

CITY PLAN 2019 - 2040

Consultation Statement

Submission Version

November 2024

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1. Introduction

1.1 Content

- 1.1.1 This Consultation Statement provides details of the Regulation 19 consultation activities and outlines Westminster City Council's compliance with the statutory responsibility to consult stakeholders and to make submission documents available for inspection. This document will form a critical piece of evidence for the Planning Inspectorate to aid their examination of the draft policies included within the City Plan Partial Review.
- 1.1.2 This Submission Version Consultation Statement is accompanied by the Regulation 19 Consultation Statement which was published in March 2024 (see CORE_013 Regulation 19 Consultation Statement). The Regulation 19 version of the Consultation Statement provides details on the informal engagement and Regulation 18 consultation undertaken up until the commencement of the Regulation 19 consultation. This includes details on which organisations and individuals were consulted, how long for and how they were invited to provide their feedback. It also summarises the key issues raised and outlines how the feedback received informed the Regulation 19 version of the City Plan.
- 1.1.3 A separate Duty to Co-operate Statement has been published to cover the engagement that has taken place with adjoining Boroughs and prescribed duty to co-operate bodies.

1.2 Background

- 1.2.1 Westminster City Council adopted the City Plan (2019-2040) in 2021. The current partial review of the City Plan does not update the whole plan, but instead focuses on introducing new policies or updating key policy areas to align the plan with Westminster’s new strategy: Fairer Westminster. The new and revised policies will help make Westminster a fairer and more inclusive city. The scope of the review includes three parts:
- Strengthening existing Policy 9 to help secure more affordable housing, particularly for those in need of social housing.
 - Introducing a new policy to prioritise retrofit and refurbishment of existing buildings.
 - Introduction of Site Allocations to help guide and unlock the development of key underutilised sites to deliver significant levels of growth, infrastructure, and provide other benefits.
- 1.2.2 Westminster City Council published the Regulation 19 City Plan document for consultation on 14th March 2024, pursuant to Regulation 19 of the of the Town and Country Planning (Local Planning) (England). The Plan was subject to eight weeks of consultation, ending on 9th May 2024.
- 1.2.3 Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) include a number of requirements that need to be demonstrated within a Consultation Statements. Table 1 below provides an overview of these requirements, along with details on where these are demonstrated.
- 1.2.4 This submission version Consultation Statement clarifies who was consulted, how the consultation process was undertaken, presents a summary of key issues and explains, where applicable, how responses have been taken into account.

Table 1: Consultation Statement requirements

Regulation 22 (1) c requirement	Reference
i. which bodies and persons the local planning authority invited to make representations under regulation 18,	See CORE_013 Regulation 19 Consultation Statement
ii. how those bodies and persons were invited to make representations under regulation 18,	See CORE_013 Regulation 19 Consultation Statement
iii. a summary of the main issues raised by the representations made pursuant to regulation 18,	See CORE_013 Regulation 19 Consultation Statement
iv. how any representations made pursuant to regulation 18 have been taken into account;	See CORE_013 Regulation 19 Consultation Statement
v. if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and	See Section 3 of this Consultation Statement
vi. if no representations were made in regulation 20, that no such representations were made;	Not applicable

1.2.5 All consultations have been carried out in line with the council's [Statement of Community Involvement \(SCI\) \(2023\)](#).

2. Regulation 19 Consultation

2.1 Consultation Process

- 2.1.1 On 14th March 2024, Westminster City Council formally launched the Regulation 19 City Plan document for public consultation. The Regulation 19 version of the City Plan was subject to eight weeks of consultation, ending on 9th May 2024.
- 2.1.2 The consultation obtained views from Westminster’s stakeholders, residents, and statutory consultees on whether the City Plan Partial Review’s proposed policies were in accordance with the council’s duty-to-cooperate, were legally compliant and met the “test of soundness” as set out in the National Planning Policy Framework.

Notifications of consultation

- 2.1.3 Awareness of the Regulation 19 consultation was raised through a range of mediums in order to ensure responses from key stakeholders and the local community. This included websites, emails and flyers and posts to social media. These are described in more detail below.

Websites

- 2.1.4 The council’s website advertised the Regulation 19 stage of consultation on a dedicated page created for the City Plan Partial Review. This included a link to the Regulation 19 Consultation Statement. A screenshot of the website is attached in Appendix 1.
- 2.1.5 The council also published a website on the ‘Commonplace’ platform which provided information on the Regulation 19 process and guidance on how to respond to the Regulation 19 surveys. It included links to online webinars and provided details of drop-in sessions. The page also provided links to the Regulation 19 City Plan document and a Simple English Explainer of the City Plan Partial Review.
- 2.1.6 Screenshots of the Commonplace platform are attached in Appendix 2.

Emails and flyers

- 2.1.7 Notification of the Regulation 19 consultation was made by email to approximately 2,100 consultees on the Council’s Planning Consultation Database, on Friday 15th March 2024. This included:
- Statutory consultees such as all neighbouring boroughs (Lambeth, Kensington and Chelsea, Wandsworth, Camden, City of London and Brent), the Greater London Authority, Transport for London, Thames Water and Historic England;
 - All ward councillors;
 - All Neighbourhood Forums;
 - General consultation bodies such as voluntary bodies;
 - Businesses, residents’ groups and members of the public who have expressed an interest in the development of Westminster’s planning policy; and

- Other specific consultees including those representing different racial, ethnic or national groups, those representing different religious groups, disabled people and the interests of those carrying out business in Westminster.

2.1.8 On Tuesday 9th April, Neighbourhood Forums were also reminded of their invitation to participate in Regulation 19 directly via email.

2.1.9 Hard-copy flyers were also produced and distributed to Westminster libraries throughout the city. The flyers gave a brief overview of the City Plan Partial Review, and presented links and QR codes to the Commonplace page where stakeholders could obtain more information on the City Plan Partial Review, provide feedback, and join one of the scheduled events.

2.1.10 Screenshot of all emails and flyers are presented in Appendix 3.

Social media

2.1.11 Prior to the commencement of the Regulation 19 consultation period, a Social Media Content Plan was produced.

2.1.12 Throughout the consultation period, 21 posts were released online through three social media websites (X – formerly known as Twitter) LinkedIn and Facebook. These social media platforms were chosen as they were considered most appropriate to reach a large audience, and utilised existing Westminster City Council channels. Posts were released throughout from 14th- 18th March. Table 1 shows how these posts were engaged with over the course of the consultation period.

2.1.13 Screenshots of social media posts are attached in Appendix 4.

Table 1: Overview of social media interactions

Social Media Network	Number of posts	Overall impressions	Overall engagement	Average impression per post
Twitter/X	5	5377	2.2%	n/a
LinkedIn	8	11180	4%	n/a
Facebook	8	3724	4.1%	455

Engagement activities

2.1.14 In order to gather responses on the Regulation 19 City Plan Partial Review, hard copies were made available across the city. Furthermore, a number of events including community drop-in sessions, online webinars, workshops and site visits were held during the Regulation 19 consultation period to inform responses to the policy areas. These were scheduled as a mix of in-person events, along with virtual events online to cater to a broad audience. Further details are provided below.

Hard copies

- 2.1.15 During the consultation period, hard copies of the Regulation 19 draft City Plan, the Policies Map and the Simple English Explainer were available to view at all Westminster libraries.
- 2.1.16 Images of library displays with hard copy materials presented are included in Appendix 5.

Drop-in sessions

- 2.1.17 Two in-person drop-in sessions were held at local Westminster libraries. These were attended by the lead officers for each policy area. These were as follows:
- Pimlico Library meeting room on Wednesday 3rd April 2024, 4pm to 7pm
 - Church Street Library community space on Monday 8th April 2024, 4pm to 7pm.
- 2.1.18 These sessions were advertised on the Commonplace platform and flyers were placed in all Westminster libraries across the city.
- 2.1.19 The purpose of these sessions was to allow members of the community to visit their local library and to ask questions of officers to clarify any queries they might have to assist them in their response to surveys or preparation of representations.

Webinars

- 2.1.20 Three webinars were held online via Microsoft Teams on the following dates:
- Affordable Housing webinar on Monday 25th March, 5pm- 7pm
 - Site Allocations webinar on Tuesday 26th March 5pm – 7pm
 - Retrofit First webinar on Wednesday 27th March 5pm- 7pm
- 2.1.21 These were advertised on the Commonplace platform and free tickets were made available on Eventbrite. The purpose of these sessions was to provide an overview of the aims of the policies within the City Plan Partial Review and to answer any queries which might assist individuals and/or organisations to participate in the consultation.
- 2.1.22 A total of 61 participants registered for three sessions through the Eventbrite portal.

Workshops

- 2.1.23 On Tuesday 9th April, the council held an in-person workshop for the Westminster Property Association (WPA) at City Hall. This workshop included presentations from officers on each of the policy areas, with WPA member representatives then invited to engage on any issues they were unclear about to assist them in developing their Regulation 19 responses.
- 2.1.24 On Tuesday 16th April, the council held an online workshop for Neighbourhood Forums. The purpose of this workshop was to share information on the consultation and to answer any queries arising from the Forums with regards to the City Plan Partial Review policies.

Site visits

- 2.1.25 Two site visits were held for the ward councillors on Tuesday 23rd April and Wednesday 24th April. The purpose of these visits was to inform ward councillors of the proposed Site Allocation policies

and to answer any queries they may have to assist in them in either responding to the Regulation 19 consultation, or to address queries about them from local residents.

2.2 Representations received during the Regulation 19 consultation

Submission of representations

2.2.1 The council welcomed representations made using the Commonplace platform online surveys and written representations sent via email or via post to Westminster City Hall.

Consultees and representations received

2.2.2 In total 102 representations were made under Regulation 20 (in response to consultation at Regulation 19 consultation). This included:

- 82 written responses received via email
- 20 validated, completed representations made via online surveys on the Commonplace webpage

2.2.3 As shown below in Figure 1, respondents covered a broad range of consultee types. A full list of respondents is provided in Appendix 6.

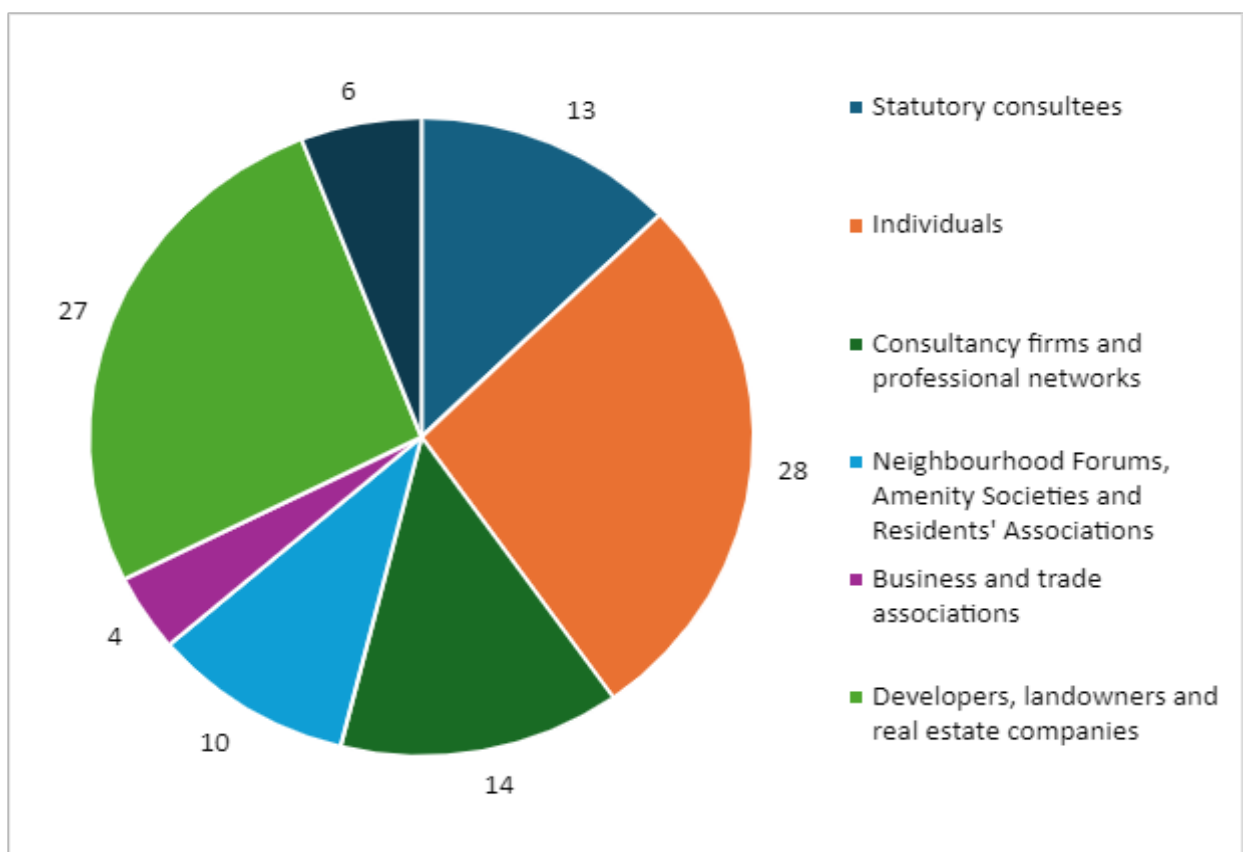


Figure 1: Overview of consultees, according to their stakeholder groupings

- 2.2.4 All received representations have been published in a separate document (see CORE_015 – Full Regulation 19 Representations). Personal contact details have been redacted following the council’s Data Protection policy.

Consultee involvement in the Examination in Public

- 2.2.5 Following the submission to the Secretary of State, an Examination in Public (EiP) will be held to consider public views on the proposed changes to the City Plan in the presence of a Planning Inspector. On 20th June 2024, emails were sent to bodies and individuals who made representations on the Regulation 19 version of the City Plan, asking them to indicate whether they planned to participate in examination hearing sessions. In response, 15 emails were received expressing an interest in attending the EiP.

3. Issues raised during consultation

3.1 Structure of responses to representations

- 3.1.1 At the conclusion of the Regulation 19 consultation period, the council had received extensive feedback. These included responses gathered from the online survey, along with the emailed representations.
- 3.1.2 This section provides an overview of the comments received and council’s responses for the following policies:
- Site Allocations
 - St Mary’s Hospital
 - Westbourne Park Bus Garage
 - Land adjacent to Royal Oak station
 - Grosvenor Sidings
 - Affordable Housing
 - Retrofit First
- 3.1.3 Representations can be read in full within “CORE_015 – Full Regulation 19 Representations”.
- 3.1.4 The feedback received has been reviewed by the council and amendments to policy wording proposed where appropriate. Further details on the proposed modifications to each policy can be found within “CORE_002 Schedule of proposed modifications (November 2024)”.

3.2 Site Allocations

Site allocation policies (8 – 11) overall

<i>Key point raised</i>	<i>Council response</i>
The policies should provide more detail, including the quantum of development expected, number of homes (including affordable), and appropriate building heights.	Introduction to site allocations (page 54 of the City Plan Partial Review Regulation 19 PDF) explains that their purpose is to provide guidance on appropriate land uses, core principles for development, and design parameters, without being overly prescriptive. Decisions on quantum of development, such as including the number of new homes and appropriate building heights will be determined through the planning application process – when more detailed designs are available, and their potential impact on their surroundings are better understood. The policies should also be read alongside adopted City Plan and London Plan policies. Proposed policy 13 of the City Plan sets out the council’s approach to affordable housing provision, whilst existing adopted City Plan Policies - 38 : Design Principles, 39: Westminster’s Heritage, 40: Townscape and Architecture, 41: Building Height - provide criteria for determining townscape parameters. For further information, see “EV_GEN_001 Scope and Site Allocations Topic Paper”.
The policies should enable and support physical activity and social interaction and therefore contribute to enabling healthy lifestyles.	Each of the policies include reference to enhancing permeability through the sites, activating public spaces and including dwell spaces, where relevant. These improvements should enable and support physical activity and social interaction, contributing to enabling healthy lifestyles. Furthermore, the policies should be read alongside adopted City Plan and London Plan policies that support and enable healthy lifestyles.
The policies are not sound as they are silent on the subject of tree planting. To better comply with paragraph 136 of the NPPF, the policies should include wording which makes clear that the sites should maximise opportunities for new tree planting.	Adopted City Plan Policy 34: Green Infrastructure requires applicants to contribute to the greening of Westminster by incorporating a range of measures, including trees, into the design of the scheme. Furthermore, development at the sites will be subject to adopted policy 38: Design Principles. This states in B(5) that: "All development will positively contribute to Westminster’s townscape and streetscape, having regard to the preservation and enhancement of the surrounding tree population." As such, it is not considered necessary to make specific reference to the need to maximise opportunities for tree planting within each of the policies for soundness.

Policy 8 St Mary's Hospital

<i>Key point raised</i>	<i>Council response</i>
General	
Masterplan: Who should complete this and when? Master-planning exercise should be carried out at allocation stage to help provide a concept plan and development requirements that can be refined as the proposal develops.	As it is anticipated that development will come forward in phases, a masterplan should be prepared by the landowner in support of future planning applications, to demonstrate how individual development phases contribute to an overall masterplan that responds to the principles set out in the site allocation.
Vision	
Support for the overall site allocation and the vision for St Mary's and the principal of the Site Allocation.	Support noted.
Principle A	
The policy must specify that the delivery of the hospital is contingent on the viable delivery of other development across the site.	This is a matter for project financing, rather than planning policy. In order to achieve good placemaking outcomes, viability should not be the primary focus of the principles within the site allocation which seek to secure a high-quality development across the site. Matters related to funding and delivery will be considered at planning application stage.
<p>Unique site circumstances and needs of the hospital are not accurately reflected.</p> <p>The Policy should mention key deliverables such as:</p> <ul style="list-style-type: none"> - The number of beds needed - Sqm of hospital floorspace needed - Intended location of the hospital 	Reference in supporting text to what is currently understood to be the hospital floorspace requirements is considered sufficient and provides flexibility should this, bedspace requirements, or preferred location within the site for this floorspace change in advance of any subsequent masterplan and planning applications.

<p>Evidence of future needs provided by the Trust has not been included, to be in line with the London Plan, policy should be linked to future planned levels of infrastructure.</p>	<p>Evidence of future needs were provided by the Imperial College Healthcare NHS Trust (ICHT) as part of their Regulation 19 representation. This now forms part of the Evidence Base for the policy. This evidence highlights the justification for the floorspace figure for the hospital (which was already included in the policy at draft paragraph 8.4 of the Regulation 19 version).</p>
<p>Principle B</p>	
<p>Concerns over the continuity of hospital provision. Policy needs to be clear that demolition will only take place once new building is occupied. An operational hospital must be retained whilst a new hospital is constructed.</p>	<p>See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>The new outpatients building at the corner site at the eastern end of South Wharf Road could potentially be brought into use early to continue providing outpatient services.</p>	<p>Any phasing of hospital development to ensure ongoing patient care will be a matter for the landowners to address in their proposals that respond to the principles in the site allocation.</p>
<p>Principle C</p>	
<p>Heritage concerns: Policy needs to be stronger in preserving, protecting and maintaining historical buildings. There should be detailed proposals for the maintenance of Historic Buildings in the master plan. Concern over the approach to demolition, it is not clear whether listed buildings will be partially or wholly demolished. Principle C should require retention of listed buildings, current wording is open to interpretation. Language should be stronger conserve heritage, not just respond to it, in line with national policy and legislation.</p>	<p>Any development at the site will be subject to all existing legislation relating to heritage assets and adopted City Plan policies including policies 38: Design Principles, 39: Westminster’s Heritage, and 40: Townscape and Architecture.</p> <p>In addition to these existing policies, see proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)”, and the support from Historic England to such modifications as set out in (SCG009)</p>

<p>The policy lacks a balanced approach between opportunity and heritage constraints and seems to have been led by heritage. Policy should make clear the requirement to deliver development opportunity, what land uses are needed and be framed to unlock development.</p>	<p>The policy seeks to balance the need to respond to existing site heritage assets, along with the need to promote development which meets the objectives of the Paddington Opportunity Area. See proposed modifications to draft principles D and E in “CORE_002 Schedule of proposed modifications (November 2024)”, which ensures the policy better captures the development opportunity.</p>
<p>Principle D</p>	
<p>Policy could make it clearer that where land is not needed, it can be considered for alternative uses and provide clear guidance on what form of development and land uses will be appropriate for the site in this context.</p>	<p>As the site is within the Paddington Opportunity Area, the types of land uses supported by adopted Policy 3: Paddington Opportunity Area would be appropriate on site. This is set out in paragraph 8.5 of the City Plan.</p>
<p>The premise behind this policy is to deliver additional hospital floorspace, however Principle D plans for surplus.</p>	<p>The intention of the policy is to ensure that a new hospital is delivered on the site without any compromises to the function of the hospital during construction. In order to do this, there will most likely be a scenario where the existing hospital remains in-use until the new hospital is completed. As this is the only way to ensure continuity of services- there will therefore most likely be a scenario where that land can then be re-used for other purposes as it could likely become surplus to the needs of the hospital.</p>
<p>The wording needs to reflect that the land uses on site are not just healthcare related (for example, one is in use as a university facility)</p>	<p>See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)” – which no longer restricts judgements of ‘surplus land’ to healthcare uses only</p>
<p>Principle E</p>	
<p>If tall buildings are being considered, the policy should mention wind tunnels.</p>	<p>See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)” with regards to draft Principle K. This includes consideration of the effects of wind tunnelling, which is something that impacts amenity values and would be a negative microclimatic condition.</p>

<p>Oppose the suggestion of 170m for the scale of development due to serious heritage and townscape implications.</p>	<p>Policy does not include a specific height. Testing of impacts of such heights on heritage and townscape were included in the St Mary's Heritage Impact Assessment to reflect similar scales of development that have emerged within the Paddington Opportunity Area – as explained in page 11 of EV_S_002 St Mary's Site Allocation Heritage Impact Assessment. Findings of the study highlight that such height has the potential for significant harm and would require further detailed analysis at planning application stage if such height was proposed.</p>
<p>The policy should not reference 'prevailing character' as this presumes that the character is whatever is most common. This is difficult to ascertain across this site, given the very different characters within the Bayswater Conservation Area and the Paddington Opportunity Area.</p>	<p>See proposed modifications in "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>Principle F</p>	
<p>Support for improving permeability, public realm improvements and access at the station.</p>	<p>Support noted.</p>
<p>Current wording in Principle F, suggests current routes are of good character. The policy should be reworded to be clearer existing character of routes is poor.</p>	<p>Noted- see proposed modifications in "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>The emerging Master Plan should provide explicitly for a continuous walkway along the canal. New buildings on the canal frontage should provide a passageway through the building at low level or over the water.</p>	<p>Content of a future masterplan is beyond the scope of the content of the site allocation policy. Draft Principle G sets out expectations for increased activation and access along the canal basin.</p>
<p>Principle G</p>	
<p>The policy should mention how development should contribute to a wider regeneration of the Paddington area. For example, more urban</p>	<p>Greening is a focus in draft Principle C of the policy and any planning application coming forward will also need to comply with the NPPF's biodiversity net gain requirements.</p>

greening to the south of the development, including the greening of Praed Street.	
Support for potential active frontage, as demonstrated in Figure 15.	Support noted.
Principle H	
Policy should look to improve traffic conditions on local routes and facilitate ambulance access throughout construction period	Noted. To address these issues draft Principle H includes requirements for a site-wide transport strategy when development proposals come forward.
Space for disabled access at St Mary's is limited. Access and public realm improvements should address access for those with mobility impairments, not just prioritise vehicle access/pick up and drop off.	Noted. Draft Principle H includes requirements for any site wide transport strategy to consider the needs of those with limited mobility.
Operational transport constraints need to be taken into account as part of development. These include both access to the side of Paddington station (which is adjacent to the site) and the infrastructure protection (IP) requirements to build over the Bakerloo, Hammersmith & City and Circle London Underground lines.	<p>Improvements to links to Paddington Station are a key aim of the Site Allocation. This is highlighted in Figure 15 which denotes 'potential permeability improvements' into the station. This corresponds to draft Principle A which states that the site should include "improved legibility for those arriving from Paddington Station". The supporting text for the policy also states at draft paragraph 8.13: "The Infrastructure Delivery Plan identifies a need for improved permeability through the site to Paddington Station."</p> <p>Infrastructure protection requirements to build over the Bakerloo, Hammersmith & City and Circle London Underground lines are already a function of existing planning requirements and are therefore not required to be repeated in detail here.</p>
Principle J	
Quiet green space is important for patients and visitors. This should be planned into the new hospital, especially with the adjacent canal.	Noted. See draft paragraph 8.15 along with proposed modifications in "CORE_002 Schedule of proposed modifications (November 2024)".

<p>Current wording is unclear and suggests that the existing amenity values are of good quality. The policy should be reworded to be clearer existing amenity value is poor.</p>	<p>See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>Public realm improvements should aim to address safety and the perception of safety through design including lighting and passive surveillance.</p>	<p>As per adopted City Plan Policy 43: Public Realm, any new public realm, including routes through the site, will be required to be safe and secure to ensure an inclusive environment. This policy would be considered as part of any planning application for the site.</p>
<p>Figure 16</p>	
<p>Key should be made clearer to distinguish between different types of heritage assets and to improve readability</p>	<p>See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>Supporting text</p>	
<p>There should not be an additional requirement to provide evidence of floorspace not being needed for healthcare purposes.</p>	<p>See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>There should be a reference made to the fact that some loss of heritage assets could be acceptable if they are balanced with the delivery of public benefits.</p>	<p>The council believe that this is in contradiction to adopted Policy 39: Westminster’s Heritage. The council’s position is that development must ensure that heritage assets and their settings are conserved and enhanced in a manner appropriate to their significance.</p> <p>The existing policy position is therefore that listed buildings or Unlisted Buildings of Merit that make a positive contribution to the Conservation Area are conserved, unless the relevant tests in national policy have been met – which would need to be demonstrated through a planning application.</p>
<p>The site is not appropriate for care homes due to 24-hour critical care location. Any residential units on the site will need to be carefully considered due to likely levels of noise, and access requirements associated with hospital use. Given that this will need to be balanced and carefully considered,</p>	<p>Westminster has a strong housing need which a site of this size could help to contribute to. The council included reference to residential care uses and key worker homes on the basis that such uses could provide synergies with the existing and proposed healthcare uses at the site, in terms of potential accommodation for hospital workers, or elderly residents who may need good access to healthcare uses. Both types of occupants would also benefit from the accessibility of the site by public transport and the co-location of key services in a sustainable location.</p>

explicit reference to key worker housing and residential care uses should be removed.

Paddington Opportunity Area policy

Amendments should be made to Paddington Opportunity Area policy to make explicit reference to improving access to Paddington Station.

See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)”.

Policy 9 Westbourne Park Bus Garage

<i>Key point raised</i>	<i>Council response</i>
<p>Constraints should explicitly refer to the retention of the bus garage, any redevelopment will need to protect the continuity of bus garage operations, both during construction and in the end state.</p>	<p style="text-align: center;">General</p> <p>Draft Policy 9 (see the Vision and Core Principle A and B) support the retention on-site of a bus garage that meets current and future sustainable transport and staff needs.</p> <p>Paragraphs 9.3-9.5 further acknowledge that the Westbourne Park Bus Garage is key to the functioning of London's sustainable transport network and that its current and future operations should be safeguarded.</p> <p>Although it is envisaged that the Bus Garage would stay on-site and facilities improved as part of the development of the site, there remains a possibility that an alternative location is found that better meets operators need and can positively contribute to improved public transport reliability. In such circumstances, protecting the existing facility with no end user would not represent efficient use of land in this sustainable location. Modifications have therefore been proposed to clarify the council's position in relation to the retention of the bus garage.</p> <p>See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>An option analysis and appraisal to relocate the concrete plant and bus station should be carried out from the outset, to ensure access and living quality is improved.</p>	<p>The council is not aware of any plans to relocate the Westbourne Park Bus Garage or Tarmac Paddington Concrete Plant to other locations. Given the purpose of the policy is to help unlock the development of underutilised land, or land where development can secure enhanced identified infrastructure of London-wide significance, it is considered that there is no need for the council to carry out an appraisal to relocate those uses- moreover, these sites are not in council ownership.</p> <p>Draft Policy 9 (see paragraphs 9.3-9.5) acknowledges that the Westbourne Park Bus Garage is key to the functioning of London's sustainable transport network and that its current and future operations should be safeguarded. If in the future, the landowners for the Bus Garage or Concrete Plan come forward with relocation plans, these will be assessed on their own merits and the council may consider the need of any further work.</p> <p>Furthermore, the policy places an importance on the improvement of access and living quality. See Core Principles C, E, H, I and J for further details.</p>
<p>Proposals should ensure final design is future proofed for both and electrification of the bus fleet.</p>	<p>Agreed – this is acknowledged in paragraph 9.5.</p>

<p>The allocation should require that any neighbouring uses are appropriate to be located next to an operational bus garage.</p>	<p>Agreed. Modifications proposed to ensure proposals consider amenity impacts and the impacts of existing uses in line with the Agent of Change principle.</p> <p>See “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>There is too much traffic causing congestion and pollution in this area and a bus garage will only make it worse.</p>	<p>A bus garage already exists on site. The site is in a sustainable location well served by public transport and can help contribute to future development needs including for new homes and jobs. Draft Policy 9 requires redevelopment of the site to ensure its upgrade and modernisation, including electrification (see paragraph 9.5) and improvements to its environmental conditions.</p>
<p>The area should add to biodiverse green areas open to the public and ideally have a safe and pleasant walkway / cycleway between Royal Oak and Paddington.</p>	<p>Draft Core Principle C requires proposals to include urban greening. Draft Core Principle J refers to opportunities to create a green corridor whilst Core Principle H sets out the objectives for an enhanced pedestrian environment.</p>
<p>Vision</p>	
<p>Support for ambitions of the allocation as development provides opportunities to activate the site and provide a better public realm alongside active travel connections.</p>	<p>Support noted.</p>
<p>Reference to residential-led development should be removed as this is restrictive in allowing a deliverable scheme to come forward.</p>	<p>One of the key goals of Westminster's City Plan is the delivery of new homes, in line with the London Plan. Furthermore, adopted City Plan Policy 5: North West Economic Development Area (NWEDA) requires 'new residential and mixed-use developments that improve housing quality and help diversify the area's tenure mix' to be delivered in the NWEDA. Given the site's location and surrounding character, the draft policy promotes a residential-led mixed-use development and references to 'residential-led' development are justified.</p> <p>It does not rule out a range of other supporting uses that provide other benefits such as job opportunities, as part of a sustainable mix of uses.</p>
<p>Principles A and B</p>	
<p>The allocation should set out that residential development will only be supported where it</p>	<p>Westbourne Park Bus Garage does not fall within the Central Activities Zone.</p>

<p>does not impact strategic functions and greater weighting should be given to office development.</p>	
<p>There is a chance to upgrade the bus fleet's carbon footprint by considering more sustainable options and mitigating tyre dust, emissions, noise, and disruption. Additionally, permanent measures should be designed into the scheme to reduce dust and noise and lessen the impacts from the concrete factory, the Westway and bus station. We recommend construction measures are taken to mitigate impacts.</p>	<p>Draft Policy 9 supports the delivery of a modern and upgraded bus garage - see draft Vision and Core Principle A. Draft Core Principle E ensures development contributes to the delivery of a high quality living and working environment and that the site's constraints are considered in early design phases. This is further explained in draft paragraphs 9.5 and 9.12 within the supporting text.</p> <p>In line with adopted Policy 33: Local Environmental Impacts, applicants will need to adhere to the council's Code of Construction Practice which includes requirements to reduce and mitigate potential impacts from noise, vibration, dust, light and traffic. The council may use planning conditions and legal agreements to secure impacts are adequately managed.</p> <p>Modifications are proposed to clarify the council's position. See proposed modifications in "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>Principle C</p>	
<p>Advocacy for a carbon-neutral or positive development, with sustainable energy systems and on-site water reuse. Development that meets BREEAM outstanding should be achieved.</p>	<p>Draft Policy 9 explains how sustainability should be at the heart of proposals. Moreover, other City Plan policies will also need to be considered by applicants including adopted Policy 36: Energy which requires major development to be 'net zero' and adopted Policy 38: Design Principles which includes the requirement to achieve at least BREEAM "Excellent" or equivalent and optimise water efficiency.</p>
<p>The scheme should prioritise active travel and be a 'car-free' scheme with essential parking only.</p>	<p>Draft Policy 9 explains how active travel should be at the heart of proposals- see draft Core Principles C, H, I and J. This is further explained in draft paragraphs 9.11 and in 9.14 - 9.18 within the supporting text.</p> <p>In line with adopted Policy 27: Parking and London Plan Policy T6, new residential developments in inner areas of PTAL 5-6 will be car free. A limited number of car parking may need to be provided for disabled persons parking or servicing.</p>
<p>Design of new development should not create wind tunnels.</p>	<p>In line with adopted policies in both the City Plan and London Plan, the impacts of any new buildings on the local environment will be assessed when development proposals come forward. This will include the consideration of if the design, size, and layout of proposals create wind tunnels.</p>

<p>There is a clear rationale for the existing buildings on site to be demolished and redeveloped (whilst re-using materials).</p>	<p>In line with adopted policies in both the City Plan and London Plan, the approach to the retention of existing buildings and structures of any applications will be assessed at planning application stage.</p> <p>Modification proposed to remove reference to existing building and instead reference wider circular economy principles. See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>Principle D</p>	
<p>There is clear potential for the site to accommodate a tall building/s and this should be recognised and stated within the policy and/or supporting text.</p>	<p>Policy provides support for optimisation of development densities as the site in a manner that responds to its context.</p> <p>Appropriate building heights will be determined through the planning application process when detailed designs are available and their potential impact on their surroundings are better understood. Adopted policies within the City Plan and London Plan provide criteria for determining appropriate building heights at planning application stage and will be used alongside any other material considerations.</p>
<p>What does 'access to new buildings should be secured at all time' mean? The site should not be a gated community and should be designed to include public rights of way and public spaces.</p>	<p>Modifications proposed for clarity. See “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>Principle E</p>	
<p>The location of residential units should be informed by specific technical assessments, and not prescribed by policy.</p>	<p>Modification proposed for clarity. See “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>New accommodation should include usable outdoor terraces and balconies with shared public spaces and local amenity to service the new and existing community should be provided.</p>	<p>Other City Plan policies will also need to be considered by applicants for any development proposals coming forward at the site. This includes adopted City Plan Policy 12: Housing Quality which requires the provision of external amenity space in new-build homes. It is not considered any modifications are needed.</p>

Principle F and G

Support for more space for small businesses is welcomed.

Support noted.

Principle H, I and J

There is very restricted vehicular access which causes traffic congestion. The new scheme needs to improve this congestion and prioritise pedestrians and non-motorised users. Including providing cycle parking and creating new pedestrian routes to Great Western Studios.

In line with adopted City Plan and London Plan policies, development will be car free except for the potential delivery of a limited number of car parking spaces for disabled persons or for servicing. Other City Plan and London Plan policies explain how this will be assessed, and any highways impacts will need to be considered by applicants in early design phases. The draft Vision and Core Principle explain how development should enhance the pedestrian experience and permeability- see Core Principles C, H, I and J, and Figure 18.

In line with adopted City Plan Policy 25: Walking and Cycling, developments are expected to contribute to cycling enhancements and adhere to London Plan cycle parking standards.

Public access must be provided. Security should be provided as much as possible by passive measures e.g. activation of the ground level / natural surveillance.

In line with adopted City Plan and London Plan policies and Draft Policy 9, any new public spaces should be publicly accessible, and safety and security should be considered in design proposals.

Modifications are proposed to clarify this point. See "CORE_002 Schedule of proposed modifications (November 2024)".

It is unclear if the development itself is expected to provide a new pedestrian connection over the canal if this been considered from a viability perspective. The development is unlikely to generate demand for a bridge and given the size of the site it would be difficult to incorporate, however we are satisfied the wording is relaxed enough, seeking exploration of the potential opportunity only.

An additional footbridge over the canal that improves permeability would benefit new residents, local workers and improve the accessibility to the Westbourne Park Underground Station by creating a safer and more inviting pedestrian link. The Draft Infrastructure Delivery Plan (2024) acknowledges delivery of such a project is likely to require pooling of funding sources.

Part I should be amended to read: 'The delivery of new dwell spaces should be

Noted. Modifications proposed to amend this clause. See "CORE_002 Schedule of proposed modifications (November 2024)".

<p>enabled between buildings which are thoughtfully considered and arranged to ensure a high quality living environment, this includes setbacks from the Bridge and the Grand Union Canal through maximising separation distances between buildings and building setbacks from the bridge and Grand Union Canal should be prioritised, with a focus on ensuring that these public areas are safe and accessible;'</p>	
Principle L	
<p>The project phasing should ensure that adequate amenity to support earlier phases is provided including greening and meanwhile uses until later stages are completed.</p>	<p>Modifications proposed to clarify position in relation to phasing and meanwhile uses. See "CORE_002 Schedule of proposed modifications (November 2024)".</p>
Other	
<p>The design should prioritise people, pedestrian-friendliness and embrace inclusive design principles as well as sustainability.</p>	<p>Draft Policy 9 explains how good design should be at the heart of proposals, and how development on the site should contribute to the delivery of a more inviting and greener public realm - see draft Vision and Core Principles C, I and H. Other City Plan and London Plan policies, including design policies, will also need to be considered by applicants. Given this is covered by other policies, no modifications are considered necessary.</p>
<p>The lighting scheme should enhance safety at night but also not cause light pollution, especially at night.</p>	<p>Adopted City Plan Policies 33: Local Environmental Impacts and 43: Public Realm explain that adequate lighting can help increase safety. Draft Policy 9 includes principles and supporting text to ensure that the redeveloped site is safer. Given this issue is addressed by a number of policies, it is not considered that any modifications are needed.</p>
<p>Local residents and canal users should have the opportunity to consult at all design stages</p>	<p>Local residents and canal users have had an opportunity to comment on draft Policy 9 through informal consultation events in the lead up to the Regulation 19 period, and through formal representations during the Regulation 19 consultation. In line with regulations and council processes, any future planning application will be consulted on. The council also encourages applicants to engage the community early in the design process.</p>
<p>The importance of procuring reputable design and engineering teams through open</p>	<p>As this site is not owned by the council, the council cannot dictate how design or engineering teams are engaged. In line with regulations and council processes, any planning application will be consulted on. The council also encourages</p>

competition should be stressed, along with the need for a clear design vision and community-responsive design review processes.	applicants to engage the community early in the design process and may recommend a planning application is assessed by a Design Review Panel.
Provisions for public art and sculpture must be included.	Adopted City Plan Policy 43: Public Realm encourages the delivery of public art. Given this issue is addressed by a number of policies, it is not considered that any modifications are needed.
The policy must mention NGET asset, 275Kv Underground Cable route: ST JOHNS WOOD - WILLESDEN 1. Currently, development cannot be delivered without acknowledging the constraints of this infrastructure.	Modifications to the policy wording are proposed to acknowledge the presence of cables and to ensure impacts of development are managed. See “CORE_002 Schedule of proposed modifications (November 2024)”.
Given the proximity of the concrete factory, measures to reduce dust and noise should be introduced to the plant including elements such as noise barriers, sound and dust absorbers to reduce the impact on the new and existing community around the plant.	The Concrete Plant is not within the site allocation’s boundary. It is also not in Westminster City Council’s ownership. Modifications are proposed to ensure development considers amenity impacts and to reference the Agent of Change principle. See “CORE_002 Schedule of proposed modifications (November 2024)”
Supporting text	
Paragraph 9.4 should also mention Tower Transit Operations as they are another relevant landowner here.	Modification proposed so supporting text refer to landowners and operators on site- see “CORE_002 Schedule of proposed modifications (November 2024)”.
The restrictions of the site should be adequately described.	Policy wording acknowledges and responds to existing constraints to the sites development – including the need for continued transport infrastructure on site, and the impact of the Westway on the quality of any living environment. A number of modifications are being proposed to the policy which will make sure development considers constraints. See “CORE_002 Schedule of proposed modifications (November 2024)”.

Policy 10 Land Adjacent to Royal Oak Station

<i>Key point raised</i>	<i>Council response</i>
General	
Lack of clarity regarding site ownership and the use of land.	Landowners of this site are Transport for London (TfL). The council have been engaging with Places for London, TfL's property company in the drafting of the site allocation policy. Please refer to "SCG_011 Places for London" for confirmation of discussions with the landowners.
Part of the site east of Ranelagh Bridge: access is problematic and any development should respect existing building heights along southern edge of the railway. Higher buildings to the north side would fail to preserve or enhance the character of adjacent Conservation Area.	The draft vision of this site allocation seeks to deliver enhanced access and improved permeability for pedestrians through the site. Principle B ensures that development responds to its heritage value, including the character of the adjacent Conservation Area and the tall building cluster adjacent to the site by ensuring that building heights grade down significantly from the buildings at Kingdom Street (to the east).
Part of the site west of Ranelagh Bridge should remain as open space with new landscaping. Difficulties building on this section include provision of light to lower two storeys, lack of access, dedicated cycle route on Lord Hills Bridge and possibility of widening Royal Oak Station platform for step-free access.	Limiting development to land east of Ranelagh Bridge will inhibit opportunities to provide for commercial and housing growth in this sustainable location and enhance access into any open space that is provided as part of the development. In terms of provision of light to the lower two storeys, early feasibility studies indicate that development will likely be situated on a 'plinth' structure whereby habitable spaces are located at ground floor level and above, with servicing areas located on the lower levels.
The creation of a 'green lung' at this site with no polluting buildings would improve air quality and help absorb heat and noise, all for the better health of the local population.	Draft Principle D seeks to put sustainability at the heart of proposals, including in terms of the design and operation of new buildings, and the approach to biodiversity.
Support the policy acknowledging surrounding strategic transport infrastructure	Support noted.

and having regard to infrastructure protection requirements for buildings operational to railway.	
Oppose site allocation policy for Royal Oak and use of site as a temporary waster transfer site or relocated bus station.	Opposition of site allocation policy is noted, however, the policy relates to the potential for the site to be used as temporary open air storage, not for general waste storage or transfer where there would be a processing element. Modifications as set out in “CORE_002 Schedule of proposed modifications (November 2024)” includes references to limiting such uses to Class B8 (open air storage) in order to provide clarity. The purposes of storing materials is to enable re-use of construction materials for development sites in the locality is in line with circular economy principles and only as a meanwhile use. The potential of the site for a relocated bus station is not being considered as part of this site allocation policy.
Where mixed-use is proposed, the policy should ensure there is no net loss of existing office floorspace.	Existing use of the site does not include office floorspace and the site allocation supports mixed use development which could include new provision.
The policy should be clear that any development here would contribute to / support the delivery of step-free access to and from the Royal Oak London Underground station.	This has been highlighted by the proposed modifications to the policy. See “CORE_002 Schedule of proposed modifications (November 2024)”.
Support site allocation policy for Royal Oak.	Support noted.
The area should ideally have a safe and pleasant walkway / cycleway between Royal Oak and Paddington.	Draft Principle C seeks to enhance permeability through the site, activate public spaces and include dwell spaces. Links between Royal Oak and Paddington fall outside of the site boundary and whilst development may be able to contribute to enhancements (e.g. through CIL or s106), it is beyond the scope of the site allocation to deliver this.
Vision	
Suggest that the Vision makes clear that the site is suitable for mixed-use.	Whilst it is considered that the original wording already included acknowledgement of the site being developed for mixed use purposes, further amendments have been proposed to provide greater clarity in terms of being capable for mixed use development that comprises “both commercial and well-designed residential”. This has been incorporated into the proposed modifications to the policy. See “CORE_002 Schedule of proposed modifications (November 2024)”.

Principle A

Should be amended to potentially include workspace, and/or light industrial and/or logistic uses and/or new homes.

These comments are noted and have been incorporated into the proposed modifications to the policy. See “CORE_002 Schedule of proposed modifications (November 2024)”.

Principle B

The suggested restriction of height on this site to “grade down significantly from the buildings at Kingdom Street” is unacceptable with little heritage or townscape basis to restrict development adjacent to the Paddington Opportunity Area.

Draft Principle B ensures that any optimisation of development densities across the site responds to its nearby heritage value, as well as the tall building cluster townscape in the vicinity. A modification to the policy has been proposed to remove the term ‘significantly’ when referencing the need to grade down building height from east to west, in order to allow more flexibility for a design-led response, whilst ensuring proposals reflect the sites location outside of Paddington Opportunity Area and the existing tall building cluster within it see “CORE_002 Schedule of proposed modifications (November 2024)”.

Reference to the 'grading down' of development towards Paddington Central and specifically towards Kingdom Street is supported.

Support noted.

Should be amended to potentially include tall buildings.

The site is outside the Paddington Opportunity Area where tall buildings are in principle supported under adopted City Plan Policy 41. Nevertheless, draft Principle B does acknowledge the scope for optimised development densities across the site, in a manner that responds to local context.

Principle C

Reference to maintenance of access routes at lower ground floor level should be removed with new principle included to maintain existing route to the Elizabeth Line portal and for access to rail infrastructure and its security to be considered in proposals.

Modifications have been proposed to the policy to better outline that access routes at lower ground level must be maintained until they are no longer required, and that development must not compromise effective access to rail infrastructure in terms of Network Rail, TfL or Elizabeth Line assets. See “CORE_002 Schedule of proposed modifications (November 2024)”.

Principle E

Should be amended to provide flexibility on provision of sound insulation and include ventilation necessary to mitigate noise associated with transport infrastructure.

This is a key requirement of the policy to ensure that residential amenity on site is protected from high levels of sound and vibrations from the associated hard transport infrastructure. Amendments to the policy wording of this section have been proposed to better encapsulate the different elements having an impact on amenity at the site and ensuring these are addressed via appropriate technical studies. See “CORE_002 Schedule of proposed modifications (November 2024)”.

Supporting Text

Supporting text on page 70 should be amended to consider non-conventional housing typologies as a small component of proposals. Unlikely to deliver live-work accommodation as part of proposals.

The supporting text at draft paragraph 10.3 has been modified to better reflect that a significant proportion of housing provided at the site will be from conventional typologies, such as apartments, whilst also keeping reference to non-conventional typologies to allow for their inclusion in a future scheme should there be demand to do so. See “CORE_002 Schedule of proposed modifications (November 2024)”.

Policy 11 Grosvenor Sidings

<i>Key point raised</i>	<i>Council response</i>
General	
Little mention of when highly polluting and noisy diesel locomotives will be phased out and the impacts this has on residential amenity.	Comments noted however, given the remit of the council, confirmation of when diesel locomotives will be phased out cannot be provided within the scope of this policy. Modifications to ensure proposals consider amenity impacts and the impacts of existing uses in line with the Agent of Change principle are proposed. See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)”.
References to policies in the Pimlico Neighbourhood Plan should be included.	Pimlico Neighbourhood Plan forms part of the development plan for planning applications that are submitted and considered by the council in the same way as the adopted City Plan. Policies in the Pimlico Neighbourhood Plan will therefore be considered for any proposal submitted for this site allocation as part of the planning application process. Nevertheless, modifications set out in “CORE_002 Schedule of proposed modifications (November 2024)” propose inserting references to local views identified in the Pimlico Neighbourhood Plan.
The two sides (Grosvenor Sidings and Pugs Lane) should be referenced separately, to allow for them to come forward individually.	The council believe this is sufficiently clear as included within the supporting text to the policy. Modifications proposed to clarify that the site may come forward independently, within different timescales in a phased manner. See “CORE_002 Schedule of proposed modifications (November 2024)”.
Given the nature and historic uses of the site, redevelopment which requires 50% affordable housing may not be viable.	London Plan policy requires that 50% affordable housing is sought on sites in public ownership. If this is not viable, a supporting viability assessment at planning application stage will be required.
There needs to be a greater focus on the commercial uses on site, including affordable workspace.	The vision for the site is to ensure it is residential-led alongside supporting commercial and community uses. Whilst commercial use is not the focus for proposals on this site, a mixed-use scheme with some elements of commercial floorspace is supported. Draft paragraph 11.4 of the supporting text within the Regulation 19 version of the policy makes clear that opportunities to provide affordable workspace should also be explored.
The policy should seek to deliver sustainability, biodiversity, local area wayfinding and safe and secure permeability routes.	Draft principle C seeks to put sustainability at the heart of proposals including through the design, operation and adaptability of new buildings, the approach to access and the promotion of active travel and through securing biodiversity net gain.

	In addition, adopted Policy 43: Public Realm (revised to be Policy 48 in the City Plan Partial Review) will ensure that any new public realm, including routes through the site will be required to be safe and secure to ensure an inclusive environment. This policy would be considered as part of any planning application for the site.
The draft allocation should not preclude the removal of buildings and existing structures where necessary.	Draft principle C seeks to put sustainability at the heart of proposals including the approach to the retention of existing buildings and structures on site. Furthermore, any application at the site would be subject to other existing and emerging City Plan policies on sustainable design and retrofitting.
The Policy should mention basement dwellings would be resisted/not permitted and steered to areas with the lowest probability of flooding.	Draft principle H ensures that proposals should be designed in line with the recommendations of the Strategic Flood Risk Assessment, this includes residential basement dwellings should be resisted/not permitted.
Where mixed-use is proposed, the policy should ensure there is no net loss of existing office floorspace.	Noted, adopted City Plan Policy 14: Town centres, high streets and the CAZ (which would apply alongside the content of the site allocation) sets out the councils approach to protection of office space in the Central Activities Zone (CAZ).
The Policy should ensure sensitive integration of development into the surrounding townscape, and the likely effect on Belgravia.	The vision for the site ensures development proposals respect and respond to the site's context, history and character, and integrate sensitively with the surrounding townscape. This includes the likely effect on Belgravia nearby to the site. Modification proposed to the draft Vision and Principle A to reflect this point. See "CORE_002 Schedule of proposed modifications (November 2024)".
Figure 22	
Figure 22 needs to be revised to show the views from the PCA and marked Pimlico Conservation Area protected views.	Figure 22 is an indicative conceptual map of the site illustrating some key features of the site and design principles, including the protected views that intersect the site. Modifications set out in "CORE_002 Schedule of proposed modifications (November 2024)" propose the insertion of references to other views in the locality to the supporting text – to ensure those identified in the Pimlico Neighbourhood Plan and Pimlico Conservation Audit inform detailed design proposals
Whilst the proposed buffer zone between Peabody Avenue and site allocation is supported, it is questioned if it is wide enough.	Figure 22 is an indicative conceptual map that visually highlights the need for a buffer to Peabody Avenue, and is not intended to provide a precise boundary of this design principle.

Vision

Vision should be revised to ensure the site allocation complements Pimlico, Churchill Gardens and the Ebury Bridge renewal area, as well as the wider surrounding area.

Modifications proposed to the policy Vision so it refers to the surrounding area rather than just Victoria- see "CORE_002 Schedule of proposed modifications (November 2024)".

Principle A

Principle A should be revised to ensure the site allocation complements Pimlico, Churchill Gardens and the Ebury Bridge renewal area, as well as the wider surrounding area.

Modifications proposed to Principle A to reflect this. See "CORE_002 Schedule of proposed modifications (November 2024)".

Principle D

Principle D and supporting text should be revised to reference Policy PIM 2 in Pimlico Neighbourhood Plan protecting historic views from the PCA along Clarendon, Sussex, Gloucester and Lupus Streets westwards into the Grosvenor Sidings Site.

Pimlico Neighbourhood Plan forms part of the development plan for planning applications that are submitted and considered by the council in the same way as the adopted City Plan. Policies in the Pimlico Neighbourhood Plan will therefore be considered for any proposal submitted for this site allocation as part of this process.

Principle D too rigid and should refer to paragraph 201 of NPPF which refers to 'minimising' conflict.

Modification proposed. See "CORE_002 Schedule of proposed modifications (November 2024)".

Principle E

Principle E should be more flexible in enhancing permeability.

Enhanced permeability across the site is a key design objective that will secure a high quality development and public benefits that development proposals should respond to.

Principle F

Support the provision of public realm and green space.

Support noted.

Supporting Text

Supporting paragraphs 11.11 and 11.12 should be amended to reference Pimlico Neighbourhood Plan policies PIM2, PIM5 and PIM8 in relation to historic views from adjacent streets and the setting of Peabody Avenue Conservation Areas.

Pimlico Neighbourhood Plan forms part of the development plan for planning applications that are submitted and considered by the council in the same way as the adopted City Plan. Policies in the Pimlico Neighbourhood Plan will therefore be considered for any proposal submitted for this site allocation as part of this process.

Supporting text should include more emphasis that existing uses are critical and any development coming forward must include consolidation/relocation of those uses.

Draft paragraphs 11.3-11.6 as included within the Regulation 19 version of the policy are sufficiently clear on the emphasis that existing uses are critical and any development coming forward must include consolidation on site and/or the relocation of those uses.

Supporting text 11.4 should take into account that 50% affordable housing expectation will need to be balanced against infrastructure costs.

If 50% affordable housing cannot be achieved, proposals will need to be supported by a viability assessment at planning application stage.

3.3 Policy 13 Affordable Housing

<i>Key point raised</i>	<i>Council response</i>
General	
Supports the revised affordable housing policy.	Support noted.
Provide clear definition of "affordable".	The City Plan (Regulation 19 draft) glossary defines 'intermediate housing' and 'social housing'. Draft Policy 13 (see draft paragraphs 13.12 to 13.15) and the council's POAH SPD (2024) provide further information on what types of housing will be considered 'affordable housing' in Westminster. The London Plan also explains what is to be considered as 'affordable housing' in a London context.
Explain who will monitor the use of affordable housing.	The council monitors affordable housing delivery. Information is made publicly available through the publication of annual Authority Monitoring Reports . This is explained in the City Plan 'Implementation and Monitoring' chapter.
There is an opportunity to tackle vacancy at the same time as providing affordable housing. This could address vacant investment properties or empty commercial assets suitable for conversion, among others.	Draft Policy 13 is concerned with the delivery of new affordable housing. Other City Plan policies and council initiatives support bringing properties back into use, especially when this will help meet housing needs. The council will continue to use all its powers and work with partners and stakeholders to reduce the number of empty properties in Westminster. More information can be found on the council's website .
Part A and B (also D and POAH SPD)	
Support the council's commitment to London Plan target of 50% Affordable Housing delivery	Support noted.
Support for Part B Paragraph 1, the retention of the London Plan policy position for 35% overall affordable housing delivery on private land.	Support noted.

Support for Affordable Housing contribution on small-scale residential developments.	Support noted
Reinsert threshold approach into the policy.	See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)” and “EV_H_003 Small-Scale Residential Developments Topic Paper Addendum” for further details on this issue – it is proposed that the approach to ‘major development’ and ‘small-scale residential developments’ is set out in separate clauses.
The proposed threshold approach set out in Page 14 of the SPD is not clear and is highly subjective.	Content of the POAH SPD is outside the scope of the City Plan Partial Review.
<p>Review overall approach to small-scale residential developments as the approach could:</p> <ul style="list-style-type: none"> • constrain the delivery of smaller scale schemes and have negative viability implications; • have negative impacts on SMEs; • cause significant delays as viability assessments are prepared and reviewed by the council and will add to further costs; • could have the unintended effect of discouraging the improvement of housing stock in some cases. 	See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)” and “EV_H_003 Small-Scale Residential Developments Topic Paper Addendum” for further details on this issue– the council is proposing modifications to clarify which schemes will trigger an affordable housing requirement and to lower the affordable housing requirement on small-scale residential developments to 20% affordable housing.
Reductions should be applicable for small-scale developments. The council should look to have a sliding scale of payments for the number of units proposed with a set financial figure of payment related to the number of	<p>See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)” and “EV_H_003 Small-Scale Residential Developments Topic Paper Addendum” for further details on this issue:</p> <ul style="list-style-type: none"> • the council is proposing modifications to clarify which schemes will trigger an affordable housing requirement and to lower the affordable housing requirement on small-scale residential developments to 20% affordable housing- the Viability Study Addendum (October 2024) recommends a sliding scale is not adopted;

<p>residential units proposed or net increase in floorspace.</p>	<ul style="list-style-type: none"> As recommended by the Viability Study Addendum (October 2024), the council will adopt a tariff approach (based on floorspace) for small-scale residential developments.
<p>Placing affordable housing requirements on small-scale residential developments will require virtually all such developments to pay an affordable housing contribution.</p>	<p>High levels of affordable housing need in the city justify seeking affordable housing contributions from all sources of future housing supply.</p>
<p>For small-scale residential developments, clarify:</p> <ul style="list-style-type: none"> when an affordable housing requirement is triggered; the definition of 'residential proposal' and 'home'; if schemes being extended or refurbished trigger the policy. 	<p>The council is proposing modifications to clarify the definition of 'small-scale residential developments' and when an affordable housing requirement is triggered. Modifications also clarify that proposals that increase the floorspace or upgrade the quality of an existing home will not be required to contribute to affordable housing.</p> <p>See proposed modifications in "CORE_002 Schedule of proposed modifications (November 2024)" and "EV_H_003 Small-Scale Residential Developments Topic Paper Addendum" for further details on this issue.</p>
<p>There should be site specific exceptions to 50% affordable housing on public sector land, where development is enabling public benefits.</p>	<p>Where 50% affordable housing is not proposed on public sector land, viability assessments will be required in line with the Mayor's 'Viability Tested Route' to affordable housing delivery as set out in the London Plan. Introducing exceptions to this would undermine the strategic target for such land as set out in the London Plan.</p>
<p>In relation to Part B Paragraph 3:</p> <ul style="list-style-type: none"> as currently written, draft policy would apply a 50% threshold to all portfolio sites in Westminster; the wording should be revised to give Westminster workers and residents priority access to any additional affordable housing delivered through a portfolio 	<p>The proposed policy does not require that 50% is achieved on each site but that all the portfolio sites are located in Westminster. Modifications are proposed so this is clarified.</p> <p>How affordable housing is allocated is not a planning policy matter. New affordable homes will be allocated to eligible households. For homes delivered outside of Westminster, the council cannot control who is eligible for such homes.</p> <p>In light of high housing needs, the approach set out in draft Policy 13 ensures that providers have flexibility to develop their sites whilst ensuring development on public sector land located in Westminster contributes to meeting Westminster's high affordable housing needs.</p> <p>See proposed modifications in "CORE_002 Schedule of proposed modifications (November 2024)".</p>

<p>agreement elsewhere in London, where deliverable.</p> <ul style="list-style-type: none"> the reference to delivery being only within Westminster should be deleted - this policy is not in conformity with London Plan Policy H4 and threatens the deliverability of increasing affordable housing on public land. 	
<p>In relation to Paragraph 13.4, the wording is faulty because Places for London has only Royal Oak in Westminster portfolio, not a portfolio of sites.</p>	<p>Places for London is not the only public sector landowner in Westminster. The text has been drafted taking into account different landowners may opt to follow a portfolio approach to delivery.</p>
<p>Part C</p>	
<p>Supports that affordable housing should be provided on site.</p>	<p>Support noted.</p>
<p>In relation to Part C Paragraph 1:</p> <ul style="list-style-type: none"> The word 'vicinity' is very vague and should be more clearly defined; Affordable housing should be provided in the same ward or in the neighbourhood plan area. Off-site provision of affordable housing should be encouraged rather than required through viability work. 	<p>In accordance with Draft Policy 13 and London Plan Policy H4, on-site delivery of affordable housing is prioritised. As explained by draft Policy 13 and the supporting text, delivering affordable housing off-site will only be accepted in exceptional cases. This approach is also in line with the NPPF and London Plan Policy H4 - the London Plan requires schemes delivering affordable housing off-site to follow the Viability Tested Route.</p> <p>Draft Paragraph 13.8 explains that, in the first instance, applicants should aim for affordable housing to 'be located as close as possible to the host development site'. Flexibility in the approach to off-site delivery is needed so schemes are not pushed to make a payment in lieu.</p>
<p>Part D</p>	

<p>Clarify how the payment in lieu will be calculated for small-scale residential developments.</p> <p>An overly restrictive position on payments in lieu will constrain beneficial residential occupation and new homes in the CAZ, leading to under-used/vacant units.</p>	<p>Draft Policy 13 and its supporting text explain how affordable housing payments in lieu will be calculated for both major and small-scale residential developments. The Viability Study Addendum (October 2024) recommends the council adopts a tariff approach (based on floorspace) for both types of schemes. See “EV_GEN_003 Viability Study Addendum (October 2024)”. In line with Draft Policy 13, the methodology and rates for both type of schemes will be set out in a revised Planning Obligations and Affordable Housing SPD.</p> <p>See proposed modifications in “CORE_002 Schedule of proposed modifications (November 2024)” and “EV_H_003 Small-Scale Residential Developments Topic Paper Addendum’ .</p>
<p>Westminster should encourage development of small sites, perhaps offer >1:1 credit for Affordable units in small scale developments.</p>	<p>The City Plan supports the development of small-scale residential developments (see adopted Policy 10). Draft Policy 13 seeks to secure affordable housing delivery from them, in line with housing needs and viability evidence See “EV_H_001 Strategic Housing Market Assessment (January 2024)”, “EV_GEN_002 Viability Study (February 2024) and “EV_GEN_003 Viability Study Addendum (October 2024)”. Draft Policy 13 also requires affordable housing delivery is maximised (see Part B).</p>
<p>Part E</p>	
<p>Support for revised tenure split under Part E.</p>	<p>Support noted.</p>
<p>Social housing should be prioritised due to statutory Right to Buy. Viability evidence should be assessed in the future once Right to Buy is abolished.</p>	<p>Support noted. Clause E prioritises social housing over intermediate housing. The council keeps its affordable housing policies and viability under review.</p>
<p>Support for the emphasis on intermediate housing catering to those not met by the market.</p>	<p>Support noted.</p>
<p>Concerns about the change in tenure mix:</p> <ul style="list-style-type: none"> proposals for the council to consider different tenure splits (e.g. 50/50 or 40/60) that are more viable and could lead to a higher affordable housing delivery; 	<p>As Draft Policy 13 supporting text explains (see paragraph 13.12 to 13.14), the policy's tenure split has been informed by robust evidence. Westminster's “EV_H_001 Strategic Housing Market Assessment (January 2024)” concluded that Westminster's affordable housing needs were very high, with a particularly high need for social housing. The council's Viability Study (February 2024) and Viability Study Addendum (October 2024) tested the viability impacts of different splits and demonstrated that a 70/30 tenure split in favour of social housing can be supported.</p>

<ul style="list-style-type: none"> proposals for the council to consider a higher proportion of intermediate homes as these help 'de-risk' development and increase the attractiveness of schemes to Registered Providers; proposals for the council to consider a cascade mechanism which triggers different tenure splits in light of marketing evidence. 	<p>The proposal is in line with the London Plan Policy H6 A which explains how boroughs should set out their tenure split, based on identified local needs. Both the council's Draft Policy 13 and the London Plan provide flexibility for schemes to come forward when the tenure split cannot be met on-site - by following the London Plan 'Viability Tested Route'.</p> <p>See "EV_GEN_002 Viability Study (February 2024)" and "EV_GEN_003 Viability Study Addendum (October 2024)".</p>
<p>The policy should include an additional part that considers site specific circumstances and viability considerations. There should be flexibility concerning the proposed new tenure split. The tenure split should be determined on a case-by-case basis, subject to identified local need and scheme viability.</p>	<p>Affordable housing needs should be determined at the planning authority area level. This was the key goal of Westminster's "EV_H_001 Strategic Housing Market Assessment (January 2024)". As explained above, the council's Viability Study (February 2024) and Viability Study Addendum (October 2024) also tested the viability impacts of different splits and showed that a 70/30 tenure split in favour of social housing can be supported. See "EV_GEN_002 Viability Study (February 2024)" and "EV_GEN_003 Viability Study Addendum (October 2024)".</p> <p>Both the council's Draft Policy 13 and the London Plan provide flexibility for schemes to come forward when the tenure split cannot be met on-site - by following the Viability Tested Route.</p> <p>See also proposed modifications in "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>Concern over whether schemes will have to change mix during the planning process due to an updated Affordable Housing Statement. Do the overall requirements for a particular mix of affordable housing units change yearly?</p>	<p>Concerns noted. See proposed modifications in "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>Shared ownership should not be ruled out where affordability and deliverability allows.</p>	<p>Draft Policy 13 does not rule out the delivery of shared ownership homes. However, in line with evidence from the "EV_H_001 Strategic Housing Market Assessment (January 2024)", "EV_GEN_001 Viability Study (February 2024)" and "EV_GEN_002 Viability Study Addendum (October 2024)", the draft policy explains that intermediate rent homes are best placed to meet the needs of Westminster's residents. Under Draft Policy 13, applicants are able to provide shared ownership homes. Each application will be assessed on each own merits.</p>

<p>Suggests the council provides design guidance on best practice on how to provide different housing tenures on the same site using 'tenure blind' principles.</p>	<p>Draft Policy 13 is concerned with the delivery of new affordable housing. The City Plan includes policies that help secure good design (including adopted Policy 12). The London Plan (see Paragraph 3.6.7) and the Mayor's Housing SPG also deal with this issue.</p>
<p>Part F, G and H</p>	
<p>The policy should calculate affordable housing on a habitable room basis, not a percentage of GIA to conform with London Plan.</p> <p>Payment in lieu calculations could then follow a sum per habitable room basis for consistency with London Plan, with a clear definition of a habitable room.</p>	<p>London Plan Policy H5 explains that the threshold level of affordable housing is set on the gross residential development. Paragraph 4.5.3 of the London Plan goes on to explain that the percentage of affordable housing should be calculated on habitable, units and floorspace to enable comparison. Although the London Plan has a stronger emphasis on 'habitable rooms', Westminster has historically used 'floorspace' when setting out affordable housing requirements. This is explained in the draft policy supporting text (Paragraph 13.6). Given that information will need to be submitted on all three metrics, that the approach is supported by the “EV_GEN_001 Viability Study (February 2024)” and “EV_GEN_002 Viability Study Addendum (October 2024)” and that it carried over a well-established Westminster approach, it is considered that there are no reasons to depart from adopted policy and that setting out a policy requirement based on floorspace is justified.</p> <p>Draft Policy 13 set out that the approach to affordable housing payments in lieu for major developments continues as adopted (as per adopted City Plan Policy 9 and the Planning Obligations and Affordable Housing SPD (see document CORE_025)). This is explained in draft Policy 13 Part H and its supporting text (see paragraph 13.16). Given the approach is supported by the “EV_GEN_001 Viability Study (February 2024)” and “EV_GEN_002 Viability Study Addendum (October 2024)” and there are no indications the existing approach is ineffective, it is considered that there are no reasons to depart from adopted policy and that setting out payments in lieu based on floorspace is justified.</p>
<p>Part K</p>	
<p>Suggestion of allowing site-specific financial viability appraisals for brownfield land in Westminster without Vacant Building Credit qualification.</p>	<p>London Plan Policy H4 and City Plan Draft Policy 13 allow for this to happen. Schemes proposing residential development on constrained sites can submit viability assessments as part of the planning application process, and be assessed under the Mayor's Viability Tested Route. This is explained in draft Policy 13 Part F and associated supporting text (see paragraphs 13.16 and 13.17).</p>
<p>Draft policy proposes stringent criteria for Vacant Building Credit application where as the National Planning Policy Framework (2023)</p>	<p>As explained by Draft Policy 13 supporting text (see paragraphs 13.20 and 13.21), the Government's Vacant Building Credit policy is intended to incentivise development on a type of sites different to those that can be found in Westminster (e.g. sites in low-market demand areas). Westminster is at the heart of the capital - its high land</p>

<p>requires only the first two criteria for Vacant Building Credit. It is not clear what evidence this is based on, this must be reviewed to ensure it is positively prepared.</p>	<p>values are testimony to its attractiveness for development and growth. The council is of therefore of the view that the use of the Vacant Building Credit will need to be robustly justified to be used. This is necessary to make sure Westminster meets its high housing needs, as identified by the “EV_H_001 Strategic Housing Market Assessment (January 2024)”.</p>
<p>POAH SPD & Evidence base</p>	
<p>The council should ensure that the need for affordable housing for NHS staff is included in housing needs assessments and other evidence base studies</p>	<p>The “EV_H_001 Strategic Housing Market Assessment (January 2024)” has been prepared in line with adopted national, regional and local guidance. The goal of Draft Policy 13 is to address the strategic need for affordable housing in the city. Draft Policy 13 does not deal with the housing needs of specific group- this is done by other policies, including adopted Policy 10.</p>
<p>If the POAH SPD is updated, the council should consider providing additional detail on NHS/health care staff need for affordable housing.</p>	<p>How affordable housing is allocated is not a planning policy matter but a housing policy matter. Social homes are allocated in line with the council's Allocations Scheme - more information can be found on the council's website. The Scheme is being reviewed as explained here. Intermediate homes are allocated in line with published criteria.</p>
<p>The POAH SPD should be updated due to the small sites policy. Ambiguity and inconsistency in the calculation of payments in lieu and affordable housing mix between emerging policy and adopted POAH SPD. The update should be done alongside policy development.</p>	<p>As SPDs can only supplement adopted policies, the council’s intention is to update the POAH SPD upon the adoption of the City Plan Partial Review to ensure consistency between documents.</p>
<p>The new small sites requirement should be subject to very rigorous viability testing to ensure it is flexible and deliverable.</p>	<p>The “EV_H_001 Viability Study (February 2024)” and “EV_H_002 Viability Study Addendum (October 2024)” have tested the viability of small-scale residential developments, and some modifications to the policy are proposed to ensure it does not undermine deliverability of such sites. See “CORE_002 Schedule of proposed modifications (November 2024)”, and “EV_H_003 Small-Scale Residential Developments Topic Paper Addendum” for further information on this issue’.</p>
<p>Viability testing may not be robust enough given most major schemes are council-led and therefore subject to different funding.</p>	<p>Not all schemes comprising affordable housing are council-led. The “EV_GEN_001 Viability Study (February 2024)” and “EV_H_002 Viability Study Addendum (October 2024)” have tested a range of typologies, which is reflective of the type of development that has come forward in the past. The studies also explain how they have assumed nil</p>

grant. Its conclusions are therefore based on a model with no grant- if grant becomes available, then this would facilitate an increase of affordable housing.

3.4 Policy 43 Retrofit First

<i>Key point raised</i>	<i>Council response</i>
Overarching comments on the policy	
Agreement with promoting a retrofit first approach and the overarching aims of the policy.	Support noted.
The cumulative impact of the Council's high operational carbon offset price, plus the need to meet the embodied carbon targets, will make schemes unviable.	The Viability Study Addendum (October 2024) has been produced to inform the modifications proposed to the Retrofit First policy. The revised calculations include consideration of the upfront embodied carbon requirements, and mechanisms for carbon offsetting (both embodied carbon offsetting, using price proxies, and credits to operational carbon offsetting). See "EV_GEN_003 Viability Study Addendum (October 2024)" for further information.
The purported legal basis for the policy is incorrect.	The Royal Town Planning Institute (RTPI) and the Town and Country Planning Association (TCPA) produced a document titled 'The Climate Crisis- A Guide for Local Authorities on Planning for Climate Change' in January 2023. This document states that local planning authorities are bound by the legal duty set out in Section 19 of the Planning and Compulsory Purchase Act 2004, as amended by the Planning Act 2008, to ensure that, taken as whole, planning policy contributes to the mitigation of, and adaptation to, climate change. In discharging this duty, local authorities should consider paragraph 153 of the National Planning Policy Framework (NPPF) and ensure that policies and decisions are in line with the objectives and provisions of the Climate Change Act 2008 and support the National Adaptation Programme. The Retrofit First policy seeks to reduce carbon emissions associated with activity in Westminster, to contribute to the mitigation of climate change.
The Council's offset fund has an offset cost of £880 per tonne of carbon, meaning that this could be a significant cost impact for developments.	The current council offsetting costs were established through the Planning Obligations and Affordable Housing (POAH) SPD (see document CORE_025), adopted in March 2024. The £880 per tonne cost of carbon is based upon the local cost of off-setting carbon in Westminster, as the emissions produced are local to Westminster. This is only relevant to non-electric development schemes, with all-electric schemes instead required to pay an offset price of £330 per tonne. These prices are established for operational carbon as per the POAH SPD and are not subject to the City Plan Partial Review.

<p>Greater transparency needed over how the council uses carbon offset funds.</p>	<p>Comment noted, however this is not something for draft Policy 43 to respond to. Further details are available in the Westminster Carbon Offset Guidance January 2023. Available here: https://www.westminster.gov.uk/media/document/carbon-offset-fund-guidance</p>
<p>The policy should be amended so that it becomes a Sustainable Development Policy whereby the policy is assessed on an equitable basis along with other development policies.</p>	<p>Comment noted, however the council already have an existing policy (adopted Policy 38: Design Principles) which relates to sustainable design matters, which the Retrofit First policy would be implemented in conjunction with. A further review of all City Plan policies will be considered as part of Westminster's full City Plan review, to commence in 2025.</p>
<p>Existing structures and any materials derived should become 'Material Banks' to facilitate the re-use of construction materials across Westminster.</p>	<p>The council recognise the importance of circular economy principles, and that supporting infrastructure is needed across Greater London to facilitate this. However, this is not currently a matter for the emerging Retrofit First policy.</p>
<p>Further clarification needed for developments that intend to procure certified 100% renewable energy.</p>	<p>The City Plan Partial Review (and the proposed Retrofit First policy) does not include a review of City Plan and London Plan policies in relation to operational carbon offsetting. It should be noted that the existing carbon offset requirements (set out within the POAH SPD) allows applicants to explore and use off-site mechanisms to offset their carbon in-lieu of a payment to the carbon offset fund.</p>
<p>The extent to which demolition and redevelopment contribute to the overall scale of Westminster's annual carbon emissions is not sufficiently demonstrated.</p>	<p>Embodied carbon emissions are not currently monitored across local authorities in the UK. As such, the extent to which demolition and redevelopment contributes to the overall scale of Westminster's annual carbon emissions is challenging to demonstrate today given it is not currently reported on. This gives further impetus to the need to introduce a policy with a standardised means of measuring the whole life carbon emissions of buildings and the requirement to report them to get a better understanding of the impact of upfront embodied carbon emissions. Further details are provided within the updated Submission Version Retrofit First Topic Paper. See "EV_R_005 Retrofit First Submission Topic Paper".</p>
<p>Consideration must also be given to other factors such as where higher-upfront embodied carbon options would result in a longer life span of a building or components, and which ultimately offer lower operational carbon.</p>	<p>It is recognised that there are many factors which need to be considered to ensure that there are no perverse outcomes arising from encouraging a retrofit first approach. This includes considerations of building lifespans and operational carbon. As a result, supporting guidance to the emerging Retrofit First policy has been prepared. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>

<p>Promoting a retrofit first approach, in conjunction with Westminster's heritage constraints, will make the redevelopment of existing building stock in Westminster unviable, leading to empty properties/stranded assets and ultimately reducing investment in Westminster's historic buildings.</p>	<p>The policy offers extra provisions supporting alterations or extensions to existing buildings, which can be demonstrated as necessary to viably achieve the wider responsible retrofit of a building, including its adaptation to address climate change. Furthermore, as there are protections to heritage buildings (including designated heritage assets) through the existing provisions within the NPPF and adopted City Plan policies, many developments already adopt an approach which retains and retrofits existing buildings to uphold their historic fabric and/or significance.</p>
<p>The policy should make greater emphasis on circular economy principles, reference a target for the reuse of demolition waste and should have a greater emphasis on setting minimum percentages for 'high value reuse'.</p>	<p>The council recognises that circular economy principles are key to the vision of the policy. Wording amendments have therefore been proposed to make this clearer, with 'circular economy' now stated within the introductory text of the policy. See "CORE_002 Schedule of proposed modifications (November 2024)". A specific requirement for Circular Economy Statements is also included within the policy to make this requirement more apparent and to ensure that it is consistently completed by applicants. Requirements to promote high value reuse are also included within the Retrofit First Policy Guidance Document. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>
<p>Greater clarity is needed to understand how embodied carbon considerations will be weighed up in the planning balance alongside other considerations of the City Plan.</p>	<p>The policy considers upfront embodied carbon alongside other factors such as the deliverability of a building, accessibility and operational requirements, and whether public benefits would be delivered. Considerations beyond the Retrofit First policy are discretionary and for consideration on a case-by-case basis when considering the Development Plan as a whole. See "CORE_002 Schedule of proposed modifications (November 2024)" which includes a diagram explaining the sequential tests. The process is also included within the Retrofit Guidance Document. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>
<p>The ambitions of the policy should not have an impact on meeting the objectives of the Development Plan (including City Plan objectives, the London Plan and requirements of the NPPF).</p>	<p>The updated evidence base for the policy, see "EV_R_003 Embodied Carbon Evidence Study Update", includes analysis from WSP on the feasibility of different building typologies to reduce their embodied carbon. This also includes cost assumptions, which have then been considered as part of the Viability Study Addendum (October 2024), see "EV_GEN_003 Viability Study Addendum (October 2024)". Together, these have shown that achieving lower carbon development does not have a detrimental impact to scheme viability. This also considers the carbon offsetting mechanisms introduced by the policy.</p> <p>Proposed modifications to the policy now introduce a diagram clarifying the sequential tests for where substantial demolition is proposed, and under which circumstances substantial demolition may still be allowed. In this way it is possible to balance the delivery of other objectives, demonstrating that the policy would be deliverable as part of the Development Plan.</p>

<p>Viability considerations need to be reflected in this policy wording more clearly.</p>	<p>The Viability Study Addendum (October 2024) has been prepared which considered the proposed modifications to the policy and took a more nuanced approach to assessing its impacts. The study found that the provisions within the policy (including the upfront embodied carbon requirements along with embodied and operational carbon offsetting) does not have a major impact on the financial viability of schemes. See “EV_GEN_003 Viability Study Addendum (October 2024)”.</p>
<p>Enforcing the policy will place a significant burden on WCC officers and it is not clear if Westminster have the resources to do this.</p>	<p>Creating a policy and guidance specifically on retrofit matters will help to streamline decisions and to better educate officers across the council in what the agreed approach is to the retention of buildings and the consideration of factors such as whole life carbon. The currently adopted City Plan sets out key considerations for sustainable design, however retrofit and upfront embodied carbon matters are scattered across several thematic policies in the current Development Plan. The consolidated Retrofit First Policy aims to introduce clarity and consistency of approach for applicants and decision makers.</p> <p>The council, alongside the new policy, is developing the digital platform known as 'PACER', which will ultimately streamline the planning application submission process and ensure that there is consistency in Whole Life Carbon Assessments and the ways in which officers are involved in design discussions. For further information, see: https://www.preoptima.com/preoptima-pacer</p>
<p>Concerns on having an emission based only policy, energy consumption is an important aspect that must not be ignored.</p>	<p>By incorporating Whole Life Carbon Assessments and setting a consistent methodology for these, there is a greater appreciation of the balance between operational and upfront embodied carbon through the introduction of the Retrofit First policy. This is in conjunction with other existing policies which focus on energy consumption.</p>
<p>A ‘retain first’ policy would be more meaningful as not all buildings need retrofitting.</p>	<p>If a building was to be retained and the nature of interventions did not require any form of planning permission (because the extent of the refurbishment measures did not constitute ‘development’), it would not be tested against City Plan policies, including the emerging Retrofit First policy.</p> <p>In the case of designated heritage assets, there is already an existing statutory presumption in favour of retention, which may supersede any provisions involving demolition within the Retrofit First policy.</p>
<p>The policy should acknowledge the benefits of light retrofit and less invasive options in the first instance as these measures can be installed easily and can make an immediate difference to owners.</p>	<p>In many cases, light retrofits will not require planning permission. Some may require planning permission; however, they would be considered non-major development and would not involve substantial demolition, therefore not relevant to this policy, as this is development which the council do not wish to restrict.</p>

Part A of the policy – the tests for demolition

<p>Part A of the policy is complex, confusing and would be very difficult to adhere to - meaning that in practice this policy is 'retrofit only' not 'retrofit first'.</p>	<p>A number of modifications have been proposed to the policy to make it clearer and to ensure that it reflects a 'retrofit first' rather than 'retrofit only' approach. See "CORE_002 Schedule of proposed modifications (November 2024)".</p> <p>Proposed modifications have made wording less ambiguous and include a visual representation of sequential tests. This is supported by the Retrofit First Policy Guidance Document. Amendments within the supporting text also include a visual diagram and table to make the policy less confusing. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>
<p>There should be more stringent tests for demolition.</p>	<p>The sequential tests for demolition have been established in order to provide a clear picture to the council of the reasons behind design decisions, namely regarding the proportion of an existing building which is retained.</p> <p>In establishing these sequential tests however, it is recognised that some flexibility is needed in order to ensure that the whole life carbon footprint is as low as possible, the type of development needed throughout the city (for example, to meet our growth targets set by the adopted City Plan and London Plan), there will be some instances where substantial demolition is necessary to deliver sustainable development.</p>
<p>Of the four tests, schemes should only have to demonstrate that they meet one of them. This is to be consistent with the Evidence Base (Paragraph 22 of the Retrofit First Topic Paper).</p>	<p>The Regulation 19 version of the policy was incorrectly referred to in the Topic Paper published in March 2024 for the Regulation 19 consultation. This error has been rectified. See "EV_R_005 Retrofit First Submission Topic Paper".</p>
<p>The term 'generally be resisted' needs to be better defined and/or removed.</p>	<p>The council recognises that the term 'generally resisted' is ambiguous and could be clarified. See "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>The requirements of the test will burden applicants who will need to provide significantly more assessments to demonstrate compliance with each of the tests, most notably at pre-application stage where this level of design work is not usually done.</p>	<p>Proposed modifications to the policy, along with the Retrofit First Policy Guidance Document make clear which tests apply to a development and the number of alternative schemes required for review. This will further help to streamline the approach to the policy, to ensure that demonstrating compliance with the tests is only reasonably applied to deliverable schemes and those which are required by the policy. See "CORE_002 Schedule of proposed modifications (November 2024)" and "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>

<p>Greater clarity needed on what is to be considered 'suitably comparable options' and that these should only be options which are deliverable and viable.</p>	<p>Proposed modifications to the policy and to the supporting text make clear in what circumstances and which 'suitably comparable options' would be required to justify substantial demolition. See "CORE_002 Schedule of proposed modifications (November 2024)", and "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>
<p>Greater clarity is needed around the definitions of key terms such as 'retrofit', 'deep retrofit', 'substantial demolition' etc. These also need to be within the City Plan Glossary and should use percentages where possible and be consistent with regards to mass and/or volume.</p>	<p>Definitions of each term are clarified through proposed modifications to the Glossary section of the City Plan in the Regulation 19 version. See "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>Greater specificity is needed on what is considered a public benefit.</p>	<p>Proposed modifications to the policy seek to align to the definition included in the National Planning Policy Framework. This has therefore removed the specification of particular geographic locations where certain public benefits are prioritised. See "CORE_002 Schedule of proposed modifications (November 2024)".</p> <p>The Retrofit First Policy Guidance Document also provides greater clarity on this matter. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>
<p>Public benefits should not be used as justification for replacing a building as in almost all cases, more benefits are not realised by not doing a retrofit approach.</p>	<p>The proposed modifications to the policy make it clear that creation of additional public benefits is the last of the four sequential tests, applied only when the first three tests fail to evidence the need for substantial demolition, and that the planning balance of these benefits is assessed by the council. See "CORE_002 Schedule of proposed modifications (November 2024)", "EV_R_005 Retrofit First Submission Topic Paper", and "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>
<p>Areas of the city which can achieve economic benefits should not be geographically constrained. This should include the CAZ.</p>	<p>The modifications proposed to the policy no longer restrict economic benefits to specific geographic areas of the city. See "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>The inclusion of the requirement for an independently verified structural engineer is accepted.</p>	<p>Support noted.</p>

<p>Further clarity needed on what is required for a structural engineering report (including what it should entail, how it should be managed/funded and guidance on what could be accepted).</p>	<p>Clarity is now provided within the Retrofit First Policy Guidance Document. See “EV_R_004 Retrofit First Policy Guidance for Environment SPD”.</p>
<p>The supporting text states that where structural reinforcement is found to be unviable, this should be supported by a viability report. There is no guidance on how the term 'unviable' is to be interpreted (for example, in terms of financial impact or carbon cost).</p>	<p>Clarity is now provided within the Retrofit First Policy Guidance Document. See “EV_R_004 Retrofit First Policy Guidance for Environment SPD”.</p>
<p>Whole life carbon assessments cannot be relied upon in isolation with respect to demolition.</p>	<p>Proposed modifications to the policy introduce a sequential test. This means that other considerations (such as structural condition and use requirements) need to be considered first before whole life carbon assessments are considered as justification for substantial demolition. See “CORE_002 Schedule of proposed modifications (November 2024)”.</p>
<p>The level of detail required in whole life carbon assessments means that pre-application proposals are unable to know the level of detail required for any meaningful comparison.</p>	<p>The implementation of the PACER platform will assist with this. Furthermore, the Retrofit First Policy Guidance Document provides additional detail on the information required in the assessment. See “EV_R_004 Retrofit First Policy Guidance for Environment SPD”.</p>
<p>Consideration should be given to other factors such as the Building Safety Act and DDA requirements. This can conflict with the ability to retrofit buildings.</p>	<p>With regards to the sequential tests for demolition, factors such as the Building Safety Act and Disability Discrimination Act (DDA) requirements will be considered operational and access requirements, which can be demonstrated as part of test 2, as proposed through modifications to this section of the policy. See “CORE_002 Schedule of proposed modifications (November 2024)”.</p>

Part B of the policy – Upfront Embodied Carbon Requirements

<p>Agreement with the intention to reduce embodied carbon emissions.</p>	<p>Support noted.</p>
<p>Part B of the policy focusses on embodied carbon and would therefore be more sensible as a separate policy so the retention and retrofit aim is not diluted.</p>	<p>As upfront embodied carbon is greatly impacted by whether a building is retained and retrofitted or not, due to significant carbon emission saving with the retention of existing buildings, the council believe that it makes sense to combine these two areas together in one policy.</p>
<p>Greater clarity is needed to understand if major schemes which involve a change of use are also required to meet the targets.</p>	<p>Major schemes including change of use applications are required to also adhere to the upfront embodied carbon requirements. This is because change of use schemes which are of a scale large enough to be deemed a 'major scheme' may still have carbon emission implications. It is expected that this will relate to a small number of applications. Data gathered in this way, using the PACER platform will assist in monitoring Westminster's carbon emissions. For further information, see: https://www.preoptima.com/preoptima-pacer</p>
<p>If new floorspace is being provided at an existing building, it is unclear which floorspace needs to be included within the Whole Life Carbon Assessment.</p>	<p>A guidance document has been prepared to provide greater clarity on this matter. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD". This specifies that for Whole Life Carbon Assessments, the whole floorspace needs to be considered. For major deep retrofit or retrofit developments, this means that the retained building on site is considered part of the assessment, meaning that it will be easier to achieve the overall carbon figures across the total GIA floorspace.</p>
<p>Any upfront embodied carbon targets should make reference to the RICS Whole Life Carbon Standard (effective from July 2024).</p>	<p>The adoption of the RICS Professional Standard Whole Life Assessment 2nd Edition in July 2024 is an important factor for consideration in the assessment of whole life carbon. The Regulation 19 version of the retrofit first policy stated within the supporting text that: <i>"Where whole-life carbon assessments are relied upon to justify demolition and construction of a new building, these must follow the most up to date RICS methodology and the Mayor of London's Whole Life Carbon London Plan Guidance"</i></p> <p>Proposed modifications to the policy continue to state that <i>"the most up to date RICS methodology"</i> should be used. Furthermore, the Retrofit First Policy Guidance Document provides additional guidance, specific to the RICS Whole Life Carbon Assessment Standard 2nd Edition and how this should be used in the preparation of Whole Life Carbon Assessments for the policy. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>

<p>Misalignment between the embodied carbon targets set by the Westminster policy, compared to that set by the GLA.</p>	<p>The pace at which the industry is promoting initiatives to lower embodied carbon in the built environment, along with the decarbonisation of building materials means that targets and standards are becoming improved upon. The GLA requirements were adopted in 2021. In the years since then, there have been advances in the ways that whole life carbon is assessed and what 'business as usual' looks like. The existing benchmarks set by the GLA were considered when setting Westminster specific requirements. In addition, data obtained on schemes submitted to the Mayor of London with whole life carbon assessments has been reviewed. Further information on this is provided within the updated Submission Version of the Retrofit First Topic Paper. See "EV_R_005 Retrofit First Submission Topic Paper".</p> <p>Proposed modifications to the policy include upfront embodied carbon requirements which are more closely aligned with the aspirational targets set by the GLA in 2021. See "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>The scope of the whole life carbon assessments is not clear (for example, which elements are in or out of scope), this should be made clearer</p>	<p>Clarity is now provided on the scope of Whole Life Carbon Assessments within the Retrofit First Policy Guidance Document. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD".</p>
<p>The use of the targets from LETI are likely to be difficult to achieve, particularly for new buildings.</p>	<p>In order to ensure the upfront embodied carbon requirements targets are achievable, updates focussed on the specific Westminster character of the built environment, with revisions made to the Embodied Carbon Evidence Study (see "EV_R_003 Embodied Carbon Evidence Study Update"), along with a further review of current performance across Westminster and London by officers, and a Viability Study Addendum (see "EV_GEN_003 Viability Study Addendum (October 2024)"). Following updates to the Evidence Base, numerical figures as upfront embodied carbon requirements are proposed to be adopted within the policy, rather than LETI bandings. This is described in further detail within the Retrofit First Topic Paper. See "EV_R_005 Retrofit First Submission Topic Paper". This removes reliance on a third-party organisation, whilst also ensuring that the requirements are robust, ambitious, but still achievable for new buildings. Additional modifications have been proposed within the policy to ensure this update is reflected across the policy wording and supporting text. See "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>LETI targets are based on a third-party organisation, and are based on limited Westminster specific data. Furthermore, these targets are becoming outdated and are seen to be 'ambitious' and 'provocative'.</p>	<p>A large number of responses at Regulation 19 related to the use of third-party embodied carbon targets, namely LETI. Specifically, that LETI bands are not appropriate for use in policy settings. The use of bands was primarily for ease of understanding, as they are already widely used and understood across the development industry. However, the evidence basis for the policy has indicated that the current methodology and design practices for whole life carbon has evolved since LETI was originally established, and therefore numerical requirements specific to Westminster</p>

	indeed are more appropriate. Proposed modifications to the policy include numerical upfront embodied carbon requirements. See “CORE_002 Schedule of proposed modifications (November 2024)”.
There is inconsistency between the 'clear site' approach adopted by LETI, and the RICS Professional Standard. Clarity is needed on whether demolition is included or not.	Clarity is now provided within the Retrofit First Policy Guidance document. See “EV_R_004 Retrofit First Policy Guidance for Environment SPD”. In this document it is set out that demolition is excluded from the upfront embodied carbon requirements set by the policy, however values should still be assigned to demolition and reported on as part of the submission of a Whole Life Carbon Assessment. This should therefore follow the RICS Professional Standard, 2 nd Edition.
The requirement for schemes to adhere to the targets set out within Part B of the policy should be raised substantially, including only major schemes and excluding schemes which do not result in any demolition taking place.	<p>The requirement to adhere to the upfront embodied carbon requirements within the Regulation 19 version of the policy was <i>'all development involving total or substantial demolition of a building above a single storey and all major development'</i>.</p> <p>Proposed modifications to the policy have amended this wording to be clearer, however the criteria remain the same. See “CORE_002 Schedule of proposed modifications (November 2024)”.</p> <p>This means that non-major development where substantial demolition does not take place will not need to meet the upfront embodied carbon requirements. However, major development which does not involve substantial demolition will need to meet the upfront embodied carbon requirements. This is because major schemes can have a significant carbon impact associated with them, which the council would like to have an understanding of when considering the overall impacts of the scheme.</p>
The policy should make reference to the forthcoming UK Net Zero Carbon Building Standard (NZCBS).	<p>A workshop held by the UK Net Zero Carbon Buildings Standard in September 2024 highlighted that following the launch of the 'Pilot Version' of the Standard, this would be followed by a consultation period for feedback with the official release of Version 1.0 of the Standard planned for 'late' 2025.</p> <p>Furthermore, the September 2024 workshop held by the UKNZCBS stated that it was a Technical Specification being launched in the Pilot Version. This would include details on how a building should meet the Standard, what limits/targets it needs to meet, what evidence is required to demonstrate this, and how this should be reported. As such, this version will not include details on how to verify that a project conforms to the Standard. This will be something that will be developed at a later date.</p> <p>The timelines associated with the adoption of the Standard do not align with those of the City Plan Partial Review (being submitted in late 2024, rather than late 2025 as is the case with the Standard). The policy can only reference the formally adopted document, standards which are material consideration in town planning decisions.</p>

	<p>The work being completed by the UKNZCBS is supported by the council, as an important step in aligning the property industry across the UK in efforts to reduce whole life carbon. Any future amendments to the retrofit first policy (and/or any others within the City Plan) will incorporate a review of the UKNZCBS from 2025 onwards. For further information, see “EV_R_005 Submission Retrofit First Topic Paper” and “SCG_015 Net Zero Carbon Buildings Limited”.</p>
<p>Details on how the embodied carbon offset will be calculated needs to be provided for clarity.</p>	<p>The POAH SPD currently provides guidance on the calculation of operational carbon offset payments. See “CORE_025 Planning Obligations and Affordable Housing Supplementary Planning Document (POAH SPD)”. Once the Retrofit First policy is adopted, the SPD will then be updated to reflect how the embodied carbon offset payment and associated crediting function will work in practice. In the interim, further details are included within the Retrofit First Topic Paper. See “EV_R_005 Submission Retrofit First Topic Paper”.</p>
<p>The policy gives harder targets for commercial buildings, over residential buildings, which penalises non-residential development coming forward in the city.</p>	<p>Through an updated evidence base, it has been demonstrated that differentiation between development uses is appropriate. This reflects the updated Embodied Carbon Evidence Report prepared by WSP which highlights that different needs of various development typologies can result in differing upfront embodied carbon. See “EV_R_003 Embodied Carbon Evidence Study Update”.</p> <p>As such, the approach of using different upfront embodied carbon benchmarks for different development typologies remains, and therefore no changes to wording are proposed.</p>
<p>The embodied carbon offset pricing mechanism has not been viability tested.</p>	<p>The council acknowledge that the original scope of the Viability Study (February 2024) for the Regulation 19 version of the City Plan Partial Review did not test the embodied carbon offsetting mechanism. See “EV_GEN_002 Viability Study”.</p> <p>Updates to the Viability Study have been undertaken to ensure that this forms part of the evidence base for the policy. This includes a number of proxy prices for embodied carbon, acknowledging that this is not a local emission source and therefore will require a different cost (compared to that currently adopted for operational carbon). For further details, see “EV_GEN_003 Viability Study Addendum (October 2024)” and “EV_R_005 Submission Retrofit First Topic Paper”.</p>
<p>An ambitious, but achievable target of 600kgCO₂e/sqm would be more appropriate for commercial buildings, with the intention of working towards achieving a target of 500kgCO₂e/sqm.</p>	<p>Modification proposed to the policy now use numerical figures for upfront embodied carbon requirements. For further details, see “CORE_002 Schedule of proposed modifications (November 2024)”. The proposed numerical figures have been established through an updated evidence base for the policy, which included work on the Embodied Carbon Evidence Study (see “EV_R_003 Embodied Carbon Evidence Study Update”) and a baselining exercise detailed in “EV_R_005 Submission Retrofit First Topic Paper”. This incorporated analysis of the updated RICS Professional Standard 2nd edition whole life carbon assessment methodology, a review of the emerging UK Net Zero Carbon</p>

	Building Standard and existing London Plan benchmarks. Together, this has informed more robust, yet achievable upfront embodied carbon requirements specific to Westminster for inclusion in the policy.
It is not clear how 'mixed uses' will be dealt with and what targets they should comply with - especially where there are mixed use schemes which are predominantly commercial in nature.	Proposed modifications to the policy clarify how mixed-uses are dealt with. The approach to mixed-uses is consistent with the GLA guidance. See "CORE_002 Schedule of proposed modifications (November 2024)".
Further guidance needed, including on what should be considered a retrofit and how the policy will work in practice.	The Retrofit First Policy Guidance Document has been drafted to provide further information on how the policy will be implemented. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD".
Requirements for Circular Economy Statement should be made clearer.	Proposed modifications to the policy make the requirement for Circular Economy Statements clearer, with this now set out within Part F of the policy. See "CORE_002 Schedule of proposed modifications (November 2024)". The Retrofit First Policy Guidance Document also provides further details on Circular Economy Statements and what they should include. See "EV_R_004 Retrofit First Policy Guidance for Environment SPD".
Requirements for Pre-Redevelopment Audit, Pre-Demolition Audits and Reclamation Audits should be made clearer.	Modifications to the policy have been proposed to make the requirements for each of the different audits clearer and simplified to reduce duplication. This includes the articulation of the Pre-Redevelopment Audit as the primary document for demonstrating adherence to the sequential tests for demolition. References to Pre-Demolition Audits and Reclamation Audits as separate documents have been removed from the policy as they make up parts of an overarching Circular Economy Statement. See "CORE_002 Schedule of proposed modifications (November 2024)" and "EV_R_004 Retrofit First Policy Guidance for Environment SPD".
Part C and Part D of the policy – unlocking and promoting retrofit	
Support for Part C of the policy	Support noted.
Part D remains unclear as to what is meant by 'extensions or alterations necessary to visibly achieve retrofit'. The Plan should also be more specific about what the rationale is for this.	The council recognises that the responsible retrofitting of historic buildings may require some alterations and/or extensions to existing structures. Interventions focussing on the adaptation of a property to respond to climate change, the reduction of its carbon footprint, or to make it habitable and affordable to maintain by future generations are essential to preserving heritage assets across the city. The policy specifies the priority for retrofitting historic

	<p>buildings, and that if this requires some alterations, including extensions to assist in funding these works to ultimately prevent buildings going into disarray and/or becoming underutilised, then this can be supported.</p> <p>The intention for including the word 'viably' is therefore to ensure that as many buildings as possible throughout Westminster are retained and maintained in-use. This acknowledges that if heritage buildings are retained in their current format, they may not be able to deliver any additional value (for example, additional commercial floorspace). This additional value may help to fund the process of retrofitting a historic building to conserve and enhance its heritage value, whilst also securing much needed energy efficiency and climate adaptation improvements.</p>
<p>The requirements for Sustainable Design Statements or Retrofit Plans across all proposals for retrofit led schemes will raise a significant burden upon all small and medium sized applications coming forwards.</p>	<p>There is an existing requirement L37 of the Westminster Validation for a Sustainable Design Statement. This is currently required for: <i>'all applications which create new floorspace and/or where extensive works to retrofit/improve the environmental performance of a building are proposed'</i>.</p> <p>The proposed modifications have removed references to Sustainable Design Statements or Retrofit Plans to avoid the duplication of requirements, which are already covered by the adopted City Plan policies (such as Policy 38: Design Principles). See "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>Support the specific call-out of climate adaptation. Building resiliency must become the norm not only in new builds, but in retrofits as well.</p>	<p>Support noted. Proposed modifications to the policy make this clearer as an overarching objective for the policy. See "CORE_002 Schedule of proposed modifications (November 2024)".</p>
<p>What is required of a 'Retrofit Plan' should be clearly set out.</p>	<p>Modifications proposed have removed reference to a 'Retrofit Plan'. As the Sustainable Design Statement is already a requirement of the adopted City Plan, it is envisaged that this will become the main document for demonstrating retrofit design matters, as already required by City Plan Policy 38: Design Principles.</p>
<p>What is required within a 'Sustainable Design Statement' should be clearly set out.</p>	<p>Sustainable Design Statements are currently required as validation requirements (see existing validation requirement L37) to demonstrate adherence to adopted City Plan Policy 38: Design Principles. The requirements for this document are therefore specified by the validation checklist, along with the existing Environment SPD.</p>

Supporting text

Support for buildings needing to demonstrate their upfront embodied carbon performance at completion.	Support noted.
Reference should be made in the supporting text around the need to maintain historic properties and to ensure the property is in a good state of repair.	Details pertaining to the surveying of historic properties to ensure that they are maintained and properly treated will be dealt with through adopted policies specific to heritage assets already within the Development Plan. This includes City Plan Policy 39: Westminster's Heritage and Chapter 16 of the NPPF. The implementation of the Retrofit First policy will be in conjunction with these policies. Furthermore, the policy stipulates that 'responsible retrofitting' shall be promoted, therefore ensuring that retrofitting measures are sensitive to the state of historic properties.
Support for the requirement that all applicants prepare a Circular Economy Statement.	Support noted.
Support for applicants needing to justify if they cannot reach an upfront embodied carbon benchmark, why this is the case.	Support noted.

Evidence Base

The WSP Evidence Paper is flawed. For example: LETI A is confirmed as unachievable for new buildings, but the paper also confirms they are more achievable for retrofits. The carbon targets apply to both new build and retrofit.	<p>The WSP Evidence Paper has been updated following comments received during the Regulation 19 consultation. See "EV_R_003 Embodied Carbon Evidence Study Update".</p> <p>Notwithstanding the updates to the findings of this report, it is the council's intention that the upfront embodied carbon requirements (previously adopted as LETI bandings, but now proposed to be modified to be numerical figures), should apply to all development types, regardless of if they are new builds or retrofits. This is because the requirements are informed by evidence of what is achievable for new buildings, with the intention being that by default (through higher degrees of existing building retention), that the developments which propose less demolition will be more easily able to meet the upfront embodied carbon requirements.</p>
It is not clear how 'retrofit' schemes have been defined by WCC in their Evidence Base (within the Topic Paper). The data supplied by Arup	<p>The council recognise that references to 'retrofit' were conflated within the policy and evidence base.</p> <p>The proposed modifications to definitions introduce clarity. See the Retrofit First Topic Paper (see "EV_R_005 Retrofit First Submission Topic Paper"), the Retrofit First Policy Guidance Document (see "EV_R_004 Retrofit First Policy</p>

<p>which is based on all referable schemes has distinct categorisations.</p>	<p>Guidance for Environment SPD”) and the proposed modifications to the Glossary definitions of the City Plan (see “CORE_002 Schedule of proposed modifications (November 2024)”). These definitions have also been applied to the interpretation of baseline data to ensure consistency.</p>
<p>There are inconsistencies between the total build costs assumed by BNP and WSP. This means that the application of the build cost uplifts to the BNP data is not appropriate.</p>	<p>Updates were made to both the Viability Study (February 2024) and the WSP Embodied Carbon Assessment following the Regulation 19 consultation period. As part of this work, a review was undertaken to better understand the build cost implications of reducing upfront embodied carbon. For further information, see “EV_GEN_003 Viability Study Addendum (October 2024)” and “EV_R_003 Embodied Carbon Evidence Study Update”.</p>
<p>Assumption of reduced employment targets for the remainder of the plan period, suggesting only 22,000 additional jobs should be catered for on the basis of purported job creation since 2020 is inconsistent with the adopted City Plan.</p>	<p>The analysis included within the Regulation 19 Retrofit First Topic Paper (March 2024) did not seek to reduce the jobs target. The analysis was used to illustrate the extent of potential embodied carbon emissions associated with these jobs. If the total number of jobs over the whole City Plan period was analysed (rather than an interim figure) this would simply demonstrate substantially more embodied carbon is expected to be expended through development over the lifetime of the City Plan.</p>
<p>It is not clear if the WSP evidence base has been reviewed by a third party (despite Part A of the policy requiring that Applicants have their own structural reports third party verified).</p>	<p>It is not common practice that documents within an evidence base are third-party verified, as by virtue of the Regulation 19 consultation process, the evidence base is able to be scrutinised in public (as has been the case). However following this comment, the council commissioned a third-party review of the WSP Embodied Carbon Evidence Paper to ensure the technical soundness of this update to evidence base. See “EV_R_005 Retrofit First Submission Topic Paper”.</p>
<p>The WSP evidence base includes a number of assumptions which are flawed when applied in a Westminster specific context. Other assumptions made are not clear and may therefore be misleading.</p>	<p>In response to the Regulation 19 consultation, the WSP evidence base has now been updated to refine the assumptions used. This work was peer-reviewed. See “EV_R_003 Embodied Carbon Evidence Study Update”.</p>
<p>The Viability Study is unsound as a basis for plan-making.</p>	<p>Following comments received during the Regulation 19 consultation, an addendum to the Regulation 19 Viability Study (February 2024) was prepared. Detailed responses to queries raised during the Regulation 19 consultation period are included within the Viability Study Addendum (October 2024), specifically within Appendix 1 of that report. See “EV_GEN_003 Viability Study Addendum (October 2024)”.</p>

4. Conclusion

- 4.1 This Consultation Statement has provided details of the Regulation 19 consultation activities and outlines Westminster City Council's compliance with the statutory responsibility to consult stakeholders and to make submission documents available for inspection. It supplements CORE_013 Regulation 19 Consultation Statement, which set out details of what consultation was carried out prior to the publication of the Regulation 19 Plan. Together they demonstrate how the City Plan Partial Review has been subject to continuous engagement with affected stakeholders.
- 4.2 As has been outlined in detail throughout this statement, Regulation 19 consultation generated feedback from a wide range of stakeholders on the content of draft policies. In some cases, this has resulted in the production of additional supporting material, including an addendum to the viability study, the production of updated topic papers, and Statements of Common Ground to resolve issues raised. Much of the feedback received has also informed the council's proposed modifications to the Regulation 19 version of the Plan, as set out in CORE_002 – Schedule of Modifications. Where the council feels it is unnecessary to modify the plan in response to feedback received, its reasoning is provided in section 3 of this statement.

5. Appendices

Appendix 1:

Screenshot of website advertising Regulation 19 Consultation



The screenshot shows the top navigation bar of the City of Westminster website. It includes the City of Westminster logo, navigation links for Residents, Businesses, and MyWestminster accounts, and a search bar. Below the navigation bar is a large banner with a white box containing the text: "Providing a framework for delivering long-term housing, commercial and infrastructure growth in Westminster" and "City Plan". Below the banner is a breadcrumb trail: "Home > Planning, building control and environmental regulations > Planning policy > City Plan Partial Review". The main heading is "What is the City Plan and why are we reviewing it?". The content area contains three paragraphs of text and a large graphic of the words "CITY PLAN" in a stylized, colorful font.

City of Westminster

Residents Businesses MyWestminster accounts Search

Providing a framework for delivering long-term housing, commercial and infrastructure growth in Westminster

City Plan

Home > Planning, building control and environmental regulations > Planning policy > City Plan Partial Review

What is the City Plan and why are we reviewing it?

Our City Plan provides our vision and framework for how long-term housing, commercial and infrastructure growth will be delivered in Westminster. The policies within the plan cover a range of topics including housing, sustainability, heritage, transport, the visitor economy and employment.

These policies are used to determine whether new developments including new housing and commercial floorspace are suitable to go ahead. The current City Plan was adopted in April 2021 and we are now refocussing our ambitions to build more affordable homes and prioritise the retrofitting of existing buildings, and steer growth on identified sites.

To address these priorities, we have now launched a partial review of our adopted City Plan.


The new and revised policies will together contribute to our vision for making Westminster a fairer and more inclusive city, where residents benefit from the opportunities new developments bring, and workers and visitors from all backgrounds feel welcome and safe.

CITY PLAN

What is happening now?

The Regulation 19 consultation on the City Plan Partial Review has now closed. We will be using the next few weeks to read your representations. We'll update this page with what happens next in due course.

The Regulation 19 process allows the public and key stakeholders to make comments on the proposed changes to the City Plan, with a view of ensuring that the changed and new policies are legally compliant, sound and have been prepared in accordance with the Duty to Cooperate.

[Visit the Regulation 19 consultation portal.](#) 

The consultation period ran from 14 March 2024 to 9 May 2024.

Affordable Housing



- We want to strengthen our existing affordable housing policy to maximise the provision of genuinely affordable housing for those most in housing need.
- Our consultation proposes to change policies that will require developers to help us meet increasing demand for more genuinely affordable housing.
- Policies to build more genuinely affordable homes will help local businesses recruit staff that have a genuine choice to live close to where they work.

Retrofitting



- Our new retrofit-first policy will prioritise the retrofit and refurbishment of existing buildings to meet future needs over unnecessary demolition and redevelopment, reducing the impact of development on climate change.
- We want to partner with landowners and developers to help them demonstrate their commitment to doing all that we can together to respond to the climate emergency.
- We know there are challenges to constructing and retrofitting more sustainable buildings. Therefore, we want to work more closely with architects and construction experts to find the right solutions.

Site allocations



- Westminster is a wonderful place to live, and we want existing and future residents to feel they can build a future here. Our consultation will help transform underused sites by allocating them in the Plan to potentially provide more affordable homes, job opportunities and support infrastructure.
- Site Allocations in the City Plan will present greater certainty to developers and landowners on what type of proposals are likely to be granted planning permission.
- Site Allocations can identify site-specific matters that will influence new designs – such as important buildings on site to retain or the need to provide new areas of open space.
- We have been gathering evidence to support these allocations including a call for sites which took place in January-May 2022 and as part of the Regulation 18 consultation on the partial City Plan review which took place October – November 2022.

Regulation 19 City Plan and Simple English Explainer



[Regulation 19 City Plan](#)
PDF, 37.06 MB, 246 pages



[Plain English Guide to the City Plan](#)
PDF, 42.37 MB, 13 pages

Core Supporting Documents



[Revised Policies Map](#)
PDF, 29.08 MB, 1 page



[Schedule of Changes to Policies Map](#)
PDF, 1.74 MB, 10 pages



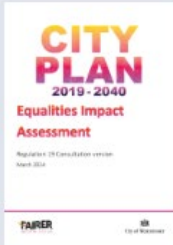
[Integrated Impact Assessment](#)
PDF, 3.42 MB, 104 pages



[Integrated Impact Assessment Appendix VIII Reasonable Alternative Appraisals](#)
PDF, 2.17 MB, 213 pages



[Integrated Impact Assessment Appendix IX Policy Appraisals](#)
PDF, 1.37 MB, 90 pages



[Equalities Impact Assessment](#)
PDF, 1.71 MB, 41 pages



[Consultation Statement](#)
PDF, 2.64 MB, 40 pages



[Duty to Co-operate Statement](#)
PDF, 1.11 MB, 26 pages



[Habitat's Regulation Assessment](#)
PDF, 1.15 MB, 21 pages



[Statement of Representations Procedure](#)
PDF, 233.29 KB, 2 pages

Evidence base



[Five Year Housing Land Supply Statement 2022-2027](#)
PDF, 495.74 KB, 22 pages



[City Plan Regulation 19 Consultation Cabinet Member Report](#)
PDF, 192.5 KB, 10 pages



[Archaeological Statement](#)
PDF, 1.6 MB, 18 pages



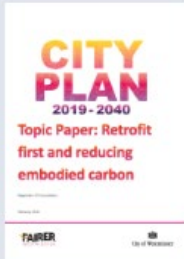
[Embodied Carbon Evidence Base](#)
PDF, 2.74 MB, 73 pages



[Grosvenor Sidings Design Review Panel Report](#)
PDF, 184.11 KB, 6 pages



[Level 2 Strategic Flood Risk Assessment](#)
PDF, 2.71 MB, 30 pages



[Retrofit-first Topic Paper](#)
PDF, 1.54 MB, 73 pages



[Royal Oak Design Review Panel Report](#)
PDF, 191.37 KB, 5 pages



[Site Allocations Heritage Impact Assessments](#)
PDF, 14.09 MB, 64 pages



[Small-scale Residential Developments Topic Paper](#)
PDF, 600.89 KB, 23 pages



[St Mary's Hospital Design Review Panel Report](#)
PDF, 197.46 KB, 7 pages



[St Mary's Site Allocation Heritage Impact Assessment](#)
PDF, 16.33 MB, 196 pages



[Strategic Housing Market Assessment](#)
 PDF, 1.44 MB, 89 pages



[Viability Report](#)
 PDF, 6.23 MB, 114 pages



[Westbourne Park Bus Garage Design Review Panel Report](#)
 PDF, 178.78 KB, 5 pages

What happens next

Following Regulation 19, the council will review and consider all provided comments. The revised City Plan, along with representations made, will be submitted to the Secretary of State for public examination by a Planning Inspector.

Due to the process of having an Independent Examination, representations cannot be treated as confidential and will be published on our website. If the Inspector finds that the proposed changes to the City Plan are legally compliant, sound, and have been prepared in accordance with the Duty to Cooperate, the existing City Plan will be amended and adopted by the council for use in planning decisions.

Regulation 18 consultation

Regulation 18 consultation for the City Plan Partial Review took place from October 2022 to November 2022. During this period the council advised the community that it intended to partially review the existing City Plan, with a focus on affordable housing, new retrofit policies and the introduction of site allocations.

Below are the documents that were provided during Regulation 18 consultation.



[Regulation 18 Statement](#)
 PDF, 151.81 KB, 3 pages



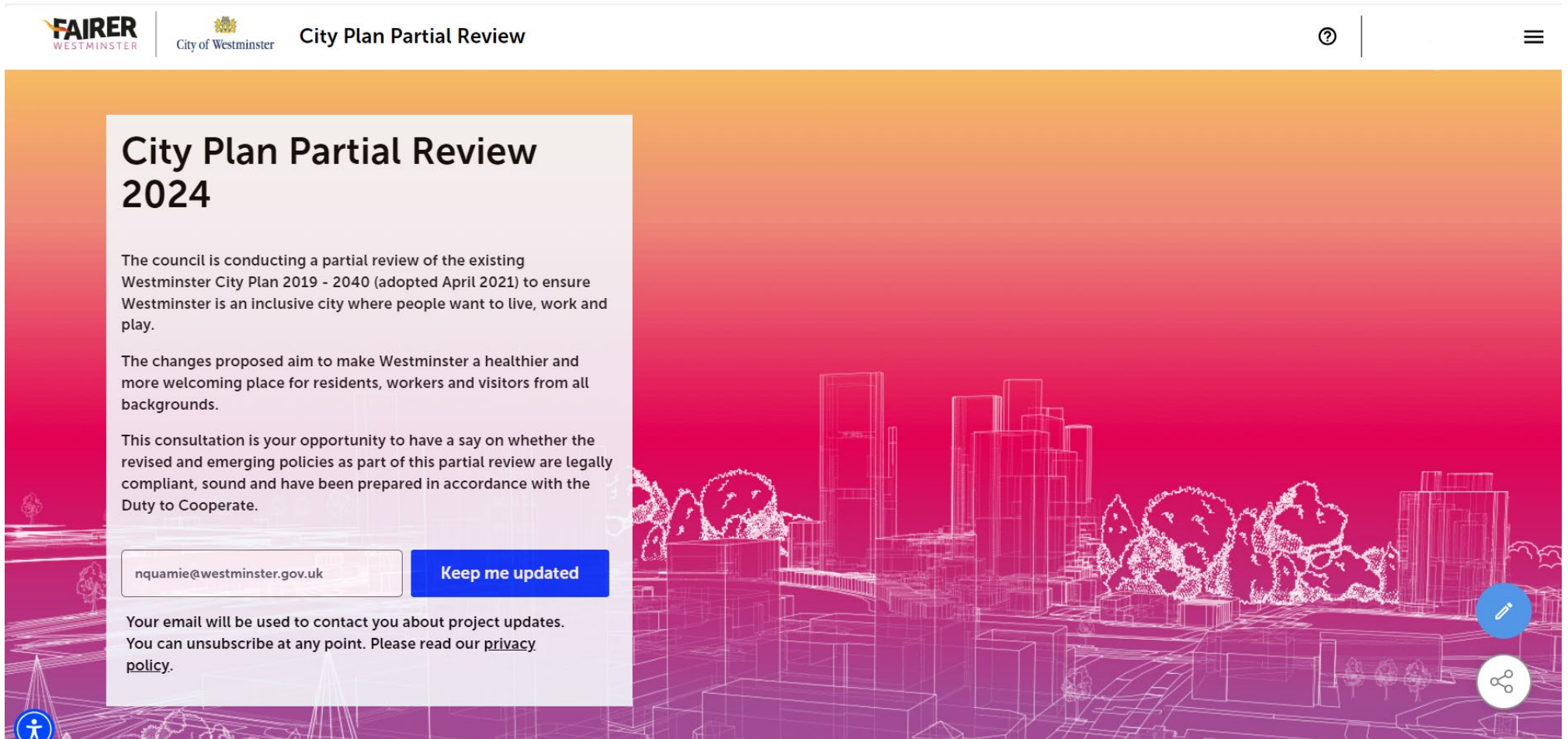
[Local Development Scheme 2024-27](#)
 PDF, 851.13 KB, 6 pages



[IIA Scoping Paper](#)
 PDF, 635.37 KB, 10 pages

Appendix 2: Screenshots of Commonplace

Screenshot of Commonplace launch page on 14th March



The partial review of the City Plan has reached a new milestone.

Following extensive evidence gathering, engagement and policy drafting, the council is now exhibiting the revised City Plan as part of a statutory 'Regulation 19' process.

The City Plan 2019–2040, is the council's Local Plan. It is our main planning document that sets out the council's vision and framework for managing both the built and natural environment in Westminster. The current City Plan was adopted in April 2021, but has been re-examined following its adoption with a vision for making Westminster a fairer and more inclusive city.

The aim of this review is not to replace the existing City Plan with an entirely new plan. Instead, we are focusing on three policy areas that we feel most urgently need attention, either through the revision of existing policy or the introduction of new policy. These are:

- Strengthening of the former Policy 9, which is now new Policy 13 - Affordable Housing.
We want to make sure that more genuinely affordable homes are developed.
- Introducing a new Policy 43 Retrofit First
Where appropriate, we want to encourage developers to prioritise retrofit and refurbishment of existing buildings over demolition.
- Introducing new Policies 8–11 for four new Site Allocations.
We're looking to unlock the development potential of four underutilised and complex sites and see them contribute towards our vision for Westminster.

This consultation is running from 14th March to 25th April 2024. Representations can be made using our consultation webpage on [Commonplace - City Plan Partial Review 2024](#), by email to planningpolicy@westminster.gov.uk or in writing to: City Planning Policy, Innovation and Change, Westminster City Council, 17th Floor, 64 Victoria Street, London, SW1E 6QP. If being sent by email or in writing, representations should be clearly labelled 'City Plan Partial Review – response to Regulation 19 consultation'.

Please note – comments should only relate to those sections of the plan subject to revision.

The full draft of the revised City Plan can be downloaded [here](#).


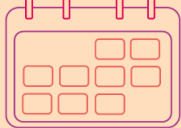

We have also produced an interactive, simple English explainer of the partial review and the revised/new policies - [Simple Explainer: What is the Partial City Plan Review](#).

Further information supporting the City Plan Partial Review can be accessed on [council's website](#).




INFORMATION

3 proposals

 <p>✔ Completed</p> <p>Regulation 19 Consultation Learn more about Regulation 19 consultation and how to respond</p> <p>Learn more</p>	 <p>✔ Completed</p> <p>Join our events Click here to see the different events we will be hosting during Regulation 19</p> <p>Learn more</p>	 <p>✔ Completed</p> <p>Westminster City Plan View the revised City Plan in full and the simple English explainer</p> <p>Learn more</p>
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COMMENT ON NEW AND REVISED POLICIES


3 proposals



✔ Completed


Revised Affordable Housing Policy
Learn more about the revised Affordable Housing Policy and provide your views

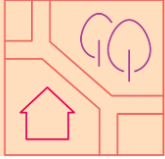
 4 [Share your views](#)



✔ Completed


New Retrofit First Policy
Learn more about the new Retrofit First Policy and provide your views

 11 [Share your views](#)




✔ Completed

New Site Allocations
Learn more about the new Site Allocation Policies and provide your views

 11 [Share your views](#)

FURTHER INFORMATION


3 proposals



✔ Completed

Supporting Information
View the documents which have been developed to support the City Plan Partial Review


[Learn more](#)



✔ Completed

FAQ
View responses to frequently asked questions

[Find out more](#)



✔ Completed

Language Services
Click here for translation services

[Learn more](#)

PROJECT TIMELINE

[Learn more](#)



Review of Your Comments

April 2024 • In Progress

The council will review and consider each of the comments received during Regulation 19 Consultation. Amendments to the plan may be made if a submission underscores elements of the partial review that may not align with Duty to Cooperate obligations, are not sound or are not legally compliant.

PLANNING POLICY TEAM

Contact us

 Email: planningpolicy@westminster.gov.uk

City Plan Partial Review 2024

Deadline Extended

The City Plan Partial Review Regulation 19 consultation has been extended to 9 May 2024 (11:59pm) to provide you with extra time to submit your responses. Please ensure your responses are provided to us before the deadline.

The council is conducting a partial review of the existing Westminster City Plan 2019 - 2040 (adopted April 2021) to ensure Westminster is an inclusive city where people want to live, work and play.

This consultation is your opportunity to have a say on whether the revised and emerging policies as part of this partial review are legally compliant, sound and have been prepared in accordance with the Duty to Cooperate.

Keep me updated

Your email will be used to contact you about project updates. You can unsubscribe at any point. Please read our [privacy policy](#).

Screenshots of Commonplace Retrofit First Regulation 19 questions

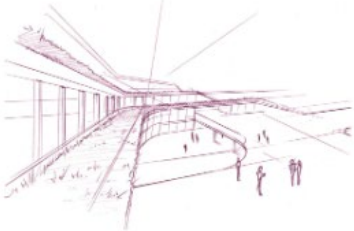
The same questions on legal compliance, compliance with the Duty to Cooperate and soundness were asked for each section of the new policy, Prioritising Retrofit, Embodied Carbon targets and Promoting Retrofit see below. This was to allow respondents to focus comments and identify issues on specific parts of the policy.

[< Home New Retrofit First Policy](#)

1/4

New Retrofit First Policy 43

In response to the effects of a changing climate, the council has declared a climate emergency and have set ambitious targets for the city to achieve net-zero by 2040. To ensure we reach this goal, we are paying close attention to the contribution of the built environment towards carbon emissions, in particular embodied carbon, which is the total carbon emissions associated with the construction of a building, including the production, transportation, and disposal of materials to be used as part of the development.




This new policy includes encouraging developers to adopt a 'retrofit first' approach, a focus on reducing embodied carbon emissions and the promotion of retrofitting.

The new policy can be found on Pages 174 - 178 of the Regulation 19 City Plan. The City Plan document can be found [here](#).

Please refer to the [Frequently Asked Questions page](#) if you have any questions.

Extract of the new Retrofit First policy in the revised City Plan

 Retrofit First Extract.pdf pdf ↓ ↻

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Prioritising Retrofit

We are proposing to encourage developers to explore retrofitting existing buildings prior to considering demolition and redevelopment options. Any proposals for substantial or total demolition will necessitate rigorous justification through a comprehensive appraisal of construction alternatives, evaluating carbon costs and assessing the public benefits of all options.

Please answer the following questions to have your say on this section of the New Retrofit Policy.

To learn more about how to answer the survey and what will be done with your personal information, please refer to the [How to Respond page](#).

What is your name? (survey responses without this field populated are not valid)

First name Last name

Are you completing this survey as a..

Select one option

Resident/Individual	Amenity Society
Charitable/Voluntary Organisation	Community Group
Consultancy	Councillor
Education Establishment	Housing Association
WCC Employee	London Borough
Neighbourhood Forum	Other public body

[Add something else](#)

What is your email? (survey responses without this field populated are not valid)

example@email.com

Do you think that the preparation of Westminster City Council's new Retrofit First policy complies with the Duty to Cooperate?

Select one option

Yes No Don't know

If you answered yes, please provide details on why you consider the preparation of Westminster's new policy does comply with the Duty to Cooperate

If you answered no, please provide details on why you consider the preparation of Westminster's new policy does NOT comply with the Duty to Cooperate

Do you consider this section of Westminster City Council's new Retrofit First policy to be legally compliant?

Select one option

If you answered yes, please provide details on why you consider this section of the new Retrofit First policy to be legally compliant.

If you answered no, please provide details of why you consider this section of the new Retrofit First policy to NOT be legally compliant.

Please set out what modification(s) you consider necessary to make this section of the new Retrofit First policy legally compliant.

Do you consider this section of the new Retrofit First policy to be sound?

Select one option

If you answered yes, please provide details on why you consider this section of the new Retrofit First policy to be sound.

If you answered no, please provide details of why you consider this section of the new Retrofit First policy to NOT be sound.

Please set out what modification(s) you consider necessary to make this section of the new Retrofit First policy sound.

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Embodied Carbon targets

For developments with more than a single storey involving demolition, we are proposing to limit the amount of embodied carbon emissions associated with their construction. Developments will be required to submit a Whole Life-Cycle Carbon assessment and a Circular Economy Statement to demonstrate how they have met embodied carbon targets and how materials have been reused and repurposed.

Please answer the following questions to have your say on this section of the New Retrofit Policy.

To learn more about how to answer the survey and what will be done with your personal information, please refer to the [How to Respond page](#).

4/4

Promoting retrofitting

We are proposing to support proposals which implement retrofitting strategies that result in energy and climate adaptation upgrades to existing buildings to ensure that they are fit for the future. We will consider the overarching benefits of retrofitting existing buildings (for example, climate change adaptation measures and improved energy performances) when assessing the townscape, heritage and design impacts of development schemes.

Please answer the following questions to have your say on this section of the New Retrofit Policy.

To learn more about how to answer the survey and what will be done with your personal information, please refer to the [How to Respond page](#).

Screenshots of Commonplace Affordable Housing Regulation 19 questions

The same questions on legal compliance, compliance with the Duty to Cooperate and soundness were asked for each section of the new policy, Tenure Split and Small-Scale developments. This was to allow respondents to focus comments and identify issues on specific parts of the policy.

< Home Revised Affordable Housing Policy

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Revised Affordable Housing Policy

New Policy 13 Affordable housing (pages 83 - 87 of the revised City Plan) refers to homes that cater to the needs of those who cannot buy or rent homes at market value.



The revision of this policy aims to deliver genuinely affordable housing in Westminster by introducing a new Affordable Housing Tenure Split and introducing a requirement for small-scale residential developments provide an Affordable Housing contribution.

The new policy can be found on Pages 83 - 87 of the Regulation 19 City Plan. The City Plan document can be found [here](#).

Please refer to the [Frequently Asked Questions page](#) if you have any questions.

Extract of the new Affordable Housing Policy in the revised City Plan



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Affordable Housing Tenure Split

We are proposing to increase the distribution of affordable housing from 60% intermediate housing and 40% social housing to 70% social housing and 30% intermediate housing. This new split is in line with council's evidence that shows a very acute need for social housing.

Current Affordable Housing Tenure Split

Proposed Affordable Housing Tenure Split



Please answer the following questions to let us know whether you believe this section of the Affordable Housing policy complies with the duty to cooperate, is sound and is legally compliant.

To learn more about how to answer the survey and what will be done with your personal information, please refer to the [How to Respond page](#).

What is your name? (survey responses without this field populated are not valid)

First name Last name

Are you completing this survey as a..

Select one option

Resident/Individual	Amenity Society
Charitable/Voluntary Organisation	Community Group
Consultancy	Councillor
Education Establishment	Housing Association
WCC Employee	London Borough
Neighbourhood Forum	Other public body

[Add something else](#)

What is your email? (survey responses without this field populated are not valid)

example@email.com

Do you think that the preparation of Westminster City Council's revised Affordable Housing policy complies with the Duty to Cooperate?

Select one option

Yes No Don't know

If you answered yes, please provide details on why you consider the preparation of Westminster's revised policy complies with the Duty to Cooperate

If you answered no, please provide details on why you consider the preparation of Westminster's revised policy does NOT comply with the Duty to Cooperate

Do you consider this section of Westminster City Council's reviewed Affordable Housing policy to be legally compliant?

Select one option

Yes No Don't know

If you answered yes, please provide details of why you consider this section of the Affordable Housing policy is legally compliant.

If you answered no, please provide details of why you consider this section of the Affordable Housing policy is NOT legally compliant.

Please set out what modification(s) you consider necessary to make this section of the Affordable Housing policy review legally compliant.

Do you consider this section of the revised Affordable Housing policy to be sound?

Select one option

Yes No Don't know

If you answered yes, please provide details on why you consider this section of the Affordable Housing policy is sound.

If you answered no, please provide details of why you consider this section of the Affordable Housing policy is NOT sound.

Please set out what modification(s) you consider necessary to make this section of the Affordable Housing policy sound.

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< Home Revised Affordable Housing Policy

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Affordable Housing from small-scale developments

We are proposing that small-scale residential developments (defined as those that deliver fewer than 10 homes) contribute to affordable housing delivery. This could be on-site, off-site, or in the form of a financial contribution to the council's Affordable Housing Fund.

Please answer the following questions to have your say on this section of the Affordable Housing policy.

To learn more about how to answer the survey and what will be done with your personal information, please refer to the [How to Respond page](#).

Screenshots of Commonplace Site Allocations Regulation 19 questions

The same questions on legal compliance, compliance with the Duty to Cooperate and soundness were asked for each Site Allocation policy, Land Adjacent to Royal Oak, St Mary's Hospital, Grosvenor Sidings and Westbourne Park Bus Garage. This was to allow respondents to focus comments and identify issues on specific site allocation policies.

[Home New Site Allocations](#)

1/5

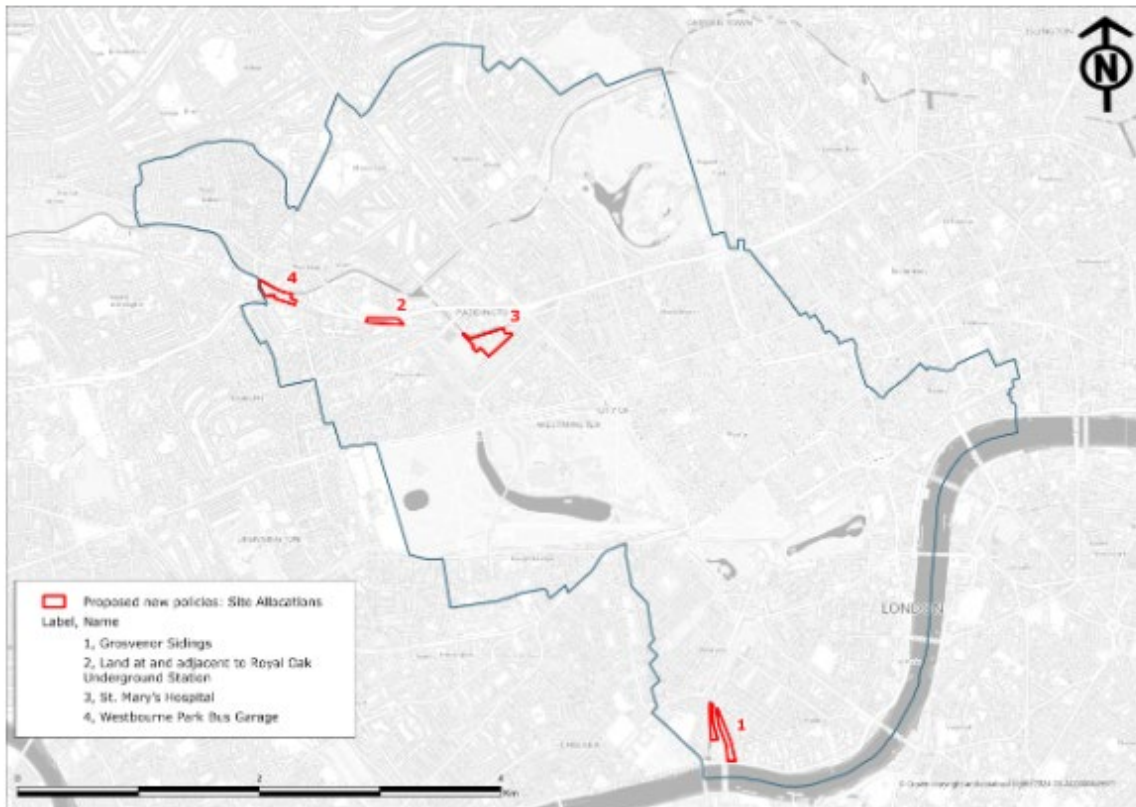
New Site Allocations

Within Westminster there are some sites that are underutilised and constrained by a number of factors so are yet to come forward for development. The council has identified four such sites and is looking to unlock their potential and encourage good growth that provides the city with new homes, employment opportunities and accessible public spaces. Through our proposed new Site Allocations policies, we are seeking to provide site-specific guidance which work alongside existing policies in the City Plan and help safeguard land for particular uses such as residential uses, commercial floor space, community space or open space.

The four sites are:

- Land adjacent to Royal Oak
- Westbourne Park Bus Garage
- Grosvenor Sidings
- St Mary's Hospital

The following map shows the location of each Site Allocation in the borough.



Please refer to the [Frequently Asked Questions page](#) if you have any questions about Site Allocations.

Extract of the Site Allocation policies in the revised City Plan



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Policy 8: St Mary's Hospital

St Marys Hospital sits next to Paddington Station, with South Wharf Road running through the centre. It is mainly used by St Mary's Hospital, which is one of the largest trauma centres and A&E departments in London. We are seeking to bring forward mixed-used development that includes a new, first-class hospital with potential commercial, residential or community uses. Proposals should also deliver new and improved urban greenery and public spaces that support recreation and leisure.



The new policy can be found on Pages 56 - 61 of the Regulation 19 City Plan. The City Plan document can be found [here](#).

Please answer the following questions to let us know whether you believe this Site Allocation policy complies with the duty to co-operate, is sound and is legally compliant.

To learn more about how to answer the survey and what will be done with your personal information, please refer to the [How to Respond page](#).

Policy 9: Westbourne Park Bus Garage

Westbourne Park Bus Garage sits in between Westbourne Park station and the Grand Union Canal. The site is currently used as a bus garage, staff car park and associated offices. We are seeking to redevelop and upgrade the bus garage and deliver a residential-led mixed use scheme. Development should deliver new commercial uses that support small and medium businesses, biodiversity improvements and enhance the pedestrian experience of the site.



The new policy can be found on Pages 62 - 66 of the Regulation 19 City Plan. The City Plan document can be found [here](#).

Please answer the following questions to let us know whether you believe this Site Allocation policy complies with the duty to co-operate, is sound and is legally compliant.

To learn more about how to answer the survey and what will be done with your personal information, please refer to the [How to Respond page](#).

Policy 10: Land Adjacent to Royal Oak

Land adjacent to Royal Oak station sits in between the station and the Westway. The site is currently underutilised with a limited amount of low-quality greenery. It is also used as a private road, providing access to Elizabeth Line portal. We are seeking for development to enhance permeability on site and improve the station approach and access. Furthermore, development should enhance biodiversity and deliver a mix of uses including commercial land, public spaces and potentially well-design new homes.



The new Policy 10 can be found on Pages 67 - 70 of the Regulation 19 City Plan. The City Plan document can be found [here](#).

Please answer the following questions to let us know whether you believe this Site Allocation policy complies with the duty to co-operate, is sound and is legally compliant.

To learn more about how to answer the survey and what will be done with your personal information, please refer to the [How to Respond page](#).

What is your name? (survey responses without this field populated are not valid)

Are you completing this survey as a..

Select one option

Resident/Individual	Amenity Society
Charitable/Voluntary Organisation	Community Group
Consultancy	Councillor
Education Establishment	Housing Association
WCC Employee	London Borough
Neighbourhood Forum	Other public body

[Add something else](#)

What is your email? (survey responses without this field populated are not valid)

Do you think that the preparation of Westminster City Council's Site Allocation policy for Royal Oak complies with the Duty to Cooperate?

Select one option

If you answered yes, please provide details on why you consider the preparation of Westminster's Site Allocation policy complies with the Duty to Cooperate

If you answered no, please provide details on why you consider the preparation of Westminster's Site Allocation policy does NOT comply with the Duty to Cooperate

Do you consider Westminster City Council's Site Allocation policy for Royal Oak to be legally compliant?

Select one option

If you answered yes, please provide details on why you consider this Site Allocation policy is legally compliant.

If you answered no, please provide details of why you consider this Site Allocation policy is NOT legally compliant.

Please set out what modification(s) you consider necessary to make this Site Allocation policy legally compliant.

Do you consider Westminster City Council's Site Allocation policy for Royal Oak to be sound?

Select one option

If you answered yes, please provide details on why you consider this Site Allocation policy is sound.

If you answered no, please provide details of why you consider this Site Allocation policy is NOT sound.

Please set out what modification(s) you consider necessary to make this Site Allocation policy sound.

Policy 11: Grosvenor Sidings

Grosvenor Sidings sits to the south of Westminster fronting the River Thames on Grosvenor Road. It is currently an underutilised site which operates as a sidings/depot for trains, supporting lines to and from London Victoria Station. The western side of the site is currently occupied by British Transport Police offices. We are seeking for development to deliver high-quality, residential-led mixed-use development, providing commercial floorspace and community uses. Proposals should also deliver enhanced greenery and water features and improve active travel through the site and beyond.



The new policy can be found on Pages 71 - 76 of the Regulation 19 City Plan. The City Plan document can be found [here](#).

Please answer the following questions to let us know whether you believe this Site Allocation policy complies with the duty to co-operate, is sound and is legally compliant.

To learn more about how to answer the survey and what will be done with your personal information, please refer to the [How to Respond page](#).

Appendix 3:

Screenshots of Regulation 19 email notices

Screenshot of email notification to all stakeholders



City of Westminster

Notice of Regulation 19 - Partial Review of Westminster's City Plan Development Plan Document

Planning and Compulsory Purchase Act 2004 / Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 / Town and Country Planning (Local Planning) (England) Regulations 2012. This notice is being made in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Westminster City Council is conducting a partial review of the City Plan 2019-2040 (adopted in April 2021), which has now reached Regulation 19 consultation. This review preserves most of the existing City Plan content. Changes will focus on three policy areas that we think most urgently need attention, either through a revision of existing policy or the introduction of new policies to drive growth, build more genuinely affordable homes and tackle the climate crisis.

The proposed changes to policy are:

- **Replacement of the former Policy 9 with a new Affordable Housing – (Policy 13)**
We want to make sure that more genuinely affordable homes are developed to address the significant waiting list for social housing and provide suitable accommodation for those who need it most.
- **Introducing a new Retrofit First Policy (Policy 43)**
While we recognise there will always be cases where demolition will be necessary, we want to encourage developers to prioritise retrofit and refurbishment of existing buildings over demolition so that we can have economic growth that maximises environmental sustainability.

- **Introducing four new Site Allocations**

We're looking to unlock the development potential of four underutilised and complex sites to deliver a mixture of new infrastructure, genuinely affordable housing and high-quality commercial uses. Four new Site Allocation Policies are proposed for the following sites: Policy 8: [St Mary's Hospital](#), Policy 9: [Westbourne Park Bus Garage](#), Policy 10: [Land adjacent to Royal Oak](#), Policy 11: [Grosvenor Sidings](#).

During Regulation 19, the proposed changes listed above are publicised, alongside [supporting evidence](#) documents which form an integral part of the final submission. The full draft of the revised City Plan can be accessed, [here](#) and we have also produced an interactive, [Plain English explainer of the partial review and the revised/new policies](#). For more information on the changes being proposed under the Partial City Plan review, please visit [our website](#).

You are invited to inspect the changes to the City Plan and supporting materials and let us know if you believe the changes proposed are legally compliant, sound and have been prepared in accordance with the Duty to Cooperate.

This consultation is running from **14 March to 25 April 2024**.

Representations can be made using our consultation webpage on Commonplace - [City Plan Partial Review 2024](#), by email to planningpolicy@westminster.gov.uk or in writing to: City Planning Policy, Innovation and Change, Westminster City Council, 17th Floor, 64 Victoria Street, London, SW1E 6QP. If being sent by email or in writing, representations should be clearly labelled 'City Plan Partial Review – response to Regulation 19 consultation'.

The council will also be hosting in-person drop-in events and online webinars as part of the consultation, please visit [Commonplace page](#) to find out more.

Kind regards,



Debbie Jackson

Executive Director – Regeneration, Economy and Planning



City of Westminster



Screenshot of email notifications to Neighbourhood Forums

From: Neighbourhood, Planning: WCC
Sent: 09 April 2024 14:50
Subject: City Plan Partial Review - Regulation 19 Consultation

Dear Stakeholder,

A reminder that the partial review of our existing City Plan 2019-2040 is currently undergoing Regulation 19 consultation until the 25th of April 2024. The partial review focuses on three areas, as follows:

- Strengthening of the former Policy 9, which is now new Policy 13 - Affordable Housing. *We want to make sure that more genuinely affordable homes are developed.*
- Introducing a new Policy 43 - Retrofit First. *Where appropriate, we want to encourage developers to prioritise retrofit and refurbishment of existing buildings over demolition.*
- Introducing new Policies 8-11 for four new Site Allocations. *We're looking to unlock the development potential of four underutilised and complex sites and see them contribute towards our vision for Westminster.*

More information on the review can be found on the council's Commonplace platform using this [link](#).

Kind regards,

Planning Policy Team
Corporate Services
Westminster City Council



Any views or opinions expressed in this email are those of the sender, and whilst given in good faith, do not necessarily represent a formal decision of the Local Planning Authority unless a statutory application is or has been made and determined in accordance with requisite procedures, planning policies and having had regard to material considerations.

Screenshot of email invitation to Examination Hearings

Participation in examination hearing sessions - Westminster City Plan Partial Review



Planning Policy: WCC

To Planning Policy: WCC

Bcc

Reply

Reply All

Forward



Thu 20/06/2024 10:03

Dear Sir/Madam,

As you are aware, Westminster City Council conducted Regulation 19 consultation for the partial review of the City Plan between March and May this year. Thank you again for participating in the consultation. The council currently intend to submit the plan for examination later this year, at which point respondents may wish to participate in hearing session(s).

If your representation was seeking a modification to the plan, **please can you indicate whether you consider it necessary to participate in examination hearing sessions, and why?**

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), who is invited to attend will be a matter for the Inspector to decide once they have been appointed and familiarised themselves with the issues raised. You may also be asked at a later point to confirm your request to participate.

Please can you respond to this email by Friday 12th July.

At the moment, we are still analysing and responding to Regulation 19 representations. Once we have completed this analysis, we will be better placed to confirm anticipated dates for the examination period and our website and Commonplace page will be updated accordingly.

For a broad understanding of our timetable, we recommend you look at our [Local Development Scheme 2024-27](#). If there are any changes, this will be updated with the new timeframes.

Kind regards,

Planning Policy Team
Corporate Services
Westminster City Council



CITY PLAN

PARTIAL REVIEW

The partial review of the City Plan has reached a new milestone. Following extensive evidence gathering, engagement and policy drafting, the council is now exhibiting the revised City Plan as part of a statutory 'Regulation 19' process.

We are not replacing the entire City Plan which was adopted in April 2021. Instead, we are focusing on three policy areas that we feel most urgently need attention. These are:



Strengthening of Policy 9 - Affordable Housing

We want to make sure that more genuinely affordable homes are developed.



Introducing a new Retrofit first policy

Where appropriate, we want to encourage developers to prioritise retrofit and refurbishment of existing buildings over demolition.



Introducing four new Site Allocations

We're looking to unlock the development potential of four underutilised and complex sites and see them contribute towards our vision for Westminster.

The revised City Plan and supporting material can be accessed on council's engagement portal on <https://cityplanpartialreview.commonplace.is/> or by scanning the QR code.

Consultation will conclude on 25 April 2024.



Find out more!

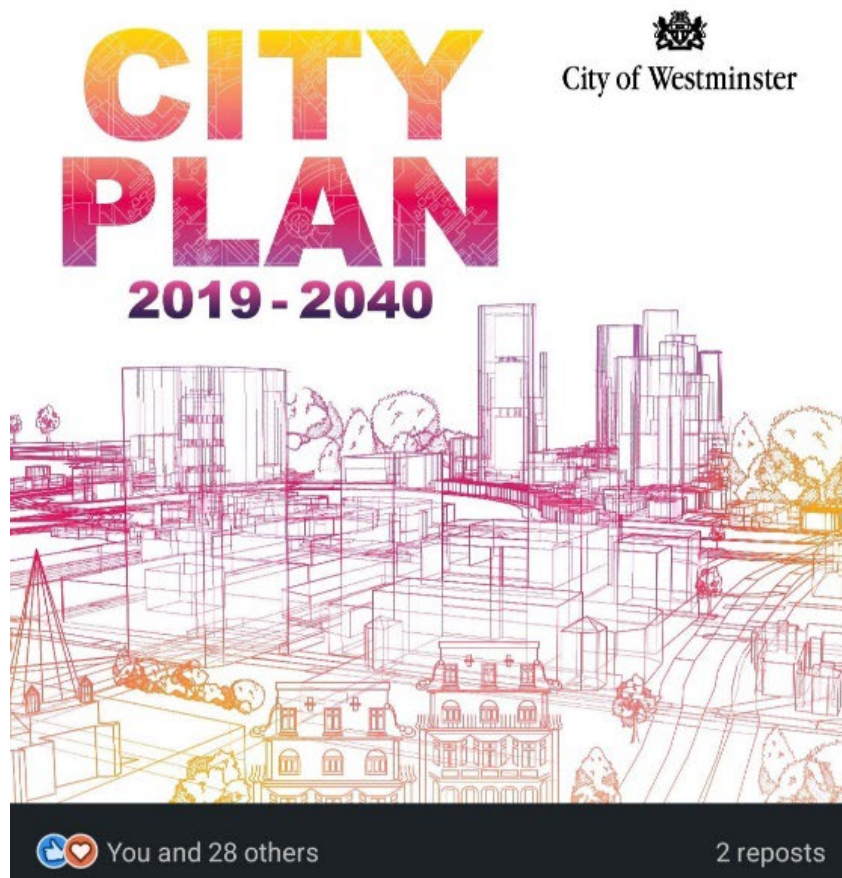
Find out more about the City Plan Partial Review by attending one of our in-person or virtual events.

Event details are provided on our engagement portal.



Appendix 4:

Screenshots of social media posts





Westminster City Council



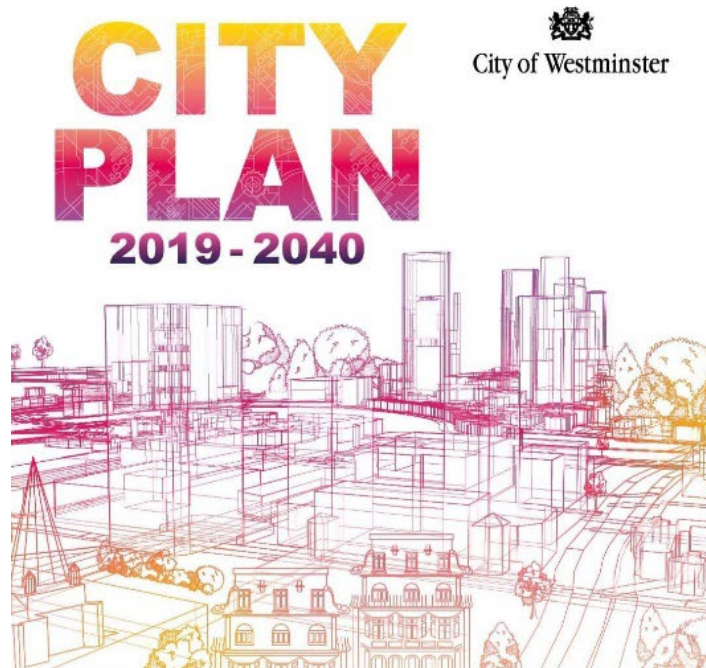
2 d · 🌐

The City Plan Partial Review consultation has launched 🙌

It's an opportunity for everyone to play a part in shaping our city. From housing to sustainability, your voice matters 💬

Take part in the consultation and make a real difference 🙌

<https://www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-policy/westminsters-planning-policies>



👍 2

4 comments

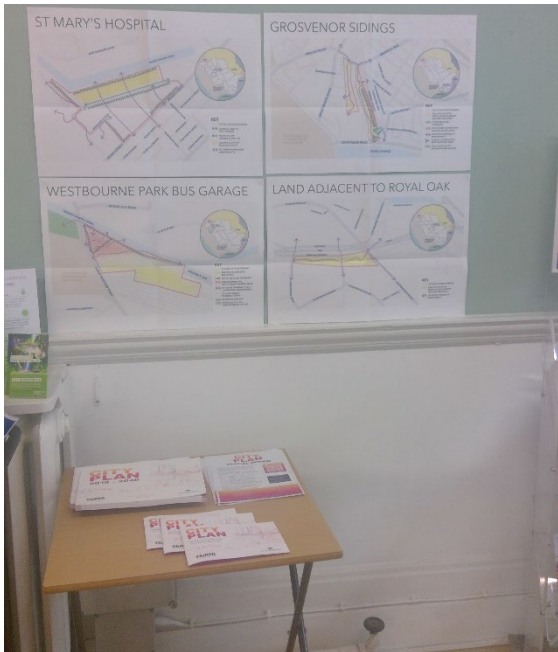
👍 Like

💬 Comment

📧 Send

➦ Share

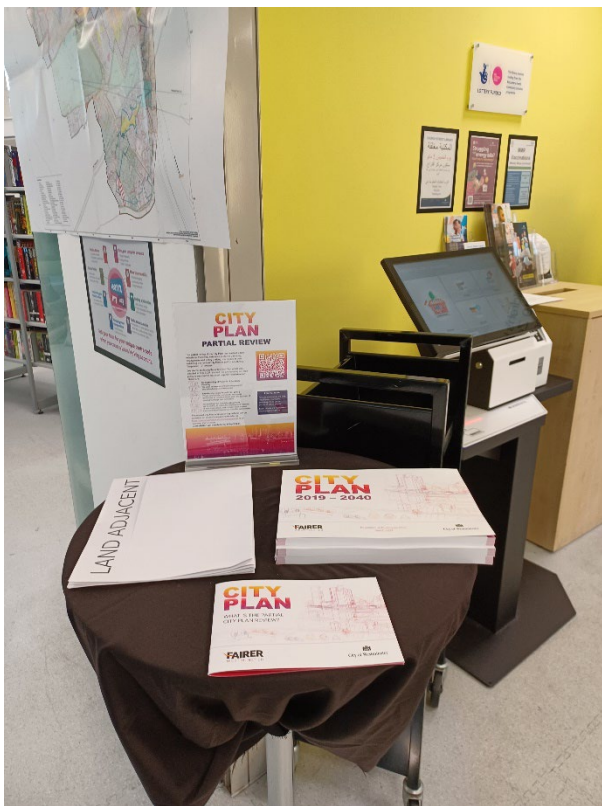
Appendix 5: Images of Westminster Library displays



Victoria Library



Paddington Library



Church Street Library



Maida Vale Library



Marylebone Library

Appendix 6: Regulation 19 respondents

ID	Channel	Name	Type of respondent
001	Email	Matthew Bennett	Individual
002	Email	Wendy Shillam	Individual
003	Email	Achim von Malotki	Individual
004	Email	Westbourne Forum and Maida Hill Forum	Neighbourhood Forum, Amenity Society or Resident's Association
005	Email	Pimlico Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
006	Email	Fitzrovia West Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
007	Email	Thames Water	Statutory consultee
008	Email	National Gas	Statutory consultee
009	Email	National Grid	Statutory consultee
010	Email	The Howard de Walden Estate	Developers, landowners and real estate company
011	Email	NHS Property Services (NHSPS)	Developers, landowners and real estate company
012	Email	Shaftesbury Capital	Developers, landowners and real estate company
013	Email	Heart of London Business Alliance (HOLBA)	Business and trade association
014	Email	Sport England	Statutory consultee
015	Email	PRACT	Neighbourhood Forum, Amenity Society or Resident's Association
016	Email	Westbourne Park Road East Residents Association	Neighbourhood Forum, Amenity Society or Resident's Association
017	Email	Buro Happold	Consultancy firm and professional network
018	Email	Yoo and Ascendal Group	Developers, landowners and real estate company

019	Email	Berkeley Homes	Developers, landowners and real estate company
020	Email	Places for London	Developers, landowners and real estate company
021	Email	Jones Lang LaSalle Limited (JLL)	Developers, landowners and real estate company
022	Email	Johanna Hicks	Individual
023	Email	London Heritage Quarter (The Northbank BID)	Business and trade association
024	Email	Church Commissioners for England	Charity, campaign groups and other clubs/association
025	Email	Network Rail	Statutory consultee
026	Email	Maida Hill Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
027	Email	DP9 Ltd	Consultancy firm and professional network
028	Email	Landsec	Developers, landowners and real estate company
029	Email	Valouran Ltd	Consultancy firm and professional network
030	Email	Elliottwood	Consultancy firm and professional network
031	Email	Savile Road 1 Ltd	Business and trade association
032	Email	Berkeley Estate Asset Management	Developers, landowners and real estate company
033	Email	Hydrock	Consultancy firm and professional network
034	Email	TfL Spatial Planning	Statutory consultee
035	Email	COHORT Ltd	Developers, landowners and real estate company
036	Email	Grosvenor Property UK	Developers, landowners and real estate company
037	Email	Network Rail	Statutory consultee
038	Email	Aldersgate Investments Ltd.	Developers, landowners and real estate company

039	Email	Great Portland Estates PLC	Developers, landowners and real estate company
040	Email	Knight Frank	Developers, landowners and real estate company
041	Email	Nicky Hessenberg	Individual
042	Email	Environment Agency	Statutory consultee
043	Email	Defence Infrastructure Organisation	Statutory consultee
044	Email	Hilson Moran	Consultancy firm and professional network
045	Email	Whitbread	Developers, landowners and real estate company
046	Email	Imperial College NHS Trust	Statutory consultee
047	Email	Innova Partnership	Consultancy firm and professional network
048	Email	GLA	Statutory consultee
049	Email	TT Group	Developers, landowners and real estate company
050	Email	WPA	Developers, landowners and real estate company
051	Email	SAVE Britain's Heritage	Charity, campaign group and other clubs/association
052	Email	Argent Services LLP / UK Net Zero Carbon Buildings Standard	Consultancy firm and professional network
053	Email	UK Green Building Council	Consultancy firm and professional network
054	Email	Max Fordham	Consultancy firm and professional network
055	Email	Oxford Properties Group	Developers, landowners and real estate company
056	Email	The Pollen Estate	Developers, landowners and real estate company
057	Email	Benthal Green Oak (BGO)	Developers, landowners and real estate company

058	Email	TATE (The Planning Lab)	Consultancy firm and professional network
059	Email	Soho Estates	Developers, landowners and real estate company
060	Email	Historic England	Statutory consultee
061	Email	Heike Schuerings-Bauschke	Individual
062	Email	Michael Rose	Individual
063	Email	Westbourne Park Residents Association	Neighbourhood Forum, Amenity Society or Resident's Association
064	Email	Margaret Mountford	Individual
065	Email	Belgravia Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
066	Email	The Crown Estate	Developers, landowners and real estate company
067	Email	Konrad Kotowski	Individual
068	Email	Susanne Walton	Individual
069	Email	Martin Walton	Individual
070	Email	Harry Rokeby-Johnson.	Individual
071	Email	CC Land Ltd	Developers, landowners and real estate company
072	Email	Margot Pioro	Individual
073	Email	Marisa Bell	Individual
074	Email	Stephen Willis	Individual
075	Email	Houses of Parliament Restoration and Renewal Programme (R&R) and UK Parliament Strategic Estates	Developers, landowners and real estate company
076	Email	Clean Air Bayswater	Charity, campaign groups and other clubs/association
077	Email	New West End Company	Developers, landowners and real estate company
078	Email	Marks and Spencer PLC	Developers, landowners and real estate company

079	Email	British Land	Developers, landowners and real estate company
080	Email	Knightsbridge Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
081	Email	Hilson Moran / ARUP / 3XN/GXN / Atelier Ten	Consultancy firm and professional network
082	Email	Michael Millership	Individual
083	Commonplace	Abby Foster	Consultancy firm and professional network
084	Commonplace	Annegret Seebass	Individual
085	Commonplace	Barbie Campbell Cole	Individual
086	Commonplace	The Institution of Structural Engineers	Charity, campaign groups and other clubs/association
087	Commonplace	Julija Sungailaite	Individual
088	Commonplace	Harry Dodd Noble	Individual
089	Commonplace	Elizabeth Carey	Individual
090	Commonplace	Woodland Trust	Charity, campaign groups and other clubs/association
091	Commonplace	Theatres Trust	Statutory consultee
092	Commonplace	Talya Davies	Individual
093	Commonplace	Jane Hill	Individual
094	Commonplace	EMR Group	Business and trade association
095	Commonplace	Brent and Westminster Swifts Group	Charity, campaign groups and other clubs/association
096	Commonplace	Hyde Park Estate Association	Neighbourhood Forum, Amenity Society or Resident's Association
097	Commonplace	Max Fordham	Consultancy firm and professional network
098	Commonplace	Simon Smith	Individual
099	Commonplace	Nicole Magoon	Individual
100	Commonplace	Sebastian Conran	Individual
101	Commonplace	Tatiana von der Pahlen	Individual
102	Commonplace	Vahid Farzad	Individual

Planning Policy Team

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City of Westminster