

CITY PLAN 2019 - 2040

Scope and Site Allocations Topic Paper

November 2024

Contents

1 Introduction	3
1.1 Introduction.....	4
2 Scope of the City Plan Partial Review	5
2.1 Scope of the City Plan Partial Review..	6
3 Selection of site allocations	8
3.1 Stage A: Call for Sites and Regulation 18 consultation	9
3.2 Stage B: Internal assessment of further development opportunities.....	10
3.3 Stage C: Initial list of sites	11
3.4 Stage D: Prioritisation of sites for inclusion in the City Plan Partial Review	12
4 Content of site allocations	14
4.1 Content of site allocations	15
5 Objectives of each site allocation and why they are necessary	16
5.1 St Mary’s Hospital	17
5.2 Westbourne Park Bus Garage	18
5.3 Royal Oak.....	19
5.4 Grosvenor Sidings.....	20
6 Conclusion.....	21
6.1 Conclusion	22
7 Appendices	23
7.1 Appendix 1: Sites submitted through Call for Sites/Regulation 18 consultation	24
7.2 Appendix 2: Initial list of potential sites from assessment of Call for Sites submissions and in-house search of other potential sites	25

1 Introduction

1.1 Introduction

1.1.1 The purpose of this paper is two-fold. It aims to:

- outline the scope of the City Plan Partial Review; and
- explain the council's process in considering potential site allocations for inclusion in the City Plan Partial Review.

1.1.2 In terms of the scope of the City Plan Partial Review, it sets out why the council has embarked on a partial rather than full review of its local plan at this time, the subjects covered, and how this has been communicated throughout the development of the document.

1.1.3 In terms of the site allocations included within the Partial Review, it documents how potential sites were initially identified in collaboration with the development industry, and how these were supplemented with other potential development opportunities based on council knowledge. It also explains the subsequent process and rationale for screening out sites and prioritising the four sites that were incorporated into the City Plan Partial Review at Regulation 19 stage. Finally it sets out how the wording on each site allocation was reached, why the allocation is considered necessary, and the benefits its inclusion in the City Plan Partial Review can bring.

2 Scope of the City Plan Partial Review

2.1 Scope of the City Plan Partial Review

- 2.1.1 The existing Westminster City Plan was adopted in April 2021 and alongside the London Plan, made neighbourhood plans, and supplementary planning documents, provides a comprehensive framework for determining planning applications in Westminster. The adopted City Plan replaced old policies contained in the November 2016 City Plan and previously saved Unitary Development Plan policies, ensuring Westminster’s planning policies fully aligned with the most recently adopted London Plan and national policy. In terms of the scope of the City Plan Partial Review, it sets out why the council has embarked on a partial rather than full review of its local plan at this time, the subjects covered, and how this has been communicated throughout the development of the document.
- 2.1.2 As the adopted plan is less than 5 years old, the legislative requirement (per Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations) to review the plan is not yet engaged. A full review of the plan is therefore not required until 2026.
- 2.1.3 Nevertheless, the council has conducted a focused review relating to the topics of affordable housing, retrofit, and the inclusion of a small number of site allocations. Doing so ensures the plan better responds to the council’s ambitions for a Fairer Westminster as articulated in its [Fairer Westminster Strategy](#). It will ensure the plan better responds to key issues facing the city, including addressing a growing housing affordability crisis and the climate emergency. It will also help unlock the development of key development sites that was originally intended to be addressed through a separate Site Allocations Development Plan Document (as referred to in adopted policy 41C on building height).
- 2.1.4 The council’s approach to the scope of the review is consistent with guidance in the ‘Plan Making’ PPG¹ that “a local planning authority can review specific policies on an individual basis”. Furthermore, the limited scope of the Partial Review has been consistently made clear since work was initiated in late 2022. The council’s [Regulation 18 Statement](#) set out the scope of the Partial Review to all stakeholders, as did page 3 of an updated [Local Development Scheme](#). The Local Development Scheme also outlined at page 3 the intention to commence a full review of the plan post the adoption of the partial review. The scope was then reiterated at Regulation 19 consultation, through all consultation events, on the council’s [consultation portal](#), and through the presentation of the [Regulation 19 document](#) (see explanatory box on page 4) and the [Plain English guide to the Partial Review](#).
- 2.1.5 As the City Plan Partial Review only consists of a revised affordable housing policy, a new retrofit first policy, and 4 site allocations, the plans overarching housing target and the council’s 5-year supply of deliverable housing sites is not within scope. A 5-year supply of deliverable sites was confirmed during the examination of the Full City Plan, and it is therefore not necessary to update this until April 2026 (i.e. 5 years post plan adoption). Furthermore, data published through successive Authority Monitoring Reports demonstrates a healthy pipeline of permissions to be implemented.

¹ Paragraph: 069 Reference ID: 61-069-20190723
Revision date: 23 07 2019

- 2.1.6 Whilst the Partial Review does include site allocations that provided for a mix of uses, including some residential elements, these are included to provide specific policies relevant to the sites rather than to contribute explicitly to the 5-year housing supply. Policy 8 of the adopted Plan, which sets out housing requirements and the components of supply, is not within the scope of the Partial Review, and neither is the housing trajectory.
- 2.1.7 While a new National Planning Policy Framework ([NPPF](#)) was published for consultation in August 2024, under the proposed transitional arrangements (paragraph 226c), the City Plan Partial Review is not to be tested against the new NPPF. Under paragraph 227, it is however clear that upon adoption of the Partial Review, work will need to commence on a Full Plan Review – as already planned for in the council’s published Local Development Scheme. The identification of deliverable and developable housing sites, and the overarching housing target, will be re-visited at this point – when progress on a new replacement London Plan is also anticipated.

3 Selection of site allocations

3.1 Stage A: Call for Sites and Regulation 18 consultation

- 3.1.1 Work on identifying potential site allocations commenced in January 2022, when the council launched a 'Call for Sites' exercise. This invited a range of stakeholders to put forward suggestions of sites that could benefit from site specific guidance in a planned new Site Allocations Development Plan Document. At the time it was intended that this would form a standalone document, that would supplement the thematic policies included in the recently adopted City Plan (adopted April 2021).
- 3.1.2 The Call for Sites was published on the council website, and all stakeholders on the council's planning policy consultations database were notified by email in January 2022. A webinar with landowners, developers, agents and Business Improvement Districts was also held on 16th February 2022. This explained to attendees the purpose of producing Site Allocations (given historically Westminster has not produced them and all development has come forward in a windfall manner), and explained what information was needed for a site to be considered as part of this process. All communication sought information on sites that could deliver a net uplift of 50 new homes and/ or 2,500sqm additional commercial floorspace, or key infrastructure investment, to ensure the focus was on larger scale schemes that would individually make a significant contribution towards growth targets.
- 3.1.3 The Call for Site remained open until May 2022. It was then re-opened through Regulation 18 consultation on the City Plan Partial Review that happened from October – November 2022. At this time it was made clear that the intention was now to incorporate Site Allocations into the City Plan Partial Review, rather than addressing them as a separate standalone document. Details were again published on the council website, and all stakeholders notified by email. This included making clear that where sites had already been submitted through the earlier Call for Sites exercise, these would still be considered, and it was only necessary to supplement such submissions if new or additional information was available.
- 3.1.4 As part of the Regulation 18 consultation, a session was held with Neighbourhood Forums and Amenity Societies on 1st November 2022, which included some explanation of the purpose of Site Allocations (alongside other policy revisions).
- 3.1.5 In total, 30 separate sites were identified through the Call for Sites and Regulation 18 consultation. This included several sites that clearly didn't meet the criteria provided – i.e. sites that may only offered opportunities for modest upwards extensions that would likely only deliver a small number of new homes (i.e. less than 10) or commercial floorspace (i.e. less than 2,500sqm).
- 3.1.6 The location of all sites identified at this stage are set out in Appendix 1.

3.2 Stage B: Internal assessment of further development opportunities

- 3.2.1 The initial list of sites identified through Stage A above was then supplemented with an extensive internal search of other potential sites with significant development opportunities. This included sites that:
- historically had planning briefs prepared for them;
 - had been subject to development proposals that had been refused within the last 5 years;
 - had previously been granted planning permission, but this had not been implemented;
 - officer knowledge indicated a landowner appetite for developing based on historic enquires.
- 3.2.2 The purpose of this exercise was to ensure the council was not wholly reliant on sites that the development industry or key stakeholders such as public sector landowners had directly told us about in response to consultation, and to ensure any major development opportunities that site allocations could help shape or unlock had not been missed.

3.3 Stage C: Initial list of sites

- 3.3.1 Following consideration of the sites identified through stages A and B above, an initial list of 24 potential sites where an allocation might be beneficial was drawn up in May 2023. The location of these are shown in Appendix 2.
- 3.3.2 In reaching these conclusions, sites put forward through the Call for Sites process or the supplementary internal search of sites that were considered out of scope at this stage included those that:
- had a recent permission, and through officer knowledge there was no reason to believe they wouldn't be built out – e.g. Paddington Green Police Station;
 - the likely level of envisaged growth could be facilitated through existing policies on design and any new policy on retrofit – e.g. Marks & Spencer Pantheon;
 - were council-led schemes with key decisions already taken (e.g. large estate renewal projects that already have outline permission or master-planning work in place) – e.g. Ebury Bridge.

3.4 Stage D: Prioritisation of sites for inclusion in the City Plan Partial Review

3.4.1 In June 2023, the list of sites identified at Stage C above was considered further, and which sites merited prioritisation for inclusion in the City Plan Partial Review decided. This exercise was carried out on the basis that:

- the Partial Review represents a precursor to commencing work on a Full City Plan Review post 2025;
- there was a need to progress the Partial Review at pace in line with the timescales in the Local Development Scheme - in order to ensure the City Plan better addresses key council priorities;
- allocation of the sites included could provide greater confidence to the market of the opportunity for growth for a range of uses, and ensure they do not remain underutilised in the long term, rather than on the basis of their cumulative impact on the delivery of growth targets.

3.4.2 Prioritisation therefore included consideration of:

- if clear and fully formed proposals were already being worked up and considered for the site (and their future would therefore be determined prior to the adoption of the City Plan Partial Review);
- if proposals were unlikely to come forward for development until work on a full review of the City Plan, and potential other work such as the Victoria Masterplan was well underway and could inform them – and there is therefore no immediate need for inclusion in the Partial Review;
- if an allocation is now needed to help provide confidence to the market of the type of development that is considered appropriate, and help unlock development that may not otherwise happen;
- if the development of the site would result in major infrastructure enhancements of Westminster and/or London-wide significance;
- if the site is long term vacant or underutilised, including extensive areas of land that can be developed without the substantial demolition of existing buildings that first merit consideration for retrofit and re-purposing.

3.4.3 As a result of this exercise, the 4 sites prioritised for inclusion in the City Plan Partial Review represent highly complex brownfield sites that may come forward for development in advance of the adoption of a Full City Plan Review, and where site specific guidance is therefore needed in the short term.

3.4.4 All 4 sites are in highly sustainable locations just a short walking distance from tube and/ or mainline rail stations, are over a hectare in size, and can accommodate significant levels of growth. In a Westminster context, the sites represent unique opportunities – with either a significant proportion of underutilised land where development could occur without the need for large-scale

demolition of buildings, or where development can secure enhanced infrastructure of London-wide significance.

- 3.4.5 Any sites that were submitted for inclusion by external parties that were not being taken forward as part of the City Plan Partial Review were then notified of the reasons why in July 2023.
- 3.4.6 No further enquiries regarding the potential inclusion of any additional sites were then received until Regulation 19 consultation was underway in April 2024. Where any such enquiries came forward, it was explained that given the advanced stage of plan production, it would not be possible to incorporate additional sites within the Partial Review, but there may be scope for incorporation into a Full City Plan Review at a later date if desired. As part of Regulation 19 consultation activities, an explanation of how sites were arrived at was also provided at separate consultation events with members of the Westminster Property Association and Neighbourhood Forums, in April 2024.

4 Content of site allocations

4.1 Content of site allocations

4.1.1 Policy wording on each site allocation has been informed by:

- analysis of existing site constraints and policy designations;
- extensive negotiation with individual landowners (as detailed in the Consultation Statement) in order to understand their aspirations for the site;
- the findings of the supporting evidence base, including Heritage Impact Assessments, Archaeological Assessment, the Strategic Flood Risk Assessment, the Viability Assessment, and the Draft Infrastructure Delivery Plan;
- the recommendations of the Westminster Design Review Panel;
- internal engagement across the council; and
- feedback from informal engagement with local communities including neighbourhood forums, amenity societies and Business Improvement Districts as detailed in the Consultation Statement².

4.1.2 Effort has been made to ensure the content of individual allocations provides meaningful site-specific guidance that is informed by the above, and goes beyond the content of existing adopted City Plan policies that they should be read in conjunction with. Each allocation is intended to endorse the future development of these key sites, and provide clarity of the council's aspirations in terms of how they should be developed. They identify key constraints that development proposals will need to respond to, and aim to help shape and inform detailed design proposals, without being overly prescriptive and stifling development options.

4.1.3 None of the proposed site allocations prescribe development capacities, precise land use mix, or maximum building heights. Instead, these matters will be established through the determination of future planning applications. This offers flexibility for developers to continue to work up the detail of development proposals in the knowledge that there is support for the development of these sites, and what the council's core objectives for the site are. It also ensures decisions on detailed design matters are only taken when their potential impact on surroundings can be more fully understood – i.e. in response to a fully designed scheme. This position is broadly supported by the key landowners of each site that are working up development proposals, and is considered proportionate given none of the included sites are being relied on as part of the council's 5-year housing land supply. Furthermore, whilst paragraph 74d of the adopted NPPF sets out that local authorities should '*make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites*' this is within the context of new settlements or significant urban extensions that may require development corporations, and therefore a different scale of strategic growth to what is envisaged in the proposed site allocations.

² NB feedback from Regulation 19 consultation has also informed some proposed modifications to the site allocations

**5 Objectives of
each site
allocation and
why they are
necessary**

5.1 St Mary's Hospital

5.1.1 The key objectives of the St Mary's Site Allocation (Policy 8) are:

- to facilitate the development of a much-needed new high-quality hospital as a piece of critical infrastructure of London-wide significance that secures better facilities for patients, staff and visitors;
- to enable the consolidation of the hospital campus and the intensification of the site to deliver a new mix of uses that responds to the objectives of the Paddington Opportunity Area;
- to guide where greater building height can be accommodated; and
- to ensure proposals come forward as part of a comprehensive plan for the site as a whole - that fully considers the relationship between different uses, and between buildings and the public realm.

5.1.2 If no site allocation was included in the City Plan Partial Review, there is some danger that aspirations for a new hospital on site continue to stall - as they have done for decades previously. The risk of incremental, uncoordinated development across individual land parcels within the estate would also increase.

5.2 Westbourne Park Bus Garage

5.2.1 The key objectives of the Westbourne Park Bus Garage Site Allocation (Policy 9) are:

- to help facilitate the development of a mixed-use scheme which secures the delivery of commercial and community uses alongside much-needed new homes;
- to support the intensification of the site given its sustainability credentials and comparatively lower heritage value than many other parts of Westminster (given it is not within a Conservation Area and does not have any listed buildings within its boundary);
- to guide where greater building height can be accommodated to enable the beneficial reuse of this land in a coordinated fashion despite its fragmented land ownership;
- to ensure impacts on existing operations of the site (for example, the bus garage and the neighbouring concrete plant) are managed;
- to act as a catalyst for the regeneration of the canal towpath, making it more inviting and pleasant to use as a pedestrian or cyclist route;
- to deliver biodiversity enhancements to the site; and
- to maximise public accessibility to the site and facilitate links to other key assets in the local area.

5.2.2 If no site allocation was included in the City Plan Partial Review, there is a risk that the site remains underutilised through its existing inefficient layout in the long term, despite the scarcity of brownfield sites available for significant levels of new development in Westminster.

5.3 Royal Oak

5.3.1 The key objectives of the Royal Oak Site Allocation (Policy 10) are:

- to facilitate the development of a currently under-utilised site in a sustainable location with a mixed-use scheme that incorporates new employment generating uses alongside much needed new homes;
- to support the intensification of the site given its sustainability credentials and comparatively lower heritage value than many other parts of Westminster (given it is not within a Conservation Area and does not have any listed buildings within its boundary);
- to ensure development secures an improved public realm and suitable living and working environment; and
- to provide support for meanwhile use of the site in advance of full development proposals.

5.3.2 If no site allocation was included in the City Plan Partial Review, there is a risk that the site remains underutilised in the long term, and makes no contribution towards economic and housing growth in Westminster, despite the scarcity of available land for such development.

5.4 Grosvenor Sidings

5.4.1 The key objectives of the Grosvenor Sidings Site Allocation (Policy 11) are:

- to provide confidence to the market that a residential-led development is supported across the site, where this integrates sensitively with the surrounding townscape, neighbouring uses, and the historic character of the area;
- to enable the beneficial re-use of underutilised land in a co-ordinated fashion, whilst ensuring minimised impacts to the critical infrastructure currently on site;
- to deliver new public open and play spaces to cater for a new and existing residential community and help address the current open space deficiency in the area;
- to improve permeability through the site from the River Thames towards Victoria Station and through adjacent residential areas; and
- to secure flood resistance and resilience measures in any new development to manage identified flood risk.

5.4.2 If no site allocation was included in the City Plan Partial Review, there is a risk that the opportunity for this underutilised, sustainable brownfield site to contribute to meeting Westminster's high levels of housing needs through a high-quality development will not be fully realised. It also increases the risk of uncoordinated proposals for individual parcels of land that do not maximise public benefits, to come forward.

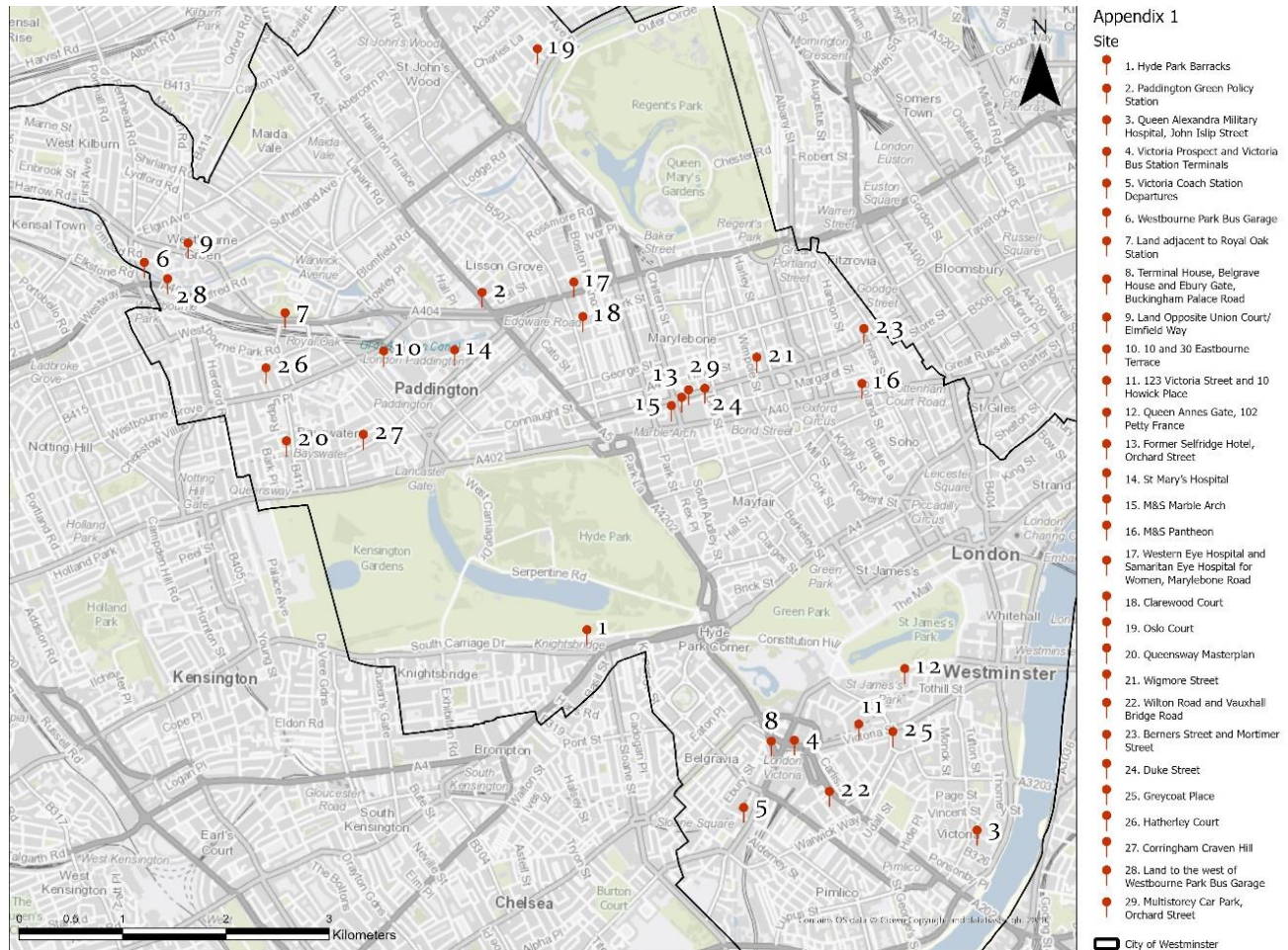
6 Conclusion

6.1 Conclusion

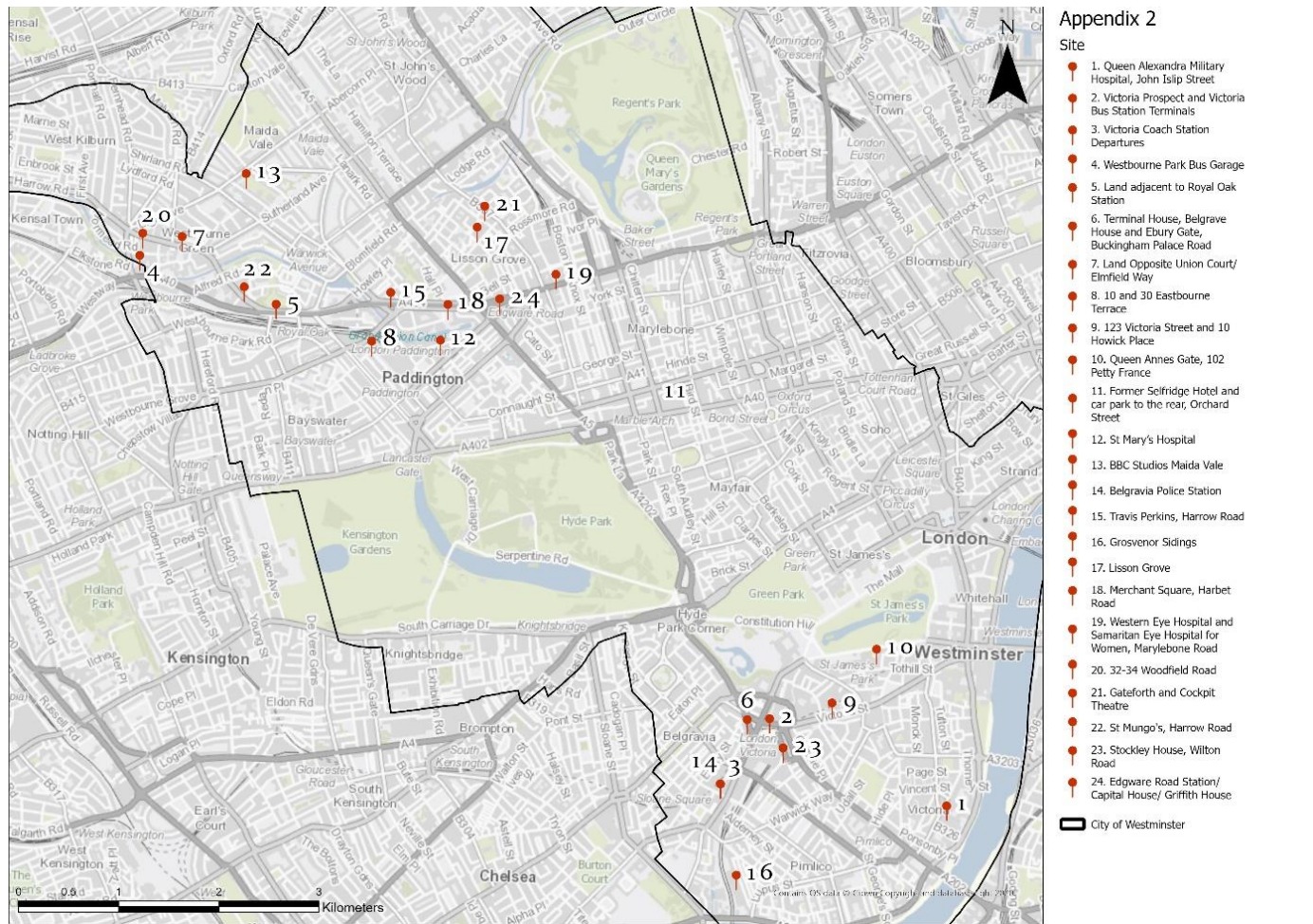
- 6.1.1 As set out in this topic paper, the City Plan Partial Review has been prepared with a tightly defined focus that has been made clear to all stakeholders at the outset. It has been prepared as an interim measure to support new policy objectives in advance of a full review of all policies post adoption:
- 6.1.2 The incorporation of site allocations into the City Plan Partial Review has been informed by an extensive search of potential significant development opportunities that has explored opportunities identified by external stakeholders, and the council's own intelligence. The prioritisation of the 4 sites included in the plan represents a proportionate approach to a Partial Review of the adopted plan, and focusses on sites where the contents of any allocation could have the most meaningful impact in the short-term.

7 Appendices

7.1 Appendix 1: Sites submitted through Call for Sites/Regulation 18 consultation



7.2 Appendix 2: Initial list of potential sites from assessment of Call for Sites submissions and in-house search of other potential sites



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