative impacts, <u>having regard to</u> .-Determining whether a non-A1 use is complementary will be based on the NPPF definition of main town centre uses, and consideration of the role, function and health of the centre within which it is proposed. Typically it will include uses such as cafés, restaurants, hotels, cultural and leisure uses, and spaces that can host exhibitions and events. These could be within standalone units or as subsidiary uses in a larger host unit. For a number of complementary uses, the application of policies 17 (visitor economy) and 18 (food, drink and entertainment uses) where relevant, will be necessary. 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, - This includes requirements to mitigate mitigating any potential negative effects, will</p>	In response to changes to the Use Classes Order. Correction to reflect evidence base.	Main	Effective Justified	In response to Matter 1, question 18. Supersedes, and incorporates previous M/EE/04 (correction to paragraph 15.3 to reflect evidence base).
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		<p>also require including through the production and implementation of management plans. for certain uses. In addition, recent changes to the Use Classes Order means that some loss of retail space and other town centre uses to office floorspace may be treated as permitted development.</p> <p><i>Renumber subsequent paragraphs accordingly</i></p>				
M/EE/05	Paragraphs 15.7 – 15.8	<p>Diversification and innovation</p> <p>While A1 retail will remain the priority use throughout the town centre hierarchy, to ensure existing centres thrive, they must also be given scope to diversify and evolve to new trends. A range of complementary town centre uses of an appropriate scale will therefore be vital to support their roles as social spaces, increase customer dwell time, and make them more interesting places to visit. In some instances, this could necessitate the loss of some A1 floorspace – such as from upper floors of multi-level stores. It could also see a continued blurring of use classes – for example shops that also serve food and drink on site and provide exhibition space. While such diversification can help businesses survive and thrive, some such proposals may be classified as sui generis, and will need to be considered in terms of the impact of any entertainment uses. Where diversification means a unit is legally re-classified as sui generis, but retail remains the dominant use, the change in use class will not necessarily mean the proposal is unacceptable – instead it will be treated on its merits.</p> <p><u>Meanwhile use and innovation</u></p> <p>Alongside these changes in the sector, further innovation such as the greater use of digital media within stores, and the development of new models such as brand showrooms and experience centres, is also welcomed. Well managed pop-up and meanwhile uses <u>across the town centre hierarchy</u> can <u>also help</u> minimise vacancies while a long-term occupier is sought, maintain active frontages, support small businesses to test their products, add to the vibrancy of an area by attracting new footfall, and provide community benefits. All of this, combined with an improved public realm, <u>and further innovation such as the greater use of digital media within stores, and development of new models such as brand showrooms and experience centres,</u> will help ensure our town centres and high streets remain at the cutting edge of the revolution in retail, and offer experiences that cannot be matched by online shopping.</p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18. Supersedes previous M/EE/05.
M/EE/06	Paragraphs 15.12 – 15.13	<p><u>Protecting vitality and viability</u></p> <p>Flexibility to support change and innovation within our town centres and high streets does have to be carefully managed to ensure a critical mass of retail that attracts shoppers, and accommodate projected levels of retail growth. The cumulative loss of A1 retail units and floorspace through the change of use and sub-division of existing units can harm the appearance, character and retail function of town centres and high streets. A predominance of uses such as shisha bars, betting shops and fast food takeaways can undermine town centre vitality and viability and be detrimental to public health. Ground floor residential meanwhile, would break up active frontages and is not identified as a main town centre use in the NPPF. The permanent change of use of an A1 retail unit, or proposals to sub-divide it and lose a subsequent standalone A1 unit will be considered in terms of its impact on the health of the centre, and will require marketing evidence demonstrating that continued retail use is no longer viable. Loss of A1 floorspace to accommodate subsidiary uses within an A1 unit meanwhile, will not require marketing evidence in the interests of enabling existing businesses to diversify, innovate, survive and thrive. Where temporary consents are granted for non-A1 uses (including under permitted development rights), this will not remove</p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18. Supersedes previous M/EE/06

		<p>requirements for marketing evidence before any permanent change of use from A1-retail is considered.</p> <p>Permitted development</p> <p>In considering change of use proposals, many town centre uses enjoy permitted development rights under national planning legislation. We will therefore keep the balance of uses and emerging clusters across our centres under review through updates to town centre health checks, and use our powers to make Article 4 Directions requiring the submission of planning applications as appropriate.</p>				
PS/EE/36	Paragraphs 15.14 – 15.16	<p>Within the town centre hierarchy, the West End and Knightsbridge International Centres provide London's prime retail destinations, and offer unparalleled specialist and comparison retail of regional and national importance that draws in international visitors. The West End International Centre includes Oxford Street, Regent Street and Bond Street, while Knightsbridge International Centre includes Brompton Road and extends beyond the city boundary into the Royal Borough of Kensington and Chelsea. A1-c Comparison retail is the dominant use in these centres, which are largely characterised by large format stores, often provided over multiple floors.</p> <p>The Mayor of London has identified these centres as being of high commercial growth potential and therefore especially suitable for further large-scale retail growth. To reflect their role and function, retail provision should be predominantly for comparison shopping and maintain a strong retail core at ground floor level and immediately above. Complementary town centre uses that enhance customer experience <u>and increase dwell time will be focussed on upper floors, alongside other commercial uses including office floorspace are also supported, particularly on upper floors. In addition, new and improved office floorspace on upper floors can support wider jobs growth, and support customer spend within the International Centre from a worker, as well as visitor population.</u> While residential use of upper floors can help sustain smaller town centres and high streets that do not generate high footfall, they are not supported within the International Centres to ensure:</p> <ul style="list-style-type: none"> • they do not fetter opportunities for these commercial centres of international importance to continue to grow and diversify; • the scale of commercial activity in these centres, and their operational requirements, are not compromised. <p>Where provided, non-retail uses should A1 uses will normally be subsidiary to primary A1 uses, and will enhance and sustain, rather than dilute the centre's comparison shopping role. Convenience shopping such as supermarkets could also dilute the comparison shopping offer and present significant servicing issues, and are therefore discouraged.</p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18
PS/EE/37	Paragraph 15.17	<p>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 District Place 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. <u>Key principles for development in the Knightsbridge International Centre, which seek to protect and enhance its role as a world-class shopping destination, are provided in the Knightsbridge Neighbourhood Plan.</u></p>	In response to issues raised in Knightsbridge Neighbourhood Forum MIQ response	Minor		In response to Matter 1, question 18

PS/EE/38	Paragraphs 15.19 -15.20	<p>Alongside retail growth, a balanced mix of complementary leisure, entertainment, food and drink and cultural and employment offers are welcomed to help the West End to grow, not only as a global shopping destination, but also as an enhanced leisure and employment destination. Policy therefore provides for greater flexibility of uses within the WERLSPA than elsewhere in the town centre hierarchy – recognising the interdependency of the mix of uses in this wider area.</p> <p>Continued growth in <u>a diverse range of commercial uses</u> in the West End will make an important contribution to meeting Westminster’s employment growth targets. To ensure such growth occurs in a manner that maintains and enhances the West End’s global reputation, and improvements to the local environment are secured, we will continue to work within the West End Partnership (WEP) and with other stakeholders.</p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18
PS/EE/39	Paragraph 15.22	<p>Queensway / Westbourne Grove Major Centre is the only Major Centre in Westminster. It is designated as such due to the scale and nature of its mix of convenience and comparison retail activity and complementary town centre uses. It has a traditional high street character largely surrounded by residential areas and provides an important convenience shopping function to these local residents. However, an over-concentration of entertainment uses and the loss of retail have weakened the vitality and viability of the centre, which now needs reversing. Over the plan period, new development <u>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 that reinforces the centre’s retail function through opportunities for ground floor retail with residential or complementary town centre uses above is welcomed, supported by new community facilities</u> and investment in the public realm.</p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18
PS/EE/40	After paragraph 15.26	<p><u>Use of conditions</u></p> <p><u>It is recognised that a flexible approach is needed to ensure town centres and high streets can evolve as multifunctional areas of commercial activity, and recent changes to the Use Classes Order will enable landowners and occupiers to adapt to changing consumer demands. However, where new and replacement dedicated retail space is secured within the town centre hierarchy, there may be instances where it is considered necessary to place limitations on how much of this can subsequently be converted to other Class E commercial, business and servicing uses without planning permission. This will help ensure:</u></p> <ul style="list-style-type: none"> <u>• town centres and high streets retain a retail function;</u> <u>• a critical mass of retail that attracts shoppers is maintained; and</u> <u>• the differing servicing and amenity functions of other uses within class E can be fully considered.</u> <p><i>And renumber subsequent paragraph accordingly</i></p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18
PS/EE/41	Paragraph 15.27	<p>Whilst not forming a part of Westminster’s town centre hierarchy, the wider CAZ as defined in the London Plan covers much of the city. Town centre uses provide a key element of the mix of uses within it and contribute to its character and strategic functions. However, the CAZ is also home to many local residents and some parts of it are also wholly residential in character. To respect its many functions, <u>and the need to protect residential amenity</u>, policy support is <u>therefore</u> provided for town centre uses <u>within the parts of the CAZ that are of a commercial or mixed-use character.</u> Furthermore, <u>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</u></p>	In response to changes to the Use Classes Order, and issues raised in Pimlico Neighbourhood Forum and Knightsbridge Neighbourhood Forum MIQ responses	Main	Effective	In response to Matter 1, question 18

		<p>uses within the vicinity of a development site, and any assessments of local character within neighbourhood plans, where they would not be detrimental to local character or residential amenity.</p> <p><u>15.28</u> 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 <u>within</u> the CAZ <u>with a commercial or mixed-use character</u>, the town centre hierarchy should provide the key focus of retail related growth. <u>However, recent revisions to the Use Classes Order mean that it may not always be clear if a development proposal will provide retail floorspace, as permission can be sought for a variety of uses under Class E (commercial, business and service) uses. Where a proposal for more than 2,500 sq m of Class E floorspace is proposed outside of the town centre hierarchy with no restrictions on types of future occupier, a retail impact test will be required. This will help ensure that any significant out of centre retail provision would not be harmful to the retail function of the town centre hierarchy.</u></p> <p><i>And renumber subsequent paragraphs accordingly</i></p>				
PS/EE/42	Paragraphs 15.28 – 15.30	<p>Existing shops convenience stores outside of the town centre hierarchy</p> <p>The extent of Westminster's town centre hierarchy means that most residents benefit from good access to a diverse range of shops and services. However, outside of the CAZ there are some residential areas that are not within easy walking distance (i.e. 400m or less) of a designated town centre or high street. In such areas, where isolated A1 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, <u>and</u> can help avoid unnecessary trips by car. , and should be protected. <u>Under recent changes to the Use Classes Order, such stores can be converted to any Class E (commercial, business, and service) use without planning permission. Beyond this, some other uses falling outside of Class E, such as community halls or a pub or drinking establishment, may also provide enhanced amenities for the local community, and will therefore also be supported subject to appropriate mitigation of any negative amenity impacts (e.g. noise disturbance from a pub or drinking establishment).</u></p> <p>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:</p> <ul style="list-style-type: none"> - vacancies; - poor physical appearance; - concentrations of uses detrimental to public health such as hot food takeaways and betting shops. <p><u>As recent changes to the Use Classes Order have increased flexibility in terms of the use of premises within such parades, policy also supports a range of new uses that can provide community benefits (subject to impact on amenity), to help improve the vitality and viability of these parades. Piecemeal conversion to residential development that breaks up any frontages and provides little benefit to the wider community meanwhile, will be resisted.</u></p> <p>It also found that these parades are in close proximity to better performing designated centres that provide a greater critical mass of activity. As such, and given the struggles smaller centres face, only existing A1 convenience stores within these parades are considered to merit policy protection. Flexibility is offered for other units to be converted to residential or community uses – where such proposals would not compromise any neighbourhood plan designations, and secure a high quality design that enhances local character.</p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18

M/EE/07	Figure 15	<i>Amend map - see Submission Policies Map (CORE_004) and the Schedule of Changes to the Policies Map (CORE_005).</i>	Correction in response to representations from Covent Garden Community Association, Longmartin Properties, Berners Allsop Estate, and Baker St Quarter Partnership.	Main	Justified Effective	
PS/EE/02	Policy 16 B	B. All existing arts and cultural uses <u>and uses of cultural significance</u> will be protected <u>and proposals for enhancement will be supported in principle</u> . <u>New Proposals for new</u> 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, <u>new</u> arts and cultural uses will be of a scale and nature appropriate to the local context and of benefit to the local community.	For clarity and in response to representations from the Marylebone Cricket Club.	Main	Effective	Statement of Common Ground between WCC and Marylebone Cricket Club (SCG_008).
PS/EE/08	Policy 16 G	New hotels <u>and conference facilities</u> will be directed to: <u>1. commercial areas of the CAZ, other than in streets that have a predominantly residential character,</u> and <u>2. to town centres that are District centres or higher in the town centre hierarchy.</u> New conference facilities will be directed to the CAZ.	To be effective by directing hotels and conference facilities to the same areas.	Main	Effective	In response to Matter 5, question 14.
PS/EE/09	Policy 16 H	Applications for extensions and upgrades to existing hotels should be linked to the upgrading of the hotel and the application should consider their impact on the wider area 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.	To be effective by managing extensions and upgrades to existing hotels.	Main	Effective	In response to Matter 5, question 15.
PS/EE/03	Paragraph 16.1	Growth in this sector must be balanced with the need to protect the liveability of the city and enhance participation of local communities in cultural activities. <u>Furthermore, to ensure the continued success of Westminster's visitor economy (including night-time economy) is not compromised by new development, the Agent of Change principle will be applied to proposals looking to introduce sensitive uses such as residential into commercial areas.</u>	For clarity and in response to representations from the Mayor of London.	Minor		Statement of Common Ground between WCC and Mayor of London (SCG_007).
M/EE/08	Paragraph 16.3	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. <u>The city also has a high concentration of theatres, music venues and LGBTQI+ venues.</u> cont... <u>New footnote: GLA Cultural Infrastructure Map - https://maps.london.gov.uk/cim/index.html.</u>	For completeness and in response to representations from the Mayor of London.	Minor		
M/EE/09	Paragraph 16.4	... In the Knightsbridge SCA a concentration of institutions of international importance includes the Royal Albert Hall, the Serpentine Gallery, <u>Imperial College,</u> the Royal College of Art and the Royal College of Music.	For completeness and in response to representations from Imperial College.	Minor		
PS/EE/10	Paragraph 16.13	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 <u>and conference facilities</u> may also be appropriate in all town centres (except local centres), where they enhance their role and function and there are no adverse impacts on the wider area, including on residential properties. When assessing proposals for new hotels, and hotel extensions <u>and conference facilities</u> , we will take into account the site location, relationship to neighbouring uses, scale of accommodation and facilities proposed (the number of bedrooms and nature of other services the hotel offers), highways and parking.	To be effective by directing hotels and conference facilities to the same areas.	Main	Effective	In response to Matter 5, question 14.
PS/EE/11	Paragraph 16.13	<u>New sentence, at the end of the paragraph.</u> <u>Extensions and upgrades to existing hotels will also consider how the sustainability</u>	To be effective by managing extensions and upgrades to existing	Main	Effective	In response to Matter 5, question 15.

		<u>and accessibility of the building can be improved. When located within heritage assets and where appropriate, development should better reveal the historic significance of the building.</u>	hotels.			
PS/EE/48	Policy 17 A	Proposals for food and drink and entertainment uses will be of a type and size appropriate to their location. The overconcentration of those uses will be <u>further prevented where this could harm residential amenity, or the vitality and character of the local area or the diversity that defines role and function of the town centre.</u> Applications for entertainment uses will need to demonstrate wider benefits for the local community, where appropriate.	For completeness and in response to representations from Knightsbridge Neighbourhood Forum	Main	Effective Justified	In response to Matter 1, question 18.
PS/EE/49	Policy 17 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. <u>Replacement of ancillary spaces on upper floors to public houses, such as function rooms or accommodation, may be acceptable where it can be satisfactorily demonstrated that loss of this floorspace will not compromise the viability or function of the public house.</u>	For completeness and in response to representations from Shaftsbury, BMO	Main	Effective Justified	In response to Matter 1, question 18.
PS/EE/12	Policy 17 F	The use of premises and outdoor areas for shisha smoking will <u>generally not be supported due to their adverse impacts on public health. In exceptional circumstances, they 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. not take place under or adjacent to windows of existing residential properties. Any negative effects must be fully mitigated by incorporating measures into the design and operation.</u>	To ensure Policy 17 is effective by managing the potential impacts of new premises and outdoors areas used to for shisha smoking.	Main	Effective	In response to Matter 5, question 20.
PS/EE/50	Paragraph 17.1	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. <u>Given the recent changes in the Use Classes Order the council cannot control growth of cafes and restaurants that are now in a new Class E. The focus of this policy will therefore be on other uses such as takeaways, shisha smoking bars and other drinking establishments that are sui generis uses.</u> Much of the entertainment sector is concentrated in the West End, but clusters also exist in other parts of the city, such as Edgware Road and Queensway/Bayswater. We are working with partners to prepare a vision for the Evening and Night-Time Economy and support proposals that help us to achieve this vision, including by providing a more diverse offer. <u>Proposals for the provision of these mix of uses within WERLSPA will be supported provided they do not lead to over-concentration owing to the impacts on servicing and amenity.</u>	To reflect changes to the Use Classes Order, for completeness and in response to representations from WPA, The Crown Estate, Shaftsbury Plc.	Main	Effective Justified	In response to Matter 1, question 18.
M/EE/10	Paragraph 17.5	<u>Whilst the council acknowledges that under the new Use Class Order public houses and other drinking establishments such as wine bars are sui generis, this policy specifically applies only to public houses. Although the public health risks of alcohol consumption are recognised, 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. cont...</u>	For completeness and in response to representations from the NHS HUDU / CCGs, and in response to changes to the Use Classes Order.	Minor		Updated in response to Matter 1, question 18
M/EE/11	Paragraph 17.6	... 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.	Typo.	Minor		
PS/EE/51	Paragraph 17.6	<u>Insert at end of paragraph:</u> <u>This policy essentially seeks to halt the loss of public houses through incorporating flexibility that differentiates between active public house use and ancillary upper floor</u>	For completeness and in response to representations from Shaftsbury, BMO	Main	Effective Justified	In response to Matter 1, question 18.

		<u>space to allow the latter to be changed to other uses where it can be satisfactorily demonstrated that loss of this floorspace will not compromise the viability or function of the public house.</u>				
PS/EE/52	Paragraph 17.8	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 of food premises or elsewhere. Hot food takeaways are a fall under sui generis use a different use class (A5) to whilst restaurants and cafés are in the new E class use (A3) 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 cafes to offer takeaway services with the rise of platform-based delivery options. We Whilst we recognise the convenience of delivery platforms, however, we will ensure that any negative impacts are minimised and managed. We will therefore seek require applicants to provide information on how they will mitigate against negative impacts of this operation from their premises in order 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 an A3 the respective sui generis use premises and will seek to promote use of sustainable delivery options.	In response to changes to the Use Classes Order, and for completeness and in response to representations from BMO	Minor		In response to Matter 1, question 18.
PS/EE/13	Paragraph 17.10	<i>New text at the end of the paragraph.</i> <u>Shisha smoking is often a social activity, with people sharing waterpipes. This means that the outdoor areas of the premises offering shisha smoking are likely to be occupied by people wanting to smoke this type of tobacco. Although smoking any type of tobacco and under any circumstances is harmful, when many people smoke together and in the same area, the public health risks increase. Smoking material and burners needed for shisha smoking and secondary smoke from water pipes and fuel sources also pose a health risk to non-smokers present in the area. The council is committed to managing the concentration and impacts of any uses detrimental to public health throughout the city.</u>	To ensure Policy 17 is effective by managing the potential impacts of new premises and outdoors areas used to for shisha smoking.	Main	Effective	In response to Matter 5, question 20.
PS/EE/14	Paragraph 17.11	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. Such premises are distributed across the city, with notable concentrations in Edgware Road, <u>Praed Street and Harrow Road.</u>	For completeness.	Minor	Effective	In response to Matter 5, question 20.
PS/EE/15	Paragraph 17.12	The use of premises and outdoor areas for shisha smoking is We consider shisha bars a sui generis use, meaning that where an applicant seeks to change the use of premises or outdoor areas for shisha smoking, to a shisha bar planning permission will be required. Where this is sought, applicants will be required to demonstrate how any potential negative impacts of the proposal can be mitigated through the implementation of a management plan for the premises.	To ensure Policy 17 is effective by managing the potential impacts of new premises and outdoors areas used to for shisha smoking.	Main	Effective	In response to Matter 5, question 20.
PS/EE/16	Paragraph 17.13	In addition to its direct health impact, oOutdoor shisha smoking at shisha bars, which often occurs late at night, can harm residential amenity through increased noise, odour and fumes, particularly in areas with large concentrations of these uses. This, in turn, can also have an impact on quality of life and public health. A loss of retail units for shisha smoking to shisha bars can result in a change of character and undermine the vitality and viability function of established shopping areas. The use of outdoor tables, chairs, and charcoal burners can also block pavements making it more difficult for people to get around the city. 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. We will use planning conditions therefore to seek to control the positioning and the number of tables and chairs used for outdoors shisha smoking, and the opening hours of shisha bars the premises and use planning conditions to secure the management of waste disposal and positioning of tables and chairs. Management arrangements will be required to	To ensure Policy 17 is effective by managing the potential impacts of new premises and outdoors areas used to for shisha smoking.	Main	Effective	In response to Matter 5, question 20.

		safeguard residential amenity, minimise disturbance <u>and negative impacts on the operational requirements of existing businesses in the vicinity</u> and manage any negative impacts in the environment. In addition, given the amenity and public health impacts of shisha smoking, we are lobbying for increased licensing powers to control the proliferation of shisha bars.				
PS/EE/43	Policy 18	<u>C. Where new community infrastructure falls within Class E (commercial, business and service uses), conditions will be applied to ensure any subsequent loss to other Class E uses fully consider the need for a range of community infrastructure and facilities to support good growth.</u> <i>And renumber subsequent clauses</i>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18
M/EE/12	Paragraph 18.1	Community infrastructure and facilities consist of: — Health facilities e.g. hospitals, GP surgeries. — Education facilities e.g. schools, nurseries, universities and colleges. — Sports and leisure facilities e.g. leisure centres, swimming pools, outdoor playing pitches <u>and fields</u> and Multi-Use Games Areas. <i>cont ...</i>	For completeness and in response to representation from Sport England.	Minor		Statement of Common Ground between WCC and Sport England (SCG_001).
PS/EE/44	Paragraph 18.1	<i>At end of paragraph insert:</i> <u>18.2 Under recent changes to the Use Classes Order, some but not all of these vital forms of community infrastructure fall within Class E (commercial, business and service uses), alongside other uses such as offices and shops, which whilst important to economic growth, do not provide comparable community benefits. As such, while it is the council's intention protect community infrastructure and facilities wherever possible, it is acknowledged that for some proposals, planning permission may not be required and the tests in policy 18 above cannot be applied. Where new community infrastructure that falls within Class E (e.g. for a GP or nursery) is provided, conditions will be applied to prevent their later loss to other Class E uses without any consideration of impact on local infrastructure supply and demand.</u> <i>And renumber subsequent paragraphs accordingly.</i>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18
M/EE/13	Paragraph 18.2	Community facilities and infrastructure can be either publicly or privately owned and/or operated. Wherever possible, they should have shared or extended use to serve the wider community, for example, the use of school sports facilities beyond the school day for the wider community ^{12a} . <u>To respond to this opportunity the council has developed a new Community Use Agreement (CUA) template, based on Sport England's guidance. This is what we use to secure community use of community facilities of all types, in schools and elsewhere. CUAs will be secured via planning condition.</u> <i>New Footnote:</i> ^{12a} <u>See Sport England guidance on making the best use of school facilities</u> <u>www.sportengland.org/useourschool/</u>	For completeness and in response to representation from Sport England.	Main	Effective	Statement of Common Ground between WCC and Sport England (SCG_001).
M/EE/14	Paragraph 18.8	There may be cases where there is no continued need or demand for the provision of community facilities. Where this may be the case, the <u>Where a community facility is identified as surplus to requirements via a strategy published by the council* (or alternative needs assessment accepted by the council as more up to date and robust),</u> 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. <i>cont...</i> <i>*New footnote: Such as the council's Playing Pitch and Built Facilities strategies</i>	For clarity and in response to representation from Sport England.	Minor		Statement of Common Ground between WCC and Sport England (SCG_001).

M/EE/15	Policy 19 D part 1	financial contributions towards employment, education and skills initiatives <u>from residential and commercial schemes</u> ; and	For clarity and in response to representations from Imperial College London.	Main	Justified	This modification ensures policy is justified in seeking financial contribution that are not overly onerous.
PS/EE/17	Paragraph 19.5	... and overcome any deficiencies in dedicated community space within a locality. <u>As set out in paragraph 18.2, Community Use Agreements will be used to secure such provision.</u>	To clarify how policy will be implemented.	Minor		In response to Matter 5, question 26.
PS/EE/18	Paragraph 19.7	...The Westminster Employment Service will provide a key point of contact to assist developments in delivering benefits to local residents. <u>Where sought, financial contributions will be set on a £ per sqm basis to ensure they are proportionate to the scale of development proposed, and calculations will take into consideration levels of worklessness in Westminster, and the average cost to Westminster Employment Service of placing an individual into sustained employment.</u> 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 out Affordable Housing and Planning Obligations SPD.	To clarify how policy will be implemented.	Minor		In response to Matter 5, question 26.
M/EE/16	Policy 21 B	...small and medium enterprise (SME) workspace, particularly in the creative sectors- <u>industries</u> ;	To align with glossary, in response to representations from the Soho Society.	Minor		
PS/EE/45	Policy 21 C	Proposals for new A3-restaurant/café uses or A4 drinking establishments will be considered with regard to their cumulative impact on the character of Soho's streets and mix of uses.	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18
M/EE/17	Paragraph 21.4	It is important to maintain the mix of uses present in Soho to protect local character. This policy aims to promote a range of uses that reflect Soho's cosmopolitan and diverse-varied nature. <u>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.</u>	For completeness.	Minor		
PS/EE/46	Paragraph 21.5	Changes of use to new A3-restaurant or café uses or A4 drinking establishments will be assessed in terms of their cumulative impact on Soho's streets. This will ensure that the mix and balance of uses in the area is maintained by preventing over-concentrations of A3 and A4 <u>these</u> uses. Although already prevalent in Soho, further clustering of these uses can have a detrimental impact on the area's overall mix and can lead to incremental changes to its character.	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18
M/EE/18	Paragraph 21.7	...Larger floorplate units are generally at odds with Soho's existing scale and grain. <u>We consider small-scale hotels, in a Soho context, to be those of fewer than 100 rooms.</u>	For clarity.	Main	Effective	This modification gives clarification to what is considered a small-scale hotel.
PS/EE/19	New Paragraph 21.11	<u>Alongside policies in this Plan, development proposals within the Soho SPA will be assessed against the Soho and Chinatown Conservation Area Audit, supplementary planning documents, specific studies and the Soho Neighbourhood Plan.</u>	For clarity.	Main	Effective	This modification clarifies which documents will be of material consideration when assessing planning applications within the Soho SPA In response to Matter 5, question 30.
M/EE/19	Policy 22	A. Development <u>s</u> in the Mayfair and St James's Special Policy Areas (SPAs) will complement, support and enhance the character and status that enhance the <u>character and function</u> of both areas as centres for the art trade and luxury retail.	To clarify how policy will be implemented in practice, and in response to changes to the Use	Main	Effective	Supersedes M/EE/19 as set out in Revised Schedule of Modifications,

		<p><u>through the provision of additional floorspace for use as art galleries, antique trading or luxury retail, is encouraged.</u></p> <p>B. Additional floorspace for use as art galleries and antique trading is supported in principle within both SPAs. The net loss of gallery floorspace from wither SPA will be resisted. Redevelopment proposals resulting in the net loss of floorspace last permanently used as an art gallery or for antique trading, will be required through condition to secure the re-provision of at least an equal amount of such floorspace available for one of these uses within the SPA affected.</p> <p>C. The council will work with landowners to protect existing niche luxury and specialist A1 retail floorspace including antiques within both SPAs. Additional retail of this type that complements the character of either SPA will be supported.</p>	Classes Order.			CORE_025_V2. In response to Matter 5, question 33, with further updates in response to Matter 1, question 18.
PS/EE/53	Paragraph 22.5	<p>Proposals for new development in either area should will demonstrate that it respects and complements the area's character and status function, given their contribution to central London's global appeal. Proposals for additional gallery floorspace, antiques trading, and luxury, bespoke and niche retail, are therefore welcomed. In seeking to protect existing character, it is recognised that existing art lawful A1 galleries and antique trading uses may be able to change to other A1 uses a range of Class E (commercial, business and service) uses without planning permission. Given the importance of these uses to the character and function of each SPA, Wwe will however use conditions our powers to ensure that redevelopment proposals secure the re-provision of dedicated space for such use within the SPA affected, and that any subsequent conversion to other uses, including those within Class E (commercial, business and service), require planning permission. any floorspace at risk through redevelopment or other substantial works requiring planning permission are re-provided in replacement or refurbished buildings, and that they will be subsequently protected by legal agreement.</p>	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18.
PS/EE/20	Policy 23	<p>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.</p> <p>B. Proposals for additional floorspace to upgrade or provide nNew medical and complementary facilities, patient care and patient accommodation, will be supported and existing floorspace protected. subject to impact on townscape and heritage. Where provided, new medical floorspace within the SPA will be protected by condition.</p> <p>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: Its loss will only be permitted in the following exceptional circumstances: 1. Where there is no reasonable prospect of its continued use for medical use or complementary facilities, as evidenced by vacancy and appropriate marketing for a period of at least 12 months; and 2. The proposal is for high quality residential development that does not materially affect the character and function of the area as a centre of medical excellence.</p>	To clarify how policy will be implemented in practice, and in response to changes to the Use Classes Order.	Main	Effective	In response to Matter 5, question 37, and further updated in response to Matter 1, question 18.

PS/EE/21	Policy 24	<p>A. Development in the Savile Row Special Policy Area (SPA) will complement and enhance its continued role as an international centre of excellence for bespoke tailoring, <u>supported by complementary Class E (commercial, business and service uses) floorspace that respects townscape and heritage value.</u></p> <p>B. New bespoke tailoring uses will be supported throughout the SPA, particularly at lower floor levels. Any new retail or complementary town centre uses will be of a scale that respects the unique role, character and function of the area. Proposals for other uses that would result in tThe net loss of tailoring floorspace from the SPA will be resisted, <u>unless this relates to floorspace benefiting from temporary consent for tailoring purposes.</u></p> <p><u>C. Where new Class E (commercial, business and service uses) incorporates retail floorspace, provision of a size, type and format that complements the unique character and function of the SPA is encouraged. Redevelopment proposals that would result in the replacement of multiple individual stores with large format retail will be resisted.</u></p>	To clarify how policy will be implemented in practice, and respond to changes to the Use Classes Order.	Main	Effective	In response to Matter 5, question 40, and updated further in response to Matter 1, question 18.
PS/EE/47	Paragraph 24.1	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 <u>A4 retail</u> uses dominate, whilst to the north the mix of uses includes art galleries and retail uses complementary to the predominant tailoring uses in the area. Some office space is also interspersed throughout the area, <u>meaning alongside its tailoring function, the area includes a range of Class E (commercial, business and service) uses), reflecting its location within the CAZ.</u> The rich townscape and heritage value of the area is recognised through Conservation Area designations.	In response to changes to the Use Classes Order	Main	Effective	In response to Matter 1, question 18.
PS/EE/22	Paragraph 24.3	To enable the tailoring industry to continue to thrive and grow within this globally recognised destination, the net loss of dedicated tailoring floorspace from the area will be resisted, <u>and the provision of additional dedicated tailoring floorspace is supported. Where floorspace not previously used for tailoring purposes in the SPA becomes vacant (e.g. an existing retail unit), the use of temporary permissions can be an effective way of securing further clustering of tailoring uses, whilst still offering flexibility over the future use of such space.</u>	To clarify how policy will be implemented in practice.	Main	Effective	In response to Matter 5, question 40.
PS/EE/23	Paragraph 24.4	<p>Any n<u>New commercial-retail</u> development within the SPA <u>that is small scale, in the fashion industry, and offers bespoke services, should will</u> complement the role and character of the area, <u>and is encouraged where it would not result in the net loss of dedicated tailoring floorspace. In contrast, large and flagship high street stores selling a wide range of products over multiple floors and generating high levels of footfall are more suited to nearby principal shopping streets with wider pavements designated as part of the West End International Centre or as CAZ Retail Clusters; where such retail formats are supported under Policy 15. Any proposals for the wholesale redevelopment of existing retail premises that would require planning permission should therefore respond to the unique character and offer of the tightly defined SPA.</u></p> <p>, which because of narrow pavements, lends itself to specific purpose visits for bespoke items, rather than high footfall retail and flagship stores associated with principal shopping streets nearby such as Regent Street and Oxford Street. Legal agreements Conditions will therefore be used to restrict the size of individual stores, in order to preserve the SPA's inherent character. extent to which any new Class E (commercial, business and service) development can be occupied by large format</p>	To clarify how policy will be implemented in practice, and respond to changes to the Use Classes Order.	Main.	Effective	In response to Matter 5, question 40. Includes further updates in response to Matter 1, question 18.

		<u>retail</u> . The average size of existing retail units in the SPA is 266 sq m. As such, stores of up to 300 sq m gross internal floorspace will normally be considered reasonable. <u>Other Class E (commercial, business and service) uses that are of a scale and design that respect local townscape, and can complement the commercial nature of the area, are in principle supported - as uses such as cafés and restaurants can increase dwell time, and additional office floorspace can contribute to the strategic office function of the CAZ.</u>				
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CONNECTIONS

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
M/C/01	Policy 25 C part 5	Major development should provide or financially contribute towards creating well-connected, high-quality, convenient, safe cycle infrastructure and routes.	For clarity and in response to representations from Transport for London.	Main	Consistent with national policy	This modification expands the application of the policy to all types of infrastructure/routes, not just those for cycling.
PS/C/01	Paragraph 25.3	This responds to the need to create an integrated transport network that minimises the impact that motorised traffic has on growth by directly designing in more pedestrian and cycle measures. <u>It is also consistent with the Mayor's Transport Strategy, which aims for 80% of all personal trips across London to be by walking, cycling or public transport journeys by 2041 (with higher mode shares expected in well-connected locations such as Westminster).</u>	Resolve objection from Mayor of London.	Minor		Statement of Common Ground between WCC and Mayor of London (SCG_007).
M/C/02	Paragraph 25.7	There is a wider need to deliver a sustainable future network by recognising that as central London grows the transport network will need to be 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 <u>(including river buses)</u> , underground and national rail networks.	For completeness and in response to representations from Port of London Authority.	Minor		
M/C/03	Policy 26 B part 2	Contribute towards improved legibility and wayfinding including signage to key infrastructure, transport nodes, green spaces, <u>the Thames Path</u> and canal towpaths (such as through TfL's Legible London).	For completeness and in response to representations from Port of London Authority.	Minor		
PS/C/20	Policy 26 D 3	...meet the cycle parking and cycle facilities standards in the London Plan Appendix 2.	To align with modifications to Appendix 2 (PS/A2/01).	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
M/C/04	Paragraph 26.11	However, <u>given the</u> pressure from competing uses, <u>priority to deliver public realm improvements</u> , 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 <u>will may</u> not always be appropriate <u>it is also important that the location and design of short-stay cycle parking does not negatively affect pedestrians, particularly in areas of high footfall, public transport reliability or essential deliveries and servicing. Wherever possible it should therefore be provided at a convenient location within a development site rather than on the public highway. This approach is reflected in Westminster's travel pattern that suggests people don't generally cycle to visit areas like the Central Activity Zone (CAZ) and many of Westminster's town-centres"</u>	For clarity and in response to representations from Mayor of London and Transport for London.	Minor		Statement of Common Ground between WCC and Mayor of London SCG_007_V2.

M/C/05	Paragraph 27.2	... Improvements to routes to and from public transport nodes (bus stops and stations) are critical in <u>ensuring that facilities can maintain or improve passenger experience and in</u> persuading more people to use buses and trains.	For clarity and in response to representations from Transport for London.	Minor		
M/C/06	Policy 27 C 1	Major development must: 1. make a financial contribution towards improvements to the public realm which facilitates access and improvements to the operation of <u>all sustainable transport modes the bus network and associated infrastructure through improvements to the public realm</u> ;	Correction.	Main	Consistent with national policy	This modification widens the application of the policy beyond bus transport alone. This modification supersedes M/C/06 as set out in the Revised Schedule of Modifications CORE_025_V2.
M/C/07	Policy 27 C 2	...support car clubs, cycle hire facilities and other sustainable transport initiatives, such as electric vehicle charging infrastructure where they do not detrimentally impact upon public realm improvements and pocket parks; and <i>cont...</i>	Correction.	Minor		
PS/C/02	Paragraph 27.5	Victoria Coach Station (VCS) is the country's largest and is considerably exceeding its original built capacity, resulting in substantial congestion and environmental and amenity concerns. We will continue to work with TfL and National Express to find an appropriate strategy to relieve these impacts in the short-term. In the long, term we support the closure of VCS and relocation of new coach terminal provision. As such VCS has been allocated as a key development site	For consistency with changes to Appendix 1 (PS/A1/01).	Main	Justified	
PS/C/03	Policy 28 A	The parking standards in the Draft London Plan Appendix 2 will apply to all developments, except in parking zones B and F where the following maximum residential standards will apply: 1. Up to 0.4 spaces per residential unit and clause B and D to H of Draft London Plan policy T.6.1 detailed in Appendix 2. <u>2. All new parking these spaces should provide active provision for electric charging vehicles. while the remaining spaces should incorporate a passive provision.</u>	Resolve objection from Mayor of London. For consistency with changes to Appendix 2 (deleted). To reflect changes to the council's position on electric vehicles.	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/04	Policy 28 B	In zones B & F <u>Where</u> 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 new residents <u>of new developments</u> on a short-term basis, <u>with spaces allocated to individual addresses or property numbers.</u>	Resolve objection from Mayor of London.	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/05	Policy 28 C	The council will apply the maximum non-residential car parking standards set out in Appendix 2 the Draft London Plan.	For clarity. For consistency with changes to Appendix 2 (deleted).	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/06	Paragraph 28.4	On-site Parking The National Planning Policy Framework (NPPF) advises that local authorities should consider an area's accessibility, type, mix and use of development, availability of public transport, local car ownership levels and the need to reduce the use of high-emission vehicles when setting local parking standards.	To align supporting text with changes to Policy 28.	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL.

						(SCG_003_V2).
PS/C/07	Paragraph 28.5 <i>Re-number 28.4</i>	Our approach to residential car parking conforms to the <u>Draft</u> London Plan principle of balancing new development with the prevention of excessive car parking that undermines cycling, walking, and public transport use. In accordance with the NPPF, Appendix 2 sets out maximum parking standards, which take into account existing levels of car ownership, existing on-street parking stress levels,6 and the high level of public transport provision in Westminster. The standards also set out the requirements for electric vehicles to encourage use of new technologies, minimum requirements for cycle parking provision and requirements for disabled and car club spaces. The standards in table 10.3 'Maximum residential parking standards' in the Draft London Plan apply in Westminster and set out maximum residential parking standards, which take into account the high level of public transport provision in the city. For non-residential developments the standards in the Draft London Plan also apply in Westminster.	To align supporting text with changes to Policy 28.	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL (SCG_003_V2).
PS/C/08	Paragraph 28.6 <i>Re-number 28.5</i>	Given the high levels of public transport provision and accessibility to jobs, leisure and shopping facilities in Westminster, we have taken the view that new development should be predominantly car free. Notwithstanding, there will always be a need to ensure that a lack of provision does not result in significant increases in demand for on-street parking in the vicinity of the development, leading to increased congestion, disruption to traffic flow, air and noise pollution, poor parking practices, and adverse impacts on the amenity of residents. To ensure this is the case, developments should not create or exacerbate areas of parking stress. As a result, we will not allow the parking stress level in a local area to exceed the defined threshold of 80% of on-street parking spaces being occupied during the day or at night, in compliance with existing parking restrictions. Where a residential development without on- or off-site car parking is proposed in an area of existing high parking stress (i.e. over 80% of on-street parking spaces being occupied during the day or at night, in compliance with existing parking restrictions), mitigation measures will be expected to off-set the impact of increased car ownership on Westminster's streets. As a minimum, mitigation may include lifetime car club membership for all future residential occupiers, increased cycle parking quantum and quality within the development site, provision of off-street car parking in the vicinity of the site by utilising existing non-residential car parking spaces and other measures agreed with the council.	To align supporting text with changes to Policy 28. For consistency with changes to Appendix 2 (deleted).	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/13	New Paragraph 28.6	Where on-site parking is provided in line with clause A-C, developers will also include sustainable transport measures, such as provision for car clubs and cycling parking. Disabled parking for residential and non-residential uses should be provided in accordance with the Draft London Plan standards. We advocate the letting rather than selling of car park spaces to residents in new development on a short term basis so that their use can be kept under review. If under-used, this approach enables car parks to be converted into another use.	To align supporting text with changes to Policy 28.	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/09	Paragraph 28.7	As a result, we have developed a parking policy approach which functions on two distinct but interrelated levels. Firstly, we have an overarching parking policy which covers most of the city and follows emerging London Plan car free standards and secondly, we have a localised policy specifically covering Parking Zones B & F.	To align supporting text with changes to Policy 28.	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/10	Paragraph 28.8	The second strand of this policy allows on-site parking under the conditions outlined above. It is considered that this approach more accurately reflects the particular characteristics and future development plans inherent in these zones. The justification for a localised parking approach in these distinct zones is:—The levels of parking stress are most acute in and around the Paddington Opportunity Area where a	In response to representations from Transport for London, Mayor of London and various resident groups.	Main	Effective Consistent with national policy	This modification supersedes M/C/08 as set out in the Revised Schedule of Modifications

		significant portion of Westminster's growth is targeted (Zones B).—Kerbside space within Westminster is at a premium and exacerbated by parking stress levels. Less-polluting travel modes such as electric charging points along with public realm improvements are challenging to deliver when space is limited.—Air quality is one of the top concerns for Westminster's residents. If off street parking is only allowed for a fraction of the predicted growth in zones B and F, residents would need to travel and search for parking spaces due to kerbside stress experienced in these zones.—A central principle of the emerging City Plan is to encourage mixed and sustainable communities and a demographic imbalance exists within Westminster in terms of the proportion of families living in the city. Cars provide a method of convenient transportation and release from the stress of living in central London. This is particularly relevant for young families where the cost of public transport and the logistical implications of using these forms of travel can be a prohibiting factor for many families moving to and staying in Westminster.—Zones B and F are separated from Westminster's main parks and areas of open space.	and to align supporting text with changes to Policy 28.			CORE_025_V2. This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/15	New Paragraph 28.7	<u>Where parking is provided in new residential developments, free membership to a Carplus accredited car club will be secured for the occupiers of all residential units. The demand for car club bays arising from this requirement should be assessed as part of the Transport Assessment or Statement. If necessary, off-street parking will be provided by the applicant in a publicly accessible location.</u>	To align supporting text with changes to Policy 28. For consistency with changes to Appendix 2 (deleted).	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/11	Paragraph 28.9	Transport assessments or statements for proposed developments without parking provision should explore the issue of parking stress and include an analysis of existing levels in the vicinity and of anticipated levels of car ownership. They must also take account of location, housing type and tenure mix and proposed sustainable transport measures, such as provision for cycling and car clubs.	To align supporting text with changes to Policy 28.	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/16	New Paragraph 28.8	<u>Cycle and Motorcycle parking</u> <u>Cycle parking should be provided in accordance with the Draft London Plan where they do not conflict with public realm enhancements. Motorcycle / moped parking should also be provided in accordance with the Draft London Plan standards.</u>	To align supporting text with changes to Policy 28. For consistency with changes to Appendix 2 (deleted).	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/12	Paragraph 28.10	It is expected that major schemes will be appropriate for dedicated parking provision in zones B & F. In these zones car parking spaces should be let on a short-term basis so that the usage of these spaces and areas can be kept under review. Where car-free development is stipulated in the policy, appropriate mitigation measures will be required, such as the fully policy compliant delivery of sustainable transport infrastructure to encourage a modal shift, including cycle parking, cycle hire facilities and electric vehicle charging provision dependent on the location of the development. We advocate the letting rather than selling of car park spaces to residents in new development on a short term basis so that their use can be kept under review. If under-used, this approach enables car parks to be converted into another use.	To align supporting text with changes to Policy 28.	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/17	New Paragraph 28.9	<u>Cycle facilities</u> <u>Showers, changing facilities and lockers should be provided for cyclists at all new workplaces (including A class uses), places of further and higher education, hospitals and health facilities. At least one shower will be installed for every 20 cycle parking spaces provided and one locker will be provided per cycle space. These facilities will be conveniently located in relation to the cycle parking spaces and accessible to all staff (and students where applicable).</u>	To align supporting text with changes to Policy 28. For consistency with changes to Appendix 2 (deleted).	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL.

						(SCG_003_V2).
PS/C/14	Paragraph 28.11 <i>Re-number 28.10</i>	Car clubs and car sharing 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. <i>Note: subsequent renumbering of paragraphs following these modifications.</i>	To align supporting text with changes to Policy 28. For consistency with changes to Appendix 2 (deleted).	Minor		
PS/C/18	Paragraph 28.14 <i>Re-number 28.13</i>	The London Plan seeks to Although the policy encourages car-free residential development, but the London Plan standards are not strictly car-free if residents can acquire will still be able to apply for on-street parking permits. Issuing permits for developments that have no on-site parking facilities would mean that the number of cars parked on-street is likely to increase and have an adverse impact on other highway users and uses, reallocation of highway space to sustainable transport modes as well as the ability of residents to find an on-street parking space, leading to increased travel on the highway network. The eligibility criteria for on-street residents' parking permits will be kept under review. Therefore, in residents' parking Zone B and F, where on-street pressure is high and where high levels of residential development are expected to take place the issuing of permits to residents of new developments will be kept under review. <i>Note: subsequent renumbering of paragraphs following these modifications.</i>	To align supporting text with changes to Policy 28.	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/19	Paragraph 28.18 <i>Re-number 28.17</i>	Housing <u>Estate</u> Renewal schemes will be expected to attain an overall reduction in car parking provision over time.	For clarity.	Minor		
M/C/09	Policy 29 A	Given the increasing demands on existing highway space, the council will resist the loss of highway land <u>particularly footways</u> . In cases involving the setting back of buildings, the council will seek to ensure the designation of resulting frontage land is designated as highway.	For clarity and in response to representations from Transport for London and Church Commissioners for England.	Main	Effective	Strengthens the policy approach.
M/C/10	Policy 29 B	New highway accesses should minimise the amount of <u>footway, cycling space and</u> kerb space lost for parking and / or servicing and should ensure no loss of street furniture	For clarity and in response to representations.	Main	Effective	Strengthens the policy approach.
PS/C/21	Paragraph 29.3	<u>Footway will not be reduced as a result of changing building lines following redevelopment to allow adequate space for pedestrians. Likewise, w</u> here new developments require vehicular access to the highway, they should minimise the loss of kerb space for parking where this will lead to increased congestion on local residential side roads <u>and not result in loss of footway or cycling space.</u>	For clarity	Main	Justified Effective	In response to Matter 6, question 6
M/C/11	Paragraph 30.9	<i>Move this paragraph to sit as supporting text for policy 26 (new Paragraph 26.13)</i>	Moved to a more appropriate location.	Minor		
M/C/12	Paragraph 31.5	... New or replacement facilities will be directed to accessible locations on the strategic road network (TLRN or WSRN). As these routes still include sensitive land uses, impact on local amenity <u>and groundwater</u> will be considered through appraisals such as noise, <u>and</u> air quality and <u>land contamination</u> assessments.	In response to representations from the Environment Agency.	Minor		
PS/C/22	Paragraph 31.6	... 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 <u>in the London Plan Appendix 2</u> . Where proposed...	To align with modifications to Appendix 2 (PS/A2/01).	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common

						Ground between WCC, GLA and TFL. (SCG_003_V2).
PS/C/23	Policy 32 A	Proposals alongside or affecting water should support the creation of a network of high-quality water spaces which promotes enhance biodiversity and promote the use of Westminster's waterways and waterbodies for sport, leisure, recreational and educational uses as well as for water-based transportation.	For clarity	Minor		In response to Matter 6, Question 8.
M/C/13	Policy 32 D	In assessing development proposals affecting Westminster's waterways and waterbodies, the council will have regard to <u>the council's SFRA</u> , the Thames River Basin Management Plan, <u>the Thames Vision</u> , the Marine Policy Statement and the emerging South East Marine Plan.	For completeness and in response to representations from Port of London Authority.	Minor		This modification supersedes M/C/13 as set out in the Revised Schedule of Modifications CORE_025_V2
M/C/14	Policy 32 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; and 3. not hinder navigation or jeopardise the long-term use of pier recesses;- 4. <u>Not compromise the integrity of the River Thames flood defences or the ability to raise it in the future in line with the Thames Estuary 2100 Plan; and</u> 5. <u>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 demonstrate necessary, provide appropriate mitigation measures that will preserve the continued dynamism and biodiversity value of the foreshore.</u>	For completeness and in response to representations from the Environment Agency.	Main	Positively prepared Consistent with national policy	This modification adds to the policy, giving full consideration to all factors relating to flood risk and management of the Thames foreshore. Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011).
M/C/15	Paragraph 32.7	Development that encroaches over or into waterways will normally be resisted due to impacts on openness, unless it demonstrates overriding strategic benefits such as water quality improvements (such as the Thames Tideway), enhanced flood defences, or increased river transportation. <u>Development in the south east marine plan area in the tidal Thames may need a licence from the Marine Management Organisation (MMO).</u>	For completeness and in response to representations from the Marine Management Organisation.	Minor		
M/C/16	Paragraph 32.9	Enhanced pier provision in the right locations can help broaden the choice of transport modes <u>(including for small scale freight and the movement of construction waste)</u> and reduce congestion elsewhere, particularly where it is well linked to public transport, pedestrian and cycle routes...	For completeness.	Minor		
M/C/17	Paragraph 32.10	... Permanent moorings on the River Thames therefore need careful management to protect the character of the river, including its views and as part of the setting to important heritage assets, <u>to manage flood risk</u> , to protect its role as a continuous wildlife corridor and to avoid impeding river navigation.	For clarity and in response to representations from the Environment Agency.	Minor		Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011).

ENVIRONMENT

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
M/E/01	Chapter introduction, page 126	For the past two decades Westminster has been designated an Air Quality Management Area, and reducing our CO2 emissions remains <u>achieving a carbon neutral city is now</u> a top priority.	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		

M/E/03	Paragraph 33.4	All other major developments should not make air quality worse and are encouraged to achieve an overall improvement to air quality. The Air Quality Neutral <u>minimum</u> requirement also applies to developments incorporating Solid Biomass Boilers and CHP due to the potential impact of these technologies on air quality.	For clarity and in response to representations from Knightsbridge Neighbourhood Forum.	Minor		
PS/E/04	Paragraph 33.5	<u>If air quality neutral status cannot be achieved, the Mayor's Sustainable Design and Construction SPG sets out the actions that should be considered.</u> When all measures to achieve Air Quality Neutral status have been exploited, financial contributions to offset the impact of the development on air quality may be considered as a final intervention, The process and calculation for this process <u>are set out in Section 5 of the GLA's Air Quality Neutral Planning Support Document (AQNPSD). We will be set out updated guidance</u> in a forthcoming supplementary planning document <u>following an expected review of the AQNPSD after the adoption of the new London Plan.</u>	To be clearer how the policy will be applied with regards to air quality neutral requirements	Main	Effective	In response to Matter 7, question 2
M/E/02	Policy 34 A	The council will make sure that quality of life, <u>and</u> health and well <u>being of existing and future occupiers,</u> and the natural environment are not adversely affected by harmful pollutants and other negative impacts on the local environment.	In response to representations from Thames Water and to correct a typo.	Main	Effective	Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011).
M/E/04	Paragraph 34.8	... In order to ensure that occupiers or users are not exposed to health risks and environmental impact is avoided (e.g. on soil, watercourses or waterbodies) the history of the land uses need to be identified and if required used as a basis for any proposed remediation measures. <u>Applicants should follow the council's Contaminated Land Guidance for Developers and adhere to relevant guidance published by regulatory bodies (including the Environment Agency) and other stakeholders (including, Claire, CIRIA and British Standards).</u>	In response to representations from the Environment Agency.	Minor		Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011). This modification supersedes M/E/04 as set out in the Revised Schedule of Modifications CORE_025_V2
M/E/05	Policy 35 G	<u>Developments should achieve biodiversity net gain, wherever feasible and appropriate.</u> Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. <i>Cont...</i>	In response to representations from the Environment Agency.	Main	Consistent with national policy	Strengthening of policy approach to ensure that the approach is in line with national policy. Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011).
PS/E/01	Paragraph 35.11	Development should aim to create net gains in biodiversity, leaving the natural environment in a better state than before. There are a growing number of tools and good practice guides available which can help <u>[NEW FOOTNOTE: Including Natural England's Biodiversity Metric 2.0].</u>	For clarity and in response to representations from the Environment Agency.	Minor		Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
PS/E/02	Figure 28	<u>Updating Figure 28 to show the triangular open space in front of the QEII centre as a private open space rather than public open space.</u>	To correct an error identified by BDP.	Main	Positively prepared	Amended from CORE_025 to correct error identified by BDP.
M/E/06	Paragraph 36.4a (new para)	<u>In addition, sleeping accommodation below the modelled breach flood water level in areas identified at risk of flooding in the event of a breach in the Thames Tidal Flood Defences, as set out in Environment Agency guidance will not be supported.</u>	In response to representations from the Environment Agency.	Main	Consistent with national policy	Draft Statement of Common Ground between WCC, Environment Agency and Thames Water

						(SCG_011).
M/E/07	Policy 36 G	G. All existing flood management infrastructure will be protected, including access for maintenance. <u>Wherever possible, an undeveloped buffer zone of 16m should be maintained around flood defences structures, including buried elements of the flood defence.</u>	For clarity and in response to representations from the Environment Agency.	Main	Effective	Strengthens the policy approach. Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011).
M/E/08	Policy 36 H	Improvements to flood defences will be secured through planning conditions and / or legal agreements where the size, type and / or location of development impacts on flood risk. <u>Development should not limit future raisings of flood defences outlined in the Thames Estuary 2100 Plan.</u>	For clarity and in response to representations from the Environment Agency.	Main	Effective	Strengthens the policy approach. Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011).
PS/E/03	Paragraph 36.5	Besides the Thames Barrier, Westminster is protected from tidal and fluvial flooding by Thames Tidal Flood Defences including the Embankment wall. We will protect flood management infrastructure to ensure the risk of flooding is minimised. <u>Development within 16m of a tidal flood defence would only be acceptable if it can be demonstrated that the defences can be raised and maintained for the lifetime of the development.</u> Access to defences for maintenance and emergency purposes must be retained, and their improvement will be sought as a condition or via legal agreement where appropriate.	For completeness and in response to representations from the Environment Agency.	Main	Consistent with national policy	Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011).
M/E/09	Paragraph 36.6	36.6 The Thames Estuary 2100 Plan (TE2100) is the strategic flood management plan for London and the Thames Estuary. Its primary focus is tidal flooding, and Westminster is located in the London City Zone. We will work with our partners to make sure the Thames Flood Defences remain strong and the recommendations of the TE2100 Plan are implemented. We will also continue to work with partners to support the timely implementation of the Thames Tideway Tunnel including the combined sewer outflows in the city. <u>We may use conditions to ensure necessary water or sewerage network upgrades.</u>	In response to representations from Thames Water.	Minor		
PS/E/05	Policy 37 B	All development proposals should follow the principles of the Mayor of London's energy hierarchy. Major development should <u>be net zero carbon and</u> demonstrate through an energy strategy how <u>this target the carbon reduction targets set out in local policy or the London Plan, whichever is the greatest,</u> can be achieved.	For clarity on the carbon reduction target required	Main	Effective	In response to Matter 7, question 15
PS/E/06	Paragraph 37.5	Developments that are unable to achieve the carbon targets set out in policy onsite will need to <u>calculate their emissions offset their shortfall in tonnes of carbon and offset</u> via a cash in lieu payment. <u>The value of the payment will be determined by multiplying the emissions shortfall by the local cost of carbon over a period of 30 years, in accordance with the methodology outlined in the London Plan and Mayor of London's Sustainable Design and Construction SPG (2014) reflecting the local cost of carbon, where appropriate.</u> Carbon offset funding will then be allocated to projects that will reduce carbon emissions elsewhere in Westminster. <u>Details of how the Westminster Carbon Offset Fund contribution will be calculated and administered will be set out in a supplementary planning document.</u>	To provide clarity on how carbon offset payments will be calculated	Main	Effective	In response to Matter 7, question 15
PS/E/07	Paragraph 37.6	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. <u>Details of how the Westminster Carbon Offset Fund contribution will be calculated and administered</u>	To provide clarity on how carbon offset payments will be calculated	Main	Effective	In response to Matter 7, question 15

		will be set out in a supplementary planning document				
PS/E/08	Policy 38 A (new clause A)	<u>The council will promote the Circular Economy and contribute to the London Plan targets for recycling and for London's net self-sufficiency by 2026.</u>	For conformity with the London Plan	Main	Effective Consistent with national policy	In response to Matter 7, question 18 As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)
M/E/10	Policy 38 B	Major developments and developments that produce hazardous, medical and / or commercial catering waste are required to provide appropriate waste management facilities on-site. Developers are required to demonstrate through a Circular Economy Statement, Site Environment Management Plan and/or associated Site Waste Management Plan, the recycling, re-use, and responsible disposal of Construction, Demolition and Excavation waste in adherence with London Plan targets and the council's Code of Construction Practice.	Strengthens the policy approach. For conformity with the London Plan and in response to representations from NLWP.	Main	Effective Consistent with national policy	In response to Matter 7, question 18 This modification supersedes M/E/10 as set out in the Revised Schedule of Modifications CORE_025_V2 As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)
PS/E/09	Policy 38 C	Existing waste management facilities shown on Figure 33 will be protected. <u>Any proposals for new waste management facilities will be assessed against the criteria set out in the London Plan and national policy.</u>	For conformity with the London Plan.	Main	Effective Consistent with national policy	In response to Matter 7, question 18 As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)
PS/E/10	Policy 38 A <i>Re-number Clause D</i>	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.	As a result of other policy modifications	Minor		As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)
M/E/11	Policy 38 E	<u>The council will continue to collaborate with other Waste Planning Authorities in the management of its waste and monitor its waste exports.</u>	Strengthens the policy approach. In response to representation from the Mayor of London and NLWP and for conformity with the London Plan.	Main	Positively prepared Effective Consistent with national policy	In response to Matter 7, question 18 This modification supersedes M/E/11 as set out in the Revised Schedule of Modifications CORE_025_V2 As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)
PS/E/11	Paragraph 38.1	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. Commercial and household waste collections add up to more than one million per week. As a result of being the commercial centre of London we produce the highest level of commercial waste in the capital. <u>Households, businesses, institutions and building projects all generate waste in</u>	To reflect new Waste Data Study (EV_ENV_022_V3) and for conformity with the London Plan.	Main	Justified Consistent with national policy	In response to Matter 7, question 18 As agreed in Statement of Common Ground with the Mayor (See

		<u>Westminster and the council has a duty to plan for the management of seven waste streams and to drive waste up the waste hierarchy. The seven waste streams include Local Authority Collected Waste (LACW), Commercial & Industrial (C&I) waste, Construction, Demolition and Excavation (CD&E) waste, hazardous, agricultural, low level radioactive waste and waste water.</u>				Appendix A EV_ENV_022_V3)
M/E/15	New Paragraph 38.2	<u>The council will contribute to the London Plan target of net self-sufficiency by 2026 by planning for Westminster's apportionment targets. The council has reached an agreement with the London Borough of Bexley to use part of its surplus capacity to meet Westminster's 2.3% waste apportionment targets (LACW and C&I waste streams) as set out in the draft London Plan*. This arrangement has been informed by a Waste Data Study (2020) which provides an understanding of the borough's waste need, and has been formalised in a Statement of Common Ground which is included in an Appendix to the study. The council has the aspiration to join the Southeast London Joint Waste Planning Group, of which the London Borough of Bexley is also part, to plan for waste collectively.</u> * [new footnote]: <u>Table 9.2 in Policy SI8 of the draft London Plan</u>	To reflect new Waste Data Study (EV_ENV_022_V3) and for conformity with the London Plan in response to representations from NLWP.	Main	Positively prepared Justified Effective Consistent with national policy	Statement of Common Ground between WCC, Mayor and neighbouring boroughs (SCG_004). In response to Matter 7, question 18 This modification supersedes M/E/15 as set out in the Revised Schedule of Modifications CORE_025_V2 As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)
M/E/13	New Paragraph 38.3	<u>The council will contribute towards meeting London Plan recycling targets. These include 65% for 'municipal' waste by 2030, 95% for reuse/recycling/recovery for Construction and Demolition waste and 95% beneficial use for excavation waste. These are London-wide targets and Westminster will contribute in its capacity as a waste authority by implementing the municipal waste strategy and in its capacity as a planning authority by requiring developers to meet the recycling and beneficial use targets for construction, demolition and excavation (CD&E) waste in the London Plan and provide sufficient space for segregating waste in new developments. Circular Economy Statements should be submitted for referable applications in line with draft London Plan policy SI7 to demonstrate how CD&E recycling and beneficial use targets will be met. The Government revoked the Site Waste Management Plan Regulations 2008 requiring a site waste management plan (SWMP) for construction projects costing greater than £300,000 (exc VAT). However, given the very significant amounts of construction and associated CD&E waste generated in the borough, the council continues to require production of an SWMP for such projects and for all basement developments as specified in its CoCP which includes management of CD&E waste, both through on-site recycling and re-use and on-site waste processing prior to disposal.</u>	To reflect new Waste Data Study (EV_ENV_022_V3) and for conformity with the London Plan.	Main	Positively prepared Justified Consistent with national policy	Strengthens the policy approach. In response to Matter 7, question 18 This modification supersedes M/E/13 as set out in the Revised Schedule of Modifications CORE_025_V2 As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)
M/E/14	New Paragraph 38.4	<u>Agricultural waste is composted in the City's Royal Parks together with agricultural waste imports from other boroughs and no additional capacity is required for such waste. The City of London Corporation provides a Hazardous Waste Collection and Disposal Service, HWCDS, to London residents in all London Boroughs (except Hillingdon). Waste water treatment is addressed by Thames Water through the upgrade and expansion of the Beckton Sewage Treatment Works as part of the Thames Tideway Tunnel scheme and only a very small amount of low level radioactive waste is generated in Westminster so no additional facilities are required for these waste streams.</u>	To reflect new Waste Data Study (EV_ENV_022_V3) and for conformity with the London Plan.	Main	Justified Consistent with national policy	Strengthens the policy approach. This modification supersedes M/E/14 as set out in the Revised Schedule of Modifications CORE_025_V2 In response to Matter 7, question 18

						As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)
PS/E/12	Paragraph 38.2 Re-number Paragraph 38.5	Our strategic focus is on waste reduction and recycling in the city.6 We are committed to ensuring that waste is managed appropriately and efficiently in the city. Recent evidence7 has shown that Westminster has no <u>capacity industrial land suitable</u> for new strategic waste management facilities and we will therefore protect existing waste management facilities and we will continue to monitor and research opportunities for new sites in Westminster. <u>Any proposals for waste management facilities will be assessed against the criteria set out in the London Plan SI8 and National Planning Policy for Waste Appendix B. We will work with local partners and other London boroughs to make arrangements to pool the waste apportionments set by the London Plan to meet our strategic waste planning duties.</u>	To reflect new Waste Data Study (EV_ENV_022_V3) and for conformity with the London Plan.	Main	Effective Consistent with national policy	In response to Matter 7, question 18 As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3) This modification supersedes modification M/E/12 as set out in the revised schedule of modifications CORE_025_V2
M/E/16	Paragraph 38.3 Re-number 38.6	Developments should provide adequate <u>segregated</u> waste storage facilities that are fully integrated into the design of the scheme, <u>both for individual units and communal storage areas ready for collection. The council's Recycle and Waste Storage Requirements guide (April 2019*), provides applicants with guidance on how it expects this to be done including the installation of balers and compactors within the development as required. This also supports the requirements for</u> the amalgamation of facilities in an area may be required in locations that demand an area specific approach to waste <u>collection management</u> . *[new footnote]: www.westminster.gov.uk/waste-storage-planning-advice	To reflect new Waste Data Study (EV_ENV_022_V3) and for conformity with the London Plan.	Main	Effective Consistent with national policy	This modification supersedes M/E/16 as set out in the Revised Schedule of Modifications CORE_025_V2 In response to Matter 7, question 18 As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)
PS/E/13	New Paragraph 38.7	<u>The Waste Data Study (2020) provides detail on waste imports and exports. It explains that Westminster is a net exporter of waste, with all of the local authority collected and commercial and industrial waste going to facilities in London including Southwark and Lewisham. Part of Westminster's Construction, Demolition and Excavation waste and Hazardous waste is managed in facilities outside of London. We have agreed Statements of Common Ground with the Waste Planning Authorities whom receive a strategic amount of Westminster's waste to agree this can continue or highlight any issues where waste exports may not be able to continue, and agree that alternative destinations for CD&E waste are available. We will continue to monitor waste exports and engage with these authorities under the duty to co-operate. Monitoring indicators include the amount, type and destination of Westminster's waste exports.</u>	To reflect new Waste Data Study (EV_ENV_022_V3) and for conformity with the London Plan.	Main	Justified Effective	In response to Matter 7, question 18 As agreed in Statement of Common Ground with the Mayor (See Appendix A EV_ENV_022_V3)

DESIGN AND HERITAGE

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
M/DH/01	Policy 39 B	All development will positively contribute and respond to Westminster's townscape and streetscape <u>including having regard to:</u> i. the character and appearance of the existing area, adjacent buildings and heritage assets, the spaces around and between them and ii. the pattern and grain of existing streets, squares, mews and passageways <i>(part 1 split into two points)</i>	For clarity and in response to representation from Historic England.	Main	Effective Consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002)
M/DH/02	Policy 39 B 3	" ... the form, character, ecological and <u>heritage</u> value of parks, gardens and open spaces".	For clarity and in response to representation from Historic England.	Main	Consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002).
M/DH/03	Policy 39 D 3	SUSTAINABLE DESIGN Development will enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design, including: i. use of high-quality durable materials and detail; ii. providing flexible, high quality floorspace; iii. optimising resource <u>and water</u> efficiency.	For completeness and in response to representation from the Environment Agency.	Main	Consistent with national policy	To further align the policy with national and London policy. Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011).
PS/DH/01	Policy 39 D (new part 6)	<u>6.maximising opportunities for greening including incorporation of living roofs, walls, landscaping and nature based sustainable drainage where appropriate.</u>	In response to representations from Environment Agency and Thames Water.	Main	Consistent with national policy	Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011).
M/DH/04	Policy 39 E	Applicants will demonstrate how sustainable design principles and measures have been incorporated into designs, utilising environmental performance standards as follows: i. Non- domestic residential developments of 500 sq m (GIA) of floorspace or above will achieve at least BREEAM "Excellent" or equivalent standard. ii. <u>Residential c</u> onversions 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.	For clarity.	Minor		
M/DH/05	Paragraph 39.2	These qualities underpin the city's attractiveness as a place to live, work and visit and contribute to a high quality of life for everyone. <u>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.</u>	For clarity and in response to representations.	Minor		
M/DH/06	Paragraph 39.3	We will prepare supplementary guidance on the application of this and the other design <u>and heritage</u> policies.	For clarity and in response to representations.	Minor		
PS/DH/02	Paragraph 39.6	We encourage applicants to engage with local communities early in the design process and will support collaborative and participatory design approaches, <u>including through the use of new technologies to widen participation.</u>	For completeness.	Minor		
PS/DH/03	Paragraph 39.7	Applicants should consider <u>demonstrate</u> how development will contribute to improving health ...	For clarity and effectiveness.	Minor		In response to Matter 8, question 1

M/DH/07	Paragraph 39.9	... This may include strategic design considerations, such as the orientation of buildings and spaces, design of façades to capitalise on solar gain, whilst minimising risks of overheating and other measures, for example incorporation of green infrastructure, and flood resilience <u>and sustainable drainage</u> measures. <i>cont...</i>	For completeness and in response to representation from the Environment Agency.	Minor		
M/DH/08	Paragraph 39.10	All development should ensure the reduction, reuse or recycling of resources and materials, <u>including water and waste</u> and minimise energy use and emissions that contribute to climate change.	For completeness and in response to representations.	Minor		
M/DH/09	Paragraph 39.10	... All development should ensure the reduction, reuse or recycling of resources and material and minimise energy use and emissions that contribute to climate change. <u>As Westminster falls within an area classified as "seriously" water stressed, all development should maximise water efficiency. Residential development proposals should meet the optional water efficiency requirement set out in Part G of the Building Regulations (110 litres/person/day), in line with the London Plan. This will be secured by condition.</u>	For completeness and in response to representation from the Environment Agency.	Main	Consistent with national policy	Sets a new standard in line with national and London policy. Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011). Supersedes proposed modification M/DH/09 as set out in Revised Schedule of Modifications, CORE_025_V2. In response to Matter 8, Question 3
M/DH/10	Paragraph 39.11	Finally Consideration should also be given to how buildings and spaces will be managed by either private or public owners and managers, to ensure they remain of high quality over the lifetime of the development.	Correction.	Minor		
M/DH/11	Paragraph 39.12	BREEAM (Building Research Establishment's Environmental Assessment Method) is the most commonly used methodology for assessing, rating and certifying the sustainable design and construction of buildings. Applicants will demonstrate how they will meet BREEAM or equivalent standards <u>set out above</u> .	Correction (equivalent standards are not set out above).	Minor		
PS/DH/04	Policy 40 B part 1	ensure heritage assets and their settings are conserved and enhanced, <u>as in a manner</u> appropriate to their significance	For completeness.	Minor		In response to Matter 8, question 4.
M/DH/12	Policy 40 D	Development will protect the <u>skyline, prominence and iconic</u> silhouettes of the Palace of Westminster and Westminster Abbey and will protect and enhance <u>identified significant</u> views out of, across and towards the World Heritage Site.	For clarity and in response to representations.	Main	Effective	Statement of Common Ground between WCC and Historic England (SCG_002).
M/DH/13	Policy 40 E	The council will work with partners to promote the use, management and interpretation of the site in ways that protect, enhance and better communicate its OUV. <u>The council will commit to lead the production and review of an updated World Heritage Site Management plan.</u>	In response to representation from Historic England.	Main	Positively prepared Effective	Statement of Common Ground between WCC and Historic England (SCG_002).
M/DH/14	Policy 40 F	Applicants will be required to demonstrate that any impacts of their proposals on the World Heritage Site or its setting have been fully assessed, <u>informed by using</u> Heritage Impact Assessment methodology <u>and that any harm, including cumulative harm, has been avoided or justified.</u>	For clarity and in response to representations.	Main	Effective Consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002).
PS/DH/05	Policy 40 G	relating sensitively to the period and architectural detail of the <u>original</u> building and protecting or, where appropriate, restoring original <u>or significant</u> detail and <u>significant</u> historic fabric	For clarity.	Minor		

M/DH/15	Policy 40 K	Development will preserve or enhance the character and appearance of conservation areas, <u>retaining features that contribute positively to their significance</u> and protecting their settings. Features that contribute positively to the significance of conservation areas will be retained and Opportunities will be taken to enhance them <u>conservation areas</u> and their settings, wherever possible.	Grammatical correction and for clarity.	Main	Effective	
M/DH/16	Policy 40 Q	REGISTERED HISTORIC PARKS AND GARDENS Proposals affecting Westminster's <u>registered</u> historic parks, gardens and open spaces will safeguard their <u>special</u> historic <u>interest</u> , integrity, character and appearance, and protect their settings and significant views from and towards these spaces.	For clarity and in response to representation from Historic England.	Main	Consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002). In response to Matter 8, question 4 Supersedes proposed modification M/DH/16 as set out in Revised Schedule of Modifications, CORE_025_V2.
PS/DH/06	Policy 40 R	Non-designated heritage assets (including local buildings of merit, archaeology and open spaces of interest within and outside conservation areas) <u>will be conserved having regard to the other criteria set out above, where relevant.</u>	For clarity	Main	Consistent with national policy	In response to Matter 8, question 4.
M/DH/17	Paragraph 40.1	Given its immense contribution to the character, economy and quality of life of our city, it is vital that the historic environment is valued, maintained, and refurbished in ways appropriate to its significance <u>and as an integral part of good growth.</u>	For clarity on what we mean by 'good growth'.	Minor		
PS/DH/07	Paragraph 40.2	any public benefits (which may include heritage benefits) and the circumstances of the case. <u>Great weight will be given to the conservation of designated heritage assets, having regard to the relevant statutory duties.</u>	For clarity.	Minor		In response to Matter 8, question 4.
M/DH/18	Paragraph 40.4	As a designated heritage asset of international importance, it is of the highest level of significance and must be afforded the highest level of protection and maximum weight possible in the planning process. <u>Development beyond the designated boundary but within the setting of the site can also affect its OUV. Its setting is not precisely defined.</u>	For clarity and in response to representation from Historic England.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002).
M/DH/19	Paragraph 40.5	Where development will affect the site or its setting, applicants should <u>will be required</u> to demonstrate proposals will conserve, enhance or better reveal its OUV. Sufficient information should <u>will</u> be provided to demonstrate impacts have been considered. and <u>Depending on the scale and nature of proposals, in addition to the heritage statement,</u> this should include a Heritage Impact Assessment using the methodology set out by ICOMOS. <i>cont...</i>	For clarity and in response to representation from Historic England.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002).
M/DH/20	Paragraph 40.6	A number of significant projects will affect the World Heritage Site during the Plan period, in particular the Restoration and Renewal of the Palace of Westminster. We will work with partner organisations to ensure potential for the positive contribution of such projects to the conservation, enhancement and communication of OUV of the site <u>and its setting</u> is realised. Enhancements to the spaces within and immediately adjacent to the site, including improvements to public realm, approaches <u>and ceremonial routes</u> to the site, security measures and visitor experience will be encouraged and initiated where possible.	For clarity and in response to representation from Historic England.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002).
M/DH/21	Paragraph 40.6	We will support production of conservation management plans for the Palace of Westminster and Westminster Abbey to ensure the protection of the key buildings within the site and are <u>will lead</u> working with the steering group to update the management plan for the site. which is a key tool for the long-term sustainable management of the site and its setting.	For clarity and in response to representation from Historic England.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002).

M/DH/22	Paragraph 40.11	The total or substantial demolition <u>of listed buildings</u> which will result in substantial harm will only be considered where exceptional circumstances have been demonstrated, as set out <u>in the tests</u> in the National Planning Policy Framework (NPPF).	For clarity of the Plan's consistency with the NPPF.	Minor		
M/DH/23	Paragraph 40.16	In some circumstances, demolition behind retained facades can provide a way to protect facades of townscape merit while allowing new accommodation to be developed behind this and may be acceptable where the overall integrity of unlisted buildings is maintained in street views <u>retaining side or rear elevations or roofscapes of townscape value. In all cases, we will only allow demolition where proposals for the future redevelopment of the site have been approved and their implementation assured by planning condition or agreement, to avoid harmful gaps occurring within the townscape as a result of empty plots.</u>	For clarity and in response to representation from Historic England.	Main	Justified Effective	Statement of Common Ground between WCC and Historic England (SCG_002).
PS/DH/08	Paragraph 40.20	Each APA is assigned to a tier reflecting their archaeological sensitivity and significance. <u>APAs are non-designated heritage assets, but as set out in the NPPF (Footnote 63) where these include sites or archaeology of national importance equivalent to Scheduled Monuments, they should be accorded the same weight as designated heritage assets.</u>	For clarity.	Minor		In response to Matter 8, question 4.
M/DH/24	Paragraph 40.26	<u>Changes to Development or proposals affecting</u> the layout, design, character, use and function of historic parks and gardens should retain and enhance their significance <u>and should not prejudice their future restoration.</u>	For clarity and in response to representation from Historic England.	Main	Effective	Statement of Common Ground between WCC and Historic England (SCG_002).
PS/DH/09	Paragraph 40.27	...the highest level of protection will be afforded to designated heritage assets and those considered to be most significant... These may include local buildings of merit (inside or outside conservation areas) , 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 neighbourhood plans <u>or any future local list.</u>	For clarity and effectiveness.	Main	Effective Consistent with national policy	In response to Matter 8, question 4.
M/DH/25	Policy 41 D	Alterations and extensions will respect the character of the existing and adjoining buildings, avoid adverse visual and amenity impacts and will not obscure important architectural features or disrupt any uniformity, patterns, rhythms or groupings of buildings <u>and spaces</u> that contribute positively to Westminster's distinctive townscape	For clarity and in response to representations.	Minor		
M/DH/26	Policy 41E & F	E. In predominantly residential areas an additional roof storey will be permitted where this adds new residential floorspace to an existing unit or creates a new self-contained residential unit. Roof extensions should and fulfils one of the following criteria: <ol style="list-style-type: none"> the application site forms part of a terrace or group where a variety of roof additions or alterations create an established mixed pattern and <u>where</u> further development of a similar form would not cause additional harm or would help to unify a group of buildings and townscape; or <u>the development would take a coordinated approach, adding roof extensions of consistent and appropriate design to each property within</u> in the case of a terrace or group of unlisted buildings which has an existing roof line unimpaired by extensions, the development would take a coordinated approach, adding roof extensions of consistent and appropriate design to each property within the complete terrace or group; or in other locations where the proposed roof form is of appropriate design, sympathetic to the architectural character of the building and does not cause harm to amenity or heritage assets. <p><u>F. An additional roof storey will be supported in principle where this adds new residential floorspace to an existing unit or creates a new self-contained residential unit and meets one of the criteria in Part E.</u></p>	For clarity and in response to representation.	Main	Positively prepared	To clarify approach and its application to both residential and commercial buildings and ensure we are positively planning for growth across the city. In response to Matter 8, question 5 Supersedes proposed modification M/DH/26 as set out in Revised Schedule of Modifications, CORE_025_V2
M/DH/27	Policy 41 F & G	<u>F G.</u> Within the Opportunity Areas, in the International Centres of the West End and Knightsbridge and the Major Centre, and in other commercial locations on the Transport for London and Strategic Road networks, <u>upwards roof</u> extensions of one or more storeys which create additional commercial floorspace <u>will not be required to meet the criteria in part E and</u> will be permitted on unlisted buildings , provided they are of appropriate and high quality design, do not impact adversely on heritage assets and	For clarity and in response to representations.	Main	Positively prepared	To clarify approach and its application to both residential and commercial buildings and ensure we are

		are designed to incorporate set backs to minimise visibility from street level, incorporating set backs where appropriate In all cases other than those listed in E & F, proposals for upwards extensions will be assessed using the criteria in clause D of the policy. (original part F&G merged)				positively planning for growth across the city. Supersedes proposed modification M/DH/27 as set out in Revised Schedule of Modifications, CORE_025_V2.
M/DH/28	Paragraph 41.7	Care should always be taken not to disfigure buildings or upset their proportions <u>and to ensure good standards of amenity as set out in Policy 7.</u>	For clarity.	Minor		
M/DH/29	Paragraph 41.11	However, we will consider applications which would take a coordinated approach, adding roof extensions of consistent design to a complete terrace or group of unlisted buildings with a uniform roofline. <u>This will typically be on Georgian and Victorian terraces where mansard roof extensions can be accommodated behind a parapet. In such cases we will require extensions across the whole terrace group to be implemented at one time and this may be secured by legal agreement.</u> Cont...	For clarity and effectiveness.	Main	Effective	Introduces a new requirement in the application of the policy. Supersedes proposed modification M/DH/29 as set out in Revised Schedule of Modifications, CORE_025_V2.
M/DH/30	Paragraph 41.12	While one additional storey will usually be most appropriate, larger extensions of more than one storey may be appropriate in certain locations, <u>particularly in commercial locations with more varied townscape character.</u>	For clarity and in response to representations.	Minor		
M/DH/31	Paragraph 41.12	More than one storey of commercial floor space may also be permitted in smaller retail centres including district centres and CAZ town clusters or other commercial locations where it can be demonstrated that they meet the criteria in clause F will be sympathetic to age and character of the building and townscape.	Correction.	Minor		
M/DH/32	Paragraph 41.17	Recognising the national importance of Westminster's heritage and townscape, we have also identified certain 'metropolitan views' of major landmarks and the most significant river views and areas of townscape in the city. The council will publish a list of views of metropolitan importance and prepare guidance on their management. <u>World Heritage Site views will be identified in the Management Plan. cont...</u>	For completeness and in response to representations.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002).
M/DH/33	Policy 42 A	Tall buildings are defined as buildings of twice the prevailing context height or higher or those which will result in a significant change to the skyline. Westminster is not generally suitable for tall buildings. Developments significantly higher than their surroundings will need to demonstrate that building higher is the only way to make the most efficient use of the site.	For clarity and in response to representations.	Main	Justified	Strengthens of policy approach to align further with evidence base. Supersedes modification M/DH/33 as set out in Revised Schedule of Modifications, CORE_025_V2. In response to Matter 8, question 6
M/DH/34	Policy 42 B	Buildings of more than 30 metres, or those that are more than twice the prevailing context height (whichever is lower) will be considered to be tall buildings, and will therefore <u>In all locations proposals for tall buildings will</u> need to satisfy both the	For clarity and in response to representations.	Main	Justified	Strengthens of policy approach to align further with evidence base.

		general principles in clause C <u>D</u> and relevant locational principles in clauses D <u>E</u> and <u>F</u> (and for Housing Renewal Areas, Policy 43).				Supersedes modification M/DH/34 as set out in Revised Schedule of Modifications, CORE_025_V2. In response to Matter 8, question 6
M/DH/35	Policy 42 C	Buildings that do not meet the definition of a tall building but are higher than their surroundings should positively respond to prevailing context heights and local character and may be subject to clauses D, E and F of this policy (and for Housing Renewal Areas, Policy 43).	For clarity and in response to representations.	Main	Justified	Strengthens of policy approach to align further with evidence base. Supersedes modification M/DH/35 as set out in Revised Schedule of Modifications, CORE_025_V2. In response to Matter 8, question 6
PS/DH/10	Policy 42 D	Rename clause C	As a result of proposed modification M/DH/35.	Minor		
PS/DH/11	Policy 42 E <i>Rename clause D</i>	MARYLEBONE FLYOVER / EDGWARE ROAD JUNCTION Tall buildings may be appropriate to mark 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. ... VICTORIA OPPORTUNITY AREA ... The prevailing context height in the Victoria <u>Opportunity Area</u> 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.	For clarity	Minor		
PS/DH/12	Policy 42 F <i>Rename clause E</i>	Proposals for tall buildings outside of the areas identified in clause D <u>E</u> will not generally be acceptable, and will deliver exceptional public benefits and need to demonstrate how they (in addition to the general principles under clause C-D): 1. set out the other design options which have been explored to make the most efficient use of the site and deliver benefits and policy compliance without adding significant additional height; and 2. significantly strengthen the legibility of a town centre or mark the location of a transport interchange or other location of civic or visual significance within the area while relating sensitively to the scale and character of the area; 3. do will not undermine the prominence and / or integrity of heritage assets, existing landmark buildings and tall building clusters.	For clarify the intention of the policy	Main	Justified Effective	

PS/DH/13	Paragraph 41.1	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 <u>due to its densely developed character and concentration of heritage assets</u> . 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.	To improve clarity	Minor		
PS/DH/14	Paragraph 42.2	Building densely does not always mean building high. There are many ways to deliver <u>on our growth targets with</u> high density developments without adding <u>significant</u> height. <u>Outside the areas identified as having potential to accommodate tall buildings,</u> proposals incorporating buildings significantly higher than their surroundings <u>will be resisted and</u> should therefore provide evidence that other options have been explored to make efficient use of the site without adding <u>significant</u> additional height.	For clarity	Main	Effective	In response to Matter 8, question 6
PS/DH/15	Paragraph 42.3	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 <u>to tall buildings</u> , which considers the <u>principal prevailing</u> height of the surrounding areas impacted by the development. The prevailing context height sets a baseline against which <u>the impacts</u> any proposals for <u>higher-tall</u> buildings will be considered	For clarity	Main	Effective	In response to Matter 8, question 6
PS/DH/16	Paragraph 42.4	It is necessary to define what a tall building is as their impact is greater than that of <u>high or large other large scale</u> buildings, and they therefore require a specific policy approach. A tall building can be created by constructing a new building or extending an existing building upwards. We may <u>in some circumstances</u> require proposals that do not meet the definition of a tall building in the policy but still have a significant impact <u>on the local context</u> due to their height, <u>and</u> design <u>or context</u> to comply with the relevant criteria for tall buildings in this policy.	For clarity	Main	Effective	In response to Matter 8, question 6
PS/DH/17	Paragraph 42.6	Tall buildings should fulfil a clear function <u>and bring exceptional benefits to local areas and communities in line with the aspirations set out in the Spatial Strategy</u> . 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. <u>Applicants will need to provide full information to demonstrate how they have sought to avoid or mitigate any potential adverse impacts including addressing potential microclimatic impacts, impacts on sensitive views and overshadowing of adjacent buildings. All tall building proposals should be supported by 3D digital modelling and provide evidence of a significant level of public engagement prior to submission.</u>	To provide more detail to applicants on how proposals will be determined	Main	Positively prepared Effective	In response to Matter 8, question 6
M/DH/36	Paragraph 42.8	The prevailing context heights identified in the policy <u>were arrived at taking into account existing and permitted tall buildings within the areas and</u> set a baseline for the consideration of any <u>new</u> 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. <u>Any deviation from Heights proposed outside the identified height ranges must be robustly justified by demonstrating the general principles in this policy have been met in full, and that proposals would have a positive impact on local communities and areas taking into account potential to deliver any exceptional public benefits.</u>	For clarity and in response to representations.	Main	Positively prepared	Clarifying the policy approach, supporting sustainable development. Supersedes modification M/DH/36 as set out in Revised Schedule of Modifications, CORE_025_V2.

						In response to Matter 8, question 6
PS/DH/18	Paragraph 42.9	The Westminster Building Height Study 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 <u>rare</u> 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 <u>and if the exceptional public benefits outweigh any harm in line with paragraph 195 and 196 of the NPPF</u> . We therefore set additional criteria to assess any proposals for tall buildings outside of the areas identified in the policy.	For clarity	Main	Effective	In response to Matter 8, question 6
PS/DH/19	NEW paragraph 42.10	<u>Exceptional public benefits will be considered on a case by case basis, but as a minimum the council will expect the scheme to</u> <ul style="list-style-type: none"> • <u>exceed the policy requirements the plan requires (such as the amount of affordable housing expected or delivering higher levels of sustainability interventions,</u> • <u>demonstrated the building will enhance the existing townscape, and</u> • <u>not affect the function of other tall buildings or tall building clusters.</u> 	To provide more detail to applicants on how proposals will be determined	Main	Positively prepared Effective	In response to Matter 8, question 6
M/DH/37	Policy 43 A	Delivering large scale <u>public</u> estate regeneration comes with <u>unique</u> viability challenges that are different to private developments , such as decanting of existing residents and a higher affordable housing requirement. <i>cont...</i>	For clarity and in response to representations.	Minor		
PS/DH/20	Policy 44 A	Development will contribute to a well- designed <u>clutter-free</u> 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.	For completeness.	Minor		In response to Matter 8, question 1
PS/DH/21	Policy 44 B part 2	optimising active frontages towards public streets and spaces particularly in areas identified as appropriate for tall buildings	For completeness	Minor		In response to Matter 8, question 1
PS/DH/22	Policy 44 B part 4	using high quality new, or reinstated paving materials <u>with an appropriately engineered surface that is fit for purpose and</u> whose colour and texture underline a sense of place and consistency of materials and is an appropriately engineered surface that is fit for purpose;	For clarity.	Minor		In response to Matter 8, question 1
PS/DH/23	Policy 44 C part 4	3. minimise energy consumption <u>for heating and lighting;</u> 4. for heating and lighting ensure they are capable of quick removal	To correct typographical error - 'heating and lighting' should be in point 3	Minor		
PS/DH/24	Paragraph 44.1	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, <u>and open spaces and building facades. This can be in public or private ownership</u>	For clarity and consistency with Glossary definition	Minor		
PS/DH/25	Paragraph 44.10	Therefore, a net growth in semi-permanent kiosks (i.e. those that <u>cannot</u> be removed without the need for dismantling) will be avoided.	Typographical error	Minor		
PS/DH/26	Paragraph 44.14	<i>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.</i> <u>Permanent public art installations should usually be integrated within the overall design, be publicly accessible and designed to maintain pedestrian movement.</u>	For clarity and effectiveness.	Minor	Effective	In response to Matter 8, question 1

PS/DH/27	Paragraph 44.15	However, new statues and monuments are strongly encouraged <u>may be supported in appropriate locations</u> in other areas of Westminster, where public art is under-represented and <u>where these relate to the site or context, particularly where they help tell the stories of our diverse communities or under-represented histories.</u> <u>Where these are sited on the public highway, or in Westminster's parks, gardens or open spaces, financial provision will be secured by appropriate planning conditions or legal agreements for future maintenance.</u>	For clarity and effectiveness.	Main	Effective	
PS/DH/28	Paragraph 45.2	To ensure that potential security-related vulnerabilities have been identified, assessed and, where necessary, addressed in a manner that is appropriate and proportionate, Applicants for major development should undertake a Security Considerations Assessment process. This will to ensure that potential security-related vulnerabilities have been identified, assessed and, where necessary, addressed in a manner that is appropriate and proportionate	Repeated sentence.	Minor		In response to Matter 8, question 1.
M/DH/39	Paragraph 46.3	... A site-specific Flood Risk Assessment (FRA) will be required for basement developments <u>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.</u> Measures to be incorporated may include Sustainable Drainage Systems (SuDS) and positive pumped devices or equivalent to address sewerage flooding, or <u>and</u> other measures recommended in the FRA.	In response to representations by Thames Water.	Minor		Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011). Supersedes modification M/DH/39 as set out in the Revised Schedule of Modifications CORE_025_V2

IMPLEMENTATION AND MONITORING

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
PS/IM/01	Page 173	The SPDs will cover the follow topic areas, among others: <ul style="list-style-type: none"> - Planning Obligations and Affordable Housing - Heritage - Design and Public Realm — North Bank - Environment — Local Enforcement - West End 	Following update to LDS (CORE_023).	Minor		
M/IM/01	Land use swaps, Page 174	... Therefore, a system of land use swaps may be appropriate in some circumstances to enable better development outcomes. Within the Savile Row Special Policy Area land use swaps will be considered where it can be demonstrated that the proposal will result in at least equal quantity and greater quality provision of bespoke tailoring floorspace.	For clarity that land use swaps are acceptable in principle across the city.	Minor		
PS/IM/02	Monitoring Framework KPI 1	Delivery of new homes (floorspace, units by size and tenure) against target of 1,495,985 new homes per year for the first ten years of the Plan period and 22,222,0685 homes overall up to 2040	To align with the London Plan target as per changes to Policies 1 and	Minor		

			8 (Modification references M/S/02, PS/H/01, PS/H/02).			
M/IM/02	Monitoring Framework KPI 5 (Trigger for review)	Trend in Net reduction in floorspace	In response to representations.	Minor		
M/IM/03	Monitoring Framework KPI 2 (Trigger for review)	Total number of new affordable homes does not meets target after five <u>three</u> years.	For consistency with KPI 1.	Minor		
M/IM/04	Monitoring Framework KPI 25 (Trigger for review)	<u>Production of updated Management Plan as 'living document' with regular review mechanism and R</u> emoval of the World Heritage Site from the annual reporting requirements of the World Heritage Committee	In response to representations.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002)
M/IM/05	Monitoring Framework KPI 33	Reduction of NOx and carbon dioxide emissions , and particulate matter (PM2.5 and PM10) concentration against national and regional Air Quality targets.	Correction.	Minor		
M/IM/06	New KPI 40	<u>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)</u>	Correction and for completeness.	Minor		
PS/IM/03	KPI 28	<i>Delete whole KPI</i>	To align with modifications to Policy 28.	Main	Effective Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL (SCG_003_V2).
M/IM/07	New KPI 28	<u>KPI:</u> <u>Number of family sized homes delivered</u> <u>City Plan Objectives:</u> <u>1</u> <u>Data source:</u> <u>Westminster City Council</u> <u>Trigger for review/review mechanism:</u> <u>Less than 35% across the city</u>	For completeness.	Minor		This modification supersedes M/IM/07 as set out in the Revised Schedule of Modifications CORE_025_V2
PS/IM/04	New KPI 38	<u>KPI:</u> <u>Amount, type and destination of waste exported from Westminster.</u> <u>City Plan Objectives:</u> <u>6, 7, 9</u> <u>Data source:</u> <u>Waste Data interrogator. In line with tables in Appendix F of the Waste Data Study (2020) and thresholds agreed by the London Waste Planning Forum</u> <u>Trigger for review/review mechanism:</u> <u>An increase in waste exports by the following amounts will trigger engagement with recipient waste planning authority:</u> <u>• 5,000 tpa non-hazardous waste (LACW and C&I)</u> <u>• 10,000 tpa inert waste (CD&E)</u>	Result of GLA representation.	Main	Effective	In response to Matter 7, question 18.

		• 100 tpa hazardous waste				
PS/IM/05	New KPI 41	KPI: Net change in A1 floorspace across the CAZ and in town centres City Plan Objectives: 3 Data source: Westminster City Council Trigger for review/review mechanism: Strategic net loss	For completeness.	Minor		

APPENDIX 1

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
PS/A1/01	Appendix 1	<i>APPENDIX 1 to be replaced entirely – see below</i>	Changes to Appendix 1 reflect a re-analysis of housing supply and identification of deliverable and developable sites in accordance with national policy.	Main	Justified Consistent with national policy	See Housing Topic Paper Addendum on Housing Supply (EV_H_03).

APPENDIX 2

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
PS/A2/01	Parking standards	<i>APPENDIX 2 to be removed entirely</i> <i>Note: subsequent renumbering of Appendix 3</i>	As a result of modifications to Policy 28 and its supporting text.	Main	Effective	Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2).

APPENDIX 3

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
M/A3/01	Policy 38 D (new clause)	<u>Strategic</u>	Following amendments to policy.	Minor		
M/A3/02	Policy 38E (new clause)	<u>Strategic</u>	Following amendments to policy.	Minor		
PS/A3/03	Policy 12	<u>Strategic</u>	Correction.	Minor		
PS/A3/04	Policy 32	<u>Strategic</u>	Correction.	Minor		

GLOSSARY

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
M/G/01	New Definition:	<u>Outstanding Universal Value: Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations.</u>	For clarity and in response to representation from Historic England.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002).
M/G/02	Idling	Unnecessarily running a motor vehicles vehicle's engine when the vehicle is not in motion.	Removed as the term does not appear in the document.	Minor		
M/G/03	Affordable housing	Housing for sale or rent, for those whose needs are not met by the market <u>in line with the NPPF definition</u> . In Westminster this is split into 'social' and 'intermediate' types.	For clarity.	Minor		
M/G/04	New Definition	<u>Estate renewal: Regeneration of the council's affordable housing estates, conducted across a range of sites over time to facilitate large-scale estate renewal and deliver mixed communities, better quality homes and a more appropriate mix of unit sizes.</u>	For clarity.	Minor		
M/G/05	New Definition	<u>Agent of Change: The principle places the responsibility of mitigating the impact of nuisances (including noise) from existing nuisance generating uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from nuisances, and existing uses are protected from nuisance complaints. Similarly, any new nuisance generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.</u>	For completeness.	Minor		
PS/G/09	Commercial use/ development/ floorspace	Comprises all <u>E A</u> uses, all B uses, C1 Hotels, private C3 hospitals, private D1 Non-residential institutions such as medical care and schools, private D2 Assembly and leisure such as private gyms and clubs , and commercial sui generis uses in accordance with the Town and Country Planning (Use Classes) Order and its subsequent amendments.	In response to changes to the Use Classes Order.	Minor		In response to Matter 1, question 18

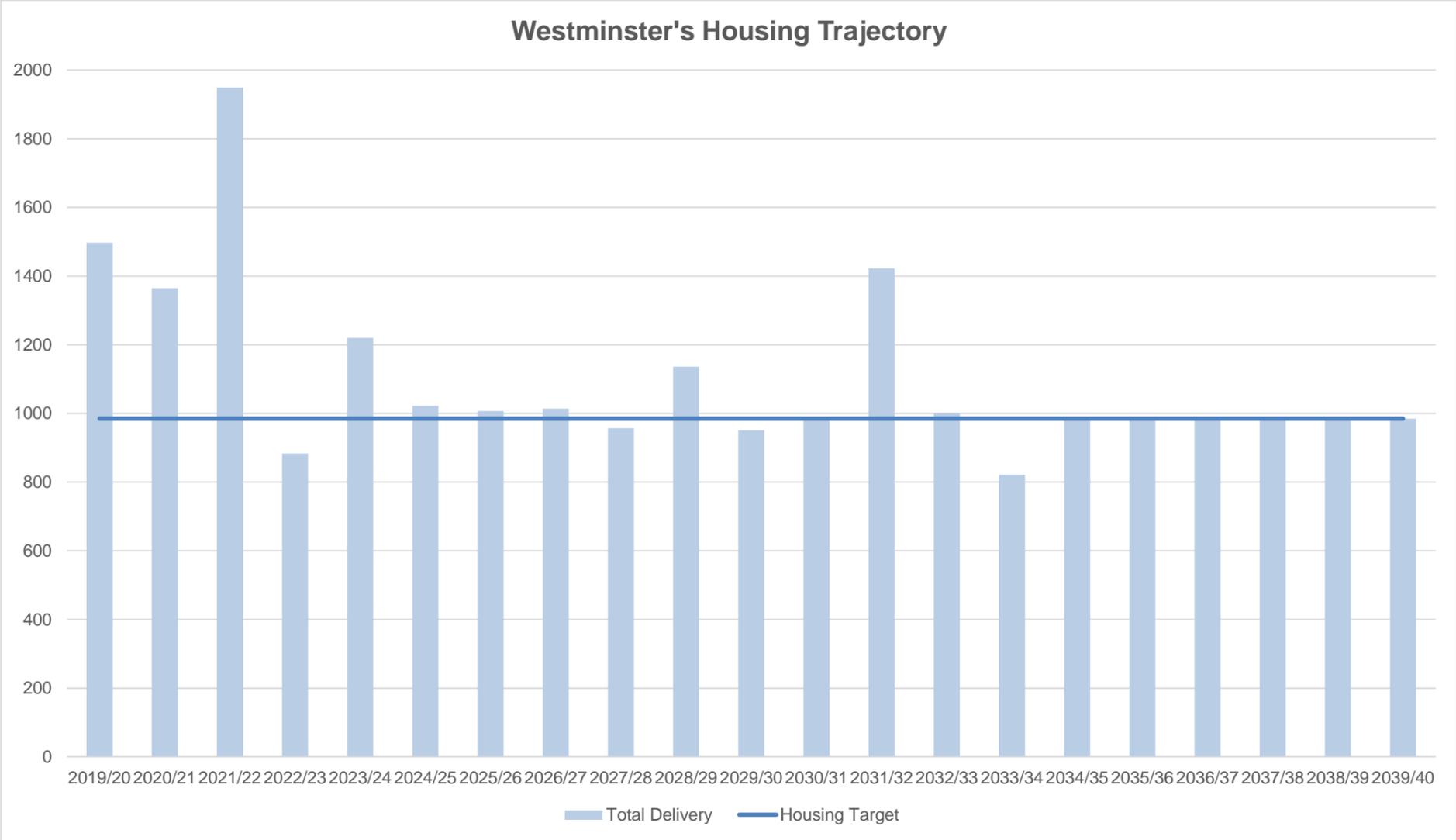
PS/G/10	Community facilities/ infrastructure	Facilities/ infrastructure available to the local community. These consist of buildings and external spaces and can be publicly or privately run. They include health facilities; education facilities; social services uses; sports and recreation facilities; community meeting halls; youth centres, local arts facilities, and public toilets. The majority of community facilities / infrastructure fall within C2 (Residential Institutions), D1 (Non-residential institutions) and D2 (Assembly and Leisure) use classes.	In response to changes to the Use Classes Order.	Minor		In response to Matter 1, question 18
PS/G/11	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 shops. Comparison goods retail use falls within A1 Retail use class.	In response to changes to the Use Classes Order.	Minor		In response to Matter 1, question 18
PS/G/12	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.	In response to changes to the Use Classes Order.	Minor		In response to Matter 1, question 18
PS/G/13	Entertainment uses	Uses predominantly or partly used for entertainment purposes: it includes <u>sui generis uses such as D2 uses including</u> 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 and recreation areas, concert halls, cinemas and theatres.	In response to changes to the Use Classes Order.	Minor		In response to Matter 1, question 18
PS/G/01	Gross floorspace	Method of assessing the extent of building (or land) occupied by a use. This should be measured as Gross Internal Area in accordance with the RICS Code of Measuring Practice, or subsequent replacement professional guidance, but excluding the following areas: —voids in atria; —internal lightwells; —double or triple height areas should be measured only once; —screened or unroofed plant areas, plant rooms, substation rooms, and other operational voids not reasonably capable of commercial or residential use; —internal and external car and cycle parking areas and associated facilities; —servicing bays, vehicle circulation and areas exclusively reserved for refuse and recycling storage and handling.	To align with how floorspace is measured for CIL in Westminster.	Main	Effective	
PS/G/02	Predominantly commercial neighbourhood (Rename)	Predominantly commercial areas of the CAZ neighbourhoods Areas of the Central Activities Zone where the majority of ground floor uses comprise of a range of commercial activity.	Correction.	Minor		
PS/G/03	Civic amenity spaces	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.	Remove as the term does not appear in the document.	Minor		
PS/G/04	District Heating Network (DHN)	District Heating Network (DHN) A network of pipes carrying that connects energy production equipment with energy customers. They can range from several metres to several kilometres in length.	Remove as the term does not appear in the document.	Minor		
PS/G/05	Host scheme	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.	Remove as the term does not appear in the document.	Minor		
PS/G/06	In-vessel composting	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.	Removed as the term does not appear in the document.	Minor		
PS/G/07	Freight consolidation centres (Rename)	Freight consolidation <u>centre facilities</u>	To better align with how the phrase is used in the Plan.	Minor		

PS/G/08	Flood-related infrastructure <i>(Rename)</i>	Flood-related <u>management</u> infrastructure	To better align with how the phrase is used in the Plan.	Minor		
PS/G/14	Tall building	A building of more than 30 meters or more than twice the prevailing context height <u>or higher (whichever is lower) or those which will result in a significant change to the skyline.</u>	To better align with how the phrase is used in the Plan.	Minor		

LIST OF STRATEGIES

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground/ Matter Statement)
M/G/06	List of strategies on page 207	<u>OSD Place Strategy & Action Plan (2019)</u>	For completeness.	Minor		
M/G/07	List of strategies on page 207	Energy Strategy 2019 (emerging) <u>Climate Emergency Action Plan 2020 (emerging)</u>	Correction.	Minor		This modification supersedes M/G/07 as set out in the Revised Schedule of Modifications CORE_025_V2
PS/G/09	List of strategies on page 206	Housing Strategy (draft) (2015)	Correction	Minor		
PS/G/10	List of strategies on page 207	Homelessness Strategy 2019- <u>24</u>	Correction	Minor		
PS/G/11	List of strategies on page 207	<u>Play Facilities Strategy (emerging)</u>	New strategy	Minor		
PS/G/12	List of strategies on page 206	Statement of Licensing Policy (2016 <u>2020</u>)	Update	Minor		
PS/G/13	List of strategies on page 206-207	<u>Statement of Licensing Principles for Gambling 2019</u>	New strategy	Minor		

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



New Appendix 1 as referred to in PS/A1/01**Appendix 1: Westminster's Housing Trajectory**

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

Site Name	Planning / Development Status	Delivery phase	Net Housing units	Deliverable / Developable
Paddington Opportunity Area				
Dudley House	Completed 2019-20	1-5	151	Deliverable
North Wharf Road	Under construction	1-5	100	Deliverable
Harbet Road (Merchant Square building 3)	Planning application (pending decision)	6-10	426	Developable
Travis Perkins	No planning status	6-10	75	Developable
St Mary's Hospital	No planning status	11-15	400	Developable
Victoria Opportunity Area				
New Scotland Yard	Under construction	1-5	268	Deliverable
Stockley House, Wilton Road	Under construction	1-5	108	Deliverable
Victoria Coach Station (Arrivals)	No planning status	6-10	75	Developable
Terminus Place	No planning status	11-15	100	Developable
Victoria Coach Station (Departures)	No planning status	11-15	230	Developable
Tottenham Court Road Opportunity Area				
Tottenham Court Road Elizabeth Line Station (Oxford Street / Dean Street)	Under construction	1-5	87	Deliverable
North West Economic Development Area (NWEDA)				
Hathaway House, Woodfield Road	Under construction	1-5	74	Deliverable
Jubilee Sports Centre, Caird Street	Under construction	1-5	56	Deliverable
Warwick Community Hall, 300 Harrow Road	Planning application (pending decision) (council Housing Investment Plan)	6-10	112	Developable
Westmead, Tavistock Road	No planning status	6-10	68	Developable
Harrow Road / Elmfield Way	No planning status	11-15	100	Developable
Royal Oak	No planning status	11-15	200	Developable
Westbourne Park Bus Garage	No planning status	11-15	50	Developable
Church Street/ Edgware Road Housing Renewal Area				
Luton St / Capland Road	Under construction	1-5	157	Deliverable
466-490 Edgware Road	Under construction	1-5	76	Deliverable
Parson's North	Under construction	1-5	60	Deliverable
West End Gate	Under construction	1-5	628	Deliverable
Paddington Green	Under construction	1-5	194	Deliverable
Lisson Arches	Under construction	1-5	59	Deliverable
Church Street Site A	No planning status (council Housing Investment Plan)	1-5 (phase 1) / 6-10 (phase 2)	233 (100 phase 1, 133 phase 2)	Deliverable (phase 1)/ Developable (phase 2)
Council Offices, Lisson Grove	Pre-application (council Housing Investment Plan)	6-10	150	Developable
Paddington Green Police Station	No planning status	6-10	350	Developable
Church Street Site B	No planning status (council Housing Investment Plan)	6-10 / 11-15	288	Developable
Gateforth and Cockpit Theatre	No planning status (council Housing Investment Plan)	11-15	98	Developable
Church Street Site C	No planning status (council Housing Investment Plan)	11-15	72	Developable
Paddington Exchange	No planning status	11-15	200	Developable
Ebury Bridge Housing Renewal Area				
Ebury Bridge Estate	Pre-application (council Housing Investment Plan)	1-5 (Phase 1) / 6-10 (Phase 2)	400 (87 phase 1, 313 phase 2)	Deliverable (Phase 1) / Developable (Phase 2)
North Westminster				
St John's Wood Road / Lodge Road	Planning application (pending decision)	1-5	101	Deliverable
Tollgate Gardens	Under construction	1-5	106	Deliverable
221-235 Lanark Road	Under construction	1-5	73	Deliverable

Queens Grove / Finchley Road	Under construction	1-5	66	Deliverable
Bayswater Road / Fosbury Mews	Under construction	1-5	50	Deliverable
Dora House, 60 St John's Wood Road	Under construction	1-5	79	Deliverable
Whiteleys Centre	Under construction	1-5	153	Deliverable
St John's Wood Barracks, Ordnance Hill	Under construction (stalled)	1-5	163	Deliverable
Carlton Dene, 45 Kilburn Park Road	Pre-application (council Housing Investment Plan)	6-10	88	Developable
Queensway / Moscow Road / Salem Road / Queens Mews	Planning application (pending decision)	6-10	60	Developable
Queensway / Inverness Terrace	Planning application (pending decision)	6-10	90	Developable
Edgware Road Station / Capital House / Griffith House	No planning status	11-15	280	Developable
Central Westminster				
22 Hanover Square	Under construction	1-5	81	Deliverable
Park Crescent / Portland Place	Under construction	1-5	73	Deliverable
Marble Arch / Edgware Road	Under construction	1-5	54	Deliverable
87-89 Cleveland Street	Under construction (stalled)	1-5	105	Deliverable
Baker Street / George Street	Planning permission (live, unimplemented)	1-5	51	Deliverable
Moxon Street Car Park / Aybrook Street	Under construction (stalled)	6-10	79	Developable
Shaftesbury Avenue	No planning status	11-15	70	Developable
South Westminster				
New Court	Completed 2019-20	1-5	221	Deliverable
First Chicago House	Under construction	1-5	119	Deliverable
Palace Street / Buckingham Gate	Under construction	1-5	72	Deliverable
Ergon House	Under construction	1-5	108	Deliverable
Millbank	Under construction	1-5	207	Deliverable
Old War Office	Under construction	1-5	85	Deliverable
Arundel Great Court	Under construction	1-5	151	Deliverable
Alexandra Buildings, Castle Lane	Planning permission (live, unimplemented)	1-5	86	Deliverable
Chelsea Barracks	Under construction	1-5	361	Deliverable
Hyde Park Barracks	No planning status	11-15	250	Developable
Queen Alexandra Military Hospital	No planning status	11-15	170	Developable
Other deliverable sites providing fewer than 50 net homes	Under construction/ Planning permission granted	1-5		2,144 Deliverable
Other developable sites	Including sites under pre-application discussions and other identified council sites	6-10 / 11-15		784 Developable
Windfalls	N/A	6-10 / 11-15		5,000 Developable
Total Deliverable Housing Supply (Years 1-5)	-	1-5		6,914 -
Total Developable Housing Supply (Years 6-10)	-	6-10		5,136 -
Total Developable Housing Supply (Years 11-15)	-	11-15		5,175 -
OVERALL TOTAL	-	-		17,225 -