

Matter 3: Spatial Strategy and Spatial Development Priorities

Introduction

This statement sets out Westminster City Council's written response in relation to the Inspector's Matter 3 issues and questions regarding the **Spatial Strategy and Spatial Development Priorities**. Examination document reference numbers are used throughout for convenience e.g. EV_GEN_001. References to modifications in the Schedule of Modifications are in the following format M/S/01 or PS/S/01.

Issue

Whether the Spatial Strategy and policies for the Spatial Development Priorities are justified, effective, consistent with national policy and in general conformity with the London Plan.

Policy 1

Question 1. What is the basis for the principles set out in Part A of Policy 1 and are they justified?

1.1 Part A of policy 1 sets out 10 key principles to support the future growth of Westminster in a manner that provides for homes and communities, secures a healthier and greener city, and the right kind of growth. It translates the council's vision (pages 22-23) and objectives (pages 24-25) into broad principles that all future developments should seek to respond to. It also provides the strategic context for all subsequent policies in the City Plan.

1.2 As set out in response to questions 3 and 4 below, all principles are in accordance with the NPPF's emphasis on sustainable development and are in general conformity with the London Plan.

Question 2. How do they reflect the vision and objectives of the City Plan?

2.1 The Spatial Strategy has been developed in response to the vision and objectives of the City Plan, with the intention of setting out key principles for all future developments, alongside guidance on where growth should be directed to. As such, each principle in clause A can be linked to at least one pillar from our vision for homes and communities, a healthier and greener city, and the right kind of growth, and at least one of the ten objectives that flows from this vision. This relationship is

demonstrated through the table below, which also highlights the cross-cutting nature of various principles within the Spatial Strategy.

Clause from City Plan Policy A1	Relevant section of vision	Relevant objectives
1	Right kind of growth Healthier and greener	1, 6, 8, 9
2	Homes and communities Right kind of growth	1, 9
3	Right kind of growth	2
4	Right kind of growth	2, 3, 4
5	Right kind of growth	4, 8, 10
6	Right kind of growth	2, 3, 4, 9
7	Right kind of growth	8, 10
8	Homes and communities Healthier and greener city	6, 8
9	Healthier and greener city	5, 7
10	Homes and communities Right kind of growth	5, 6, 9

2.2 In order to provide a stronger link between the key development principles in Policy 1, and the importance of addressing climate change to the council's vision and objectives, the following modification PS/S/05 to clause A8 is now proposed:

Adapting to and mitigating the effects of climate change, and securing enhancements to the natural environment and public realm, including supporting the delivery of a new North Bank river front destination.

Question 3. How do they align with the London Plan?

3.1 Taken together, the 10 principles support good growth, in alignment with the overarching principles in chapter 1 of the New London Plan to:

- Build strong and inclusive communities (London Plan Policy GG1);
- Make the best use of land in (London Plan Policy GG2);
- Create a healthy city (London Plan Policy GG3);
- Deliver the homes Londoners need (London Plan Policy GG4);
- Grow a good economy (London Plan Policy GG5); and
- Increase efficiency and resilience (London Plan Policy GG6);

3.2 Each principle also aligns with policies in subsequent chapters of the New London Plan, as set out in the table below:

Clause from City Plan Policy 1A	Relevant sections of the New London Plan
1	Policies in chapter 3 (design) support the optimisation of densities, efficient use of land, and high architectural standards.
2	Policies in chapter 4 (housing) support increased housing growth, and set housing and affordable housing targets that the clause (as modified) conforms with.
3	Policies in chapter 6 (economy) support growth in a range of business

	space, whilst CAZ policies in chapter 2 (spatial development patterns) emphasise the importance of office growth in central London.
4	Policies in chapter 2 (spatial development patterns) outlines the global importance of the CAZ's multiple functions and prioritises its commercial functions (outside of areas of predominantly residential character).
5	CAZ policies in chapter 2 (spatial development patterns) recognise the international importance of uses and buildings in central London, and therefore the need to protect them.
6	Policies in chapter 2 (spatial development patterns) supports the evolution of town centres and identifies the international importance of such centres in Westminster.
7	Policies in chapter 7 (heritage and culture) set out the importance of protecting London's heritage assets while policies on design in chapter 3 also emphasise the importance of the impact of proposals on townscape.
8	Policies in chapter 8 (green infrastructure and natural environment) support enhancements to the natural environment and urban greening of the public realm, while policies in chapter 9 (sustainable infrastructure) also emphasise the importance of responding to climate change.
9	Policies in chapter 10 (transport) priorities sustainable travel.
10	Policies in chapter 5 (social infrastructure) emphasise the need to ensure development is supported by appropriate infrastructure.

3.3 As set out in response to question 2 above, proposed modifications ensure climate change is more strongly embedded into Policy 1. Given the contents of chapter 9 of the New London Plan, such modification will strengthen not only links to the council's vision and objectives, but also alignment with the London Plan.

3.4 In addition, as can be seen from the Statement of Common Ground with the Mayor (document SCG_007_V2), no issues of general conformity have been raised regarding the Spatial Strategy – with regards to either the adopted (CORE_021) or the New London Plan.

Question 4. How are they consistent with national policy?

4.1 As well as conforming with the London Plan's principles of good growth, clauses A1-10 of Policy 1 of the City Plan are also consistent with the NPPF's focus on sustainable development. Taken together, they seek to balance the needs for future growth to fulfil economic, social, and environmental objectives, as set out in paragraph 8 of the NPPF. Section 3.1 and Annex 1 of the Integrated Impact Assessment (CORE_006) demonstrate that as a whole, the policy achieves these intentions.

4.2 Furthermore, each principle also responds to at least 1 of the overarching objectives of the NPPF, as set out in the table below:

Clause from City Plan Policy 1A	Relevant objective of the NPPF
1	<ul style="list-style-type: none"> Delivering a sufficient supply of homes

	<ul style="list-style-type: none"> • Building a strong, competitive economy • Making effective use of land, • Achieving well-designed places
2	<ul style="list-style-type: none"> • Delivering a sufficient supply of homes
3	<ul style="list-style-type: none"> • Building a strong, competitive economy
4	<ul style="list-style-type: none"> • Building a strong competitive economy • Ensuring the vitality of town centres • Achieving well designed place
5	<ul style="list-style-type: none"> • Building a strong, competitive economy • Conserving and enhancing the historic environment
6	<ul style="list-style-type: none"> • Building a strong, competitive economy • Ensuring the vitality of town centres • Promoting health and safe communities
7	<ul style="list-style-type: none"> • Achieving well-designed places • Conserving and enhancing the historic environment
8	<ul style="list-style-type: none"> • Conserving and enhancing the natural environment
9	<ul style="list-style-type: none"> • Promoting sustainable transport • Promoting healthy and safe communities
10	<ul style="list-style-type: none"> • Promoting healthy and safe communities • Promoting sustainable transport • Supporting high quality communications • Meeting the challenge of climate change, flooding and coastal change

4.3 The only overarching objectives of the NPPF that are not covered in Policy 1 therefore, are “protecting Green Belt”, and “facilitating the sustainable use of minerals” – which reflects that there is no designated Green Belt or minerals extraction sites in Westminster.

4.4 Modification PS/S/05 to clause 8 as set out in response to question 2 above will also strengthen alignment between Policy 1 and the NPPF – given the contents of chapter 14 of the NPPF on “meeting the challenge of climate change, flooding and coastal change.”

Question 5. Do they cover all necessary issues?

5.1 Yes, the principles provide a strong framework to guide development in Westminster in achieving the vision and objectives set out in the City Plan, and provide the overarching strategy for all subsequent policies. As set out in response to questions 2-4 above, they respond to the council’s vision and objectives for the city, align with the London Plan, and are consistent with national policy. One further opportunity has also been identified to strengthen these links through modification to clause A8 – which will also strengthen links between the overall strategy and subsequent policies in the City Plan on climate change.

5.2 Policies 2 – 6 link to multiple principles in Policy 1 for each of the identified key growth areas – to ensure growth in these areas contributes to economic and residential growth in a manner that achieves the right kind of growth.

5.3 Where it is considered that modifications to Policy 1 are required in response to issues raised during consultation, these are included in the Updated Schedule of Modification (CORE_025_V3). Reasons for rejecting other suggestions for additions to Policy 1 raised during Regulation 19 consultation are documented in pages 12-13 of the Consultation Statement (CORE_010).

Question 6. What is the background to and justification for the area based approach to growth set out in Part B of Policy 1?

6.1 Paragraphs 3.3 to 3.5 of the Integrated Impact Assessment (IIA) Addendum Reasonable Alternatives (CORE_024) set out the background and justification for the area-based approach to the growth areas identified in clause B of Policy 1. As can be seen from this, the identified growth areas align with the principles of sustainable development and good growth as set out in the NPPF and the New London Plan.

6.2 In addition, it is also worth noting that:

- Place Plans are being developed by the council to help shape and co-ordinate developments for Victoria and Paddington Opportunity Areas, and the Harrow Road area within the North West Economic Development Area (NWEDA) (EV_GEN_010);
- The Housing Renewal Areas form an integral part of the council's Housing Investment Strategy and Housing Revenue Account Development Programme. A masterplan has been prepared for Church Street (EV_H_008), and extensive collaboration has taken place with local residents on investment in Ebury Bridge Estate;
- The NWEDA has been identified as a focus for regeneration due to persistent levels of deprivation in the adopted City Plan (CORE 020) and the 2011 Core Strategy, and before that, designated as the North West Westminster Special Policy Area in Westminster's 2007 Unitary Development Plan.

Question 7. How does this align with the London Plan?

7.1 All identified areas align with the principles of Good Growth set out in the New London Plan. Directing growth to these areas will help make the best use of land, support agglomeration in areas of high and improving connectivity, and improve opportunities for all in areas of deprivation. Furthermore, within the New London Plan:

- Policies SD4 and SD5 support continued agglomeration and intensification of the CAZ and prioritise its diverse range commercial functions (whilst preserving the character of its more residential areas);
- Policy SD4 supports the vitality, viability, adaptation and diversification (and therefore growth) in the WERLSPA
- Policy SD6 identifies town centres as the primary locations for commercial growth beyond the CAZ;
- Policy SD1 supports growth in Paddington, Victoria and Tottenham Court Road Opportunity Areas, whilst table 2.1 (page 37), provides indicative development capacities for them;
- Policy H8 supports the replacement of existing housing with higher density development that can provide an uplift in affordable housing, which the council's plans for its Housing Renewal Areas are in accordance with;
- Policy SD10 supports the use of policies that enable local regeneration whilst policy GG5 emphasises the need to ensure economic success is shared amongst all Londoners; both of which the council's intentions for the NWEDA align with.

7.2 As can be seen from the Statement of Common Ground with the Mayor (SCG_007_V2), the distribution of growth across these areas is supported by the Mayor, who “welcomes the ambition...and the spatial distribution of development... welcomes the clear commitment to meeting the indicative growth targets set out in the London Plan for each Opportunity Area...and welcomes growth in the North West Economic Development Area and Church Street/Edgware Road and Ebury Bridge Estate at a scale that reflects its location on the edge of the Central Activities Zone (CAZ).”

Question 8. Were there reasonable alternatives to this approach? If so, what options were considered and why were alternatives discounted?

8.1 See response to Matter 1, question 6 (WCC_MIQ_Matter1).

Question 9. Is the boundary of the Central Activities Zone appropriate and justified?

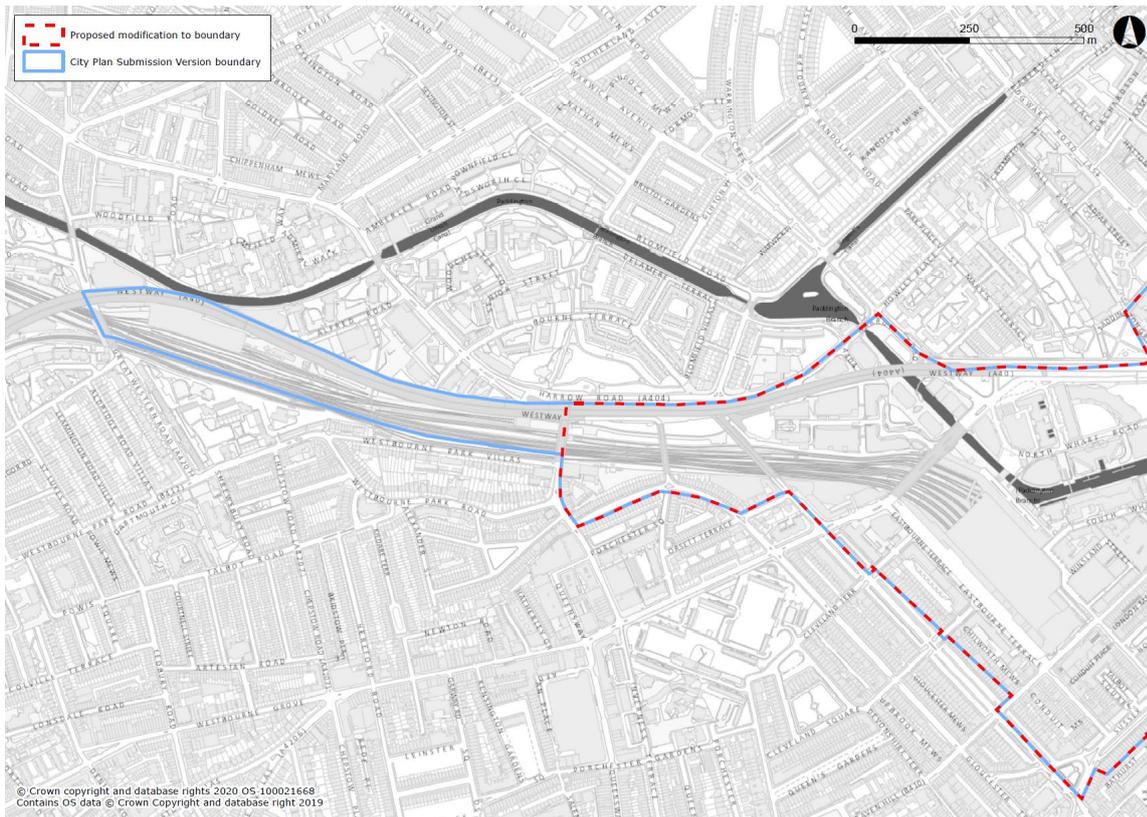
9.1 Figure 2.16 on page 80 of the New London Plan provides an indicative boundary of the Central Activities Zone and clause N of Policy SD4 (The Central Activities Zone) indicates boroughs should use this to define detailed boundaries.

9.2 The council have therefore made some minor refinements to the boundary in figure 2.16, to reflect the character and mix of uses present in Westminster, and informed by the definition in paragraph 2.4.4 of the New London Plan of the strategic functions of the CAZ.

9.3 As noted in page 12 the Consultation Statement (CORE_010), there have been objections to the inclusion of parts of Belgravia within the CAZ. However, its inclusion aligns with the indicative boundary provided by the New London Plan and reflects the character and function of this part of Westminster – which accord with the strategic functions of the CAZ (i.e. diplomatic uses, heritage value).

9.4 As can be seen from Figure 7 of the City Plan, one significant difference in boundary from that set out in the New London Plan is the inclusion of land to the west of Paddington Opportunity Area. This was originally included in the draft City Plan on the basis that it aligned with the route of Crossrail, and that new developments could come forward in this area that could further contribute to the strategic functions of the CAZ. However, as such sites have subsequently been determined undeliverable, it is suggested that the boundary is now amended as set out below, which forms modification PS/S/07, and is also included in the Post-submission Draft Policies Map (WCC, June 2020) (CORE_027_V2) and the Addendum I - Post-submission Schedule of Changes to the Policies Map (WCC, June 2020) (CORE_026_V2)

Modification PS/S/07:



Question 10. Is the policy sufficiently clear in terms of the scale and nature of development across the different areas?

10.1 Westminster is largely characterised by either dense mixed-use areas providing a number of viable commercial functions alongside high value residential, or wholly residential areas that offer limited opportunities for intensification. As such, future development is largely predicated on landowner willingness to reinvest in sites where high value existing uses are present, as part of a long-term approach to their land holdings, and in response to a supportive policy framework. The lack of vacant or inefficiently used sites offering obvious redevelopment potential makes it difficult to accurately predict how all future growth will be distributed across the city.

10.2 Nevertheless, Policy 1 seeks to provide broad direction of key areas of growth in the city, and what type of growth is expected. However, it is acknowledged that the spatial strategy could offer more clarity about the nature of likely development across different geographic areas, and in cases where deliverable growth targets do exist, the scale of what is expected. As such, it is now suggested that clause B is modified as set out below (which also incorporates and supersedes previous modifications M/S/04 and PS/S/02):

Modification PS/S/06:

- B. Growth will ***primarily*** be delivered through the:
1. Intensification of the CAZ, West End, and our town centre hierarchy ***with commercial-led and mixed-use development to provide significant growth in office, retail and leisure floorspace, alongside new homes;***
 2. Continued ***major mixed-use*** redevelopment within ***identified*** the Opportunity Areas to ***achieve London Plan growth targets of 13,000 new jobs and 1,000 new homes in Paddington Opportunity Area;***

4,000 new jobs and 1,000 new homes in Victoria Opportunity Area; and 3,000 new jobs and 150 new homes in Tottenham Court Road Opportunity Area;

3. *Renewal of Church Street/ Edgware Road and Ebury Bridge Estate Housing Renewal Areas to **collectively provide 2,750 new homes alongside increased local job opportunities;***
4. *Commercial-led ~~r~~Regeneration of the North West Economic Development Area **including the commercial-led intensification of areas of commercial and mixed-use character, to increase local job opportunities alongside residential growth;** and*
5. *Realisation of the **development** potential of ~~our~~ **the** identified key development sites **listed in** (see Appendix 1).*

Question 11. What is the approach to other areas not identified and is this clear?

11.1 Clause B identifies the areas of Westminster where most growth will be directed. Areas that are not identified are not expected to face significant development pressure, for the reasons set out in table 1 on page 5 of the IIA Addendum Reasonable Alternatives (CORE_024).

11.2 However, the absence of specific references to certain areas of the city in clause B does not mean development proposals should be resisted. Instead, where proposals come forward, they should be treated on their merits. As such, the insertion of the word “primarily” in the opening sentence of clause B (within modification PS/S/06) makes clear that the areas identified in clause B are not the only areas for future growth in Westminster.

Question 12. What was the intended purpose of including the Key Development Sites in Appendix 1 and referring to them in Policy 1? What is their status in terms of allocations and what evidence is there to support their inclusion for example in terms of flood risk and the effect on heritage assets?

12.1 The Key Development Sites set out in Appendix 1 of the Regulation 19 draft City Plan (CORE_001) represented developable sites of strategic importance to the City Plan’s objectives and spatial strategy, where large-scale residential or mixed-use development and/or strategic infrastructure will be delivered over the lifetime of the plan. This represented a continuation of the approach in the adopted City Plan (CORE_020), which itself is a revised version of Westminster’s original Core Strategy (2011).

12.2 The Key Development Sites identified in Appendix 1 were not, and were never intended to be, site allocations. They were not a comprehensive list of deliverable and developable sites but were indicative of the location of large sites capable of delivering significant development to meet Westminster’s strategic targets set out in Policy 1. As described in the submitted Housing Topic Paper (EV_H_001), the sites in question were identified from a range of pre-existing sources and underwent a high-level assessment of developability to identify key constraints and indicative capacities for new homes. This included a broad assessment of suitability, availability and achievability, including identifying flood risk and heritage sensitivity concerns. Further,

more detailed assessment of the sites is to be conducted through the forthcoming Site Allocations Development Plan Document (DPD), as set out in the Local Development Scheme (LDS) (CORE_023), which will formally allocate sites.

Question 13. What is the basis for the Council’s proposed modifications in relation to these sites? What status would the sites have and how would they contribute to development needs?

13.1 Following correspondence from the Inspectors (INSP2 and INSP3), it became clear that the term ‘Key Development Sites’ and their inclusion in Appendix 1 was causing confusion as to their status within the Plan. We were advised to review this in the interests of ensuring the justification and effectiveness of the City Plan and to make clear that they were not site allocations.

13.2 Our correspondence (WCC_LETTER_05 and WCC_LETTER_06) confirmed that the sites in question were not intended as site allocations and undertook a review of Appendix 1 to present a more comprehensive list of deliverable and developable sites in accordance with NPPF and PPG requirements on housing supply evidence. The methodology undertaken to review our housing supply evidence that forms the basis for the revised Appendix 1 is set out in our Housing Supply Topic Paper (EV_H_013). This included both a site selection and indicative capacity methodology for those sites with no formal planning status. Indicative capacities incorporated the need to provide commercial growth alongside housing on the majority of sites, given their locations within areas where mixed use development would be expected, and to ensure housing capacities were not overestimated.

13.3 Proposed modification PS/A1/01 sets out a new Appendix 1 which makes clear that the sites identified make up Westminster’s 5-15 year housing land supply. Appendix 1 therefore represents the council’s housing trajectory, as required by the NPPF, and not formal site allocations. The named sites in Appendix 1 represent sites delivering 50 or more net homes, but the appendix also includes the sum of housing units from smaller deliverable and developable sites and windfall estimates. The allocation of sites will be carried out by the forthcoming Site Allocations DPD, which will identify the quantum of commercial development expected from each site, alongside the number of homes and any site-specific infrastructure requirements, as set out in the LDS (CORE_023). Nevertheless, this does not mean that individual applications for these sites could not be determined using the policy framework in the City Plan prior to their formal allocation.

13.4 The revised Appendix 1 provides a more comprehensive overview of Westminster’s housing supply position and this has led to the revision of the Plan’s housing target in line with the New London Plan, as discussed in our Matter 4 Statement (WCC_MIQ_Matter4). Associated modifications have been proposed or revised to accord with the revised Appendix 1 and the subsequent alteration of the Plan’s housing target (PS/I/01, PS/I/02, M/S/02, PS/S/02, M/S/05, M/S/11, PS/S/03, M/S/16, M/S/18, PS/S/04, PS/H/01 – PS/H/08, M/H/18, PS/EE/01, PS/C/02 and PS/IM/02).

Question 14. What would be the implications of the proposed modifications for the City Plan as a whole?

14.1 The proposed modifications outlined in the response to Question 14 above would ensure the City Plan is fully compliant with NPPF and PPG requirements in terms of housing land supply. They will safeguard the overall deliverability of the City Plan through clarifying the position on housing land supply and revising the Plan's housing target in line with the New London Plan.

Question 15. Are the proposed modifications necessary for soundness?

15.1 Yes, the proposed modifications outlined in the response to Question 14 above are necessary to ensure the City Plan as a whole is justified, effective and consistent with national policy.

Question 16. What role will the Site Allocations DPD have in relation to these sites?

16.1 The forthcoming Site Allocations DPD will provide detailed guidance on large known development opportunities that are expected to significantly contribute to the city's strategic growth targets to the period 2040 as identified in the City Plan. The document will formally allocate individual sites, setting out what use or mix of uses are supported in principle and give an indication of likely development capacity and timeframe for development. The document will also provide site specific guidance of issues that any proposal will need to respond to, identify specific infrastructure requirements (as detailed in response to Question 5 in Matter 9, WCC_MIQ_Matter9) and set out design and place shaping principles for each site, taking into account detailed assessments of flood risk and impact on heritage against which planning applications will be considered to ensure each site fulfils its potential and that development positively contributes to the City Plan's objectives.

16.2 Appendix 1 (as per proposed modification PS/A1/01 in the Revised Schedule of Modifications (CORE_025_V3)) of the City Plan identifies deliverable and developable sites which are expected to make significant contributions to delivering Westminster's housing target within the plan period. The Site Allocations DPD will include sites in Appendix 1 that are not in council ownership and that have no active planning status, which are considered capable of delivering a significant number of housing units through redevelopment over the lifetime of the plan (50+ units as set out in EV_H_013). While this will form the basis of sites taken forward in the Site Allocations DPD given that they are already identified as likely to be of a significant scale, Appendix 1 does not preclude any further sites which may be identified as the DPD is developed.

16.3 For clarity, it is important to note that the City Plan has been drafted in a way that ensures it can be implemented as a standalone document, and that schemes can be determined using the policies within it in advance of the production of the Site Allocations DPD.

Question 17. Are the other proposed modifications to Policy 1, the reasoned justification and the Key Diagram necessary for soundness? Are any other modifications necessary?

17.1 Modifications proposed to the key diagram and to clause B of policy, as set out in response to questions 9 and 10 above, are both considered necessary for soundness to ensure the policy approach is justified and effective. Regarding the modifications set out in the Revised Schedule of Modifications (CORE_025_V3):

- Modifications M/S/04 and PS/S/02 are incorporated into, and therefore superseded by the proposed modifications to clause B set out above in response to question 10 above;
- Modifications M/S/02, PS/S/01, M/S/03, M/S/05 and M/S/07 are all considered necessary for soundness, in response to issues raised by consultees, and for the reasons set out in CORE_025_V3;
- Modification M/S/06 is not considered necessary for soundness but would ensure reasoned justification better reflects the multiple functions of the CAZ.

17.2 Regarding other issues raised by consultees at Regulation 19, no further modifications are considered necessary for soundness, as explained in pages 12-13 of the Consultation Statement (CORE_010).

Policy 2

Question 18. What is the background and justification for the priorities set out in Policy 2? Are they consistent with national policy?

18.1 The West End Retail and Leisure Special Policy Area (WERLSPA) and the Tottenham Court Road Opportunity Area are both identified in the New London Plan. This identifies the WERLSPA as an area of international importance for retail, and also of strategic importance in terms of its cultural, leisure, and evening and night-time economy roles (paragraph 2.4.12). It also defines Opportunity Areas as “significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity” (paragraph 2.1.1).

18.2 The Tottenham Court Road Opportunity Area also existed in Westminster’s adopted City Plan (CORE_020), while the WERLSPA represents an evolution of a smaller, retail focussed designation of the West End Retail Special Policy Area.

18.3 Given the characteristics of the area and its importance to the national economy, Policy 2 seeks to provide a supportive framework for continued sustainable economic growth and productivity. The priorities set out in Policy 2 have been informed by:

- The council and key stakeholders shared vision for the area, as determined through the West End Partnership, and as expressed in its 15 year vision¹ and delivery plan (EV_E_014);
- The principles of ‘Good Growth’ as set out in the New London Plan, and the West End Good Growth Study (EV_E_015); and
- Feedback from consultees as the Plan was developed.

18.4 In terms of consistency with national policy:

¹https://westendpartnership.london/wp-content/uploads/2017/10/wep_vision_2030.pdf

- Promoting good growth and agglomeration in areas of high productivity and areas well served by public transport is consistent with paragraphs 80 and 104 of the NPPF;
- Enhancing the retail, leisure, and cultural offer and diversifying the night-time economy offer is consistent with requirements of paragraph 85 of the NPPF to take a positive approach to the growth, management and adaptation of town centres;
- Managing road congestion and improving the pedestrian environment is consistent with the emphasis in paragraph 102 of the NPPF of promoting sustainable development; and
- Protecting character and heritage is consistent with requirements of paragraph 185 of the NPPF to take account of the “social, cultural, economic and environmental benefits that conservation of the historic environment can bring”.

Question 19. Does Policy 2 adequately and effectively deal with the full range of relevant issues?

19.1 Yes. Policy 2 provides support for continued commercial-led growth, and highlights shared priorities of the council and landowners that such growth should seek to address for this specific area. However, no single policy can deal with the full range of issues any development proposal in the area is likely to raise – particularly given its complex mix of uses and functions. This complexity is highlighted by the presence of multiple policy designations within the area – including International Centres, CAZ Retail Clusters, Special Policy Areas, a Strategic Cultural Area, and multiple Conservation Areas and heritage designations.

19.2 As such, to be applied effectively, Policy 2 must be read in conjunction with other relevant policies within the Plan, which provide greater detail for the determination of individual planning applications.

Question 20. How will these priorities be delivered?

20.1 As set out in response to question 18 above, Policy 2 sets out shared priorities of both the council and key stakeholders including major landowners and representatives of the business community. A continued partnership approach to their subsequent delivery will be required.

20.2 The council will grant planning permission for development schemes that contribute to the achievement of these priorities, and are in accordance with the development plan as whole, along with any other material considerations, such as SPDs. In this respect, as set out in response to question 19, it is important to emphasise that Policy 2 will not be used in isolation. Instead, it will be used in conjunction with all other relevant policies in the Plan, which will contribute to the delivery of its priorities. For example:

- policies 39 – 42 provide criteria that will help determine if proposals are of an appropriate design, height, and fully respect heritage considerations
- policies 14 – 17 provide considerations for a range of different commercial land uses
- policy 30 provides more detailed transport considerations; including for example, how delivery and services plans will be required and freight and

servicing consolidation encouraged – which will help reduce congestion and improve air quality.

20.3 The council's limited land holdings in the area means that development delivery will be private sector led through a combination of the long-term strategies and plans of the Great Estates, the Landed Estates and individual investors and landowners. As these partners strategies and plans for their own land holdings align with the priorities identified in Policy 2 – e.g. with an emphasis on sustainability and successful place shaping, there is a broad consensus amongst key delivery partners of the nature of future growth in the area. Regulation 19 consultation therefore resulted in general support for the policy from the development industry, as set out in the Consultation Statement (CORE_010).

20.4 The forthcoming Site Allocations DPD will provide a further opportunity to ensure major developments in the area comes forward in a manner that delivers the priorities set out in Policy 2. However, the City Plan has been drafted in a way that ensures it can be implemented as a standalone document, and that schemes can be determined using the policies within it in advance of the production of the Site Allocations DPD.

Question 21. What is the basis for the designation and boundaries of the West End Retail and Leisure Special Policy Area, the West End International Centre and the Tottenham Court Road Opportunity Area? Are the areas covered appropriate and justified?

21.1 All designations are recognised in the New London Plan, which does not provide detailed boundaries. Specifically, Policy SD1 (Opportunity Areas) and Table 2.1 identifies Tottenham Court Road as one of London's Opportunity Areas, while Policy SD4 (The Central Activity Zone) identifies both the West End International Centre and the West End Retail and Leisure Special Policy Area.

21.2 Similar designations were included in the adopted City Plan (CORE_020), which has provided the starting point for any refining of boundaries in the New City Plan.

21.3 For the Tottenham Court Road Opportunity Area, the boundary from the 2016 City Plan (CORE_20) has been rolled forward unaltered. While this incorporates some sites that have recently been redeveloped, their continued inclusion was considered relevant as:

- they reflect the status of Tottenham Court Road as a 'maturing' Opportunity Area in line with figure 2.11 of the New London Plan;
- the nature of recent development on these sites sets the context for continued change and intensification of the area; and
- indicative job capacities in the New London Plan relate to the period 2016 – 2041, as set out on page 40 of the New London Plan.

21.4 As no obvious further development opportunities in the immediate surrounding areas have been identified, no expansion of the boundary was considered necessary. Furthermore, the current boundary reflects that the main opportunity for growth is focussed around where major infrastructure investments (i.e. Crossrail) are underway.

21.5 The West End International Centre boundary has been refined from that included in the adopted City Plan (CORE_020), based on the recommendations set out in the Town Centre Health Checks Report 2018/19 (EV_E_005 – EV_E_009 –

specifically the boundary recommended on page 1 of EV_E_008). As set out in that document, refinements fix existing inaccuracies, such as where existing units were only partially covered by the designation. Further expansion of the boundary was not considered necessary to reflect the differing functions and policy approaches to the International Centre and the surrounding WERLSPA. While growth is supported in both, the International Centre provides for key concentrations of higher order comparison goods retailing (as set out in policy SD8 of the New London Plan), while the surrounding WERLSPA offers greater flexibility for a wider range of supporting town centre uses.

21.6 The WERLSPA boundary also follows recommendations set out in the Town Centre Health Checks Report 2018/19, specifically page 2 of EV_E_008. This captures areas of broadly commercial and mixed-use character across the West End, utilising GOAD land use data. It expands areas previously designated as the West End Retail Special Policy Area (WERSPA) in the adopted City Plan (CORE_020), to also incorporate areas previously designated as Core CAZ, in the interests of reducing unnecessary overlapping designations covering areas where a similar policy approach applies.

Question 22. How does the designation of these areas and the policy approach align with the London Plan?

22.1 Tottenham Court Road has been identified as an Opportunity Area in successive London Plans, and therefore recognised as an area with potential for large scale change, linked to infrastructure improvements.

22.2 The New London Plan recognises Tottenham Court Road as a 'maturing' Opportunity Area, where most development potential is already underway. It provides indicative capacities for jobs and homes, which provide a clear steer that commercial-led growth is the expectation. It does not define the detailed boundary of the Opportunity Area.

22.3 Policy 2 is consistent with guidance on Opportunity Areas set out in Policy SD1 of the New London Plan; particularly in supporting continued commercial-led growth in the area. As set out in the Statement of Common Ground with the Mayor (SCG_007_V2), no issues of general conformity have been raised regarding the approach to this Opportunity Area, instead the Mayor 'welcomes the clear commitment to meeting the indicative growth targets set out in the London Plan for each Opportunity Area.'

22.4 The role of the WERLSPA and the West End International Centre is also acknowledged in the New London Plan, which does not seek to provide growth targets or define detailed boundaries for either area. Instead Policy SD4 (The Central Activities Zone) identifies both as shopping and leisure destinations, whose vitality, viability, adaptation and diversification should be supported (clause F). Paragraph 2.4.12 also notes that the West End International Centre includes Oxford Street, Regent Street and Bond Street, which serve a primary retail function, and that the WERLSPA includes Covent Garden and Soho, and is an area where retail should complement the cultural, leisure, evening and night-time economy roles. Again, the approach in Policy 2 is consistent with the London Plan - in that it supports commercial growth, including an improved retail and leisure experience and diversified evening and night-time economy here. No issues of general conformity with the

council's approach have been raised by the Mayor of London, as set out in the Statement of Common Ground with him (SCG_007_V2).

Question 23. Is the policy sufficiently clear in terms of the scale and nature of development envisaged?

23.1 Policy 2 recognises the major opportunities for continued commercial-led growth across the WERLSPA including Tottenham Court Road Opportunity Area, to secure the continued economic growth and clustering to the benefit of the national economy. However, it is acknowledged that policy could more clearly set out:

- the different nature of development across the two areas – with Tottenham Court Road Opportunity Area representing a tightly defined area of major redevelopment activity, while the rest of the WERLSPA providing scope for more incremental growth across a much wider area; and
- that growth targets identified in the London Plan only relate to Tottenham Court Road Opportunity Area.

23.2 As such, it is suggested that clauses A and B are modified as set out below.

Modification PS/S/08:

*A. Significant jobs growth through a range of commercial-led developments including retail, leisure, offices, and hotel use. **Additional commercial floorspace will be provided in a manner that respects its setting, through:***

- **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;**
- **The sensitive refurbishment and extension, or replacement of existing buildings across the WERLSPA.**

~~B. The realisation of growth targets for the area as identified in the London Plan.~~

(Then rename clauses C – G accordingly).

23.3 The following addition to paragraph 2.5 is also suggested, which helps clarify recent progress towards targets for Tottenham Court Road Opportunity Area, as set out in response to question 24 below.

Modification PS/S/09:

*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 **through the implementation of planning permissions for schemes that provide increased scale and massing.** Cont...*

23.4 Accurately predicting deliverable growth targets for the WERLSPA as a whole is not considered possible due to the diverse nature of activity in the area, and the nature of development that occurs within it (as explained in the answer to question 10 above). The area provides a unique mix of highly valuable existing uses unlike anywhere else in the country – simultaneously operating as a retail and leisure

destination with a vibrant night-time economy, as a global office centre providing jobs in high value industries, and as a tourist destination. In this context, most growth, particularly beyond Tottenham Court Road Opportunity Area, will be largely dependent on where landowners wish to reinvest in high value existing uses. Policy also needs to be sufficiently flexible to support growth in a range of sectors given the area’s multiple functions.

23.5 As set out in paragraphs 2.22 - 2.23 of the Economy and Employment Topic Paper (EV_E_002), where studies have provided ambitious total targets for certain parts of the West End, they have not been subject to any testing of impact on townscape and heritage. As such, and given the different geographical areas they cover, it is not considered necessary for soundness for the policy to directly refer to such targets.

Question 24. What progress has been made towards the growth targets for the Tottenham Court Road Opportunity Area and how will future growth be delivered?

24.1 As set out in response to question 22 above, Tottenham Court Road is classed as a ‘maturing’ Opportunity Area. As such, significant development activity has taken place in recent years. As set out on page 40 of the New London Plan, indicative jobs and homes capacities for the area cover two separate time periods. For homes, figures relate to the period 2019 – 2041. For jobs, figures relate to the period 2016 – 2041.

24.2 Council monitoring data indicates that 95 new homes are under construction in the Opportunity Area. Beyond this, and no further homes have been granted planning permission, or have been completed this year.

24.3 Calculating how many jobs new developments have provided is less straightforward than monitoring delivery against targets for new homes. For such purposes, the council have monitored commercial development activity in the area since April 2016. The amount of additional floorspace by use class is then converted to likely jobs, based on average job density ranges set out in HCA Employment Densities Guide².

24.4 In Tottenham Court Road Opportunity Area, since April 2016, data indicates the following net changes in commercial floorspace

Category of commercial space	Development status	Change in floorspace (sqm)
B1	Completed	25,008
	Under Construction	9,546
	Not Started	0
	Total	34,544
A1	Completed	13,916
	Under Construction	3,531
	Not Started	0
	Total	17,447

² www.gov.uk/government/publications/employment-densities-guide

Other town centre uses	Completed	-7,789
	Under Construction	-6,636
	Not Started	0
	Total	-14,425

24.5 Assuming all permissions are built out, a gross to net conversion ratio of 85%, and applying average job density ratios, indicates schemes implemented or permitted since April 2016 will deliver 2,599 new office based jobs and 847 new retail based jobs, alongside a loss of 368 jobs from losses in other town centre uses. Together these schemes should therefore achieve the plan target of 3,000 jobs.

24.6 As such, significant progress has already been made towards growth targets within Westminster's portion of the Opportunity Area, and the implementation of existing permissions, alongside any future development opportunities, such as at Crossrail 2 safeguarded sites, or other windfall opportunities, will ensure targets are achieved.

Question 25. Are any modifications necessary for soundness?

25.1 Modifications M/S/08 and M/S/09 as put forward in the Revised Schedule of Modification (CORE_025_V3) represent minor points that would improve the content of the City Plan in response to issues raised through consultation, but are not considered necessary for soundness. However, in addition to these, the modifications to policy proposed in response to question 23 (modification PS/S/08 and PS/S/09) are more substantive, and are considered necessary for soundness to ensure the policy is effective.

25.2 As detailed in the Consultation Statement (CORE_010), other issues raised during Regulation 19 consultation relate to issues beyond the scope of the Plan, or issues that can be addressed by applying policies in conjunction. As such, for the reasons set out in CORE_010, no further modifications are considered necessary for soundness.

Policy 3

Question 26. What is the background and justification for the priorities set out in Policy 3? Are they consistent with national policy?

26.1 Paddington is identified as one of London's Opportunity Areas by the (existing and) New London Plan. These are London's primary spaces of brownfield land which have significant 'capacity to accommodate new housing, commercial development and infrastructure, linked with improvements in public transport connectivity and capacity' (paragraph 2.1.1 of the New London Plan) and are therefore expected to see the most significant change. The New London Plan sets out indicative growth targets for an additional 13,000 jobs and 1,000 homes within this area as detailed in paragraph 3.4 of the City Plan.

26.2 Policy 3 is consistent with guidance on Opportunity Areas set out in Policy SD1 of the New London Plan. As set out in the Statement of Common Ground with the Mayor (SCG_007_V2), no issues of general conformity have been raised regarding the approach to this Opportunity Area, instead the Mayor 'welcomes the clear

commitment to meeting the indicative growth targets set out in the London Plan for each Opportunity Area.’

26.3 The Paddington Opportunity Area is a long-standing designation in local development documents: it was first designated as a Special Policy Area in 1988 and was also included in both the Core Strategy (2011) and the adopted City Plan (CORE_020). Although since its original designation the area has experienced considerable growth, the New London Plan designation reflects how significant development opportunities still remain within the area due to the presence of under-utilised brownfield sites. While the policy sets out the achievement of the indicative growth targets as a priority for the area, further partnership work with relevant stakeholders on the council’s forthcoming Site Allocations DPD will provide more detailed growth figures for identified development sites in the Opportunity Area.

26.4 While the area’s central and accessible location and its development potential make it particularly suitable for new housing and commercial uses, it is important to note that the Opportunity Area sits between existing neighbourhoods that are quite distinct and physically severed from one another. These include areas marked by some of the highest levels of deprivation and lowest levels of health in Westminster, as highlighted by section 5.1 of the Equalities Impact Assessment IIA Addendum (CORE_007). Due to the area’s strategic importance as well as the likely extent and impact of development, it is considered that an up to date policy for the Paddington Opportunity Area is needed to ensure the significant change that is expected in the area continues to happen in a holistic manner.

26.5 In conjunction with other policies in the Plan, Policy 3’s priorities and requirements in Clauses C – F are aimed at ensuring that the transformation of the area contributes to shaping Paddington as a place while reconnecting the area with its surroundings, and that it benefits the communities within and beyond its boundary.

26.6 Consultation on the draft City Plan has found general support for the policy priorities as evidenced in CORE_010 section 3.2.

26.7 The policy priorities are consistent with national policy, particularly as they contribute to promoting healthy and inclusive places (NPPF paragraphs 91, 92), promoting sustainable transport (102, 103), making effective use of land (117) and achieving well-designed places (127).

Question 27. Does Policy 3 adequately and effectively deal with the full range of relevant issues?

27.1 Yes. It is a spatial policy which provides strategic guidance relevant specifically to the priorities in this area to steer development opportunities there. It sets out a number of key overarching principles that contribute to achieving the vision and objectives of the Plan (City Plan pages 22-25) in this area.

27.2 As no single policy can deal with the full range of issues any development proposal in the area is likely to raise, the policy is complemented by more detailed policies throughout the Plan which outline specific mechanisms to deliver the principles set out in the spatial policies.

27.3 As such, when read in conjunction with other relevant policies within the Plan, which provide greater detail for the determination of individual planning applications,

the policy will be effective in dealing with relevant issues.

Question 28. How will these priorities be delivered?

28.1 As the identified sites within this Opportunity Area fall outside of council land ownership, delivery of the policy priorities is expected to be led by either private initiative or public-private partnerships and the role of the council is therefore to steer and co-ordinate proposals to achieve the policy priorities for this area.

28.2 This will be done through the planning decision making process, when proposals will be assessed against the development plan as a whole, along with any other material considerations. In this respect, as set out in response to question 27 above, it is important to emphasise that Policy 3 will not be used in isolation. Instead, it will be used in conjunction with all other relevant policies in the Plan. For example:

- policies 39 – 42 provide criteria that will help determine if proposals are of an appropriate design, height, and fully respect heritage considerations
- policies 25 – 27 provide criteria to determine if proposals improve accessibility, legibility and connectivity, and contribute to promoting sustainable transport
- policy 19 provides details on the provision of education facilities and sets out the requirements for major developments to contribute to improved economic prospects for local residents.

28.3 The policy priorities have been developed taking on board feedback from consultees as the plan was developed to ensure support from key stakeholders, including major landowners in the area, which is essential to ensure the priorities are deliverable. Engagement with partners as part of the emerging Paddington Place Plan has also informed the policy priorities and continue to provide a platform for continuing positive partnership work on delivery, including through individual projects and strategic investment.

28.4 The forthcoming Site Allocations DPD will provide further opportunities to ensure major development in the area comes forward in a manner that delivers the priorities set out in Policy 3. However, the City Plan has been drafted in a way that ensures it can be implemented as a standalone document, and that schemes can be determined using the policies within it in advance of the production of the Site Allocations DPD.

28.5 In addition, to ensure development is supported by the necessary infrastructure including public realm improvements and community facilities particularly as set out in clauses B and F of the policy, the council's Infrastructure Delivery Plan (IDP) (EV_GEN_007) will be used in conjunction with the City Plan, the forthcoming Site Allocations DPD and other strategic infrastructure delivery documents to inform infrastructure delivery decisions such as the allocation of CIL funds. Infrastructure delivery is addressed in more detail as part of the response to Questions 1-5 in Matter 9 (WCC_MIQ_Matter9).

Question 29. Is the boundary of the Paddington Opportunity Area justified? Are main modifications necessary to make it sound?

29.1 As mentioned in response to question 26, the Paddington Opportunity Area is a long-standing policy designation in Westminster's development plan that has been

maintained to recognise the remaining growing potential within its identified boundary.

29.2 While the London Plan establishes indicative areas for Opportunity Area designations, it is for the council to define the boundary line through the City Plan and ensure this designation remains up to date and effective in delivering the policy objectives. For this reason, the draft City Plan included some minor proposed changes as detailed under section 3.3 of the Schedule of Changes to the Policies Map (CORE_005). As demonstrated by the Statement of Common Ground with the Mayor of London (SCG_007_V2), the Mayor does not have a general conformity issue in relation to the boundary.

29.3 While one consultee raised objections on the extent of the Opportunity Area and proposed its extension to include the Royal Oak site, we do not consider it appropriate to extend the boundary for the reasons set out in Section 3.2 of the Consultation Statement (CORE_010). While it is recognised that other development opportunities exist beyond the Opportunity Area in the broader area, it is not considered appropriate to expand the boundary further in order to maintain the focus of the policy. It is important to note that whether a site sits within or outside of the Opportunity Area boundary does not pre-determine its ability to accommodate growth. All proposals will be determined on their merits as far as they can demonstrate they meet all the relevant policy requirements in the City Plan. Schemes falling within the Opportunity Area boundary will also need to demonstrate how they contribute to the priorities set out in Policy 3.

29.4 The boundary is therefore robust and no changes are necessary.

Question 30. Should Policy 3 specify the amount of housing and employment expected in the Paddington Opportunity Area over the plan period?

30.1 Yes and modifications are proposed to rectify this.

30.2 It is noted that the submitted draft policy wording is technically inaccurate in relation to the stated timescales as the indicative growth targets for the Opportunity Area do not refer to the City Plan period (2019-40), as the current wording would suggest. The London Plan sets out indicative capacities for jobs and homes for each Opportunity Area. London Plan targets for new homes refer to the period 2019-41 while targets for additional jobs refer to the 2016-41 period. The intention of the policy is to refer to the indicative capacities against the timeframes defined by the London Plan. To ensure clarity, the following amendments under PS/S/10 and PS/S/11 are therefore suggested:

- To the policy text:

Development in the Paddington Opportunity Area ~~over the Plan period~~ will deliver the following priorities:

*A. The achievement of **the** growth targets for the area **of 1,000 new homes and 13,000 additional jobs** identified in the London Plan.
(cont.)*

- To paragraph 3.4 of the reasoned justification:

*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 **between 2016 and 2041** and 1,000 new homes over the period ~~2016~~**2019**-2041 for the Paddington Opportunity Area. (cont.)*

Question 31. Is Policy 3 consistent with other policies in the City Plan, particularly Policy 42?

31.1 Yes. Policy 3 is considered to be in line with the other policies in the City Plan. To ensure development contributes to the policy priorities, Policy 3 will be applied in conjunction with other relevant policies in the Plan. Therefore, to ensure effectiveness, Policy 3 was prepared to be consistent with other policies in the Plan. In particular, a number of policies in the Plan provide further details on how schemes are expected to meet the priorities in Policy 3. Some of these key policies have been listed in response to question 28.

31.2 Preliminary testing for indicative capacities for new housing and commercial floorspace on the identified development sites within the area was carried out in accordance with draft Policy 42, which sets out specific locational principles for development in the Opportunity Area. This ensures the policy priorities for Policy 3 are aligned with the requirements of Policy 42 and the growth targets for the area (as set by the New London Plan) are appropriate. The resulting indicative development capacity, in addition to pipeline data as detailed in response to question 32 below show that the policy will enable the indicative growth targets for the area (as set by the New London Plan) to be met.

Question 32. What progress has been made towards the growth targets for the Paddington Opportunity Area and how will future growth be delivered?

32.1 Paragraph 3.1 of the City Plan recognises that considerable growth has already happened in Paddington. As set out on page 40 of the New London Plan, indicative jobs and homes capacities for the area cover two separate time periods. For homes, figures relate to the period 2019 – 2041. For jobs, figures relate to the period 2016 – 2041.

32.2 Council monitoring data indicates that since April 2019 151 new homes have been built in the Opportunity Area, 107 are under construction and a further two have been granted planning permission. Assuming all permissions are implemented, these will deliver a total of 260 new homes. Further developable sites with capacity for an additional 475 homes have been identified in the council's housing trajectory. Sites at St. Mary's Hospital and Travis Perkins will likely form part of the council's forthcoming Site Allocations DPD, which will consider the number and type of homes and other requirements of development proposals at these sites.

32.3 Calculating how many jobs new developments have provided is less straightforward. For such purposes, the council have monitored commercial development activity in the area since April 2016. The amount of additional floorspace

by use class is then converted to likely jobs, based on average job density ranges set out in HCA Employment Densities Guide³.

32.4 In the Paddington Opportunity Area, since April 2016, data indicates the following net changes in commercial floorspace:

Category of commercial space	Development status	Change in floorspace (sqm)
B1	<i>Completed</i>	1,737
	<i>Under Construction</i>	86,109
	<i>Not Started</i>	34,273
	Total	122,119
A1	<i>Completed</i>	1,162
	<i>Under Construction</i>	6,682
	<i>Not Started</i>	1,396
	Total	9,240
Other town centre uses	<i>Completed</i>	14,409
	<i>Under Construction</i>	17,442
	<i>Not Started</i>	32,309
	Total	64,160

32.5 Assuming all permissions are built out, using a gross to net conversion ratio of 85% and applying average job density ratios, indicates schemes implemented or permitted since April 2016 will deliver 9,186 new office based jobs and 449 new retail based jobs, alongside 1,635 new jobs in other town centre uses. Together these schemes are therefore considered capable of achieving an estimated total of 11,270 new jobs.

32.6 In addition, as set out in paragraph 3.8 of the Housing Supply Paper (EV_H_013), as most development in Westminster is mixed-use a proportion of the development sites identified in our housing trajectory will yield a mix of uses and we have accounted for what we consider will be a reasonable mix in their housing capacity. Being mixed-use developments, they will therefore provide further jobs growth. While average job density ratios were used for the purpose of these calculations, it is important to acknowledge that changing working practices are likely to impact on the amount of floorspace required by businesses and organisations, particularly those that have been traditionally office based, suggesting a potential greater role of 'space-less' jobs in achieving the area's growth targets. Furthermore, these calculations do not consider temporary construction jobs associated with development in the area, as there is no methodology for calculating this.

32.7 As such, significant progress has already been made towards growth targets, and the implementation of existing permissions, alongside any future windfall development opportunities and intensification at any sites identified in the forthcoming Site Allocations DPD that Policy 3 supports will ensure targets are achieved.

³ <https://www.gov.uk/government/publications/employment-densities-guide>

Question 33. Are the proposed modifications necessary for soundness? Are any other modifications necessary?

33.1 In response to question 30 above, two modifications (PS/S/10 and PS/S/11) are proposed to clarify that the growth targets for additional jobs and homes in the Opportunity Area refer to the periods 2016-41 and 2019-41 respectively (as set out in the London Plan) to ensure the policy is justified and effective. Other modifications M/S/10 and M/S/11 set out in the Revised Schedule of Modifications (CORE_025_V3) are also considered necessary to make the policy justified and effective.

33.2 As detailed in the Consultation Statement (CORE_010), other issues raised during Regulation 19 consultation relate to issues that can be addressed by applying policies in conjunction. As such, for the reasons set out in document CORE_010, no further modifications are considered necessary for soundness.

Policy 4

Question 34. What is the background and justification for the priorities set out in Policy 4? Are they consistent with national policy?

34.1 Victoria is identified as one of London's Opportunity Areas by the London Plan. These are London's primary spaces of brownfield land which have significant 'capacity to accommodate new housing, commercial development and infrastructure, linked with improvements in public transport connectivity and capacity' (paragraph 2.1.1 of the New London Plan) and are therefore expected to see the most significant change. The New London Plan sets out indicative growth targets for an additional 4,000 jobs between 2016 and 2041 and 1,000 homes between 2019 and 2041 within this area.

34.2 Policy 4 is consistent with guidance on Opportunity Areas set out in Policy SD1 of the New London Plan. As set out in the Statement of Common Ground with the Mayor (SCG_007_V2), no issues of general conformity have been raised regarding the approach to this Opportunity Area, instead the Mayor 'welcomes the clear commitment to meeting the indicative growth targets set out in the London Plan for each Opportunity Area.'

34.3 The Victoria Opportunity Area is a long-standing designation included in previous iterations of Westminster's local development documents including the Core Strategy (2011) and the current City Plan, 2016 (CORE_020).

34.4 Although the area has already experienced considerable growth since its original designation, the continued New London Plan designation reflects how significant opportunities still remain within the area particularly around potential improvements to the Victoria Transport Interchange and the presence of under-utilised brownfield sites in the station environs. Due to the area's strategic importance as well as the likely extent and impact of development, it is considered that an up to date policy for the Victoria Opportunity Area is still needed to ensure the significant change that is expected in the area continues to happen in a holistic manner. While the policy sets out the achievement of the indicative growth targets as a priority for the area, further partnership work with relevant stakeholders on the forthcoming Site Allocations DPD will provide more detailed figures for identified and future development sites in the Opportunity Area.

34.5 As set out in paragraph 4.1 of the City Plan, in addition to its busy transport interchange Victoria is also home to several different functions that generate competing demands, particularly those associated with commuters, businesses, government functions, residents and visitors. Paragraph 4.8 of the reasoned justification recognises the area is currently congested, with significant numbers of pedestrians due to the area's transport function, existing conflict between modes and the dominance of vehicular traffic, which all negatively affect urban quality. The policy intends to enable good growth to ensure Victoria can develop its potential as a successful place. In order to do so, it seeks to ensure development is accompanied by improved transport accessibility, respect and enhancement to local environmental quality, including the public realm, and provision of further social and community facilities. This is also key to ensuring that development within the Opportunity Area helps integrate the Victoria Opportunity Area with its surrounding neighbourhoods and support wider regeneration to benefit both emerging and existing communities.

34.6 Feedback received from consultees on the draft Plan policies show general support for the policy priorities as evidenced in section 3.2 of the Consultation Statement (CORE_010).

34.7 The policy priorities are consistent with national policy , particularly as they contribute to promoting healthy and inclusive places (NPPF paragraphs 91, 92), promoting sustainable transport (102-104), making effective use of land (117), achieving well-designed places (127) and conserving and enhancing the historic environment (184).

Question 35. Does Policy 4 adequately and effectively deal with the full range of relevant issues?

35.1 Yes. It is a spatial policy which provides strategic guidance relevant specifically to the priorities in this area to steer development opportunities there. It sets out a number of key overarching principles that contribute to achieving the vision and objectives of the Plan (City Plan pages 22-25) in this area. As no single policy can deal with the full range of issues any development proposal in the area is likely to raise, the policy is complemented by more detailed policies which outline specific mechanisms to deliver the principles set out in the spatial policies.

35.2 As such, to be applied effectively, it is important that policy is read in conjunction with other relevant policies within the Plan, which provide greater detail for the determination of individual planning applications.

Question 36. How will these priorities be delivered?

36.1 As the identified sites within this Opportunity Area fall outside of council land ownership, delivery of the policy priorities is expected to be led by either private initiative or public-private partnerships and the role of the council is therefore to steer and co-ordinate proposals to achieve the policy priorities for this area. As set out in the answer to question 35, Policy 4 will not be applied in isolation. The council will achieve the priorities for the area by applying this policy in combination with other relevant policies in the Plan. For example:

- policies 39 – 42 provide criteria that will help determine if proposals are of an appropriate design, height, and fully respect heritage considerations

- policies 25 – 27 provide criteria to determine if proposals improve accessibility, legibility and connectivity, and contribute to promoting sustainable transport
- policy 18 provides details on the provision of community infrastructure and facilities.

36.2 The policy priorities have been developed to ensure support from key stakeholders, including major landowners in the area and were informed by feedback from consultees as the Plan was developed. Ongoing engagement with partners as part of the emerging Future Victoria Place Plan provides a platform for continuing positive partnership work on delivery.

36.3 The forthcoming Site Allocations DPD may provide further opportunities to ensure major development in the area comes forward in a manner that delivers the priorities set out in Policy 4. However, the City Plan has been drafted in a way that ensures it can be implemented as a standalone document, and that schemes can be determined using the policies within it in advance of the production of the Site Allocations DPD.

36.4 In addition, to ensure development is supported by the necessary infrastructure including social and community facilities and public realm, particularly as set out in clauses B and D of the policy, the council's IDP (EV_GEN_007) will be used in conjunction with the City Plan, the forthcoming Site Allocations DPD and other strategic infrastructure delivery documents to inform infrastructure delivery decisions such as the allocation of CIL funds. Infrastructure delivery is addressed in more detail as part of the response to Questions 1-5 in Matter 9 (WCC_MIQ_Matter9).

Question 37. Is the boundary of the Victoria Opportunity Area justified? Are main modifications necessary to make it sound?

37.1 As mentioned in response to question 34, the Victoria Opportunity Area is a long-standing policy designation in Westminster's development plan that has been maintained to recognise the remaining growing potential within its identified boundary, consistent with the London Plan's ongoing designation for this area.

37.2 While the London Plan establishes indicative areas for Opportunity Area designations, it is for the council to define the boundary line through the City Plan and ensure this designation remains up to date and effective in delivering the policy objectives. For this reason, the draft City Plan at Regulation 19 included some proposed boundary changes that were intended to recognise further development opportunities which could contribute to the policy objectives and sought to ensure these sites were developed coherently along with other sites in the area. However, concerns raised through the consultation (see pp 16-17 in CORE_010 and 9-10 in CORE_005) led to a reconsideration of the proposed boundary changes, which recognised that there was no compelling case for such changes in light of the reasons for the opposition and therefore it was proposed to revert to the boundary set by the adopted Westminster City Plan. As demonstrated by the SCG with the Mayor of London (SCG_007_V2), the Mayor has not raised any general conformity issues in relation to this boundary.

37.3 While it is recognised that other development opportunities exist in the broader area, it is not considered appropriate to expand the boundary further to maintain the focus of the policy. It is important to note that whether a site sits within or outside of

the Opportunity Area boundary does not preclude its ability to accommodate growth. All proposals will be determined on their merits as far as they meet all the relevant policy requirements in the City Plan. Schemes falling within the Opportunity Area boundary will also need to demonstrate how they contribute to the priorities set out in Policy 4.

37.4 The boundary is therefore robust and no further changes are necessary to make it sound.

Question 38. Should Policy 4 specify the amount of housing and employment expected in the Victoria Opportunity Area over the plan period?

38.1 Yes and modifications are proposed to rectify this.

38.2 It is noted that the submitted draft policy wording is technically inaccurate in relation to the stated timescales as the indicative growth targets for the Opportunity Area do not refer to the City Plan period (2019-40), as the current wording would suggest. The London Plan sets out indicative capacities for jobs and homes for each Opportunity Area. London Plan targets for new homes refer to the period 2019-41 while targets for additional jobs refer to the 2016-41 period. The intention of the policy is to refer to the indicative capacities against the timeframes defined by the London Plan To ensure clarity, the following amendments under PS/S/12 and PS/S/03 are suggested:

- To the policy text:

Development in the Victoria Opportunity Area ~~over the Plan period~~ will deliver the following priorities:

*A. The achievement of **the** growth targets for the area **of 1,000 new homes and 4,000 additional jobs** identified in the London Plan.*

(cont.)

- To the reasoned justification paragraph 4.3:

*The London Plan sets out indicative growth targets of ~~at least~~ 4,000 additional jobs **between 2016 and 2041** and 1,000 new homes over the period ~~2016~~**2019**-2041 for the Victoria Opportunity Area and identifies Victoria Station and its environs, including the airspace above its tracks and approaches, to have significant potential for mixed-use intensification. (cont.)*

Question 39. Is Policy 4 consistent with other policies in the City Plan, particularly Policy 42?

39.1 Yes. Policy 4 provides strategic direction for development in the Victoria Opportunity Area, however it does not contain the detailed development management policy guidance. Therefore, to ensure development contributes to the policy priorities, it will be used in conjunction with other relevant policies in the Plan. It is essential therefore, that Policy 4 is consistent with other policies in the plan and the policy has been prepared as such. Some of these key policies have been listed in response to question 36.

39.2 Preliminary testing for indicative capacities for new housing and commercial floorspace on the identified development sites within the area was carried out in accordance with draft Policy 42, which sets out specific locational principles for development in the Opportunity Area to ensure the policy priorities for Policy 4 are aligned with the requirements of Policy 42 and the growth targets. The resulting indicative development capacity, in addition to pipeline data as detailed in response to question 40 below show that the policy will enable the indicative growth targets for the area (as set by the New London Plan) can be met. See also the answer to question 40 below.

Question 40. What progress has been made towards the growth targets for the Victoria Opportunity Area and how will future growth be delivered?

40.1 As set out on page 40 of the New London Plan, indicative jobs and homes capacities for the area cover two separate time periods. For homes, figures relate to the period 2019 – 2041. For jobs, figures relate to the period 2016 – 2041.

40.2 Council monitoring data indicates that since April 2019 13 new homes have been built in the Opportunity Area, 431 are under construction (including 268 as part of the New Scotland Yard scheme) and one has been granted planning permission. Assuming all permissions are implemented, these will deliver a total of 445 new homes. Further developable sites with capacity for an additional 405 homes have been identified in the council’s housing trajectory. Sites within the Victoria Station environs will likely form part of the council’s forthcoming Site Allocations DPD, which will consider the number and type of homes and other requirements of development proposals at these sites.

40.3 Calculating how many jobs new developments have provided is less straightforward than monitoring delivery against targets for new homes. For such purposes, the council have monitored commercial development activity in the area since April 2016. The amount of additional floorspace by use class is then converted to likely jobs, based on average job density ranges set out in HCA Employment Densities Guide⁴.

40.4 In the Victoria Opportunity Area, since April 2016, data indicates the following net changes in commercial floorspace:

Category of commercial space	Development status	Change in floorspace (sqm)
B1	<i>Completed</i>	19,321
	<i>Under Construction</i>	-16,726
	<i>Not Started</i>	13,972
	Total	16,567
A1	<i>Completed</i>	5,127
	<i>Under Construction</i>	-894
	<i>Not Started</i>	142
	Total	4,375

⁴ <https://www.gov.uk/government/publications/employment-densities-guide>

<i>Other town centre uses</i>	<i>Completed</i>	<i>7,643</i>
	<i>Under Construction</i>	<i>27,299</i>
	<i>Not Started</i>	<i>1,153</i>
	<i>Total</i>	<i>36,095</i>

40.5 While the permissions for Portland House and New Scotland Yard were originally included in our pipeline, the loss of jobs associated with these schemes has been discounted from the above calculations for the following reasons. The owners of Portland House have confirmed they will no longer implement the extant permission for the conversion from office to residential use, which has now been superseded by a commercial refurbishment scheme. On the other hand, while the commenced scheme at New Scotland Yard involves the loss of office floorspace last occupied by the London MET Police, as the space was demonstrated to be surplus to their requirements, it is not counted as representing a loss of jobs.

40.6 Assuming all permissions are built out, using a gross to net conversion ratio of 85% and applying average job density ratios indicates schemes implemented or permitted since April 2016 will deliver 1,246 new office based jobs and 213 new retail based jobs, alongside 920 new jobs in other town centre uses. Together these schemes are therefore considered capable of achieving an estimated total of 2,378 new jobs.

40.7 In addition, as set out in paragraph 3.8 of the Housing Supply Paper (EV_H_013), as most development in Westminster is mixed-use a proportion of the development sites identified in our housing trajectory will yield a mix of uses and we have accounted for what we consider will be a reasonable mix in their housing capacity. Being mixed-use developments, they will therefore provide further jobs growth. While average job density ratios were used for the purpose of these calculations, it is important to acknowledge that changing working practices are likely to impact on the amount of floorspace required by businesses and organisations, particularly those that have been traditionally office based, suggesting a potential greater role of 'space-less' jobs in achieving the area's growth targets. Furthermore, these calculations do not consider temporary construction jobs associated with development in the area, as there is no methodology for calculating this.

40.8 As such, significant progress has already been made towards growth targets, and the implementation of existing permissions, alongside any future windfall development opportunities and intensification at any sites identified in the forthcoming Site Allocations DPD that Policy 4 supports will ensure targets are achieved.

Question 41. Are the proposed modifications necessary for soundness? Are any other modifications necessary?

41.1 Minor modifications M/S/12, M/S/14, M/S/15 and PS/S/13 as proposed in the Revised Schedule of Modifications (CORE 025_V3) will improve the content of the City Plan in response to issues raised through consultation, but are not considered necessary for soundness. However, the proposed modifications M/S/13 and M/S/16 are considered necessary for soundness to ensure the policy is justified and effective.

41.2 In addition, in response to question 38 above, two further modifications (PS/S/12 and PS/S/03) are proposed to clarify that the growth targets for additional jobs and homes in the Opportunity Area refer to the periods 2016-41 and 2019-41

respectively (as set out in the New London Plan). This will ensure the policy is justified and effective.

41.3 As detailed in the Consultation Statement (CORE_010), other issues raised during Regulation 19 consultation relate to issues that can be addressed by applying policies in conjunction. As such, for the reasons set out in document CORE_010, in response to them, no further modifications are considered necessary for soundness purposes.

Policy 5

Question 42. What is the background and justification for the priorities set out in Policy 5?

42.1 The North West Economic Development Area (NWEDA) was designated through Westminster's Core Strategy (2011) as an area in need of economic renewal, with development opportunities on a smaller scale than elsewhere in the city. The policy is an evolution of the North West Westminster Special Policy Area designated in the Unitary Development Plan⁵. It is a strategic designation denoting this character, requiring a strategic policy approach. This approach was continued through the consolidation of the council's City Plan and is covered by Policy S12 of the adopted City Plan (CORE_020).

42.2 The new draft City Plan (CORE_001) alters the boundary of the NWEDA to exclude the overlapping designations of the Church Street/ Edgware Road Housing Renewal Area and the Paddington Opportunity Area, reflecting the differing policy priorities in each.

42.3 Policy 5's priorities are set out to reflect the needs of the NWEDA over the Plan period. Clause A seeks to improve job opportunities through the protection of existing commercial floorspace and the encouragement to deliver new floorspace, particularly that which is suitable for SME businesses or that helps to diversify the local economy. This priority reflects the smaller scale nature of commercial development in the area, in contrast to the CAZ, with the potential to provide smaller-scale, locally distinct and multi-use commercial spaces. Paragraph 5.2 of the reasoned justification gives examples of where and how this might be achieved.

42.4 Clause B seeks to improve housing quality and the diversity of tenure in the area through new residential and mixed-use developments. This clause recognises that the majority of the area is residential in nature and while commercial-led regeneration of the area is a priority, there will be opportunities for residential-led developments to come forward. It is important that such developments are able to meet local housing needs by including a mix of tenures.

42.5 Clause C reflects the ongoing need to address issues of severance in the area caused by canals, railway lines and the Westway, and improve the pedestrian environment. Opportunities to improve walking and cycling in the area should be delivered alongside greening measures to address biodiversity and air quality goals for the area and city as a whole.

⁵ See policies NWW1 – 3:

http://transact.westminster.gov.uk/docstores/publications_store/planning/Policy/udp_chapter_5_nw_westminster.pdf

42.6 Clause D works with clause A to improve the local economy by encouraging enhancements to the Harrow Road District Centre to both encourage a greater range of activities, through improving the range of town centre uses and the evening economy, and to improve the physical environment, through active retail frontages and investment in public realm.

42.7 Clause E encourages the improvement of, and the provision of new, social and community infrastructure that meets the needs of the local community, including education, health and leisure facilities. The Harrow Road Place Plan and the IDP (EV_GEN_007) identify the need for these facilities and will inform the council's spending of CIL and S106 planning obligations in the area. The forthcoming Site Allocations DPD will identify site-specific infrastructure requirements for larger development opportunities in the area (see Matter 9 statement (WCC_MIQ_Matter9) and LDS (CORE_023)).

Question 43. Are they consistent with national policy?

43.1 Yes, the priorities identified in Policy 5 are consistent with those identified in the NPPF, particularly Chapters 5 (Delivering a sufficient supply of homes); 6 (Building a strong, competitive economy); 7 (Ensuring the vitality of town centres); 8 (Promoting healthy and safer communities); and 9 (Promoting sustainable transport).

Question 44. Does Policy 5 adequately and effectively deal with the full range of relevant issues?

44.1 Yes, as a strategic spatial policy, Policy 5 sets out the overarching priorities for the NWEDA, which will be complemented by the other more detailed policies in the City Plan and the London Plan when assessing individual development proposals.

Question 45. How will these priorities be delivered?

45.1 The council will work with landowners, developers and other stakeholders to deliver the priorities through development permissions.

45.2 Appendix 1 (as per proposed modification PS/A1/01 in the Revised Schedule of Modifications (CORE_025_V3)) of the City Plan identifies several development opportunities in NWEDA, notably at Royal Oak, Harrow Road/ Elmfield Way and Westbourne Park Bus Garage. The forthcoming Site Allocations DPD will consider site-specific requirements of these larger-scale opportunities in line with Policy 5's priorities and set policy accordingly. The council will grant planning permission for development schemes that contribute to the achievement of Policy 5's priorities and are in accordance with the development plan as whole, along with any other material considerations, such as SPDs.

45.3 The council has published a 'Place Plan' for the Harrow Road District Centre (EV_GEN_10) which incorporates the priorities identified in Policy 5. The Place Plan incorporates a vision and objectives for the area and identifies individual projects and

opportunities to realise them. The Place Plan will be complemented with strategic investment including through CIL and S106 planning obligations to realise its aims.

Question 46. What is the basis for the designation and boundary of the North West Economic Development Area and is it appropriately defined and justified?

46.1 As per the response to question 42 above, the NWEDA boundary was originally designated via the council's 2011 Core Strategy. The draft City Plan (CORE_001) alters this boundary to remove the overlapping designations of Paddington Opportunity Area and Church Street/ Edgware Road Housing Renewal Area. These areas' priorities are covered by policies 3 and 6 respectively. The boundary has therefore been revised to remove duplication or competing priorities and clearly sets out the strategic priorities for the NWEDA as a separate and distinct area. The boundary now covers the Westbourne, Harrow Road and Queens Park wards as well as parts of Little Venice ward. The boundary encompasses the focal points of Harrow Road district centre and identified larger development opportunities at Royal Oak, Harrow Road/ Elmfield Way and Westbourne Park Bus Garage. Nevertheless, the priorities outlined in the policy also apply to smaller scale development opportunities across the remainder of the area, helping provide a positive strategic framework for policy development in neighbourhood plans.

Question 47. Is the policy sufficiently clear in terms of the scale and nature of development envisaged?

47.1 The NWEDA is designated as an area in need of economic regeneration and Policy 5 clearly establishes general priorities across the area, setting the tone for the nature of development envisaged. As such it sets a strategic framework of priorities against which individual development proposals will be assessed. It is not considered necessary to set a specific quantum of development to be achieved across the NWEDA as the majority of new development is expected to be smaller in scale as the boundary now excludes the Paddington Opportunity Area and Church Street/ Edgware Road Housing Renewal Area, which will deliver major housing and commercial growth. The forthcoming Site Allocations DPD (see LDS, CORE_023) will clarify the amount of development expected from the larger opportunities within the NWEDA identified in Appendix 1 (as per proposed modification PS/A1/01 in the Revised Schedule of Modifications (CORE_025_V3)) of the City Plan and any further sites that arise from ongoing discussions with stakeholders.

Question 48. What progress has been made and how will future growth be delivered?

48.1 Council monitoring data indicates that since April 2019 two new homes have been built in the NWEDA, 209 are under construction, and 88 have been granted planning permission. Further developable sites with capacity for an additional 542 homes have been identified in the council's housing trajectory. Sites at Royal Oak, Harrow Road/ Elmfield Way and Westbourne Park Bus Garage will likely form part of the council's forthcoming Site Allocations DPD (see LDS, CORE_023), which will consider the number and type of homes and other requirements of development

proposals at these sites. Delivery of these homes will contribute to the priorities of Policy 5, particularly clause B.

48.2 Calculating how many jobs new developments have provided is less straightforward. For such purposes, the council have monitored commercial development activity in the area since April 2016. The amount of additional floorspace by use class is then converted to likely jobs, based on average job density ranges set out in HCA Employment Densities Guide⁶.

Category of commercial space	Development status	Change in floorspace (sqm)
B1	Completed	-6,209
	Under Construction	981
	Not Started	-3070
	Total	-8,298
A1	Completed	-631
	Under Construction	838
	Not Started	-688
	Total	-481
Other town centre uses	Completed	-247
	Under Construction	5,828
	Not Started	-3,676
	Total	1,905

48.3 Assuming all permissions are built out, a gross to net conversion ratio of 85%, and applying average job density ratios, indicates schemes implemented or permitted since April 2016 will result in a loss of 8,779 office and retail jobs, alongside growth of 1,905 jobs in other town centre uses. This data indicates that the existing policies governing NWEDA are insufficiently protecting against the loss of jobs, particularly in B1 offices. New permissions granted in accordance with Policy 5 (especially Clause A) will seek to arrest this trend, supported by the Place Plan the council has produced to help guide development and future investment opportunities in the Harrow Road area.

Question 49. Are the proposed modifications necessary for soundness? Are any other modifications necessary?

49.1 Modification M/S/18 as set out in the Revised Schedule of Modifications (CORE_025_V3) is considered necessary for soundness, as the redevelopment of the sites in question will need to provide a mix of land uses in order to meet Policy 5's priorities. The additions to text will therefore improve the policy's effectiveness. We propose to modify paragraph 5.5 further to include reference to the site at Royal Oak, as requested by representors. The modification would now read:

Redevelopment in the Woodfield Road area represents an opportunity to improve the pedestrian environment in this part of the NWEDA and to address the issues of severance identified above. The developments ~~of~~ key-sites at

⁶ www.gov.uk/government/publications/employment-densities-guide

***Royal Oak**, Harrow Road/Elmfield Way and at Westbourne Park Bus Garage among others over the plan period will **deliver a mix of uses including housing**, will help to improve pedestrian permeability and provide better connections both within and beyond the NWEDA ~~as well as delivering the land use priorities of the NWEDA...~~*

49.2 A further modification M/S/17 is proposed for clarification purposes but is not considered necessary for soundness. No further modifications to Policy 5 are necessary.

Policy 6

Church Street/Edgware Road

Question 50. What is the basis for the boundary of the Housing Renewal Area and is it appropriately defined?

50.1 The boundary of the Church Street/ Edgware Road Housing Renewal Area is based on the boundary of the Edgware Road Housing Zone designated by the Greater London Authority in June 2014. This designation originally included initial grant funding to facilitate the delivery of new homes in the area. The area was first identified by the council's Housing Renewal Strategy 2010⁷. The boundary has been taken forward through the 2017 Church Street Masterplan (EV_H_008). Whilst some sites have come forward and are undergoing redevelopment, there are many other identified development opportunities in the area that will deliver new homes over the next 20 years. The Housing Renewal Area boundary is therefore appropriately defined.

Question 51. What is the basis for the priorities set out in the policy and are they justified?

51.1 The priorities of Policy 6 are based on those identified in the 2017 Church Street Masterplan (EV_H_008). The council's Church Street Development Team have carried out extensive consultation on the Masterplan with local residents, businesses, and other key stakeholders to ensure the proposed redevelopment of the area actively responds to their needs, which has fed into the priorities of the policy.

51.2 Justification for the priorities set out in Policy 6 include: the overall need for housing and affordable housing in Westminster, the reciprocal need for jobs, a place based around the community that lives there including the need for local infrastructure, the need for more usable green space, ease of movement and connections to and from the wider area, enhancing the existing street market for the future, and optimising the potential of the sites in line with national, regional and local planning policy. These issues are addressed in detail in the Church Street Masterplan (EV_H_008).

⁷http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf

Question 52. Do they cover all necessary issues?

52.1 Yes. Policy 6 sets out the key priorities for the area as set out in the Church Street Masterplan (EV_H_008). The policy will be used to determine development proposals in the area alongside others in the City Plan and London Plan. As such, to be applied effectively, it is important that policy is read in conjunction with other relevant policies within the Plan, which provide greater detail for the determination of individual planning applications.

Question 53. How will these priorities be delivered?

53.1 A significant number of large development sites have been identified within the Church Street/ Edgware Road Housing Renewal Area that will deliver these opportunities. These sites were identified through the Church Street Masterplan (EV_H_008) and are set out in the council's housing trajectory in Appendix 1 of the City Plan (as modified by PS/A1/01 in the Revised Schedule of Modifications (CORE_025_V3)). Alongside smaller sites identified in the council's housing trajectory, there is capacity for at least 2,000 additional homes in the area. Most of these remaining large sites are in council freehold ownership and there is therefore some certainty about the levels of growth envisaged being delivered.

53.2 Sensitive regeneration of sites within the Housing Renewal Area, in accordance with Policy 6 of the City Plan (among others) and the Church Street Masterplan, together with strategic infrastructure investment by the council, will deliver these priorities.

Question 54. In particular, how and where will the number of new homes and jobs envisaged be delivered?

54.1 As per the answer to question 53 above, significant redevelopment opportunities exist within the Housing Renewal Area to deliver the numbers of homes and jobs envisaged. Sites with capacity for 1,200 homes are already under construction, at the West End Gate site to the west of Edgware Road, but also at Paddington Green and Luton Street/ Capland Road. Many of the larger sites present opportunities to bring forward some commercial floorspace within residential-led mixed-use development to deliver new jobs, particularly the sites fronting Church Street.

Question 55. How will the proposals affect the local community and the existing housing stock?

55.1 The council believes that providing good homes can act as the bedrock of a successful community. In this area of Westminster, the overarching aim in delivering regeneration is to provide: long term physical, economic and social sustainability; and create a high quality, sustainable mixed-use urban neighbourhood that is attractive to residents and visitors and integrates with the surrounding areas.

55.2 The council is aware that redevelopment is not merely about upgrading housing stock, but also about improving the overall quality of people's lives now and for future

generations. This is particularly relevant to the community in the Church Street area. The central aspiration is for the Church Street area to facilitate estate renewal and economic growth, while making fundamental and lasting difference to the lives of its residents, both current and future.

55.3 A decant strategy continues to be developed which relocates residents to either upgraded existing housing stock to improve the living environment or replacing existing housing stock with new homes.

55.4 Extensive consultation has been undertaken with key stakeholders and the local residential and business community including market traders. At each stage of design, the feedback received from consultation exercises has been responded to in the next iteration of the design.

Question 56. Are any modifications necessary for soundness?

56.1 Modification PS/S/04 has been proposed to alter the reasoned justification to Policy 6 in order to clarify the role of Appendix 1 of the City Plan and the sites identified therein. This modification will ensure the text is consistent with other proposed modifications and thereby ensure Policy 6 is justified and effective. No further modifications are necessary for soundness, although we have proposed modification M/S/19 as a minor clarification.

Ebury Bridge Estate

Question 57. What is the basis for the boundary of the Housing Renewal Area and is it appropriately defined?

57.1 The Ebury Bridge Estate was first identified for renewal in the council's 2010 Housing Renewal Strategy⁸. The Housing Renewal Area boundary is concurrent with the full extent of the existing Ebury Bridge Estate to enable its redevelopment to be considered comprehensively.

Question 58. What is the basis for the priorities set out in the policy and are they justified?

58.1 The council's 2010 Housing Renewal Strategy first identified Ebury as a priority area for housing refurbishment, and resolution of social issues. On this basis, the council extensively consulted tenants on their priorities for an estate masterplan. This culminated in a planning application in 2014 (14/01295/COFUL). Although approved, the permission lapsed as the proposal was found to be unviable.

58.2 To secure an alternative way forward, the council worked with residents to identify priorities for a new scheme, culminating in the publication of the Community Commitments Charter⁹. The council then consulted residents on eight potential

⁸http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf

⁹<https://eburybridge.org/news/our-commitments-to-the-ebury-bridge-community/>

scenarios for the Estate in 2018¹⁰. The council's Cabinet approved Scenario 7 in July 2018¹¹.

58.3 The priorities outlined in Policy 6 clauses H-K are aligned with tenants' priorities, gathered through the above extensive consultation. The quantum of development envisaged in Clause H relates to achieving a scheme which is desirable, deliverable and viable. Of the 750 homes over half will be affordable and will see an over 50% uplift in affordable homes on the site.

58.4 Clause I will be delivered through proposals for four new high quality public squares providing greater connectivity to the wider neighbourhood. The scheme will prioritise pedestrians throughout the public realm and the estate will improve building performance and energy efficiency by up to 75%. The estate will use sustainable energy sources in the form of air and ground source heat pumps.

58.5 Clause J will be delivered through the design of the scheme, which is expected to increase the quality of daylight and sunlight by as much as 25% (even in winter) through the orientation of buildings, whilst delivering much needed new homes and green space. The quality of public spaces will be enhanced and will see an increase of play and wellbeing spaces for all age groups.

58.6 Clause K will be delivered through the re-provision and enhancement of retail and community facilities. The scheme will see a range of new community facilities ranging from a new community centre, management hub and creche through to a gym, mixed use sports space and community café. The existing retail provision will be extended and will provide opportunities for a more diverse retail offer.

Question 59. Do they cover all necessary issues?

59.1 Yes, as the council's consultation activities undertaken over eight years were thorough and extensive, it is considered that priorities in Policy 6 clauses H-K cover all necessary issues.

Question 60. How will these priorities be delivered?

60.1 The council is developing a scheme for complete site redevelopment. Design principles have been established through public consultation. The council intends to self-deliver this redevelopment and has the resources to do so without reliance on third party funding, although partners will be sought for specific phases of delivery. The delivery of the project is also not reliant on any infrastructure improvements not within the control of the site. A Compulsory Purchase Order is to be progressed to address the acquisition of the outstanding leasehold tenancies on the site which is otherwise owned by the council freehold.

60.2 The council is seeking to progress delivery on the site through enabling works and has already progressed demolition of vacant properties. The Pre-Phase 1

¹⁰https://www.westminster.gov.uk/sites/default/files/shaping_the_preferred_scenario-ebury_bridge_estate_0.pdf

¹¹<https://committees.westminster.gov.uk/documents/s28725/Decision.pdf>

demolition of Edgson House has been granted planning permission (18/08372/COFUL) and undertaken. Phase 1 and 1A demolition has been granted permission by prior approval (19/06951/APAD). Works are programmed to take place between May 2020 and January 2021.

60.3 A planning application for the comprehensive scheme currently being developed is intended to be submitted in July 2020, which aligns with the priorities of the policy. This scheme will include approximately 750 units (gross), with 50% of the units being affordable, and will provide a cohesive network of open spaces to enhance play opportunities and wellbeing for all ages. By more than doubling the number of homes on the site, the scheme will make efficient use of land and is utilising an innovative design approach to ensure tenure blind, energy efficient and sustainability conscious development. The scheme proposes new retail units to maintain and enhance the Ebury Bridge Local Centre, creating an active gateway, a new community centre and other community uses such as a nursery.

Question 61. In particular, how and where will the number of new homes envisaged be delivered?

61.1 As set out above, the new homes will be delivered across the entire site as it will be comprehensively redeveloped. The current designs envisage five buildings ranging from 16 to 19 storeys positioned adjacent to the railway, with a further four buildings of eight storeys positioned along Ebury Bridge Road respecting the neighbouring conservation area. These proposals have been developed through detailed discussion between council officers and in consultation with local residents and other stakeholders.

Question 62. How will the proposals affect the local community and the existing housing stock?

62.1 The impacts on the local community have been detailed in an Equality Impact Assessment undertaken specifically for the redevelopment of Ebury Bridge Estate in 2018¹² which have been considered as part of the development of the policy. Furthermore, the council's Community Commitments¹³ for the scheme pledges a right of return for all secure tenants and resident leaseholders.

62.2 In terms of the existing housing stock, as set out above, the on-site existing housing stock would be demolished and replaced with more than double the number of units.

Question 63. Are any modifications necessary for soundness?

63.1 No, modifications relating to the Ebury Bridge Housing Renewal Area are not necessary for soundness.

¹²<https://committees.westminster.gov.uk/documents/s28553/Background%20Paper%20-%20Ebury%20Bridge%20EQIA.pdf>

¹³<https://eburybridge.org/news/our-commitments-to-the-ebury-bridge-community/>

Policy 7

Question 64. Are the criteria in Policy 7 sufficiently clear and effective?

64.1 Yes, the criteria set the clear strategic approach to ensuring development in Westminster is neighbourly, subject to proposed modifications.

64.2 As set out in the 'How to use this plan' section of the draft City Plan, the Plan should be read as a whole to understand if a development will be acceptable. It is also noted that there are many interrelated issues across the chapters which should be considered in conjunction with one another. It is therefore important to emphasise that Policy 7 will not be used in isolation, but in conjunction with all other relevant policies in the Plan which provide more detail. In particular:

- Policy 34 sets out requirements to address local environmental impacts, including light pollution, noise and vibration, odour, land contamination and construction impacts;
- Policies 39-42 set out the approach to the creation of high-quality places and include design, heritage and townscape considerations;
- Policy 35 provides criteria on city greening;
- Policy 25-30 provides further details on sustainable transport, parking, highway access and management, freight and servicing;
- Policy 38 details waste management requirements.

64.3 Taken together, this provides an effective strategy for managing the impacts of development in Westminster.

64.4 Following representations received at Regulation 19 consultation (as detailed in the Consultation Statement, CORE_010), modifications M/S/20 through to M/S/27 have been proposed to improve clarity around the application of the policy.

Question 65. Are they justified?

65.1 Yes. Westminster is largely characterised by a dense urban environment with development mostly taking the form of intensification of brownfield sites. The density of the built environment combined with the presence of several different uses coexisting side by side in Westminster, make it particularly important to ensure development does not cause any significant negative impact on quality of life. The issues dealt with in Clauses A and B directly address this.

65.2 Improving health and wellbeing is the overarching objective of the City Plan and the criteria in Policy 7 are therefore designed around this objective and seek to protect amenity and enhance local environmental quality, in conjunction with other relevant policies in the Plan as set out in response to question 64. The focus on the health and wellbeing aspect of sustainable development aligns with the Mayor of London's Good Growth objectives, particularly Policy GG3 (Creating a healthy city) of the New London Plan.

65.3 In order to achieve good growth, it is also important to ensure development is of high quality and it protects and enhances local character, capacity of local infrastructure – including the city's green infrastructure – is sufficient and sustainable transport is improved. Clauses C, D, E and F are justified in that they seek to ensure development positively contributes to this.

65.4 The policy criteria are in line with paragraph 127 of the NPPF which seeks to ensure developments 'promote health and well-being, with a high standard of amenity for existing and future users'.

Question 66. Are the proposed modifications necessary for soundness? Are any other modifications necessary?

66.1 The proposed main modifications M/S/20, M/S/21 and M/S/24 are considered necessary to ensure the policy is effective and have been proposed in light of representations received during consultation particularly in relation to clarity over the application of the policy (as detailed in the Consultation Statement, CORE_010).

66.2 In addition, while not essential to the functioning or soundness of the policy, proposed modifications M/S/22, M/S/23, M/S/25, M/S/26 and M/S/27 are considered beneficial to improve clarity when assessing proposals.

66.3 While a limited number of further modifications were suggested at Regulation 19 consultation, the council does not consider these modifications appropriate for the reasons set out in Section 3.2 of the Consultation Statement (CORE_010).