

Schedule of proposed modifications

Submission version

November 2024

Contents

1. Introduction	3
Background.....	4
Format	5
2. Schedule of proposed modifications	6
Table 1 - Policy 3: Spatial Development Priorities: Paddington Opportunity Area (not in scope)	7
Table 2 - Site Allocations.....	8
Table 3 - Policy 8: St Mary’s Hospital	9
Table 4 - Policy 9: Westbourne Park Bus Garage	14
Table 5 - Policy 10: Land adjacent to Royal Oak.....	18
Table 6 - Policy 11: Grosvenor Sidings.....	23
Table 7 - Policy 13: Affordable Housing.....	26
Table 8 - Policy 37: Waste Management (not in scope)	32
Table 9 - Policy 43: Retrofit First	33
Table 10 - Appendix 3: Schedule of superseded policies.....	52
Table 11 - Glossary.....	53
3. Appendices	55
Appendix 1: Heritage diagram for St Mary’s Hospital	56
Appendix 2: Proposed Graphic Illustration of Part A of the Retrofit Policy	57
Appendix 3: Additional table 1 for Retrofit First policy	58
Appendix 4: Removed table from Retrofit First policy	59
Appendix 5: Additional table 2 for Retrofit First policy	60

1. Introduction

Background

- 1.1 The council considers that the Westminster City Plan 2019-2040- Publication Draft Plan (Regulation 19) March 2024 meets the requirements of Section 20(5) (a-c) of the 2004 Act, associated regulations and complies with the requirements of the National Planning Policy Framework ('the Framework').
- 1.2 Under section 20(7C) of the 2004 Act, the council will be requesting that the appointed Inspector recommend any main modifications to the plan that are necessary to make it sound and legally compliant.
- 1.3 Following consultation under Regulation 19, the council is proposing Modifications to the Publication Draft Plan to address matters raised by the representors. The proposed Modifications are contained in this schedule.
- 1.4 Modifications are being proposed to the six new policies inserted by the City Plan Partial Review:
 - Site Allocations:
 - Policy 8 St Mary's Hospital
 - Policy 9 Westbourne Park Bus Garage
 - Policy 10 Land adjacent to Royal Oak station
 - Policy 11 Grosvenor Sidings
 - Policy 13 Affordable Housing
 - Policy 43 Retrofit First
- 1.5 A small number of other incidental modifications to other policies or sections of the Plan are also being proposed. The reasons for making each of the changes are clearly set out in the schedule.

Format

- 1.6 As this schedule may be updated during the Examination process, modifications proposed at submission stage (November 2024) have 'S' at the start of their reference; post-submission modifications will have 'PS' at the start of their reference. Some post-submission modifications may include pre- and post-submission changes to the same paragraph. Where this is the case, the modification reference given at submission will be kept.
- 1.7 The following format is being used to denote the modifications:
- Underlined red text = new text suggested at submission
 - ~~Strikethrough red text~~ = text proposed for removal at submission
 - Underlined blue text = new text suggested post-submission
 - ~~Strikethrough blue text~~ = text proposed for removal post-submission
 - Underline green text = submission modification altered post-submission
 - ~~Strikethrough green text~~ = submission modification removed post submission

2. Schedule of proposed modifications

Table 1- Policy 3: Spatial Development Priorities: Paddington Opportunity Area (not in scope)

Modification reference	Section of the Plan	Proposed change	Reason for change
S/03/01	Paragraph 3.3	<p>Significant changes in pedestrian flows and routes are expected in connection to different phases of station improvement works and major redevelopment projects in the area around the station (including Crossrail and Paddington Square) will require different solutions to enable the operations of the transport hub and the success of its neighbourhood. This is key to ensure the area is accessible and can be easily navigated, which in turn will enable growth and help encourage sustainable modes of travel, including active mobility. <u>As new developments come forward in the area, given their impact on passenger flows, contributions towards improvements to station access may be sought.</u></p>	<p>For consistency with proposed Policy 8: St Mary’s Hospital and in response to representations made by Network Rail. See draft Statement of Common Ground between WCC and Network Rail (SCG_010).</p>

Table 2- Site Allocations

Modification reference	Section of the Plan	Proposed change	Reason for change
S/0/01	2 nd paragraph on page 54	The site allocations included here merit additional site-specific guidance to help shape and unlock significant levels of growth at these key sites in a manner that responds to site context, <u>conserves and enhances the significance of the historic environment</u> , conforms with our spatial strategy, and secures benefits for local residents....	For clarity and in response to representations made by Historic England. See Statement of Common Ground between WCC and Historic England (SCG_009)
S/0/02	Page 54	Insert new penultimate paragraph to read: <u>Whilst every site has been subject to a Heritage Impact Assessment for site allocation purposes, detailed development proposals should be informed by a site-specific Heritage Impact Assessment at planning application stage. This will help ensure proposals fully take account of, and wherever possible, avoid and minimise harm to, the significance of heritage assets within an adjoining the site.</u>	For clarity and in response to representations made by Historic England. See Statement of Common Ground between WCC and Historic England (SCG_009)

Table 3- Policy 8: St Mary's Hospital

Modification reference	Section of the Plan	Proposed change	Reason for change
S/8/01	Core Principle B	Existing levels of healthcare to be maintained across the site during the construction of any the new hospital building/s <u>within a smaller footprint of the site</u> ;	For clarity and in response to representations made by the Imperial College Healthcare NHS Trust. See Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012)
S/8/02	Core Principle C ii	ii) the approach to the retention of existing buildings on site- which should consider heritage value and embodied carbon <u>and circular economy principles</u> ;	For clarity and in response to representations from Historic England, whereby heritage assets should be retained. Statement of Common Ground between WCC and Historic England (SCG_009).
S/8/03	Core Principle D	<u>The delivery of the new hospital will release surplus land for alternative uses that will help facilitate the wider ambitions of the designated Paddington Opportunity Area whilst also contributing to the deliverability of the new hospital. Where any existing land is evidence to no longer be need for healthcare purposes,</u> a Alternative uses such as commercial, community and/or residential will contribute to the objectives of the Paddington Opportunity Area, be designed to a high standard and should not compromise the operational requirements of any the new hospital;	For clarity and in response to representations made by the Imperial College Healthcare NHS Trust. See Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012)

S/8/04	New Core Principle E	<u>Development across the site will conserve and enhance heritage assets in a manner appropriate to their significance;</u>	For clarity and to align with adopted city Plan Policy 39 and the NPPF. See Statement of Common Ground between WCC and Historic England (SCG_009).
S/8/05	Existing Core Principle E (New Core Principle F)	Where <u>the new</u> hospital floorspace is evidenced to be required through the delivery of a tall building/s, all other uses should grade down in scale from this, so the important public function of the hospital is given prominence and provides legibility benefits. Optimisation of development densities across the site shall be in a manner that will responds to <u>its designation within the Paddington Opportunity Area and the varied townscape character and heritage value on site and the prevailing character and scale of the surrounding area;</u>	For clarity and in response to representations made by the Imperial College Healthcare NHS Trust to ensure that this core principle deals with issues of development density and townscape, rather than conflating with heritage considerations. See Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012).
S/8/06	Existing Core Principle F (New Core Principle G)	Enhancements to <u>the key routes through the site in terms of quality, navigation and useability permeability</u> should <u>form a key part of the masterplan for the area, be made through the site,</u> including <u>improved pedestrian access to the canal and enhanced permeability;</u>	For clarity and in response to representations made by the Imperial College Healthcare NHS Trust. See Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012).
S/8/07	Existing Core Principle J (New Core Principle K)	New development should include the provision of new <u>high quality</u> and enhanced public realm including spaces for leisure and rest. This should promote high amenity values, limit negative microclimatic conditions and optimise separation distances between buildings of greater massing.	For clarity and in response to representations made by the Imperial College Healthcare NHS Trust. See Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012)
S/8/08	Paragraph 8.4	Current projections are that new hospital floorspace of approximately 136,000sqm GIA is needed. This is	For clarity and in response to representations made by the Imperial College Healthcare NHS Trust.

		<p>coupled with a need to consolidate the functional requirements of such floorspace in a manner that optimises clinical adjacencies and enables helipad access, to secure better quality healthcare provision. These requirements will need to be balanced whilst maintaining existing levels of healthcare provision during the construction of <u>the</u> new hospital building/s. <u>The provision of new hospital floorspace will therefore require intensification of the site and consolidation of healthcare uses on a smaller footprint than the existing hospital to ensure there are no interruptions to services during the redevelopment.</u></p>	Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012).
S/8/09	Paragraph 8.5	<p><i>Optimisation of the site, townscape and heritage</i></p> <p>Upon completion of a consolidated new, fit for purpose hospital on site, where it is evidenced that some existing floorspace currently used for healthcare purposes <u>will become is then</u> surplus to operational requirements, <u>and available for other forms of development.</u> <u>Alternative uses that can positively contribute to wider objectives of the Paddington Opportunity Area are supported.</u></p>	<p>For clarity and in response to representations made by the Imperial College Healthcare NHS Trust.</p> <p>See Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012).</p>
S/8/10	Paragraph 8.7	<p>Intensification of the site will however need to respond to existing heritage and townscape value, <u>the wider setting of the Paddington Opportunity Area, and the cluster of established tall buildings</u> within the context of the need to deliver a new hospital on site.</p>	<p>For clarity and in response to representations made by the Imperial College Healthcare NHS Trust and to align with other policy changes.</p> <p>See Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012).</p>
S/8/11	New paragraph 8.8	<p><u>Proposals will conserve and enhance heritage assets in a manner appropriate to their significance. Proposals resulting in any harm to heritage assets or their settings</u></p>	For clarity and in response to representations made by Historic England.

		<u>will be determined in accordance with the NPPF</u> . Figure 16 identifies key heritage assets and designations within the site. In addition, as there is some potential for some significant 19th century archaeology within the site (as set out in the Archaeological Statement), any planning application should be accompanied by an updated archaeological assessment that sets out appropriate mitigation measures where relevant.	See Statement of Common Ground between WCC and Historic England (SCG_009).
S/8/12	Existing paragraph 8.9 (new paragraph 8.10)	Where new hospital floorspace may be <u>is</u> provided through a tall building/s, this should be given primacy in terms of building height across the site, reflecting the important public function of its uses, increasing its legibility, and providing functional benefits in terms of the need for helipad access.	For clarity and in response to representations made by the Imperial College Healthcare NHS Trust. See Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012)
S/8/13	Figure 16	[See Appendix 1] Figure 16: Heritage designations within the St Mary's Hospital site allocation to have the key within the diagram updated to include the following: <ul style="list-style-type: none"> • Site allocation boundary • Bayswater Conservation Area • <u>Designated Heritage Assets</u> <ul style="list-style-type: none"> ○ Grade I <u>Listed Building</u> ○ Grade II <u>Listed Building</u> ○ Grade II* <u>Listed Building</u> • <u>Non-designated Heritage Assets</u> <ul style="list-style-type: none"> ○ Unlisted Buildings of Merit 	For clarity and in response to representations made by the Imperial College Healthcare NHS Trust. See Statement of Common Ground between WCC and The Imperial College Healthcare NHS Trust (SCG_012).

S/8/14	Existing paragraph 8.17 (new paragraph 8.18)	<p><i>Living conditions environment</i></p> <p>The incorporation of some residential development (which could include key worker housing or residential care uses) into proposals can help address high levels of housing need and contribute to a vibrant mix of uses across the site. However, likely levels of noise, and access requirements associated with hospital use, mean that any such provision will need to be carefully considered and, if provided, sited and designed to achieve <u>high quality</u> living condition <u>environment</u> for <u>any</u> future residents.</p>	For clarity and to ensure consistency with other site allocation policies. This modification is included to better capture the range of considerations associated with good residential development.
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Table 4- Policy 9: Westbourne Park Bus Garage

Modification reference	Section of the Plan	Proposed change	Reason for change
S/9/01	Core Principle C.2	The approach to the retention of existing buildings and structures on-site (which should consider heritage value and embodied carbon) <u>and circular economy principles;</u>	For clarity and in response to representations from Historic England. See Statement of Common Ground between WCC and Historic England (SCG_009).
S/9/02	Core Principle D	The optimisation of development densities in a manner that responds to the site's context. This should have regard for <u>Proposals will conserve and enhance the significance of nearby heritage assets, including and townscape values of</u> the Grand Union Canal and other relevant heritage assets and associated views <u>Trellick Tower</u> . Access to <u>public spaces and</u> new buildings should be secured at all times (including in the event of the canal towpath being closed <u>for maintenance purposes</u>).	For clarity and in response to representations from Historic England, an individual and the Maida Hill and Westbourne Neighbourhood Forums. This modification also widens the application of the policy to public spaces and clarifies the approach to closures. See Statement of Common Ground between WCC and Historic England (SCG_009).
S/9/03	Core Principle E	Buildings adjacent to the Westway which include residential floorspace should provide homes in floors that are above the height of the Westway. Proposals should <u>will secure a high quality living conditions environment. Development proposals will be informed by appropriate technical assessments (including an assessment of by addressing the sound, daylight and sunlight, overheating, noise, vibration and air quality) to ensure</u> impacts	For completeness and clarity, and in response to representations from Yoo and Ascendal Group, the Mayor of London, Transport for London, Maida Hill and Westbourne Neighbourhood Forums. This modification supports a design-led approach to the site and ensures proposals consider amenity impacts and the constrained location of the site. See draft Statement of Common Ground between WCC and the Yoo and Ascendal Group (SCG_013).

		associated with <u>existing</u> nearby <u>uses and</u> transport infrastructure <u>are mitigated</u> .	
S/9/04	Core Principle I	The delivery of new dwell spaces, through maximising separation distances between buildings and building setbacks <u>should be enabled between buildings which are arranged to ensure a high-quality environment and the usability of these public spaces. This includes considering setbacks</u> from the bridge and Grand Union Canal <u>and overshadowing</u> . should be prioritised, with a focus on ensuring that <u>These public areas should be designed to be accessible, safe, and should provide natural surveillance.</u> are safe and accessible;	For completeness and clarity, and in response to representations from an individual, Yoo and Ascendal Group, and Maida Hill and Westbourne Neighbourhood Forums. This modification supports a design-led approach to the site while ensures proposals consider amenity impacts and the usability of the site. See draft Statement of Common Ground between WCC and the Yoo and Ascendal Group (SCG_013).
S/9/05	New Core Principle L	<u>The consideration and management of development impacts on the on-site National Grid Electricity Transmission underground cables from early design phases; and</u>	For completeness, and in response to representations from the National Grid. This modification acknowledges the presence of National Grid infrastructure on-site and will ensure proposals consider it from early design phases.
S/9/06	Core Principle L (New Core Principle M)	Meanwhile uses that activate <u>and/or green</u> the site and improve safety while works are completed may be <u>are</u> encouraged.	For completeness, and in response to representations from Maida Hill and Westbourne Neighbourhood Forums.
S/9/07	Paragraph 9.4 (last sentence)	Landowners and operators <u>Transport for London and Network Rail</u> indicate that there is a potential to reconfigure the garage to release land for a residential-led mixed-use development.	For completeness, and in response to representations from Places for London. See draft Statement of Common Ground between WCC and Places for London (SCG_011) and draft Statement of Common Ground between WCC and the Yoo and Ascendal Group (SCG_013).

S/9/08	New paragraph 9.6	<u>If an alternative site for relocation is found for a new bus garage, this may free up further land for alternative development at a later date. In the absence of any information on a potential relocation, it is currently assumed that the bus garage should continue to operate on part of the site.</u>	For completeness, and in response to representations from the Mayor of London and Transport for London. See draft Statement of Common Ground between WCC and the Yoo and Ascendal Group (SCG_013).
S/9/09	Paragraph 9.7 (New Paragraph 9.8)	In line with the Heritage Impact Assessment, intensification of the site will however need to respect and respond to <u>conserve and enhance</u> existing heritage and townscape value, including having regard for the Grand Union Canal, Meanwhile Gardens and any impacts on views, including on the Grade II* listed Trellick Tower in the Royal Borough of Kensington and Chelsea.	For completeness, and in response to representations from Historic England. Statement of Common Ground between WCC and Historic England (SCG_009).
S/9/10	Paragraph 9.8 (New Paragraph 9.9)	Given the nearby transport infrastructure (including <u>the elevated Westway</u> , Great Western Road and the Grand Union Canal), design proposals should consider building setbacks, and shall ensure that buildings can be accessed at all times, <u>including in the event that the canal is closed for maintenance purposes.</u>	For completeness, in response to representations from Maida Hill and Westbourne Neighbourhood Forums. This modification clarifies the approach to closures across the site to ensure it is clear that the site needs to be publicly accessible at all times.
S/9/11	Between Paragraphs 9.11 and 9.12	Living and working environment <u>conditions</u>	For clarity and to ensure consistency with other site allocation policies.
S/9/12	Paragraph 9.12 (New Paragraph 9.13)	<u>Proposals will be developed in line with the 'agent of change' principle as established in the London Plan.</u> Residential development, <u>including communal areas and outside amenity spaces</u> , will be of a high quality. However, <u>likely</u> levels of noise and vibration and air quality impacts associated with the nearby transport infrastructure <u>and Concrete Plant</u> mean that <u>new buildings such provision</u>	For completeness, in response to representations from the Mayor of London, Transport for London and Maida Hill and Westbourne Neighbourhood Forums. This modification ensures development will be high quality and considered existing uses and impacts from early design phases.

		will need to be carefully sited and designed. Development should also consider how air quality can be improved.	
S/9/13	Paragraph 9.13 (New Paragraph 9.14). New sentence at end of paragraph.	<u>Given the site is crossed by National Grid Electricity Transmission (NGET) infrastructure, applicants will need to demonstrate how they have considered NGET guidance, to minimise impact of development on the utility network. Applicants are expected to engage with infrastructure providers from early phases.</u>	For completeness, and in response to representations from the National Grid. This modification acknowledges the presence of National Grid infrastructure on-site and will ensure proposals consider it from early design phases.
S/9/14	Paragraph 9.17 (New Paragraph 9.18)	Existing and new public realm will be redesigned to be high quality, include greening measures that increase biodiversity and incorporate Sustainable Urban Drainage Systems to manage flood risk.	Correction.
S/9/15	New paragraph 9.19	<u>As different parcels may not be redeveloped simultaneously and the development of the whole site may take time, applicants should consider meanwhile uses and greening measures in early phases of development to create a safer and more attractive public realm and deliver visual and environmental benefits to the local community as early as possible.</u>	For completeness, and in response to representations from Maida Hill and Westbourne Neighbourhood Forums.

Table 5- Policy 10: Land adjacent to Royal Oak

Modification reference	Section of the Plan	Proposed change	Reason for change
S/10/01	Vision	Development on the site should deliver enhanced station approach and access, and improved permeability for pedestrians through the site, enabled through a high quality and sustainable mixed and commercial use development, <u>comprising both commercial and which may include and</u> well-designed residential. Non-residential land uses at the site should reflect the needs and aspirations for the local area, providing for a range and mix of flexible work-spaces, light industrial, logistics, and offices.	For clarity and in response to the representations from Places for London. This modification ensures that the policy wording properly reflects that mixed use development is appropriate for the site and better balances commercial and residential land uses. This is also referenced in the draft Statement of Common Ground between WCC and Places for London (SCG_011).
S/10/02	Core Principle A	The viable delivery of improvements to the access of Royal Oak station and its surrounds, and permeability through the site for pedestrians, alongside the delivery of a mix of uses including commercial uses and <u>(potentially including</u> office, light industrial <u>or logistics)</u> uses and <u>new housing provision</u> to positively contribute to the needs of the local area; <u>This will include contributions towards the delivery step-free access to the station and enhancements to station capacity;</u>	For completeness, and in response to representations from Places for London and the Greater London Authority. This modification ensures consistency with other site allocations policies, better reflects appropriate land uses for the site and reflects contributions that will be necessary as part of the development process. This is also referenced in the draft Statement of Common Ground between WCC and the GLA (SCG_001), as well as the draft Statement of Common Ground between WCC and Places for London (SCG_011).

S/10/03	Core Principle B	The optimisation of development densities across the site in a manner that responds to its heritage value, <u>townscape context</u> and the integrity of the adjacent tall building cluster, ensuring that building heights grade down significantly from the buildings at Kingdom Street <u>and within the wider Paddington Opportunity Area</u> ;	For completeness, and in response to representations from Places for London. This modification introduces some additional context to the policy wording to reflect considerations that would come into play in the assessment of an appropriate building height and to better acknowledge that some height will need to be accommodated on site to ensure site densities are optimised.
S/10/04	Core Principle C	Enhanced permeability through the site and activation of public spaces at ground floor level, including around Royal Oak station, and in particular pedestrian through routes, including dwell spaces, through strategic separation distances between buildings. Access routes at lower ground floor level should be maintained <u>The existing vehicular route to the Elizabeth Line portal must be maintained unless TfL agrees that it is no longer required. Access to rail infrastructure and its security (Network Rail, London Underground, and Elizabeth Line) must not be compromised by development proposals;</u>	For completeness and clarity, and in response to representations from Places for London. This modification seeks to improve the clarity of the policy wording in relation to the required access to the emergency portal for the Elizabeth Line as requested by the landowner, Places for London. This is also referenced in the draft Statement of Common Ground between WCC and Places for London (SCG_011).
S/10/05	Core Principle E	Where provided, any new residential development should secure high quality living conditions — including through the provision of high levels of sound insulation given the noise associated the hard transport infrastructure, and measures to prevent overheating. <u>Development will secure high quality living and working environments. Development will explore a full range of options to mitigate the impacts arising from nearby transport infrastructure, with these measures informed by appropriate technical assessments focusing on daylight and</u>	For completeness and clarity, and in response to representations from Places for London and the Greater London Authority. This modification supports a design-led approach to the site and ensures proposals consider amenity impacts and the constrained location of the site.

		<u>sunlight, overheating, noise, vibration, air quality and ventilation.</u>	
S/10/06	Core Principle F	Meanwhile uses for the site should be explored, in particular considering the potential of the site for waste management and supporting to be used for the storage of materials to support the circular economy. <u>Any such use will be confined to the B8 use class.</u>	For completeness and clarity, and in response to representations from the South East Bayswater Residents Association (SEBRA), Paddington Residents Active Concern on Transport and local residents. This modification addresses concerns from a number of parties that the site would be used for general waste management purposes and therefore limits and use meanwhile use to open air storage with no processing on site.
S/10/07	Paragraph 10.1	The Land adjacent to Royal Oak is an underutilised site, which has several significant constraints which need careful consideration. The site does present an opportunity for improving the environs of Royal Oak station, and delivering growth. Careful management of land uses and mitigation of the constraints should enable a viable development to be delivered. It may take some time for a suitable scheme to come forward, and so meanwhile uses could be considered for the site. The site's relatively set back location, and brownfield character, could lend itself to number of meanwhile uses, and opportunities for this should be explored, and fully justified – but could include public recreation, waste management (in particular where this facilitates the circular economy), <u>storage of materials associated with the circular economy</u> or urban logistics.	For completeness and clarity, and in response to representations from the South East Bayswater Residents Association (SEBRA), Paddington Residents Active Concern on Transport and local residents. This modification addresses concerns from a number of parties that the site would be used for general waste management purposes and therefore limits and use meanwhile use to open air storage with no processing on site.
S/10/08	Paragraph 10.2	The site sits within the NWEDA and the CAZ, and any proposals for the site should respond to the spatial strategy of the NWEDA and the CAZ, in particular by providing <u>a high quality and sustainable mixed use development comprising both new</u>	For clarity and in response to the representations from Places for London. This modification is proposed to align the supporting text to the modifications made to the Vision and

		<p>commercial and well-designed residential floorspace, with the potential for residential as part of mixed use development.</p> <p>Commercial Land uses should cater for a range of different businesses, including affordable and smaller scale commercial space, which will support the diversity of commercial and job opportunities in the NWEDA. The pedestrian environment around Royal Oak station requires significant improvement, and is a key objective for the site. In particular, development should secure improved pedestrian permeability from Royal Oak station towards Paddington Basin.</p>	<p>Core Principle A which seek to better advocate for a mixed use development by allowing for a greater proportion of residential. This is also referenced in the draft Statement of Common Ground between WCC and Places for London (SCG_011).</p>
S/10/09	Paragraph 10.3	<p>The site densities should be optimised, while respecting the surrounding townscape and heritage. The site is bordered by the Bayswater Conservation Area, and a Grade II listed bridge. Furthermore, adjacent to the site is a tall building cluster within the Paddington Opportunity Area, and so the integrity of this cluster should be preserved. Opportunities for viable residential development should be explored, within the parameters of an optimised design of the site. Given the significant constraints, especially in relation to access and adjacent heavy transport infrastructure, and subsequent impact on viability, non-conventional housing (including live/work spaces or student housing) may be more appropriate than homes suitable for family life which could be more challenging to viably deliver. <u>proposals will be developed in line with the ‘agent of change’ principle as established in the London Plan and it is imperative that any development secures high quality living and working environments through careful siting and design. Development should also consider measures to prevent overheating and maintain good indoor air quality. A range of housing typologies may be appropriate at the site, including both conventional and</u></p>	<p>For completeness and in response to representations from the Greater London Authority, Places for London and the South East Bayswater Residents Association.</p> <p>This modification ensures development will be high quality and considered existing uses and impacts from early design phases.</p>

		<u>non-conventional housing typologies (student housing or live/work-spaces).</u>	
S/10/10	Paragraph 10.6	Waste management sites, including those designed to facilitate <u>facilitating</u> regional circular economies are in short supply throughout the inner London area, and the site may present opportunities for a meanwhile use which contributes to the management and re-use of <u>construction</u> materials in the locality, which is supported. <u>Any such use will be confined to the B8 use class to ensure that the site is only used for open air storage, with no on-site processing in order to mitigate potential impacts on surrounding sensitive land uses, particularly the adjacent residential properties to the south.</u>	For completeness and clarity, and in response to representations from the South East Bayswater Residents Association (SEBRA), Paddington Residents Active Concern on Transport and local residents. This modification addresses concerns from a number of parties that the site would be used for general waste management purposes and therefore limits and use meanwhile use to open air storage with no processing on site.
S/10/11	Figure 19: Royal Oak Boundary	Figure to be updated in line with changes proposed to Policies Map.	For completeness and clarity, and in response to representations from Places for London. See Addendum I – Submission Schedule of Changes to the Policies Map (CORE_006) and Submission Policies Map (CORE_005)
S/10/12	Figure 20: Land adjacent to Royal Oak site allocation	Figure to be updated in line with changes proposed to Policies Map.	For completeness and clarity, and in response to representations from Places for London. See Addendum I–Submission Schedule of Changes to the Policies Map (CORE_006) and Submission Policies Map (CORE_005)

Table 6- Policy 11: Grosvenor Sidings

Modification reference	Section of the Plan	Proposed change	Reason for change
S/11/01	Vision	Development will respect and respond to the site's context, history and character, and integrate sensitively with the surrounding townscape, enhancing the civic environment, whilst also creating a distinctive identity and sense of place that connects with the wider Victoria <u>surrounding</u> area.	For clarity, and in response to Pimlico and Belgravia Neighbourhood Forum. This modification clarifies that the site allocation complements Pimlico, Churchill Gardens and the Ebury Bridge renewal area, as well as the surrounding area.
S/11/02	Core Principle A	The efficient use of land for housing-led development alongside supporting commercial and community uses that meet the needs of the wider Victoria area <u>complement existing and planned commercial centres to serve the needs of the local area;</u>	For clarity, and in response to Pimlico and Belgravia Neighbourhood Forum. This modification clarifies that the site allocation complements Pimlico, Churchill Gardens and the Ebury Bridge renewal area, as well as the surrounding area.
S/11/03	Core Principle C.2	The approach to the retention of existing buildings and structures on-site (which should consider heritage value and embodied carbon) <u>and circular economy principles;</u>	For clarity, and in response to representation from Historic England. See Statement of Common Ground between WCC and Historic England (SCG_009).
S/11/04	Core Principle D	Proposals should be designed in such a way that respects and responds to the local context, sustaining and conserves and or enhances the significance of views to adjacent heritage assets and Conservation Areas, along with strategic and local views. Proposals should also sensitively repurpose the on-site listed 123A Grosvenor Road building and adjacent workshop building;	For clarity, and in response to representation from Historic England. See Statement of Common Ground between WCC and Historic England (SCG_009). This modification also ensures alignment with Pimlico Neighbourhood Plan.

S/11/05	Core Principle E	Enhanced permeability through the site and beyond, providing <u>including the provision of</u> access routes north to south from the River Thames to London Victoria Station and east to west through adjacent residential estates;	For clarity, and in response to representation made by DP9 on behalf of Network Rail. See draft Statement of Common Ground between WCC and Network Rail (SCG_010).
S/11/06	Core Principle I	Where provided, any new residential development should <u>will</u> secure <u>a</u> high quality living environment conditions and not compromise the operational requirements of the railway – including through the provision of high levels of sound insulation given the noise associated with railway use. <u>Development proposals will be informed by appropriate technical assessments (including an assessment of daylight and sunlight, overheating, noise, vibration and air quality) to ensure impacts associated with existing transport infrastructure are mitigated.</u>	For completeness and clarity, in response to representation from the Mayor of London, Transport for London. This modification ensures development will be high quality and considered existing uses and impacts from early design phases.
S/11/07	Paragraph 11.2	Overall, however, the vision and core principles should be reflected across the site allocation as a whole to ensure the delivery of a new place that benefits residents, workers and visitors that responds to its local context -, <u>regardless of if development across the site comes forward simultaneously or independently.</u>	For clarity, and in response to representations made by DP9 on behalf of Network Rail. See draft Statement of Common Ground between WCC and Network Rail (SCG_010).
S/11/08	Paragraph 11.3	<u>To facilitate any redevelopment</u> As part of proposals for the site, it is envisioned that the sidings will be relocated elsewhere on the network and continue to serve the London train network.	For clarity, and in response to representations made by DP9 on behalf of Network Rail. See draft Statement of Common Ground between WCC and Network Rail (SCG_010).
S/11/09	Paragraph 11.6	Given the nature of the existing use in supporting the London train network and beyond, as well as being an operational transport police site, it is essential that these uses remain operational during any construction phase.	Modification proposed to amend typographical error.

S/11/10	Paragraph 11.10	As a result, any groundworks or excavations will be required to demonstrate and evaluate the archaeological potential and significance of the site through an up-to-date archaeological desk-based assessment including a geo-archaeological deposit <u>model</u> .	For clarity and in response to representation from Historic England. See draft Statement of Common Ground between WCC and Historic England (SCG_009).
S/11/11	Paragraph 11.11	Proposals should also seek to sustain the local views identified in the <u>Pimlico Neighbourhood Plan</u> , Peabody <u>and Pimlico Conservation Audits</u> , and other views across the site to the Grade II Listed Western Pumping Station chimney, Battersea Power Station and reduce any impacts upon the Grade I Listed Royal Hospital Chelsea and Hospital Gardens.	For clarity and in response to Pimlico Neighbourhood Forum. This modification ensures alignment with views detailed in Pimlico Neighbourhood Plan and shown as part of the Pimlico Conservation Area Management Plan.
S/11/12	Paragraph 11.23	<u>Living and working environment conditions</u> The incorporation of some residential development into proposals can help address high levels of housing need and contribute to a vibrant mix of uses across the site. <u>Proposals will be developed in line with the ‘agent of change’ principle as established in the London Plan. Residential development, including communal areas and outside amenity spaces, will be of a high quality. However, likely levels of noise, vibration, air quality impacts and access requirements associated with the railway line, mean that new buildings any such provision will need to be carefully sited and designed with high levels of sound insulation in order to achieve satisfactory living conditions for future residents. Development should also consider how air quality can be improved.</u>	For completeness and clarity, in response to representations from the Mayor of London, Transport for London. This modification ensures development will be high quality and considered existing uses and impacts from early design phases. This modification is also included to re-phrase from ‘conditions’ to ‘environment’ to better capture the range of considerations associated with good residential development.

Table 7- Policy 13: Affordable Housing

Modification reference	Section of the Plan	Proposed change	Reason for change
S/13/01	Between Clause A and B	<u>Major residential development</u>	For clarity on how the policy operates, in response to representations.
S/13/02	Clause B	<p>All Major residential developments will maximise the provision of affordable housing. <u>To be assessed under the Fast Track Route:</u></p> <p>1.on private land, a minimum of 35% affordable housing is required;</p> <p>2.on public sector land:</p> <p>i. <u>where a portfolio approach is not proposed,</u> the requirement increases to 50% affordable housing;</p> <p>ii. 3. where a portfolio approach to delivery on public sector land is proposed in agreement with the Mayor of London, all the portfolio sites will be located in Westminster <u>and 50% affordable housing will be delivered across the portfolio, with a minimum of 35% at each individual site.</u></p>	<p>For completeness and clarity, in response to representations.</p> <p>This modification ensures it is clear to applicants how the Fast Track Route and ‘portfolio’ approach operates in Westminster.</p> <p>See draft Statement of Common Ground between WCC and the Mayor of London (SCG_001).</p>
S/13/03	Between Clause B and C	Delivery mechanism	For clarity on how the policy operates, in response to representations.
S/13/04	Clause D	Small scale residential developments (those providing fewer than 10 homes) are not required to deliver affordable housing on-site and follow the delivery cascade set out in Clause C, and may	For clarity on how the policy operates, in response to representations.

		provide from the outset the affordable housing requirement in the form of a payment in lieu into the council's Affordable Housing Fund.	
S/13/05	Between Clause D and E	Tenure and size mix	For clarity on how the policy operates, in response to representations.
S/13/06	Clause E (New Clause D) (opening sentence)	Where <u>major</u> residential development provides affordable housing on and/or off-site:	For clarity on how the policy operates, in response to representations.
S/13/07	Clause E.2 ((New Clause D.2)	the size of the affordable homes, including the number of bedrooms required to meet need, will be provided in line with the council's Annual Affordable Housing Statement.	For clarity on how the policy operates, in response to representations from Network Rail and Aldersgate Investments. This modification ensures it is clear to applicants that they need to refer to the latest Affordable Housing Statement published by the council.
S/13/08	Between Clause E and F	Viability and payments in lieu	For clarity on how the policy operates, in response to representations.
S/13/09	Clause G	Small scale residential developments not able to deliver the full affordable housing requirement, irrespective of the delivery mechanism chosen, will be required to submit viability evidence that shows the maximum level of affordable housing that can be provided.	For clarity on how the policy operates, in response to representations.
S/13/10	Clause H	Payments in lieu to the council's Affordable Housing Fund should be of a broadly equivalent value to the cost of meeting the affordable housing requirement on-site, and will be calculated	For clarity on how the policy operates, in response to representations.

		following the methodology set out in the council's Planning Obligations and Affordable Housing SPD.	
S/13/11	After New Clause E	<u>Small-scale residential development</u>	For clarity on how the policy operates, in response to representations.
S/13/12	New Clause F	<u>Small-scale residential development will provide 20% of the floorspace as affordable housing. Provision can be made on-site or through a payment in lieu to the council's Affordable Housing Fund.</u>	For clarity on how the policy operates, in response to representations.
S/13/13	New Clause G	<u>Regardless of the delivery mechanism chosen, small-scale residential development unable to deliver the full affordable housing requirement will be required to submit viability evidence that shows the maximum level of affordable housing that can be provided.</u>	For clarity on how the policy operates, in response to representations.
S/13/14	Paragraph 13.2 (last sentence)	Thus, in order to meet needs and make sure Westminster contributes to the Mayor's strategic target of 50% affordable homes across London, it is essential that all residential developments <u>creating new homes</u> contribute to affordable housing delivery (including mixed-use schemes) and that affordable housing delivery is maximised.	For clarity on how the policy operates, in response to representations.
S/13/15	Paragraph 13.3	Private schemes and developments proposed on public sector land will be assessed in line with the London Plan 'Threshold approach to applications'. The council's Viability Study (February 2024) shows that most private sites are viable with 35% affordable housing. On public sector land the requirement increases to 50% affordable housing.	For clarity on how the policy operates, in response to representations.
S/13/16	Paragraph 13.6 (To be moved so it is New	In line with the London Plan, all affordable housing requirements from <u>major</u> residential development will be calculated based on the total gross residential development proposed (Gross Internal Area, GIA). Where residential floorspace is proposed as part of	For clarity on how the policy operates, in response to representations.

	paragraph 13.4)	<u>major</u> redevelopment and intensification proposals that include existing housing, applicants should have regard to guidance set out in the Planning Obligations and Affordable Housing SPD on how the Gross Internal Area of the scheme will be determined. All planning applications <u>for major residential development</u> will need to provide details on affordable housing by floorspace, number of homes and number of habitable rooms.	
S/13/17	Paragraph 13.5 (end)	Given <u>the high contribution small-scale developments make to new housing supply, that</u> Westminster's Strategic Housing Market Assessment (SHMA) (January 2024) concludes that non-major developments can contribute to meeting high levels of housing need, that and that this is supported by the Viability Study (February <u>and October</u> 2024) and the high contribution small-scale developments make to new housing supply, it is justified requiring all residential proposals <u>small-scale residential developments are required to contribute to the</u> delivery of affordable housing.	For clarity on how the policy operates, in response to representations.
S/13/18	New paragraph 13.6	<u>Developments creating new self-contained homes (including conversions) and not classed as 'major development' will trigger an affordable housing requirement, calculated on the total gross residential development proposed (Gross Internal Area, GIA). Proposals that only upgrade or add floorspace to existing homes are excluded.</u>	For clarity on how the policy operates, in response to representations.
S/13/19	Paragraph 13.8 (first sentence)	Where it is accepted that <u>major development cannot provide</u> affordable housing cannot be provided on-site, off-site delivery would be the second-preferred approach.	For clarity on how the policy operates, in response to representations.
S/13/20	Paragraph 13.10	Where both on-site and off-site delivery are proven to be impractical or inappropriate, developers <u>major development</u> will provide a payment in lieu to the council's Affordable Housing Fund. Where payments in lieu are accepted, they will be equivalent to	For clarity on how the policy operates, in response to representations.

		<p>the cost of providing the affordable housing on-site, preventing financial advantage over on-site delivery. Payments will be based on a fixed rate per sqm of floorspace that would have been provided as affordable housing on-site, ensuring a cost neutral impact on developers. The values of the payments in lieu and indexation details are set out in the council's Planning Obligations and Affordable Housing Supplementary Planning Document. Payments in lieu may also be deemed appropriate to address shortfalls in on-site or off-site contributions.</p>	
S/13/21	Paragraph 13.11	<p>Notwithstanding the above, the sequential approach to affordable housing delivery may not apply to small-scale residential developments – those delivering fewer than 10 homes. While applicants are encouraged to explore on-site delivery, it is acknowledged that there may be practicable and management issues of providing small numbers of affordable housing that mean on-site delivery is not appropriate. <u>Therefore, the sequential approach to affordable housing delivery that applies to major developments does not apply to small-scale residential developments.</u> Payments in lieu towards the council's Affordable Housing Fund therefore represents a pragmatic approach that ensures the opportunity for small-scale residential development to contribute towards affordable housing is not lost, and offers a more straightforward approach for small-scale residential schemes' developers compared to on-site delivery.</p>	For clarity on how the policy operates, in response to representations.
S/13/22	New Paragraph 13.12	<p><u>The payments in lieu for both major and small-scale residential developments will be based on a fixed rate per sqm of floorspace that would have been provided as affordable housing on-site, ensuring a cost-neutral impact on developers. The values of the payments in lieu and indexation details for both type of schemes are set out in the council's Planning Obligations and Affordable</u></p>	For clarity on how the policy operates, in response to representations.

		<u>Housing Supplementary Planning Document. Payments in lieu may also be deemed appropriate to address shortfalls in on-site or off-site contributions (e.g. because the site's size or constraints mean it is not practicable to deliver a mix of housing types on the site).</u>	
S/13/23	Paragraph 13.13 (new Paragraph 13.14)(end)	The council's Viability Study (January <u>February and October</u> 2024) also shows how the council's proposed tenure split is viable in most cases.	To reference the updated version of the Viability Study that has informed proposed modifications.
S/13/24	Paragraph 13.15 (new Paragraph 13.16)	To ensure the size of new affordable properties responds to the dynamic nature of need, the council's Annual Affordable Housing Statement sets out up-to-date affordable unit size requirements based on actual need as defined through our social and intermediate housing registers.	For clarity on how the policy operates, in response to representations from Network Rail and Aldersgate Investments. This modification ensures it is clear to applicants that they need to refer to the latest Affordable Housing Statement published by the council.
S/13/25	Between new Paragraphs 13.16 and 13.17	Viability and payments in lieu	For clarity on how the policy operates, in response to representations.
S/13/26	Paragraph 13.17 (new Paragraph 13.18)(End)	<u>Further guidance on viability assessments for small-scale residential developments is set out in the council's Planning Obligations and Affordable Housing SPD.</u>	For clarity on how the policy operates, and where further guidance will be set out.

Table 8- Policy 37: Waste Management (not in scope)

Modification reference	Section of the Plan	Proposed change	Reason for change
S/37/01	Clause C	<p>Developers are required to demonstrate through a Circular Economy Statement (and where appropriate a pre-deconstruction, demolition and redevelopment audit), Site Environment Management Plan and/or associated Site Waste Management Plan, the recycling, re-use, and responsible disposal of Construction, Demolition and Excavation waste in accordance with London Plan targets and the council's Code of Construction Practice (CoCP).</p>	<p>For consistency with the documents required through the introduction of the Retrofit First policy.</p>

Table 9- Policy 43: Retrofit First

Modification reference	Section of the Plan	Proposed change	Reason for change
S/43/01	New Clause A	All development will minimise embodied carbon emissions and support the circular economy, through the adoption of a retrofit first approach.	For clarity on how the policy operates, in response to a wide range of stakeholders supporting retrofit first approach and the overarching aims of the policy. Modification is proposed to better set the tone of the policy and to make explicit reference to its objectives and the strategic nature of the policy.
S/43/02	New Clause B	Proposals involving responsible retrofitting, which result in extended lifespans of existing buildings, and energy, performance, and climate adaptation upgrades, will be supported in principle.	For clarity on how the policy operates, in response to representations from a range of stakeholders. Modification proposed to relocate text to this section of the policy, so the intent is clearer from the outset (see S/43/22) and to better align with the introduction of the policy.
S/43/03	New Clause C	Proposals should prioritise uses and/or development options (such as retrofitting or deep retrofitting) which facilitate the retention and repurposing of existing building(s).	For clarity on how the policy operates, in response to representations from a range of stakeholders. The objective is to consider overall whether different use types could facilitate greater building retention.
S/43/04	Existing Part A amended to become new Clause D	Prioritising retrofitting over demolition Development should adopt a retrofit first approach, where options for retrofitting and retention of existing buildings are considered before demolition. Where substantial or total demolition is proposed, this should be fully justified	For clarity on how the policy operates, in response to representations from a range of stakeholders, making it more explicit which types of proposals are required to demonstrate adherence to the sequential tests and what supporting evidence is required from a proposal

		<p>through an appraisal of the construction options, assessing the carbon cost and public benefits of refurbishment, retrofit, deep retrofit or newbuild options. Development proposals involving total substantial demolition of a building which has more than a single storey will generally be resisted, unless must demonstrated through the appraisal that they meet the sequential test set out below. Substantial demolition will be supported if:</p>	<p>(reinforced by updates to definitions included in glossary terms, see S/G/05)</p>
S/43/05	New Clause D, 1	<p>The proposed development will deliver public benefits which could not be delivered through a suitably comparable retrofit option; and Existing building(s) on site are structurally unsound and unsuitable for safe retention and re-purposing, either partially or in full.</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders. Text from Part A, 4 (see S/43/08) proposed to be moved to become Part D, 1. This reflects the sequential nature of tests.</p>
S/43/06	New Clause D, 2	<p>The whole lifetime carbon of a new building would be less or similar to a suitably comparable retrofit option; or Where test 1 is not met, specialised operational and access requirements of proposed uses could not be delivered by retrofit or deep retrofit options.</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders. Text from Part A, 3 (see S/43/07) proposed to be moved to become Part D, 2. This reflects the sequential nature of tests.</p>
S/43/07	New Clause D, 3	<p>The proposed development has bespoke operational requirements which could not be provided through the repurposing, adaptation and/or extension of the existing building(s); or Where test 2 is not met, the whole life carbon of the proposed development is less than a retrofit or deep retrofit.</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders. Text from Part A, 2 (see S/43/06) proposed to be moved to become Part D, 3. This reflects the sequential nature of tests.</p>

S/43/08	New Clause D, 4	<p>It is demonstrated that a retrofitting option is not possible or achievable due to structural constraints, demonstrated through an independently verified structural engineers report.</p> <p>Where test 3 is not met, additional public benefits beyond the requirements of the Development Plan are substantially greater than a retrofit or deep retrofit.</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders.</p> <p>Text from Part A, 1 (see S/43/05) proposed to be moved to become Part D, 4. This reflects the sequential nature of tests.</p>
S/43/09	New Clause E	<p>The relevant elements of the sequential test in Part D must be evidenced within a Pre-Redevelopment Audit.</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders.</p> <p>Requirement for a Pre-Redevelopment Audit previously included in text at Part B, 2 (see S/43/20).</p>
S/43/10	New Clause F	<p>For all developments involving any demolition, a Circular Economy Statement shall be submitted which demonstrates how materials from existing building(s) will be re-used and re-purposed.</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders.</p> <p>Requirement for a Circular Economy Statement previously included in text at Part B, 2 (see S/43/20).</p>
S/43/11	Amend existing Part B to become new Clause G	<p>Reducing embodied carbon emissions</p> <p>All development involving total or substantial demolition of a building which has more than a single storey, and all major developments are required to:</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders, a result of proposed modifications to definitions for inclusion within the City Plan (see S/G/06).</p>
S/43/12	New Clause G, 1	<p>Submit a Whole Life-Cycle Carbon assessment, which demonstrates how the development will aim to achieve:</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders.</p>
S/43/13	New Clause G, 1, a	<p>For new non-residential buildings major commercial schemes, including commercial-led mixed uses, an target</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders</p>

		<p>aspirational upfront embodied carbon equivalent of London Energy Transformation Initiative (LETI) band "A" $\leq 550\text{kg CO}_2\text{e/sqm}$, with an absolute minimum rating of "B" $\leq 650\text{kg CO}_2\text{e/sqm}$.</p>	<p>which raised concerns with the use of LETI bandings and their appropriateness for being referenced in planning policy.</p> <p>Wording proposed reflects data submitted during the Regulation 19 consultation, updates made to the Evidence Base which suggests that these upfront embodied carbon requirements are both ambitious and achievable by new build schemes, where substantial demolition has been justified.</p> <p>Phrasing used to reflect UK Net Zero Carbon Building Standard. See Statement of Common Ground with Net Zero Carbon Buildings Standard Limited (SCG_015).</p>
S/43/14	New Clause G, 1, b	<p>For new major residential buildings schemes, including residential-led mixed-uses and hotels over 18 metres in height, a target aspirational upfront embodied carbon equivalent of LETI band "C" $\leq 600\text{kg CO}_2\text{e/sqm}$, with an absolute minimum limit rating of "D" $\leq 700\text{kg CO}_2\text{e/sqm}$. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders which raised concerns with the use of LETI bandings and their appropriateness for being referenced in planning policy.</p> <p>Wording proposed reflects data submitted during the Regulation 19 consultation, and updates made to the Evidence Base which suggests that these upfront embodied carbon requirements are both ambitious and achievable by new build schemes, where substantial demolition has been justified.</p> <p>Text involving arrangements for affordable housing proposed to be relocated as a new clause to improve readability (see S/43/19).</p> <p>Phrasing used to reflect UK Net Zero Carbon Building Standard. See Statement of Common Ground with Net Zero Carbon Buildings Standard Limited (SCG_015).</p>

S/43/15	New Clause G, 1, c	<p>For new major residential buildings schemes, including residential-led mixed-uses and hotels below 18 metres in height, a target aspirational upfront embodied carbon equivalent of LETI band "B" ≤550kg CO₂e/sqm with an absolute minimum limit rating of "C" ≤650kg CO₂e/sqm. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders which raised concerns with the use of LETI bandings and their appropriateness for being referenced in planning policy.</p> <p>Wording proposed reflects data submitted during the Regulation 19 consultation, updates made to the Evidence Base which suggests that these upfront embodied carbon requirements are both ambitious and achievable by new build schemes, where substantial demolition has been justified.</p> <p>Text involving arrangements for affordable housing proposed to be relocated as a new clause to improve readability (see S/43/19).</p> <p>Phrasing used to reflect UK Net Zero Carbon Building Standard. See Statement of Common Ground with Net Zero Carbon Buildings Standard Limited (SCG_015).</p>
S/43/16	New Clause G, 1, d	<p>All other major developments not covered by paragraphs a, b and c above must achieve the maximum reductions in upfront embodied carbon deliverable, and these should be fully justified, including reference to any recognised industry benchmarks where applicable.</p>	<p>For completeness and clarity on how the policy operates, in response to representations from a range of stakeholders.</p>
S/43/17	New Clause G, 1, e	<p>For non-major developments involving the construction of bespoke buildings which do not have a recognised LETI benchmark, or self build or custom build homes, proposing substantial demolition, applicants should must demonstrate how they will achieve the maximum reductions in upfront embodied carbon deliverable, and</p>	<p>For consistency with other policies and clarity on how the policy operates.</p>

		these should be fully justified, including reference to any recognised industry benchmarks where applicable.	
S/43/18	New Clause G, 1, f	In exceptional circumstances where there are justified site specific constraints or bespoke design requirements which make the benchmarks requirements listed in paragraphs a, b and c above undeliverable, any shortfall against the minimum upfront embodied carbon targets limits at practical completion will be offset through a financial contribution towards the council's carbon offset fund.	For consistency with other policies and clarity on how the policy operates. Phrasing used to reflect UK Net Zero Carbon Building Standard. See Statement of Common Ground with Net Zero Carbon Buildings Standard Limited (SCG_015).
S/43/19	New Clause G, 2	Developments that follow the Fast Track Route to affordable housing delivery must demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery, rather than needing to adhere to the requirements set out in paragraphs b and c above.	For clarity on how the policy operates, in response to representations from a range of stakeholders. This text has been relocated in the policy to become a standalone clause (see S/43/14 and S/43/15).
S/43/20	Existing Part B, 2	2. Where substantial or total demolition is proposed, applicants must: a. Submit a Circular Economy Statement including a pre-redevelopment, and pre-demolition and reclamation audit which demonstrates how materials will be reused and repurposed; and b. Design any new structures to ensure the longevity of the building, easy adaptation, and with easily re-usable materials.	For clarity on how the policy operates, in response to representations from a range of stakeholders. Modification proposed to relocate text to other sections of the policy to improve readability (see S/43/02 and S/43/10).
S/43/21	New Clause G, 3	When calculating operational carbon off-set payments due under Policy 40, applicants will be able to deduct any upfront embodied carbon savings below the aspirational	For clarity on how the policy operates, in response to representations from a range of stakeholders.

		requirement to the total operational carbon offset payment due.	Phrasing used to reflect UK Net Zero Carbon Building Standard. See Statement of Common Ground with Net Zero Carbon Buildings Standard Limited (SCG_015).
S/43/22	Title above existing Part C	Unlocking and promoting responsible retrofitting Proposals involving responsible retrofitting, which result in energy, performance, and climate adaptation upgrades, will be supported in principle.	For clarity on how the policy operates. Modification proposed to relocate text to be within the introduction section of the policy to make the policy more effective and to improve readability (see S/43/02).
S/43/23	Existing Part D amended to become new Clause H	When considering the townscape, heritage or design impacts of extensions or alterations or extensions, which are can be demonstrated through the appraisal of the construction options as necessary to viably achieve a the wider responsible retrofit of a building, regard will be had to the desirability of securing the retention and retrofit of the building, including improvements to its environmental performance, building longevity and with adaptations to address climate change adaptation will be a material consideration. Applicants should must demonstrate in a Sustainable Design Statement or Retrofit Plan how technical risks have been addressed and how harm to heritage assets resulting from retrofit has been avoided or minimised.	For clarity on how the policy operates, in response to representations from a range of stakeholders.
S/43/24	Paragraph 43.1	We recognise that the expected level of growth in the city will have associated emissions from embodied carbon. As the grid moves towards decarbonisation during the lifetime of the City Plan, operational emissions from the city's building stock will play a less important role when considering the whole life in carbon emissions from development, and the embodied carbon associated with impacts of development. will become a greater source of	For clarity on how the policy operates.

		<p>emissions. It is essential that developments utilise every opportunity to reduce embodied carbon now to limit the extent of future climate change. Our priority is for development to achieve a reduction in embodied carbon to meet the council's target of a net zero City by 2040, and supports the UK transition towards net zero carbon emissions. This means that the embodied carbon associated with development will become a greater proportion of built environment emissions.</p>	
S/43/25	Paragraph 43.2	<p>Retrofitting buildings should prolong their useful life and reduce operational carbon emissions. The council recognise that demolition of some buildings will continue to play an important part of renewing and upgrading the city's building stock, however given the higher amounts of embodied carbon associated with demolition and rebuild schemes, development should explore all options for retrofitting first. Any proposals for demolition need to be fully justified and should demonstrate that a new building would be the most sustainable outcome.</p> <p>The most effective way to reduce embodied carbon from development is to maximise the re-use of existing buildings and the materials they are composed of through refurbishment and retrofitting, along with prioritising the use of recycled materials. Therefore, proposals which promote and the retention of existing buildings, rather than their substantial demolition will be supported in principle.</p>	Modifications proposed to simplify the text and to make it more succinct.
S/43/26	New supporting	Where a use is proposed which requires substantial demolition, other alternative uses which might instead	For clarity on how the policy operates (see S/43/03).

	text (new paragraph 43.3)	allow for a retrofit or deep retrofit of an existing building should be considered first.	
S/43/27	New supporting text (new paragraph 43.4)	<p>The tests for demolition</p> <p>Prioritising retrofit over demolition</p> <p>Where development proposals include substantial demolition of existing building(s) over a single storey, applicants must provide evidence to justify this demolition. This is through the sequential test set out in Part D of the policy. The tests in Part D must be addressed sequentially as the investigation and analysis of the existing building and consideration of its current and future use(s), required to demonstrate compliance with the earlier tests, will contribute to the evidence base for demonstrating compliance or otherwise with the later tests in the sequence.</p>	For clarity on how the policy operates.
S/43/28	New supporting text (new paragraph 43.5)	<p><i>[Please see Appendix 2 of this document below for graphic]</i></p> <p><u>Figure 42: Overview of sequential test for demolition</u></p> <p>The sequential test is required to demonstrate that other construction options have been considered and compared to the proposed development. The alternative development options which must be considered are set out in the table below.</p> <p><i>[See table in Appendix 3 below]</i></p>	Graphic proposed for inclusion for clarity and in response in response to representations from a range of stakeholders.

S/43/29	New supporting text (new paragraph 43.6)	<p>Pre-Redevelopment Audits</p> <p>Where the sequential test is required to be met, planning applications must be supported by a Pre-Redevelopment Audit, which shall be independently verified by the Council through a third-party review, by an appropriately qualified professional, at the applicant's expense. Chapters of the Pre-Redevelopment Audit will correspond to the requirements of the sequential test outlined in Part D, as follows:</p> <ul style="list-style-type: none"> • Analysis of structural soundness – Chapter 1: Structural Engineers Report • Analysis of appropriateness of use and relevant operational and access requirements - Chapter 2: Requirements of Use Report • Analysis of whole life carbon impacts – Chapter 3: Carbon Options Appraisal • Analysis of public benefits – Chapter 4: Public Benefits Statement 	For consistency and clarity on how the policy operates, to reflect other modifications to the policy (see S/43/09).
S/43/30	New supporting text (new paragraph 43.7)	Where retrofitting is unfeasible due to structural or safety concerns, applicants must demonstrate this through an independently verified structural assessment from a suitably qualified engineer. Where structural reinforcement is possible, but the extent and cost of which would make the development undeliverable, this should also be supported by evidence.	For consistency and clarity on how the policy operates. Relocation of text from paragraph 43.3 (see S/43/32) to reflect the ordering of the sequential tests and other updates to the policy.
S/43/31	New supporting text (new	Where substantial demolition is required due to new specialised and bespoke operational requirements, applicants must demonstrate why those operational or	For consistency and clarity on how the policy operates.

	paragraph 43.8)	access requirements are integral to the proposed use of the building and cannot be addressed within the existing structure, providing evidence of any technical requirements or standards. Bespoke specialised operational requirements may include technological parameters without which the proposed use could not function, or development phasing in order to maintain an important public service.	Relocation of text from paragraph 43.5 (see S/43/34) to reflect the ordering of the sequential tests and other updates to the policy.
S/43/32	Paragraph 43.3 (new paragraph 43.9)	Where test 2 does not apply or is not met , whole-life carbon assessments comparing building options are can be relied upon to justify demolition. and construction of a new building, † These must follow the most up to date RICS methodology, factoring in grid de-carbonisation and consider realistic life cycles. and the Mayor of London's Whole Life Carbon London Plan Guidance (LPG) and be presented as an appraisal of the construction options for reuse, refurbishment, retrofit, deep retrofit and demolition. When presenting comparisons between retrofit and newbuild options, a realistic whole life cycle for a retrofit scheme should be used which accounts for the extended life of a building resulting from a high quality retrofit; and how the material choices for a retrofit option and a newbuild both aim to deliver the lowest embodied carbon achievable. Where retrofitting is unfeasible due to structural or safety concerns, applicants should demonstrate this through a structural statement from a suitably qualified engineer. Where structural reinforcement is possible, but the extent of which would make the development unviable to retrofit, this should be supported by a viability report. Some purpose-built structures may	For consistency and clarity on how the policy operates, to reflect other modifications to the policy, including re-ordering of text (see S/43/30).

		<p>pose technical challenges for retrofitting, such as multi-storey car parks, and single storey garages — and redevelopment may be acceptable in these instances, provided that all options for material re-use from the existing structure are utilised through a pre-demolition audit.</p>	
S/43/33	Paragraph 43.4 (new paragraph 43.10)	<p>Newbuilds The demolition of existing buildings can bring opportunities for the delivery of additional significant public benefits which exceed policy compliant requirements set by the Development Plan. such as the delivery of new public infrastructure, the provision of affordable workspace, significant uplifts in jobs, affordable housing and estate regeneration. In such instances, planning Applications for developments incorporating such benefits as a result of demolition should must demonstrate how these benefits are significant and why these could not be delivered to the same extent through a development option which retains a higher proportion of the existing building(s). practicably or viably be realised through a retrofit scheme. In recognition of the global, national and local economic importance of the West End Retail and Leisure Special Policy Area (WERLSPA), the Paddington and Victoria Opportunity Areas and North West Economic Development Area (NWEDA), optimising the site capacity to achieve significant employment, jobs and investment opportunities may also be considered a public benefit justifying the replacement of a building. Any economic benefits would need to be fully justified and the applicant must demonstrate to the council's satisfaction why they could not be achieved through a retrofit option</p>	For completeness and clarity on how the policy operates.

		<p>through a meaningful and honest comparison.</p> <p>Furthermore, the scale of the net additional public benefits proposed must be proportionate to the extra carbon emissions associated with the proposed development. The relative carbon difference will be based on the options evidenced in test 3.</p>	
S/43/34	Paragraph 43.5 (new paragraph 43.11)	<p>Applicants should fully assess the suitability of a site for a proposed use when justifying operational requirements which could not be met through retrofit. Where bespoke operational requirements are relied upon to support demolition, these should be demonstrated as unachievable through a retrofit, alteration or extension to an existing building. Operational requirements may include: development phasing in order to maintain an important public service, and necessary design requirements without which the proposed use could not function. Where a change of use is proposed that requires bespoke design requirements, applicants should demonstrate the suitability of the site through a Site Selection Statement and set out why those design requirements are integral to the proposed use or operations of the building, providing evidence of any technical requirements or standards.</p>	<p>For consistency and clarity on how the policy operates. Text relocated for consistency with proposed policy modifications and ordering of sequential test (see S/43/31).</p>
S/43/35	New supporting text (new paragraph 43.12)	<p>Further guidance on the structure and form of the Pre-Redevelopment Audit, which chapters should be included, and how this should be used to demonstrate compliance with the sequential test will be provided within an upcoming update to the Environment SPD.</p> <p>In addition, for all developments where any demolition is taking place, a Circular Economy Statement shall be</p>	<p>For consistency and clarity on how the policy operates, to reflect modifications to the policy, along with relocating text from paragraph 43.12 (see S/43/49).</p>

		prepared. Further guidance will also be provided in an upcoming update to the Environment SPD.	
S/43/36	Paragraph 43.6 (new paragraph 43.13)	<p>Embodied Carbon</p> <p>To respond to the climate emergency, development should be innovative in design and incorporate low carbon materials. The lowest carbon materials available are those which can be re-used from existing buildings through retrofitting. Where the assessment of Whole Life Carbon is required, demolition of an existing building occurs and where the development is a major scheme, applicants are expected to evidence that they development should aim to meet the relevant upfront target embodied carbon aspirational requirement benchmark at application stage. Where the target benchmark is not possible, a minimum embodied carbon benchmark will still apply to limit the overall carbon footprint of the development. The most up to date RICS methodology should be followed to calculate embodied carbon. Where subsequent benchmarks are established by other bodies, for example the UKGBC, these may be used where they have been aligned to LETI benchmarks. At the time of writing, the benchmarks recommended are based off guidance published by LETI in 2020. Applicants will be expected to provide evidence pursuant to a legal agreement or planning condition to demonstrate that the upfront embodied carbon limit or lower has been achieved through the implementation of the development.</p>	<p>For consistency and clarity on how the policy operates (see S/43/13, S/43/14 and S/43/15) and to reflect other proposed policy modifications.</p> <p>Phrasing used to reflect UK Net Zero Carbon Building Standard. See Statement of Common Ground with Net Zero Carbon Buildings Standard Limited (SCG_015).</p>
S/43/37	New supporting	Mixed-use developments should target the upfront embodied carbon requirement of the typology which	For consistency and clarity on how the policy operates, in response to representations from a range of stakeholders,

	text (new paragraph 43.14)	makes up the greatest proportion of the development in GIA. If the uses are relatively equally split, then the lower aspirational requirement (in Co ₂ e/sqm) should be achieved.	and to ensure consistency with approaches used by the Greater London Authority.
S/43/38	Paragraph 43.7 (new paragraph 43.15)	Some sites are particularly challenging to achieve low embodied carbon outcomes, whether that be due to heritage reasons, existing underground infrastructure, or ground conditions. Where there are site specific constraints that make the upfront embodied carbon limit a benchmark unachievable, applicants should provide robust justification of these constraints. the building design, and should include a breakdown of the embodied carbon in the structure, façade and MEP, demonstrating how these align with the relevant benchmark, and providing justification for features which cannot meet the benchmark. This should include a detailed breakdown of the embodied carbon per building element to demonstrate how the site specific conditions have an impact on the ability to reach the upfront embodied carbon requirements.	For consistency and clarity on how the policy operates.
S/43/39	New supporting text (new paragraph 43.16)	For residential schemes where the upfront embodied carbon targets could impede the delivery of affordable housing, priority will be given to the delivery of affordable homes. Applicants should justify the maximum upfront embodied carbon reductions deliverable without affecting the deliverability of policy compliant levels of affordable housing.	For consistency with other changes proposed to the policy.

S/43/40	Paragraph 43.8 (new paragraph 43.17)	Following practical completion, major schemes will be required to publicly display the total embodied carbon associated with the development, ensuring the information is visible to visitors and occupants of a building.	For clarity and to align with common industry terminology.
S/43/41	New supporting text (new paragraph 43.18)	Further guidance on the scope of the Whole Life Carbon Assessment will be provided in an upcoming update to the Environment SPD.	For clarity on technical details pertaining to the policy requirement for Whole Life Carbon Assessments
S/43/42	Existing table following paragraph 43.8	<u>[See deleted table in Appendix 4 below]</u>	For consistency, to reflect other modification proposed to the policy.
S/43/43	New table	<u>[See table in Appendix 5 below]</u>	For completeness and clarity on how the policy operates.
S/43/44	Paragraph 43.9	Use of targets and absolute minimums The use of LETI Band A is the current stretch target for non-residential schemes. The use of LETI Band B is the current stretch target for residential and mixed-use schemes below 18 metres. LETI Band C is the current stretch target for residential and mixed-use schemes above 18 metres. The targets differentiate heights buildings which include residential development to reflect the wider range of low-	For consistency and clarity on how the policy operates, with information now presented more clearly in a table (see S/43/43).

		carbon materials that are available for use in residential buildings below 18 metres.	
S/43/45	Paragraph 43.10	It is expected that these benchmarks will likely become business as usual during the City Plan period as building standards improve and the push for sustainable development gains greater momentum. The Whole Life Cycle Carbon assessment should provide detail on the measures taken to lower embodied carbon, including an assessment of the design performance against the target benchmarks.	For consistency and clarity on how the policy operates. Modification proposed to remove text, as this is instead referenced in new supporting text (see S/43/41).
S/43/46	Paragraph 43.11 (new paragraph 43.19)	Carbon offset payments in lieu Where applicants fully demonstrate the upfront embodied carbon benchmark limits is are undeliverable due to site specific constraints or justified bespoke design parameters, a payments are to will be made required to the Council's carbon offset fund in lieu of meeting embodied carbon limits targets on site.	For consistency and clarity on how the policy operates, in response to representations from a range of stakeholders.
S/43/47	Paragraph 43.11 (new paragraph 43.20)	Applicants will also be able to credit upfront embodied carbon reductions below the minimum benchmarks aspirational requirement to their total operational carbon offset payment calculated in their eEnergy s Statement.	For consistency and clarity on how the policy operates, in response to representations from a range of stakeholders.
S/43/48	Paragraph 43.11 (new paragraph 43.21)	Further details are provided in Policy 40 (Energy). Further Additional details on how this carbon offset payments shall is to be calculated will be provided in an update to the	For consistency and clarity on how the policy operates, in response to representations from a range of stakeholders.

		Planning Obligations and Affordable Housing Supplementary Planning Document (2024).	
S/43/49	Paragraph 43.12	<p>Circular Economy Statement, pre-redevelopment, pre-demolition and reclamation audits</p> <p>For all developments where the principle of demolition has been agreed, a Circular Economy Statement shall be prepared in accordance with the London Plan Guidance on Circular Economy Statements (2022). As part of this guidance, pre-redevelopment and pre-demolition audits are required which should identify potential materials which could be reused, and a strategy for their reclamation.</p>	<p>For consistency and clarity on how the policy operates. Modification proposed as text relating to Circular Economy Statements is relocated elsewhere within the supporting text (see S/43/35).</p>
S/43/50	Paragraph 43.13 (new paragraph 43.22)	<p>Alterations and extensions</p> <p>Unlocking and promoting responsible retrofitting</p> <p>8.13/ Securing extensions alongside newly retrofitted buildings will enable continued sustainable growth across the city. Retrofitting buildings, along with providing an uplift in floorspace through extensions can enable continued sustainable growth across the city. Where applicants can demonstrate that an extension or external alteration is required to deliver a viable retrofit of a heritage asset, we will consideration will be given to desire of keeping the existing building in-use and the wider sustainability benefits resulting from responsible retrofit. the benefits of securing a lower carbon development when considering its design impacts — in particular, where buildings may otherwise meet the tests for demolition.</p>	<p>For clarity on how the policy operates, in response to representations from a range of stakeholders.</p>

S/43/51	Paragraph 43.13 (new paragraph 43.23)	Applicants should must demonstrate how any harm townscape, heritage or design impacts identified from the development as a result of the retrofitting approach has have been avoided, mitigated, or minimised, where possible. and identify the potential carbon reduction benefits that the development will deliver, considering both embodied carbon and operational carbon.	For clarity on how the policy operates, in response to representations from a range of stakeholders.
S/43/52	Paragraph 43.14	Sustainable Design Statement or Retrofit Plan All applications for development which create new floorspace and/or proposals which involve extensive works to retrofit existing buildings to improve their environmental performance must be supported by a Sustainable Design Statement. This requirement forms an important component of demonstrating consideration of retrofit options for new developments. A Retrofit Plan will be required in line with the Sustainable Design Statement to summarise how the retrofit policy has been complied with and any issues relevant to the proposal.	For consistency and to reflect modifications made to the policy (see S/43/23).

Table 10- Appendix 3: Schedule of superseded policies

Modification reference	Section of the Plan	Proposed change	Reason for change
S/A3/01	New Table 1: Westminster City Plan (2021)	<p>City Plan Strategic Policies (April 2021) Policy 9 Affordable Housing</p> <p>Superseded by policy Policy 13 Affordable Housing</p>	To clarify that new Policy 13 replaces adopted Policy 9, ensuring compliance with Regulation 8(5) of the 2012 Regulations.

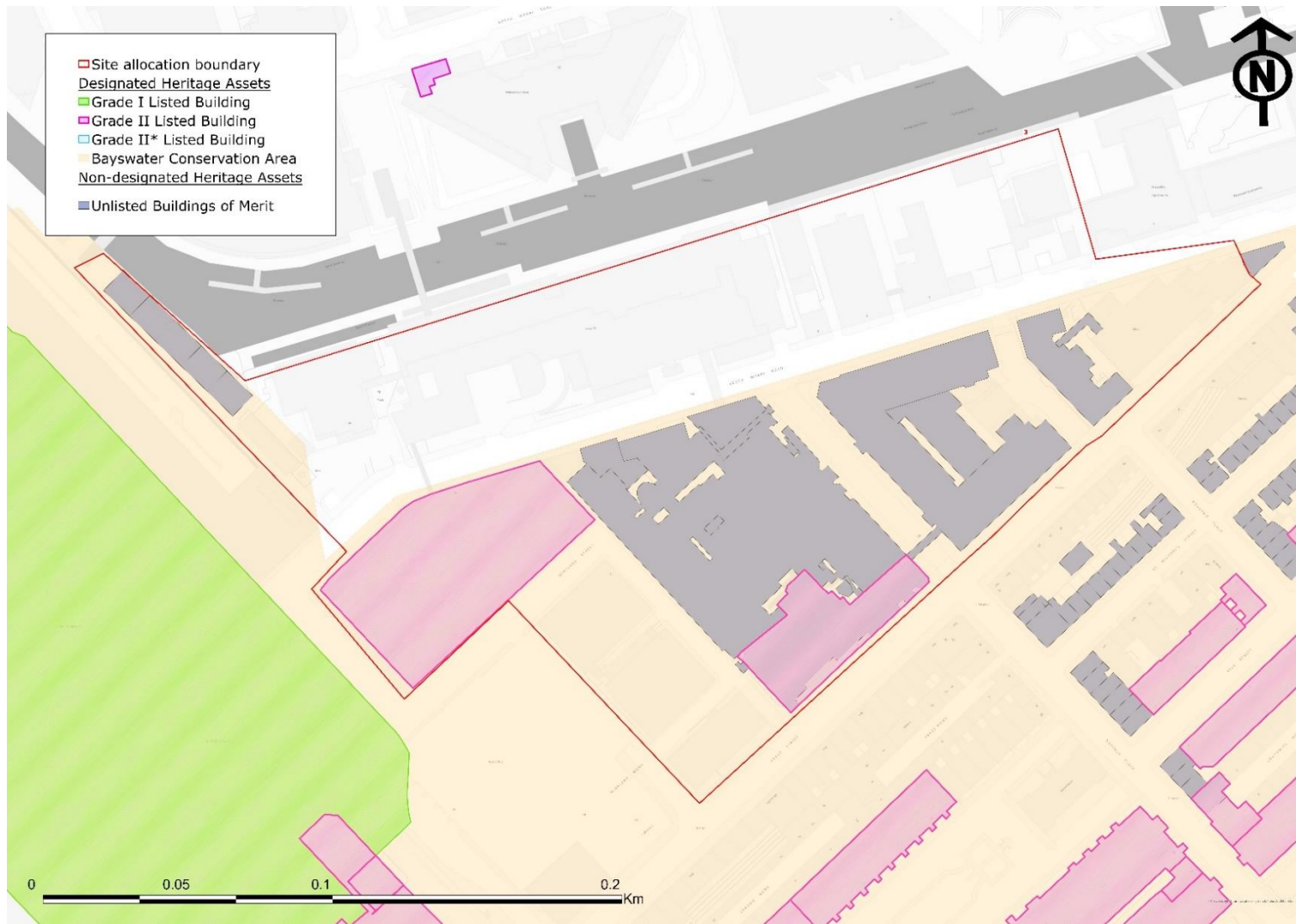
Table 11- Glossary

Modification reference	Section of the Plan	Proposed change	Reason for change
S/G/01	Glossary	<p>Deep retrofit: Development involving the re-use of as much of the existing building(s) as possible, and which involves measures to facilitate energy, performance and climate adaptation upgrades. For the purposes of the Retrofit First policy, this could include the removal and replacement of building envelope, services and finishes and may involve works to superstructure of the existing building(s), but may involving the demolition and replacement of parts of the façade and core, floor and retains at least less than, or equal to 50% of the existing floor slabs., and which results in significant energy, performance, and climate adaptation upgrades., comparable to those in a new building, dramatically reducing carbon emissions from the building compared to the existing structure and prolonging its usable lifespan.</p>	For clarity and to align with proposed modifications to the policy.
S/G/02	Glossary	<p>New building: For the purposes of the Retrofit First policy, development which involves the demolition and replacement of more than 50% of the floor slabs and substructure of any pre-existing building over a single storey, or entirely new structures.</p>	For clarity and to align with proposed modifications to the policy.

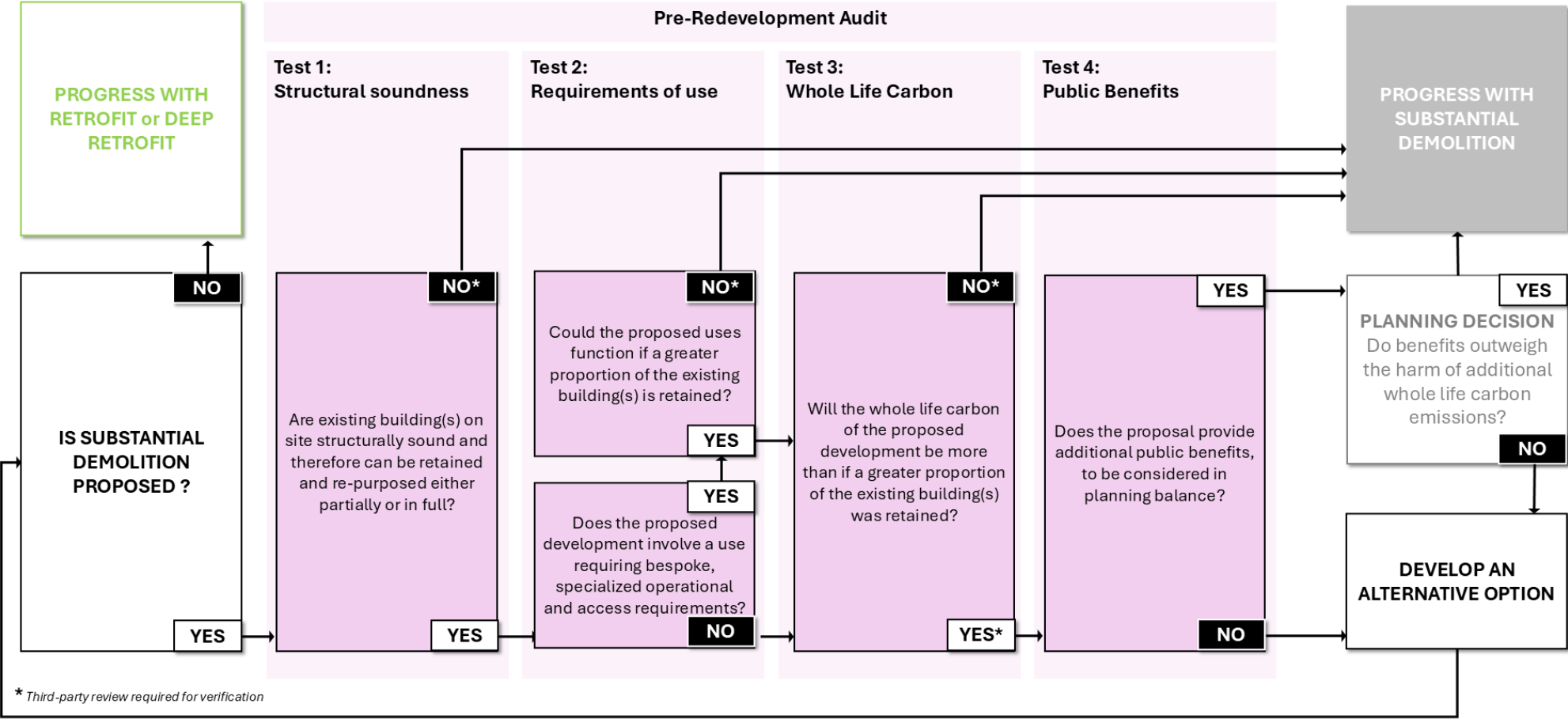
S/G/03	Glossary	<p>Retrofit: Development which involves the re-use of at least 50% measures to facilitate energy, performance and climate adaptation upgrades. For the purposes of the Retrofit First policy, this could include the removal and replacement of the building envelope, services and finishes and may involve none or minor works to the superstructure of the existing building(s) (including foundations, core, and floor slabs), resulting in less than 10% of the existing building(s) being subject to demolition. and which results in energy, performance, and climate adaptation upgrades., which will reduce carbon emissions from the building compared to the existing structure and prolong its usable lifespan.</p>	For clarity and to align with proposed modifications to the policy.
S/G/04	Glossary	<p>Small-scale residential development: For the purposes of affordable housing delivery, small-scale residential developments are those schemes that do not meet the definition of ‘major residential development’ and create new homes.</p>	For clarity and to align with proposed modifications to the policy.
S/G/05	Glossary	<p>Substantial Demolition: Development consisting of the Demolition of more than 50% or more of the floor slabs and substructure of any pre-existing building. above ground structures, by area or volume, but not constituting total demolition.</p>	For clarity and to align with proposed modifications to the policy.
S/G/06	Glossary	<p>Total demolition: For the purposes of the Retrofit First policy only, development consisting of Tthe removal, deconstruction or demolition of an existing building, which will entail the removal of all of its fit out, superstructure, cores, and basement slab(s), but may involve the retention of the façade destruction of all of the above ground floor slabs.</p>	For clarity and to align with proposed modifications to the policy.

3. Appendices

Appendix 1: Heritage diagram for St Mary's Hospital



Appendix 2: Proposed Graphic Illustration of Part A of the Retrofit Policy



Appendix 3: Additional table 1 for Retrofit First policy

<u>Proposed Development Type</u>	<u>Type of alternative options to be assessed</u>	<u>Number of alternative options to be assessed</u>
1. <u>Retrofit</u>	<u>Not applicable</u>	<u>0</u>
2. <u>Retrofit with extension</u>	<u>Not applicable</u>	<u>0</u>
3. <u>Deep Retrofit</u>	<u>Not applicable</u>	<u>0</u>
4. <u>Deep Retrofit with extension</u>	<u>Not applicable</u>	<u>0</u>
5. <u>Complete New Build</u>	a) <u>Retrofit; or</u> b) <u>Retrofit with extension; or</u> c) <u>Deep retrofit; or</u> d) <u>Deep retrofit with extension.</u>	<u>2</u>

Appendix 4: Removed table from Retrofit First policy

Building type	LETI band equivalent
Non-residential buildings	Target A Minimum B
Residential (including mixed use) under 18 metres in height	Target B Minimum C
Residential (including mixed use) over 18 metres in height	Target C Minimum D
Exceptions (site constraints, fast track affordable housing schemes, custom build and self-build homes)	Lowest deliverable embodied carbon without affecting provision of affordable housing

Appendix 5: Additional table 2 for Retrofit First policy

<u>Building type</u>	<u>Upfront Embodied Carbon (A1-A5) requirements</u>	<u>Embodied carbon offset</u>	<u>Credit to operational carbon offset payment</u>
<u>Major schemes- Commercial buildings (including commercial led mixed-use schemes)</u>	<u>Aspirational : 550kg CO₂e/sqm</u> <u>Limit: 650kg CO₂e/sqm</u>	<u>Will be required where the limit (650kg CO₂e/sqm) is being exceeded for justified reasons such as site constraints and bespoke design requirements.</u>	<u>Will be applied based on the tonnes of carbon below the aspirational requirement (550kg CO₂e/sqm), confirmed at practical completion.</u>
<u>Major schemes- Residential (including residential-led mixed-use schemes and hotels) over 18 metres* in height</u>	<u>Aspirational: 600kg CO₂e/sqm</u> <u>Limit: 700kg CO₂e/sqm</u>	<u>Will be required where the limit (700kg CO₂e/sqm) is being exceeded for justified reasons such as site constraints and bespoke design requirements.</u>	<u>Will be applied based on the tonnes of carbon below the aspirational requirement (600kg CO₂e/sqm), confirmed at practical completion.</u>
<u>Major schemes- Residential (including residential-led mixed-use schemes and hotels) under 18 metres* in height</u>	<u>Aspirational: 550kg CO₂e/sqm</u> <u>Limit: 650kg CO₂e/sqm</u>	<u>Will be required where the limit (650kg CO₂e/sqm) is being exceeded for justified reasons such as site constraints and bespoke design requirements.</u>	<u>Will be applied based on the tonnes of carbon below the aspirational requirement (550kg CO₂e/sqm), confirmed at practical completion.</u>
<u>Non-major schemes where policy applies, and development types not considered above</u>	<u>Lowest deliverable upfront embodied carbon without affecting provision of affordable housing</u>	<u>Will not be required</u>	<u>Will not apply</u>
<u>Major and non-major schemes delivering policy compliant affordable housing</u>	<u>Lowest deliverable upfront embodied carbon without affecting provision of affordable housing</u>	<u>Will not be required</u>	<u>Will not apply</u>
<u>*The requirements differentiate heights buildings which include residential development to reflect the wider range of low-carbon materials that are available for use in residential buildings below 18 metres.</u>			

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