

St. James's Neighbourhood Plan

Consultation Statement
October 2024



St James's
Neighbourhood
Forum



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1.0

Introduction

1.1 The St. James's Neighbourhood Forum

The St. James's Neighbourhood Forum (SJNF) was initially set up by the St. James's Conservation Trust and consists of members living and working in the St James's Neighbourhood Plan (SJNP) area. It comprises residents' representatives, private members clubs, retailers, restaurateurs, office occupiers, The Crown Estate, the St James's Conservation Trust, Heart of Business Alliance, and Ward Councillors. It is the responsible body for monitoring the effectiveness and delivery of the plan and periodically reviewing it to ensure its continued relevance. It is a business-led Neighbourhood Plan and Area, meaning that it needs to pay particular attention to the needs of the business community as well as those of local residents.

1.2 The St James's Neighbourhood Plan

Neighbourhood Plans were introduced by the Localism Act 2011, to enable communities to have a say in the development of their areas. The purpose of the Neighbourhood Plan is to guide development within the St James's Neighbourhood Area as well as providing guidance on submitting planning applications.

1.3 Consultation on the plan

This Consultation Statement has been prepared by Concilio, on behalf of the St. James's Neighbourhood Forum in support of the creation of the St. James's Neighbourhood Plan.

This report details the public and stakeholder consultation carried out to date in order to inform the evolution of the Neighbourhood Plan. Consultation has been carried out in accordance with national and local policies, as is laid out in Section 2.0 of this report. Following our initial feedback consultation which took place between November 2022 and January 2023 which set out the guiding principles of the Neighbourhood Plan. We held the statutory Regulation 14 Consultation between June and September 2023.

Concilio is a communications agency that specialises in political and stakeholder engagement in support of the built environment. Concilio has managed the programme, ensuring robust and in-depth engagement can take place.

1.4 The Consultation Process and Objectives:

Pre-consultation

In August 2022 Concilio undertook pre-consultation engagement on the first draft of the neighbourhood plan.

The purpose of the initial consultation was to gather feedback on the vision for St James's ahead of the formal Regulation 14 Consultation on the draft plan. The Forum's initial consultation comprised an informative in-person drop-in event, a collaborative virtual workshop, street stall and an in-depth online survey.

The consultation was advertised through a brochure which was distributed to all addresses within the St James's Neighbourhood Plan Area. The consultation was also advertised through social media advertisements and was shared via councillor mailing lists and social media pages.

On Wednesday 30th November, the Forum held a drop-in event at Sofitel St James's, which was attended by 8 people. At this event, attendees were able to learn more about the vision for the new Neighbourhood Plan and provide their feedback.

On Saturday 3rd December 2022 the Forum spoke to residents, employers and visitors on location in St James's to learn more about what they like about the area and what they would like to change.

The Forum then hosted a virtual Zoom workshop on Monday 5th December 2022 which allowed members of the local community to discuss their thoughts on the area and ways it could be improved through the new Neighbourhood Plan. This was attended by 13 people.

Additionally, an online survey was available between 22nd November 2022 and 6th January 2023 to enable residents, local business owners/employees and visitors to leave in-depth feedback on the area and the measures that they would like to see in a new Neighbourhood Plan. The pre-consultation report can be found in **Appendix C**.

Regulation 14 Consultation

On Wednesday 24th June 2023, the Forum launched the Regulation 14 statutory consultation process on the draft Neighbourhood Plan. The consultation was launched with a brochure issued to the local community alongside a letter to all stakeholders and members of the community who had participated in the initial round of consultation.

Using the brochure, residents and businesses were able to visit the consultation website to read the draft plan in full. The public were also encouraged to leave their feedback on the plan using our online survey. The survey asked respondents to indicate whether they supported or objected to the policies outlined in the

draft plan. Those who objected were asked what changes they would like to see in relation to any policies they disagreed with.

In addition to the digital and print consultation, the Forum undertook in-person engagement, hosting a stall at the St. James's Conservation Trust's Annual Garden Party in St. James's Square. This gave the Forum the opportunity to engage with local residents and businesses, raising awareness of the draft local plan and encouraging attendees to provide their feedback.

Street stalls were also held in the local area for direct engagement with residents and businesses. Details of the plan were shared via a sandwich board and flyers, and the public were asked to leave their comments via the online survey.

In order to engage local businesses in the consultation, a door knocking exercise was also undertaken over multiple days to notify firms of the consultation and answer any questions that they may have.

Street stalls and door knocking took place on the following dates:

- Jermyn Street – Thursday 29th June
- Pall Mall – Saturday 1st July
- St. James's Market – Wednesday 19th July

Upon the close of the Regulation 14 consultation, residents and businesses were invited to the Forum's AGM, held on September 13th at SMEG St. James's. This was an opportunity for feedback from the survey to be presented to the Neighbourhood Forum and the local community. Those in attendance were also able to ask any questions to the Forum. A copy of the Regulation 14 consultation report presented to the AGM can be found in **Appendix G**.

Regulation 14 Focused Consultation

Following the conclusion of the Regulation 14 consultation on the full draft plan the Neighbourhood Forum used the feedback received to make changes to the plan. From this feedback two new policies were created:

- Policy STJ9: Energy Building Fabric
- Policy STJ10: Green Roofs

To ensure that all policies had been fully consulted on with the local community and stakeholders we launched a "Regulation 14 Focused Consultation" on the 31st May running until the 28th June. This consultation asked the local community and stakeholders to comment only on the two new proposed policies.

The consultation was launched through letter to all statutory stakeholders and the St. James's Neighbourhood Forum's mailing list generated through interaction with the local community during the first Regulation 14 consultation. The letter directed recipients to the St. James's Neighbourhood Forum's website where they could read the new proposed policies (See **Appendix L**) and complete a survey.

The survey asked respondents to indicate whether they supported or objected to the policies outlined in the draft plan. Those who objected were asked what changes they would like to see in relation to any policies they disagreed with.

1.5 Consultation materials

Digital Interactive Consultation Website

A digital website was created and has been live since November 2022. The website (www.stjamesforum.org) has remained live so that the project team can continue to receive comments and take these into consideration when evolving the proposals. The Site has been continually updated throughout the process to reflect the evolution of the proposals and consultation. A copy of the website can be found in **Appendix I**.

Engagement with locally elected representatives

From the outset, the Forum sought to engage with the site's ward members from Westminster City Council (St James's Ward). The Forum has engaged with ward councillors throughout the process, inviting them to both a neighbours meeting and additional private briefings on the proposals. A notification of the Regulation 14 consultation was also extended to the Local Member of Parliament.

Engagement with key stakeholders

The applicant sought to engage widely with community stakeholders and statutory consultees. This engagement fostered positive relationships and created a dialogue with the local community.

- Westminster City Council
- Whitehall BID
- Northbank BID
- Victoria BID
- The Crown Estate
- Mayor of London
- Sustainable Places
- Natural England
- Historic England
- Network Rail
- Highways England
- The Environment Agency
- The Coal Authority
- The NHS
- Thames Water
- UK Power Networks
- Transport for London
- Homes England
- Knightsbridge Neighbourhood Forum
- Soho Neighbourhood Forum
- Mayfair Neighbourhood Forum

Direct liaison with residents and businesses

The SJNF ensured that members of the project team were able to discuss the plans with residents and businesses who wished to be involved in the Regulation 14 consultation. This was achieved through the targeted delivery

of multiple flyers to an area of 1,930 addresses within St. James's, which directed people to the online consultation website and invited them to share their views via submitting an online survey. A freephone number was displayed on the flyer to residents to ensure those without internet access could still provide their comments. Copies of the pre-consultation brochure (**Appendix B**) and Regulation 14 brochure (**Appendix D**).

Pre-consultation communications with Westminster City Council

The Forum worked constructively with Westminster City Council (WCC) to shape the development of the plan. Early drafts of the emerging Neighbourhood Plan were shared with officers who provided constructive informal feedback on both the context and issues to consider relating to ensuring that adequate consultation had been undertaken.

This process is in addition to correspondence and communication with Westminster City Council as part of the formal pre-submission process.

2.0 policy framework

2.1 The Neighbourhood Plan

The St. James's Neighbourhood Forum (SJNF) was designated by Westminster City Council in April 2013 to develop a neighbourhood plan for St. James's in accordance with the localism act of 2011. The SJNF intends to create neighbourhood planning policies that govern how development will proceed in the area until 2040.

2.2 Policy Framework

Both Westminster City Council's Statement of Community Involvement in Planning (adopted in June 2014) and the emerging one, make clear that community involvement should be sought during the pre-submission period.

The consultation strategy devised and implemented by Concilio has been designed to meet the requirements for consultation as laid out in the neighbourhood planning regulations (2012) and Westminster City Council's Emerging Statement of Community Involvement.

The consultation strategy has also been shaped in accordance with the Neighbourhood Planning (General) Regulations 2012. The local community was notified using both digital and print materials; we conducted interactive digital engagement with our online website that allowed visitors to provide comments, fill in our feedback forms and contact the project team directly. Ward councillors were also notified of the consultation and were invited to provide comments. The website has remained live since the November 2022 and will be updated with any further details on the proposals. Our consultation on the draft neighbourhood plan is therefore meeting these expectations according to the new guidance.

This Statement is submitted to set out the type of community involvement undertaken, the views expressed, and the changes made, in accordance with Westminster City Council's expectation.

3.0

the consultation process

3.1 Aims of the Pre-consultation Engagement and Regulation 14 Consultation

The SJNF was keen to ensure the consultation strategy put in place delivered a series of key aims to assist with the evolution and development of the proposals. In addition to meeting the requirements of the Regulation 14 statutory requirements:

- To raise awareness of the draft neighbourhood plan and discuss the public benefits it would facilitate;
- To undertake consultation to ensure feedback could be received during the pre-submission period;
- To build a relationship with the local community;
- To enable constructive dialogue between local stakeholders, the community, and The SJNF;
- To ensure everyone who wanted to take part in the consultation was able to by being accessible and inclusive.

3.2 Consultation Process

The consultation strategy and process that Concilio has undertaken in relation to the Neighbourhood Plan has been developed with both local policy and the above aims in mind. Specifically, the consultation process has:

- Conducted an engagement programme that is appropriate for the local community and key stakeholders and the scale of the Neighbourhood Plan;
- Conducted consultation consisting of offering for individual meetings with key stakeholders and digital interactive engagement with a consultation website with options to provide feedback and to contact the SJNF directly;
- Ensured the consultation was well publicised;
- Explained clearly what the scope of the consultation was;
- Analysed the results from the online survey objectively; and

- Publicised collective responses with due regard to the Data Protection Act and General Data Protection Regulation (GDPR) requirements.

3.3 Consultation Area

A consultation area was identified to reflect the scale of the proposed redevelopment proposals. The consultation area consisted of 1,930 addresses, comprising residents and businesses around the site.

A copy of the distribution area is included in **Appendix A**

3.4 Project Contact and Communications Channels

A link for the consultation website and details of the draft Neighbourhood Plan were provided in the consultation flyer. The flyer also included a freephone number and e-mail address. The freephone number was provided so those who did not have access to the internet could still engage with the consultation.

A freephone number and e-mail address were publicised to ensure that information and questions could be managed from one place and there was a single point of contact for residents.

An interactive consultation website formed the 'consultation hub' with information on the emerging proposals and a survey that included an open-comments section to provide visitors the opportunity to ask questions to the project team and give their feedback on the proposals.

The consultation website sought the views of local residents to gather meaningful feedback from the local community.

Appendix B and D is a copy of the brochure inviting residents to share their views on the consultation website and attend one of the consultation events.

Appendix E is a copy of the Regulation 14 launch letter sent to consultees.

Appendix F is a copy of the reminder letter sent to the Forum's mailing list encouraging people to fill in the survey before the close of the consultation and invite them to the SJNF AGM.

Appendix H is a copy of the social media adverts used.

Appendix I contains screenshots of the consultation website.

Appendix K contains a copy of the Regulation 14 Focused Consultation launch letter sent to consultees

Appendix L contains the new policies that was shared with consultees upon the launch of the Regulation 14 Focused Consultation

Appendix M contains the Regulation 14 Focused Consultation survey

3.5 Consultation – Levels of Engagement

As part of the consultation, key stakeholders were invited to meet with the project team to discuss the proposals.

Engagement with the local authority

As part of the consultation, ward councillors and the planning team at Westminster City Council.

The three Ward Councillors that represent the St. James's area, Cllr Mark Shearer; Cllr Louise Hyams; and Cllr Tim Mitchell, have been kept fully advised throughout the process, and all of them have been invited to every Steering Group meeting. At least one of them has attended each of the meetings. They are supportive of the Plan and have provided input and comment from time to time.

There has been no consultation either formally or informally with Westminster City Council cabinet member Cllrs Barraclough and Planning Committee chair Cllr Bush. However there has been constant dialogue with the relevant planning officers at Westminster.

Raising Awareness

In order to raise awareness of the public consultation, the following was undertaken:

Method	Date	Additional Information
Brochure	21 st June 2023	1,903 Addresses – Invitation to read and leave comment on the draft plan
Attendance at St. James's Conservation Trust's Garden Party	28 th June 2023	Spoke to more than 30 individuals about the draft plan
Street Stall and door knocking – Jermyn Street	29 th June 2023	Over 40 brochures given to members of the public
Street Stall and door knocking – Pall Mall	1 st July 2023	12 brochures given to the public
Street Stall and door knocking – St. James's Market	19 th July 2023	22 brochures given to the public

Letter	6 th September 2023	Letter to inform community of the AGM and the close of the consultation
Letter	31 st May 2024	Letter to inform consultees about the launch of the Regulation 14 Focused Consultation

Consultation Website

The consultation website was live from November 2022, and was repeatedly updated throughout the consultation including for the Regulation 14 Focused Consultation to contain the new proposed policies.

The website contained the draft of the Neighbourhood Plan, a survey to provide feedback, and contact details for questions. Between June and December 2023, the website was viewed 1,700 times, with 76% of site visits coming from interaction with our social media advertisements.

The consultation website is included in [Appendix I](#)

Social Media Advertisements

The consultation utilised targeted social media advertisements to spread awareness of the Draft St. James's Neighbourhood Plan and consultation period. The advertisements were visible on Facebook and Instagram, reaching 94,594 users with thousands of clicks to our website and survey links.

The social media advertisements are included in [Appendix H](#)

4.0

Feedback

4.1 Introduction

The pre-consultation engagement to identify the themes and objectives of the draft plan took place between November 2022 and January 2023. This involved an informative in-person drop-in event, a collaborative virtual workshop, street stalls and an in-depth online survey.

Following this early engagement our Regulation 14 consultation was launched on the 21st June 2023, the consultation closed at midnight on the 10th September 2023. As outlined above, this involved an interactive consultation website, virtual and in-person public meetings, a survey with an open comments box where people could leave their feedback and meetings with key stakeholders.

The sections below outline the feedback received throughout both stages of the consultation process.

The statutory stakeholders contacted upon the launch of the Regulation 14 and the Regulation 14 consultation were:

- Westminster City Council
- The Crown Estate
- TfL
- Knightsbridge Neighbourhood Forum
- London HQ
- Natural England
- Environment Agency
- Historic England
- Network Rail
- National Highways
- Local Health Authority
- Water and sewerage companies
- National Grid
- UK Power Networks
- BT
- Royal Borough of Kensington and Chelsea
- Mayor of London
- Coal Authority
- Homes England

4.2 Stakeholder Meetings and Feedback

Alongside public consultation, the Neighbourhood Forum held private meetings and received written feedback from key stakeholders.

Regulation 14 Consultation 2023		
Stakeholder	Date/Type of response	Feedback
Steering Group – Including representations from Ward Cllrs, HOLBA and TCE	29/09/21 - Meeting 24/11/21 - Meeting 21/09/22 - Meeting 16/03/23 - Meeting 18/07/24 - Meeting	<ul style="list-style-type: none"> Provided guidance and comments on the draft neighbourhood plan throughout its development.
Tim Allibone and representatives of TCE	23/02/23 - Meeting 09/08/23 - Meeting 05/09/23 - Meeting 08/08/24 - Meeting	<ul style="list-style-type: none"> Positive feedback and support for the Draft Plan with their request to highlight specific Policy matters being agreed to and the Plan changed accordingly.
Chris Rofe, Chairman of the London Private Members Clubs Alex Bray, Secretary of the East India Club	21/05/23 - Meeting	<ul style="list-style-type: none"> Comments were shared on the plan's approach to Private Members' Club and the draft plan was subsequently updated to incorporate these comments
St James's Conservation Trust	07/06/23 - Meeting 06/09/23 - Meeting 06/12/23 - Meeting 20/03/24 - Meeting 05/06/24 - Meeting 04/09/24 - Meeting	<ul style="list-style-type: none"> The Trust has been briefed throughout the development of the draft plan. The Forum has continually attended meetings to brief the Trust on progress. The Trust is supportive of the draft plan.
The Crown Estate	Written response	<ul style="list-style-type: none"> The Crown Estate believed that the draft plan could do more to encourage low carbon solutions and incorporate more greening into developments and the built environment. Suggested a police encouraging the provision of amenity roof space where appropriate.
Whitehall & Northbank BIDs (joint response)	Written response	<ul style="list-style-type: none"> Support for the NP's vision for St. James's Believed the plan would benefit from showing the land use mix of St. James's on a map Suggestions for additional policies regarding roof top plant and ground floor furniture A desire to have a policy on freight, servicing and deliveries included in the NP To see included an explanation of where the NP would like to see CIL payments utilised Believes the plan should include a specific policy to help promote the use of green infrastructure

Knightsbridge Neighbourhood Forum	Written response	<ul style="list-style-type: none"> • Support for the neighbourhood plan, describing many of the proposed policies as “excellent” • Would like to see the plan include locally specific sustainability policies
Transport for London	Written response	<ul style="list-style-type: none"> • Welcome walking and cycling policies in the plan • Encouraged the plan to support on street cycle parking where possible • Would welcome mentions of future cycle pathways as identified by TfL’s analysis • Would welcome the inclusion of policies that reflect the importance the area plays for TfL’s bus network • Support for improved pedestrian linkages between St. James’s and Haymarket

Regulation 14 Focused Consultation

Stakeholder	Date/Type of response	Feedback
Historic England	Written response 12 th June	<ul style="list-style-type: none"> • Support for the neighbourhood plan’s aims to reduce carbon emissions for new and existing buildings • Recommended additional wording regarding the fitting of new windows in historic buildings • Recommended that historic building owners are encouraged to engage with WCC at an early stage when developing proposals for historic buildings
Westminster City Council	Written response 27 th June	<ul style="list-style-type: none"> • Supportive of the inclusion of the new policies • Suggested minor amendments to the new policies to ensure that they are robust, effective and enforceable
Natural England	Written response 27 th June	<ul style="list-style-type: none"> • No specific comments on the additional policies • Shared guidance forums to consider when developing a neighbourhood plan
National Highways	Written response 28 th June	<ul style="list-style-type: none"> • No comments on the additional policies

4.3 Consultation Survey Responses

Pre-consultation engagement

Our pre-engagement survey was an opportunity to help guide the themes and principles of the draft plan using feedback from the local community.

In total, we received 38 responses to the survey. This includes surveys that were filled in online and in-person at the drop-in event. The feedback from the surveys is detailed below:

1. What is your relationship to the area?

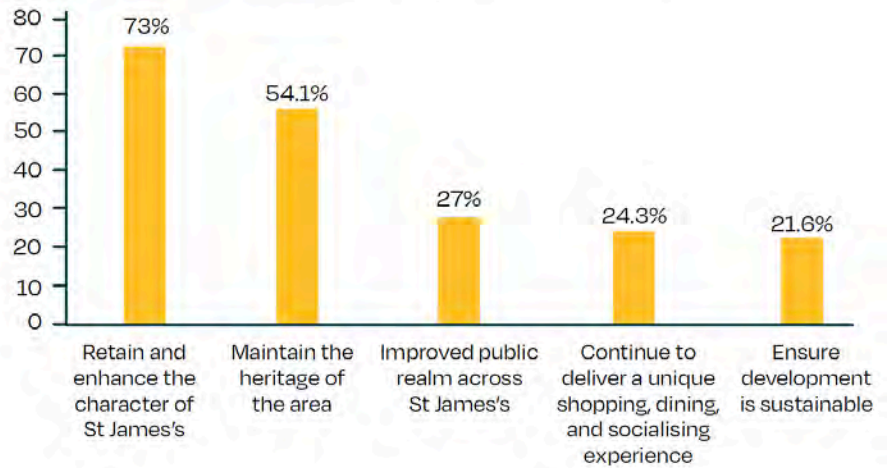


2. What is your postcode?

Respondents were from a range of areas, but the majority were focused in the St James's area. The addresses in the St James's area can be seen below.



3. When thinking about the neighbourhood plan, which two of the following objectives are most important to you?



4. Is there any thing else you feel the plan should focus on?

Balancing the old with the new

- Retaining the heritage and tradition, while ensuring the area remains relevant to a modern audience
- Balancing character with keeping up with the times



Safety

- Make it safe for women to move around the area- there are gentlemen's clubs here which I find deeply offensive. It is not a good look and deeply offensive to women who work in the area. Improve the alley ways and make them safe and brighter to enhance safety
- Anti-social behaviour



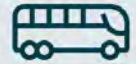
Cleanliness and less cluttered

- Focus on ensuring the area remains clean
- Litter
- Take into account the wishes of the resident and not the tourist - uncluttered the pavements from lime cycles



Traffic

- Reduction of or improvement in the flow of traffic
- Less cars passing through Marlborough road and Pall Mall, pedestrian area
- Primarily improving active travel including bus services and dedicated lanes for cycling & micromobility.
- Better accessibility
- Being pedestrian friendly, less aggressive & loud driving
- Safer walking and cycling infrastructure through the area, particularly for employees working in or next to the area.



Retail uses

- World class centre of art/antique dealing
- Prevent chain stores and encourage art dealers
- Cohesion of retailers making sure we work together
- Retention of unique/original retailers, such as art galleries and bespoke tailors/shoemakers
- In the Retail arena, focus on art market priorities; curtail men's clothes & frock shops
- Independent retailers
- Food & coffee availability for people who work locally.



Sustainability and green spaces

- Extend greening
- Sustainability
- Promote re-cycling among the residents and businesses
- Recycling
- Health of trees
- Air quality



Other

- Enhanced experiences all round
- Homelessness
- The clients of Three Crowns in Babmaes Street!
- Diversity and inclusion in the area - all welcome



Has the way you use the area changed since Covid-19? If so, how?

Of the 29 people who answered this question, 16 people said there has been no change in the way they use the area. 3 people said they or their staff work from home more and 3 people said they come into the area less.

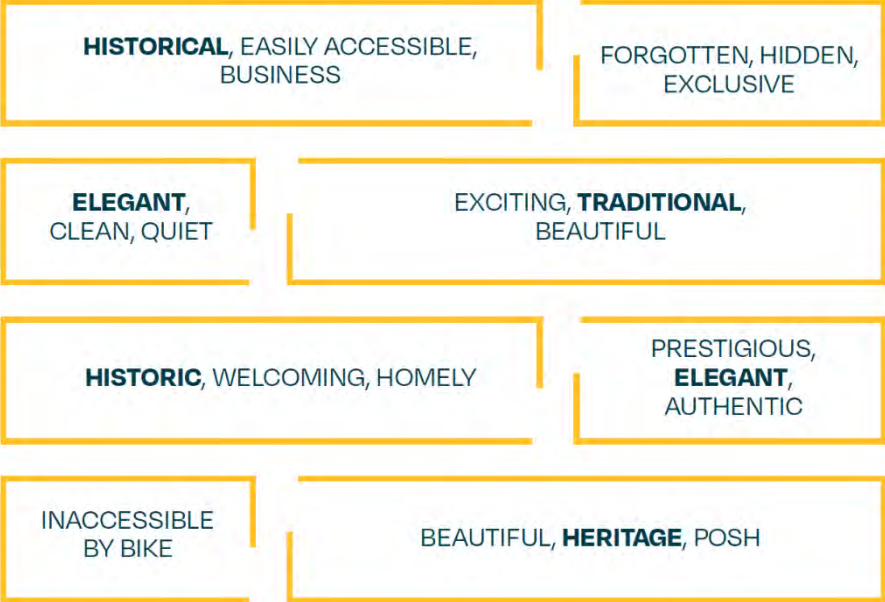
One person commented a number of convenience shops have closed down since Covid-19 so it is difficult to survive using establishments just in St James's.

Other changes in the way respondents use St James's are listed below:

- Greater use of parks
- More walking, using local shops
- It is nice that Marlborough road is closed on Saturdays now (before it was only Sundays) so we can use more the street to play with the children but we don't like that the congestion charge ends at 18:00 while it was 22:00 before

5. What three words would you use to describe the St James's area?

TRADITIONAL , WELCOMING, WARM	CALM, ROYAL, HISTORIC
QUALITY, SERVICE, RELIABILITY	BEAUTIFUL, HISTORIC , VIBRANT
HERITAGE , CENTRAL, SPECIALIST-RETAIL	HISTORICAL , DESIRABLE, CULTURAL
COLD, REMOTE & UNWELCOMING TO WOMEN	BEAUTIFUL, CHARACTERFUL, CHARMING
SMART, SOPHISTICATED, UNIQUE	SPECIAL, UNIQUE , ELEGANT
ELEGANT , RESPECTABLE, POSH	HERITAGE , SHOPPING, SMART
BEAUTIFUL, HISTORIC , CULTURAL	HERITAGE , TRADITION, STATELY
CLASSY , EXPENSIVE, GREEN	GENTLEMEN'S CLUBS
GENTEEL YET VIBRANT	HISTORIC , HIDDEN, CHARMING
TIMELESS , TRANQUIL, VIBRANT	HISTORIC , IMPORTANT AND POPULAR



6. Which of the following buildings around St James's do you like the most?



CHOICE 1
50%



CHOICE 2
25%



CHOICE 3
5.6%



CHOICE 4
5.6%

13.9% of respondents selected 'Other'. Those responses are below:

- St James's Church and Jermyn Street variety
- New Zealand House
- 146 Cleveland Row
- Does not matter to me
- I like modern buildings that are well designed and built

7. Why do you like that building that most?

CHOICE 1

- General look and feel
- Typical old London
- The historical architecture, with contemporary appeal.
- Typical Victorian architecture - invaluable mixed use
- Historic
- Pretty
- Unique heritage architecture
- Could easily have chosen "B", both give great character to the area
- Assuming internal spec can be improved v. important to have buildings with character
- The architecture
- Character
- Beautiful and unique architecture
- Heritage
- It has character

CHOICE 3

- It's pleasing on the eye

CHOICE 4

- Its a very clever use of brutalism in a traditional area
- It's iconic of it's time
- Because London as a city needs to move forward, keeping in mind it's past but embracing the future.

ST JAMES'S CHURCH AND JERMYN STREET VARIETY

- Focus of history and community

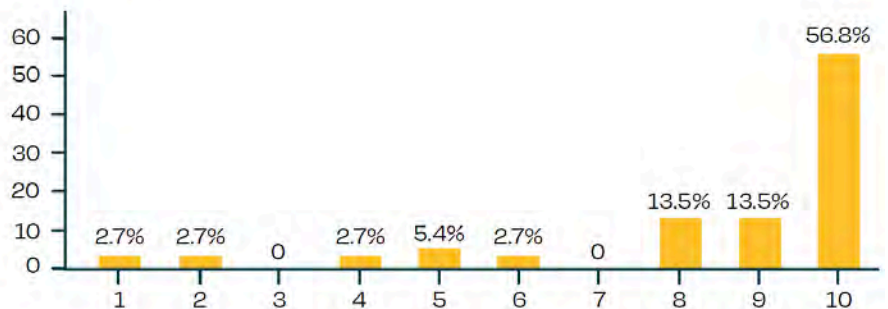
NEW ZEALAND HOUSE

- It brings a point of difference and diversity to the area

146 CLEVELAND ROW

- Light blue colour and the architecture, authentic and colourful

9. Do you believe it is important that future development respects the heritage of St James's?



1 being not at all important and 10 being very important

10. Of the following shopfronts, which do you like the most?

10.8% of respondents selected 'Other'. Those responses are below:

- 186 Piccadilly
- Paxton & Whitfield
- Does not matter to me
- They're all great



CHOICE 1
45.9%



CHOICE 2
10.8%



CHOICE 3
24.3%



CHOICE 4
8.1%

11. Why do you like that shopfront the most?

CHOICE 1

- Fits in with surrounding buildings, traditional
- Heritage, welcoming, human scale
- It is very iconic.
- Combining elegance with a sensible retail window
- It has a desirable character, which encourages visitors to explore its interior
- It gives a light but traditional impression
- Historic!
- I liked them all. But that looked most Dickensian
- It is unique and recognisable
- Style and personal love of books
- Independent retailer with lots of character
- Design, tradition
- classic, clean
- It's traditional and welcoming

CHOICE 2

- It's very welcoming
- Aesthetics
- They are all wonderful

CHOICE 3

- Synonymous with London
- Historic...
- Always pretty
- I would put in Berry Bros but I haven't a photo
- Major magnet to the area
- High effort, iconic to the area
- It's well-maintained interesting appropriate windows and a wonderful working clock

CHOICE 4

- I find it inviting
- It's unique
- As previous - traditional without being flashy

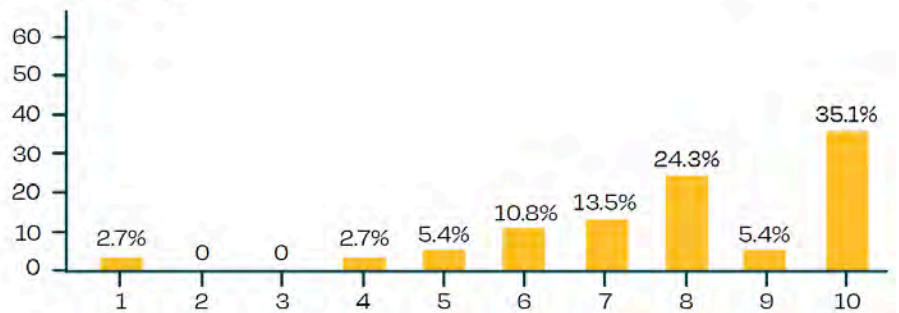
186 PICCADILLY

- Culture, history, authenticity

PAXTON & WHITFIELD

- Traditional without being over the top luxury (which risk damaging the area)

12. Do you believe it is important that there is a diverse range of uses in St James's?



1 being not at all important and 10 being very important

13. What types of use would you like to see more of in St James's?

Residential

- Higher residential use
- Affordable housing
- Slightly more residential some of the offices
- Residential
- Residential
- Affordable houses



Food & Drink Retail

- Butcher, Fishmonger
- Wine merchants
- Supermarket that's affordable and more shops useful to residents than tourists
- Affordable food



Clothing Retail

- Wildsmith's



Variety of shops

- Different shops
- More contemporary shopping
- More shops geared for women, give it a little bit of a feminine feel



Art

- More art galleries/antiques dealers
- Art market
- Gallery space
- As many art galleries as possible



Dining

- Lunch places, such as independent cafes that aren't horrid chains like Pret
- Lunchtime offerings
- More casual outdoor cafes
- More coffee shops, affordable lunch options



Night-time economy

- The area becomes rather quiet at night. Appropriate, independent, prestige restaurants might add value
- The mix is right but the night-time economy needs to be looked after



Outdoor spaces

- No major changes...more outdoor social areas would be nice though.
- Public realm
- More and better use of St James square for public events - summer fair etc
- Family friendly, pedestrian, more trees and plants, fountains, more green, make St James like a village, no cars, just pedestrians so there will be piazza with café terrace and street with cobblestones, affordable farmer markets and kids running around safely More plants on the pavements Make St James a leading area in London



Transport Infrastructure

- Protected Cycle/Micromobility lanes and parking infrastructure.. I don't want to have to cab into St James.



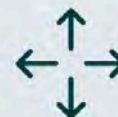
Nothing

- None . Let's keep the current character
- Actually the diversity is impressive, from food and post office right through to luxury goods and galleries
- It has everything so I wouldn't change it.



Other

- Pop ups, creative uses
- Community engagement
- Homeless shelters
- Leisure
- Commercial (non-office)



14. What types of use would you like to see less of in St James's?

Cars & Traffic

- Motorised traffic
- Cars. Way fewer private cars please!
- Pall Mall is not a racing track please.
- Less cars and trucks / vans
- Aggressive driving, large number of cars



Dinning

- Cafes
- Gregarious restaurants
- Cheap places to eat



Chains

- Chain restaurants
- Chain stores
- Chain retail
- Chain cafes



Tourist Shops

- Fewer tourist gimmicks, it is transient trade and causes congestion and mess.
- Souvenir shops



Clothing Shops

- Shirt shops!
- Clothes- and frock-shops
- Men's shops



Other Retail

- Hunting shops
- Luxury retail



Private Clubs/Events

- Private members clubs
- Private members clubs
- Private art events in the square



Littering

- Less rubbish left by passers-by



Nothing

- None
- no complaints
- Nothing
- NA

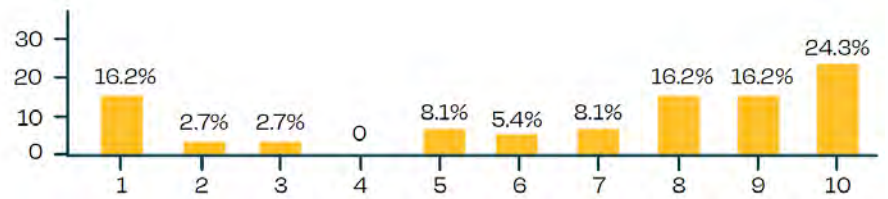


Other

- Offices
- Gentlemen's clubs- women's bodies should be respected

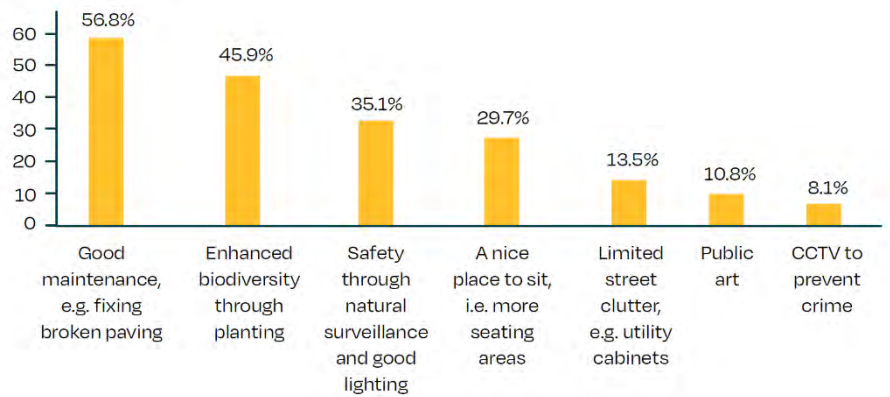


15. Do you believe it is important that St James's becomes more cycle and pedestrian friendly?

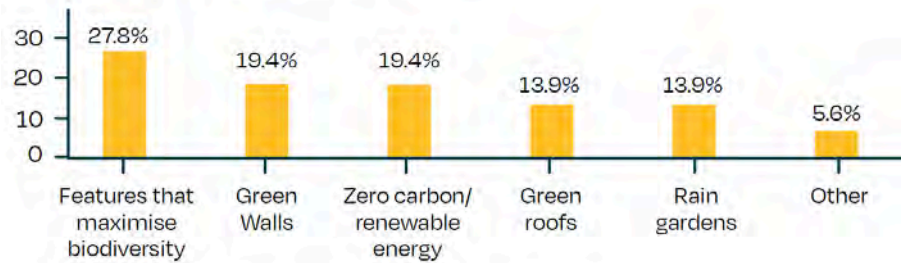


1 being not at all important and 10 being very important

16. Which two are most important to you when thinking about public realm improvements?



17. What sustainability features would you like to see incorporated as part of new developments?



Those who selected other gave the following feedback:

- Do not care
- Low Emission Zone, with drivers fined if they leave their engines running. Needs to be enforced 24/7

18. Are there any other sustainable initiatives you would like to see in St James's?

Planting

- Green streets with plants
- More tree planting

EV chargers

- More car charging points
- Electric vehicle chargers
- More electric charging points

Active travel

- Much more support for active travel (walking, cycling, public transit, etc).
- Cycling facilitated, especially on Pall Mall
- Fewer cars
- Pedestrianise Jermyn street and turn it in to a street garden - would encourage as a shopping destination whilst providing an additional outdoor space
- Cycling roads
- More bike hangars

Other

- There are CO2 air suckers that clean the air. They exist in several other world leading cities
- Any really...
- Make our pavements safer and stop these bikes and scooters
- Green roof + green walls + solar panel + beehives + little St James farm + farmer market + a house 100% ecological that can be used also as a museum, plenty of pedestrian areas, maximum speed of 10 mil per hour if cannot make it all pedestrian, some fountains, use innovative ideas and propose space for start-up which are focussed on sustainability. We need a focus on recycling and launch a program to help all the shops to become sustainable please

4.5 Regulation 14 Consultation

The Regulation 14 consultation was held between June and September 2023. The Forum distributed 1,930 flyers to local residents and businesses. In addition to this, a letter was sent to the same address list in early September to inform people of the approaching close of consultation and give details of the Forum's AGM. A full summary of the responses can be found in [Appendix J](#)

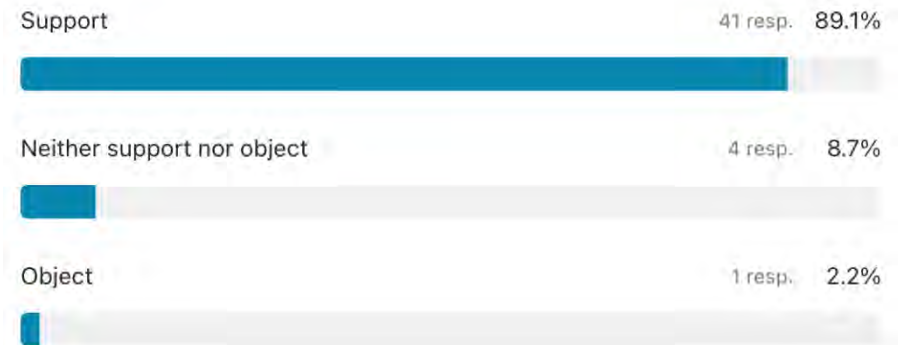
The purpose of this survey was to ascertain support for the draft policies in the plan. The survey was structured to ensure that all respondents could express their supported, objection or neutrality to each policy. Those who objected to a policy were asked to explain "what would you change about this policy and why?" in order to gather their feedback.

We received 46 responses to our survey, and the responses are outlined below.

Q1. What is your relationship to the area?



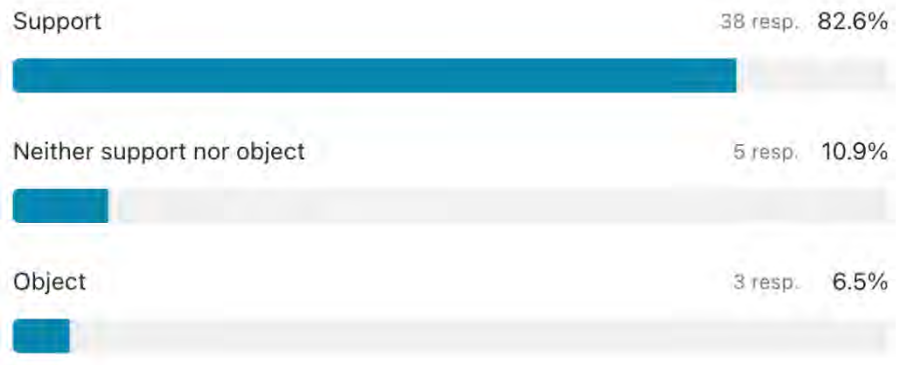
Q2. The plan proposes that all new buildings, conversion and refurbishments in St. James's will be of architectural excellence and should contribute to the local distinctiveness of St. James's. What do you think of this proposal?



What would you change about this policy and why?

- Higher density residential property should be prioritised

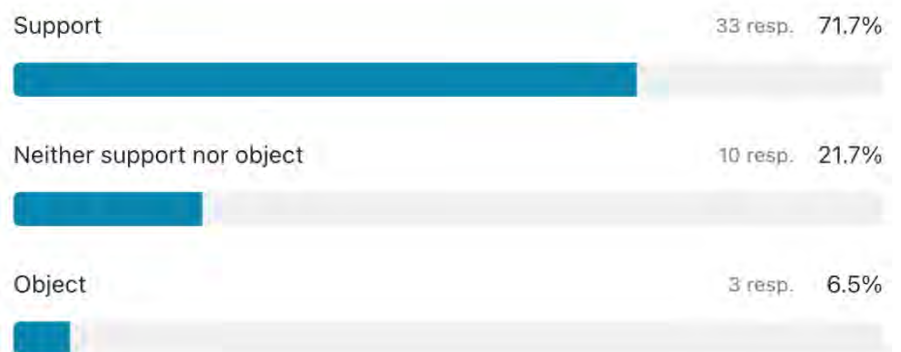
Q3. The Plan has identified separate areas within St. James's that share similar characteristics. These areas will guide development to ensure it is cohesive with the existing spatial environment. What do you think of this proposal?



What would you change about this policy and why?

- Each of these areas is already far more heterogeneous than the zoning would suggest. They're maybe a majority style in an area but certainly not a unique one.
- I am a resident in Duke St. where an all night club, Scotch St James's, was given permission to operate in Masons Yard. The subsequent noise and anti social behaviour between 3 and 5 am has had a terrible effect on residential life here. If "cohesive" means that more such clubs will be concentrated in my area designated "Duke St, King St", residential life will be made impossible. There are many high end restaurants, pubs in the area but their operating hours respect residential living. If having 1 all night club means the plan will designate the area as suitable for more of the same, residents committees will strongly object.

Q4. The Plan states that environmentally sustainable materials should be used in development works. Building materials should promote a circular economy and aim to be net zero. What do you think of this proposal?



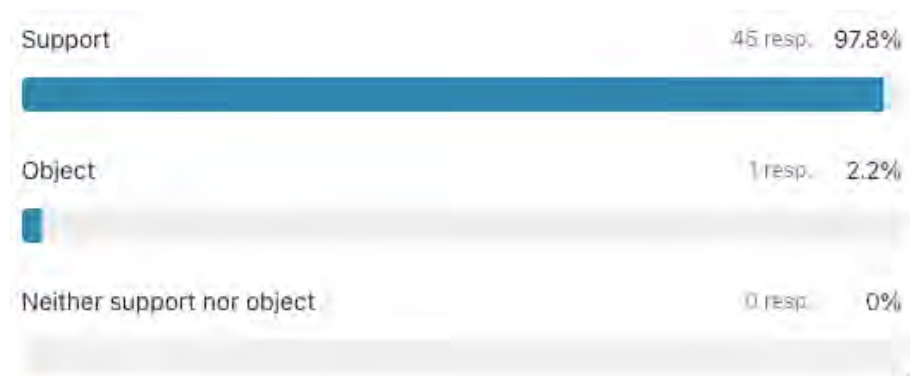
What would you change about this policy and why?

- Removal of the term "aim". New construction should have to be demonstrably consistent with Net Zero in order to proceed.
- These measures have a habit of resulting in viability issues that then effect build quality, the provision of affordable housing and workspace. Further thought should be given to the compatibility of the design excellence/build quality policy and this one.
- Over emphasis on Zero Carbon

Q5. The Plan will encourage that roof-top plant and clutter is mitigated or located away from any areas it may cause disturbances. Planning proposals will be directed (where possible) to install plant and building infrastructure in basements or enclosed spaces. What do you think of this proposal?



Q6. The Plan will ensure that new, restored or adapted shopfronts must be designed in a manner that is complementary to the prevailing character of the area. What do you think of this proposal?



What would you change about this policy and why?

- Use of sustainable materials should be mandatory for new, restored or adapted shopfronts

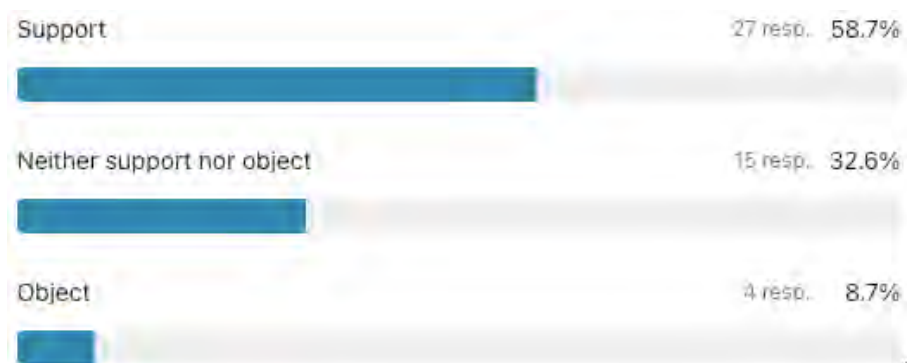
Q7. The Plan identifies and aims to protect iconic views in St. James's. Proposals will be expected to respect and enhance these local and metropolitan views. What do you think of this proposal?



What would you change about this policy and why?

- Views should be a secondary consideration as opposed to a priority.

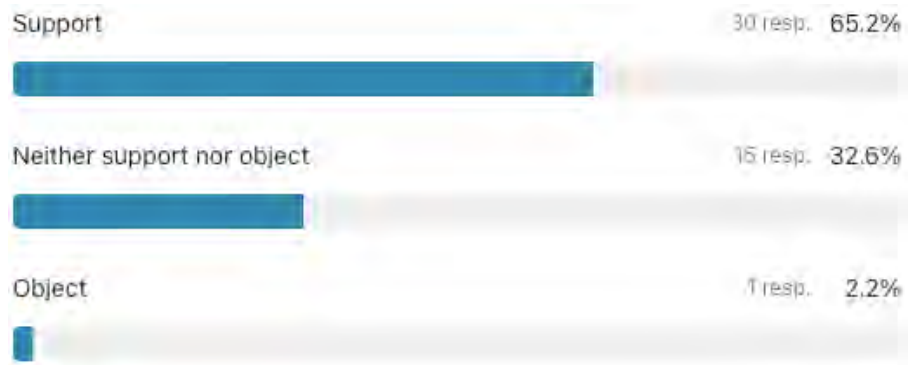
Q8. The Plan will allow for new hotel development primarily in commercial areas of St. James's. In areas where there are local residents, proposals must demonstrate how they will mitigate any adverse impact on residential amenity. What do you think of this proposal?



What would you change about this policy and why?

- I simply cannot understand why another hotel is needed ahead of other uses for the building/spaces in the area.
- development would be harmful, and mitigation would be inadequate.
- It is already extremely noisy in Duke of York Street, there is no room for any more through/commercial traffic - the sound of broken shop windows (bin/bottle collection around 02:30 in the morning) and high-pressure water cleaning in Jermyn Street 05:30 in the morning - leaving only a few hours of rest during summer months when windows need to be open...

Q9. The Plan will aim to protect the existence of Private Members' Clubs that occupy some of the most architecturally important buildings in St. James's. PMCs can only be closed if it can be demonstrated that there is no demand for another operator of such a club. What do you think of this proposal?



What would you change about this policy and why?

- Whilst PMCs represent an important historical aspect of the area, their operations are a matter for their members and trustees I don't see why this plan should be singling out this type of organisation for particular treatment or seen as more advantageous to the area than any other type of organisation. Indeed, given that some clubs still operate outdated and sexist membership policies are they really to be protected and encouraged in this way?

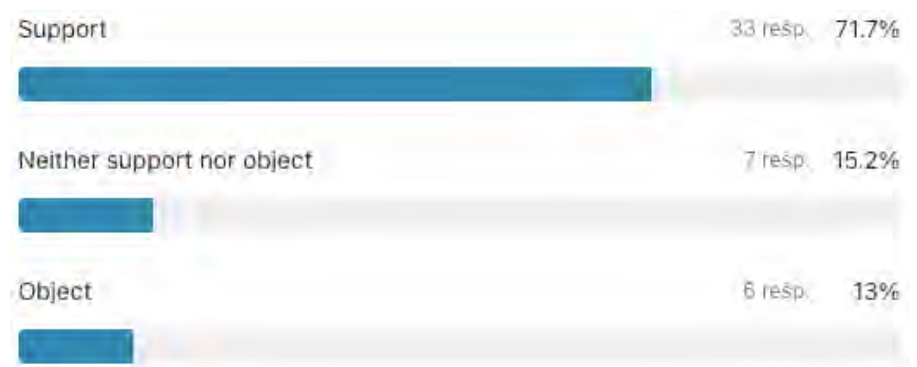
Q10. Any major development will be required to provide or support the public realm in the immediate vicinity of the site. This includes – but is not limited to – upgrading/repairing public footways or replacing listed and historic street furniture. What do you think of this proposal?



What would you change about this policy and why?

- The policy needs to account for organisations - charities, not-for-profits etc which couldn't be able to support public realm works. Also, making developers provide may lead to uncoordinated investment.

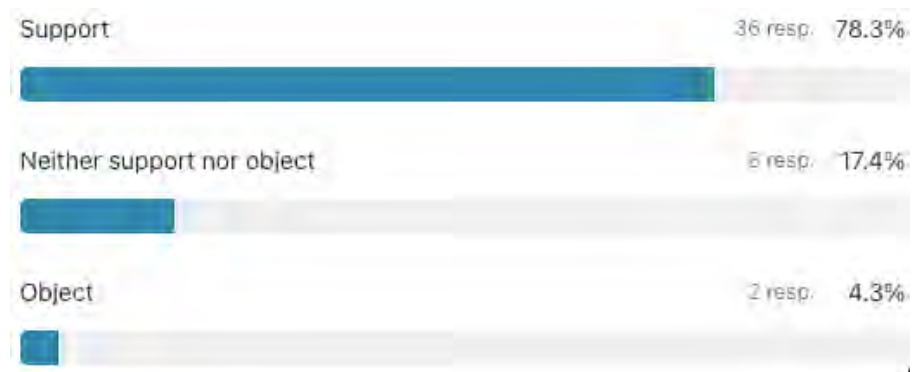
Q11. The Plan will encourage the facilitation of walking and cycling. New developments should provide new or improve existing infrastructure which supports safe and active travel. What do you think of this proposal?



What would you change about this policy and why?

- People need to be able to drive - not everyone is able to walk, carry shopping or use public transport
- Cyclists often have little or no respect for pedestrians. Older or disabled members of the public may be disadvantaged as walking may be an issue for them
- London as a whole is having its traffic circulation destroyed for the sake of bicycle lanes. No more restrictions for car /taxi traffic please.
- We should encourage walking not cycling. I am sick and tired of cyclist riding the wrong way down one-way streets and riding on our footpaths.
- I am concerned about the quantity of rental e-bikes, pedal bikes and electronic scooters being deposited in the area. This clutters the pavements and roads and obscures shopfronts.
- A desirable objective-but only if in conjunction with serious measures taken to stop on pavement and against traffic flow cu=cycling

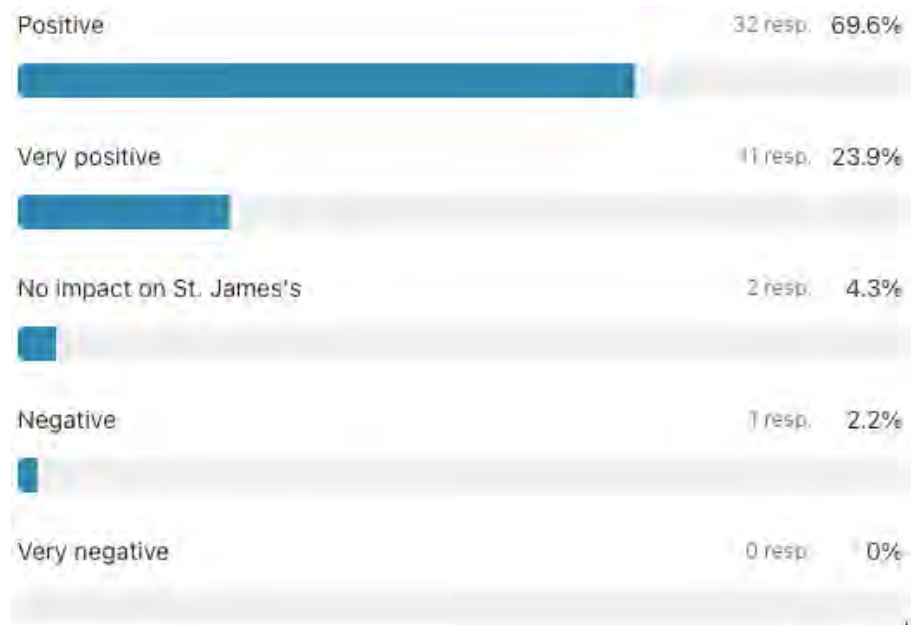
Q12. The Plan endorses the sustainable policies as outlined in the Westminster City Plan 2021 and London Plan 2021 in order to reduce emissions and improve bio-diversity. What do you think of this proposal?



What would you change about this policy and why?

- We already have effective emissions controls . No need for this policy to be extended here .
- This area has remained sustainable for years. If it ain't broke, don't fix it!

Q13. Overall, what impact do you think the St. James's Neighbourhood Plan will have on St. James's?



Q13 A. Could you explain why you selected your answer?

Very Positive

- What I have read confirms my belief that St James's is a special area and needs protection and development to ensure it remains the best for residents and enhances a visitor's experience. We need to keep pavements safe by keeping bikes and scooters off the road and out of the parks.
- All very sensible to preserve this lovely part of London.
- I was born and raised in Pimlico (1946) and grew up with all these beautiful buildings so to stay with the style is perfect. I also enjoy going to Fortnum and Mason's.
- The plan sounds common sense. The survey would have been better if participants could have done than box ticking
- St James's is the best place to live in London. The streets, architecture and spaces have history, beauty and human scale. It is also full of life and variety. A plan that can recognise and perpetuate these qualities, while keeping the place alive, is to be supported.
- I want the character to stay as it is and the vile buildings from the 60s replaced with classical designs

Positive

- If all that is proposed in this document is carried out to the letter, then yes it should be positive. You are however powerless to address the lawless nuisance of high performance motor cars revving their engines to impress drunken revellers at 03.30, of unlicensed dangerous rickshaws blaring out music and ripping off tourists, of Lime Bikes littering the pavements, of Deliveroo riders cycling the wrong way down streets, of cyclists cycling on the pavement, of food outlets increasing

encroachment onto public realm, of the litter of cheap kiosks around Piccadilly Circus one of which ruins the beautiful view down Regents St South from Sherwood St. My own flat has large windows overlooking Eagle Passage. There is a proposal for outside tables for one new fast-food outlet, what is to stop all property on Eagle Passage following the same example. Is such an outcome protecting your much vaunted protection of public realm. I'm sure your intentions are admirable, but no one can address these issues that really do have impact on people's lives.

- Well, it all seems to retain its historical / current look
- The Fact that you Mention Eco Surely that is Good for everybody and the Environment. I Strongly Support this.
- Because I believe the improvements will help the area.
- Some of the questions prompt obvious answers. One important thing: please put speed camera on Pall Mall and St James's Street!
- Hopefully not too much change to the beautiful area
- Providing all the building work is in keeping as laid out in the plans
- Prioritisation of public space and pedestrian use
- A more pedestrianised area will be more pleasant to live and work in
- Implementation may take many years to achieve by which time cost or other issues will have had an impact upon proposals
- I think it's key to retain the character of the Neighbourhood if the galleries and shops are to survive. Retail is already struggling because of congestion charges and traffic restrictions. The only reason to come to St. James's is the unique character of its shops, galleries and clubs. If we lose this then why would anyone bother to come? Just go to a shopping mall outside of London where you can park, not pay congestion charges and the traffic flows because someone sensible has designed the road systems.
- Better to have a plan and implement it quickly
- I support all development in Westminster as I am business owner in the area last 13 years
- St James's has a unique architectural and social heritage which must be conserved. The policy seems to support this conservation.
- I don't think it will be transformational as many buildings have already been modified which don't conform to these guidelines but it will help limit future "damage"
- It may make it easier to walk and cycle when visiting the area with children.
- The plan, 'FIRST' considers the existing inhabitants /traders (visitors etc) within the area with regard to their surroundings for future proposed developments, which I think is the fair, best and morally responsible option. Although economical understanding is required, and business must progress for the benefit of all. We all understand (as myself having the good fortune to migrate to living and working in London from Yorkshire since 1983) it is a Universal fact, that our USP is the historical, unique and genuine heritage (landmarks etc) that ALL of London offers the world and therefore the historical integrity of London structures must be maintained as much as possible. (or at least future intention must align with the same etc) We pay homage, to our creative ancestral past -cherish and care for it, as it reminds us, of the greatness in

ourselves with such achievement and therefore, encourages and inspires future greatness in its citizens.

- We need to maintain our inheritance in such unique & historic area as the priority. Yes, evo friendly but not at the expense of what we are privileged to enjoy & bring income to tourists, UK & international area & not
- Answered based on the understanding that the plan is to ensure a coherent design in the area while improving walkability.
- Difficult to be SO very positive until there is more information forthcoming and clearer plans for the areas involved
- You have to consider residents views, and keep the area in keeping
- Retaining the character whilst improving sustainability, biodiversity and active travel can only be a good thing
- The plan seeks to enhance existing heritage and architectural merit whilst seeking to harness and facilitate innovation in the built environment. Good in this respect.
- More coherence would be good. Small local businesses should be cherished.
- All the questions were extremely pre-loaded and give no chance of providing real alternatives or concerns
- I regularly visit this area as my partner attends meetings there. So, comforting to be surrounded by so much history. Keep the past alive please.
- I hope the plan will preserve and not destroy the historic mix of residential properties, art galleries, book shops, high end restaurants, food and clothing shops. I fear that the "cohesion" of types of property could mean "ghetto". As I said earlier, my immediate area already has 1 noisy, all-night club in my designated area, I don't want it to become a ghetto for more. As local policemen no longer patrol our streets, the St James's scheme should strengthen relationships with the excellent environmental / noise/ anti-social behaviour team at Westminster Council. Residents and local hotels could be encouraged to support extra patrols during the night, even contribute to funding additional security patrols specifically in St James's. Our streets in St James's are narrow so the introduction of cycle lanes would make traffic congestion even worse. I hope they won't be introduced here. The current policy of reducing street furniture/ signage has had a welcome visual effect on the area. I hope this minimalistic approach to signage etc will continue. Our local street sweepers do excellent work continuously gathering visitor and commercial refuse during the day. This policy should continue. When a building development taking up to 3 years to complete from demolition to completion, developers should be asked to provide a visually pleasing camouflage masking the work and dust, as they do in Mayfair. Noise from plant which makes a building function is an especially important feature of the proposal. As we no longer have local policemen on the street, could St James's residents and property owners contribute to funding a security guard patrolling our specific area during the night? I favour any policy which will enhance residential experience - either for apartment residents or hotel visitors.

No impact on St. James's

- What exactly has been proposed? Colouring a few neighbour streets in the same colour - with intention of co-planning... Deal with the A) noise pollution in the area, B) allow residents access to St James's Square during weekends, C sort out the homeless problem in St James's, D restore St James's Church original entrance leading down to the Square, E make Pall Mall a alle of cafés and small shops again. On the opposite side of the Clubs :)

Q14. Is there anything else you would like to see included in the St. James's Neighbourhood Plan?

- No
- I would like to See Cheese Mongers and A Traditional Butchers and Fish Monger you Must Support Local Independent Businesses
- "Please install speed cameras and/or speed bumps on pall mall leading into St. James Street. There is significant speeding happening on Pall Mall, Marlborough Road and St. James Street. Especially at the late hours of the night.
- It can be very dangerous for passerby, and it is very noisy for the residents."
- More trees and fountains as well as pedestrians' roads
- Clean up alleyways, find ways to stop anti-social cyclists riding on pavements, cycling the wrong way i.e. on the roundabout the wrong way, knocking people over on the crossing by Marlborough Road.
- Better policing to keep parks pavements safe for all including disabled blind and elderly
- Expansion of pedestrian/cycle only streets
- I would like to see an active encouragement system in place for independent shops and galleries. Customers do not come to St. James's for the chain stores. They come for the speciality shops that are only found here. I am open to how this can be achieved. Reduced business rates for independent shops? Rent control?
- If we lose the small independent shops, we lose the charm and attraction of the area.
- Less street drinking. Contain drinkers to the pub not 10 deep on the footpath
- I wish they do some private events plans for all neighbourhood accordingly
- Help should be given (if needed) to preserve the lovely architectural vernacular of the buildings. In a funny way it is a peaceful and wonderful area rather like a cathedral.
- I think it has all it needs
- A police/community consulting group. The West End used to have one.
- I would like to preserve existing architectural heritage, include but not limited to the original gas lamps.
- Remove the motorbike parking from St James's Square as many are excessively noisy and the parking is an eyesore in a historic location. Also reduce parking and through traffic to improve the tranquillity of the square.
- Old skills like stone masonry, carpentry- handmade skills and crafts being encouraged and purposefully incorporated into plans for renovations/ new builds.

- True separated cycle paths and proper cycle parking for cargo and family bikes.
- Not at the moment, it looks pretty comprehensive as it is—
- More bike parking, more benches in the square, more bins
- Encouragement for people to enjoy the area in the evenings with cafes (not just restaurants & pubs) open after working hours
- Further moves towards pedestrianising busy areas
- A theatre!
- The plans to restore the public realm are excellent. My only reservation is the recent repaving with piebald granite. The random mixture of bright granite colours is jarring and not traditional. A calmer solution would allow the buildings and spaces to read more comfortably.
- Please don't modernise it. Keep the character of our wonderful city
- More tree and wildflower planting if possible
- No.
- Encouragement of the church.
- More green spaces within pedestrian spaces.
- More concentration on pedestrianisation and less bicycles, which are left after hiring all over the area
- Flexibility to allow energy efficiency improvements that are not visible from public spaces, e.g. double glazing in the back of buildings. Grant air conditioning permissions only where it can be demonstrated that passive cooling, open windows, fans etc cannot deliver acceptable indoor temperatures.
- More control over misuse of public spaces by Pubs
- No, love it as it is.
- Access to St James's Square for long-time residents... Happy to pay something, but feels very strange to look at the closed gates every Sunday, very off for a country at the lead ;)
- Whilst I like the widened pavements brought in during the pandemic I do think they are a bit slapdash and would like to see them brought in line with surrounding paving.

Q15. Do you have any other comments?

- Plenty but I will attend your meeting.
- Not at this Stage Thank you
- We hope that our survey will be taken into consideration and the issue of the cars speeding at night can be addressed in a timely manner, thank you.
- Make St James's a leader in green initiatives
- More supermarkets for residents
- More greenery more life
- No. Good luck - these are the views of a countryman who visits London once a year but always likes this area.
- No
- No
- Thanking everybody concerned, always a wonderful place to visit beautifully maintained.
- The plans should not limit opportunities in the area to the extremely rich
- See previous answer
- Good luck

- No
- "Increased promotion of St James as London's foremost shopping district
- Bond Street is now over saturated with multinationals with none of the independent uniqueness that it used to have
- It's like terminal 5 now.
- St James has the chance to take this crown"
- No. But thanks for asking.
- Will we have another opportunity to look at comments on the plan as they are submitted?
- "Really like the emphasis on protecting the look and style of the local area, I hope this extends up above street level - i.e. height limits to new builds even if they are in keeping with surrounding building at lower levels.
- Personally, cycling is very important to me, I commute to the office this way several times a week so any improvements there would be great. I find getting from Piccadilly to the office on St James' St slow and fiddly, particularly going from Shaftesbury Ave. Realise that is not part of the area in the plan but could something be done with the cyclist light that crosses Lower Regents St by the Tesco, it takes a very long time to change."

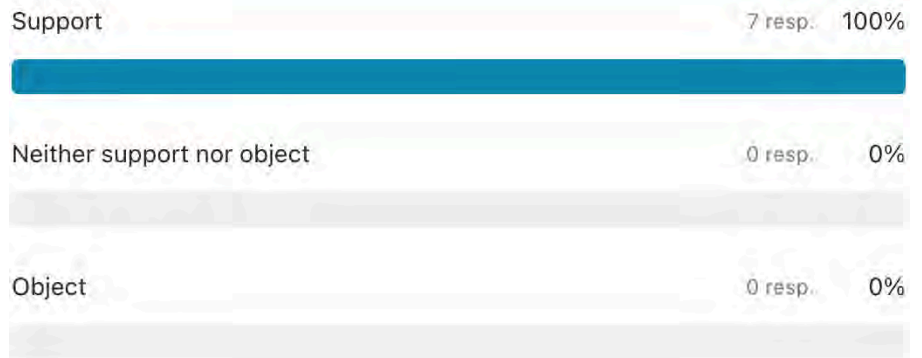
4.5 Regulation 14 Pre-Submission Focused Consultation

The Regulation 14 Pre-Submission Focused Consultation was held between May and June 2024. The Forum distributed a letter to its mailing list from the local community as well as notifying all statutory stakeholders as notified in the previous Regulation 14 consultation. Responses were made by Westminster City Council and Historic England to the Forum. A full summary of the responses can be found in **Appendix O**

The purpose of this survey was to ascertain support for the new proposed draft policies in the plan. The survey was structured to ensure that all respondents could express their supported, objection or neutrality to each policy. Those who objected to a policy were asked to explain "what would you change about this policy and why?" in order to gather their feedback.

We received 7 responses to our survey, and the responses are outlined below.

Q1. Policy STJ9 will encourage that all new buildings, conversions, extensions, retro-fits and refurbishments utilise low carbon technologies and maximise energy efficiency of buildings. Additionally, sensitive retrofitting of energy efficiency measures in historic buildings will be encouraged. What do you think of this proposal?



Q2. The Plan will encourage the provision of green infrastructure on roofs. In order to ensure that these green assets are viable, Policy STJ10 encourages planning proposals to include a series of considerations in any proposals for green roofs. What do you think of this proposal?



Q3. Do you have any other comments on these new policies?

- Stop knocking down sound buildings just to put up a new structure save the fronts keep our heritage
- Support for bees and wildlife integrated in these green rooftops would be good

4.6 Strategic Environmental Assessment and Habitats Regulations Assessment

The SJNF requesting a screening opinion in respect of the need for a Strategic Environmental Assessment (SEA) of the draft NP in July 2024. The draft screening opinion was that an SEA was not required. BDC then consulted with the statutory bodies (Historic England, Natural England and Environment Agency) on this draft opinion. The responses received concurred with this view that an SEA was not required. The final screening opinion was published in September 2024.

A screening opinion in respect of the need for a Habitats Regulations Assessment (HRA) was also requested in July 2024. The draft screening opinion was that an HRA was not required. BDC then consulted with the statutory body (Natural England) on this draft opinion. The response received concurred with this view

that an HRA was not required. The final screening opinion was published in September 2024.

4.7 Summary

Following the stages of consultation, a number of key themes were identified by residents. The clearest theme was that the Neighbourhood Plan's Policies were supported by respondents. Respondents valued the character and heritage of St. James's and agreed with the principles outlined in the plan to preserve the character of the area whilst allowing for future growth. Concerns were raised that further active travel in the area could lead to risks to pedestrians if the behaviour of bike and e-scooter users is not more closely monitored.

Themes	Response
Support for the protection and heritage of St. James's architecture and independent businesses	Policies developed relating to character and design, shopfronts and signage, views, rooftop plant and activity and private members' clubs.
Noise from hotels	Policy developed seeking to address noise from hotel users congregating outside late at night.
Behavioural concerns from non-motorised traffic	Policies developed relating to improving the public realm for pedestrians, walking and cycling (with the latter seeking to ensure cycle routes are effective and encourage cycling to be away from pedestrian routes).
Further support for urban greening and high-quality public realm Requests for tailored policies regarding sustainability	Policies developed relating to the public realm and green roofs. A sustainability charter was also developed to provide a set of guiding principles to developers.

5.0

Conclusion

5.1 Summary

Throughout this consultation, the SJNF has effectively opened a line of communication with a wide range of stakeholders, including locally elected politicians, community groups, and local residents. The SJNF's consultation has prioritised an open approach to engagement, genuinely seeking to understand the views of the local community and establish close relationships.

Through the Forum's early engagement to help shape the themes of the draft plan, the SJNF has responded to and included the thoughts and opinions of the local community. Upon the launch of the draft neighbourhood plan, the Forum has made every effort to be accessible to local residents and businesses. Consultation consisted of a range of activities, including door knocking, attending events and street stalls alongside a digital strategy to ensure local residents and businesses were aware of the consultation and had the opportunity to help shape the Neighbourhood Plan.

The principles of the Neighbourhood Plan were strongly welcomed, with more than 90% of survey respondents agreeing that the plan would have a positive impact on St. James's. There was some concern with how active travel solutions may affect pedestrian safety and the public realm.

The following Focused Consultation in 2024 also showed strong support for the policies across both stakeholders and the local community. With 100% of respondents supporting both of the new policies.

All comments raised have been considered and the SJNF is committed to work on the community considerations about possible implications.

5.2 Continued Engagement (Regulation 16)

Throughout the consultation process, the SJNF has been clear in its intention to create genuine dialogue and relationships with the local community.

The submission of the draft Neighbourhood Plan does not mark the end of community engagement and the SJNF will continue to discuss the proposals with the local community throughout the planning process. The consultation website will continue to receive updates as the draft plan progresses with Westminster

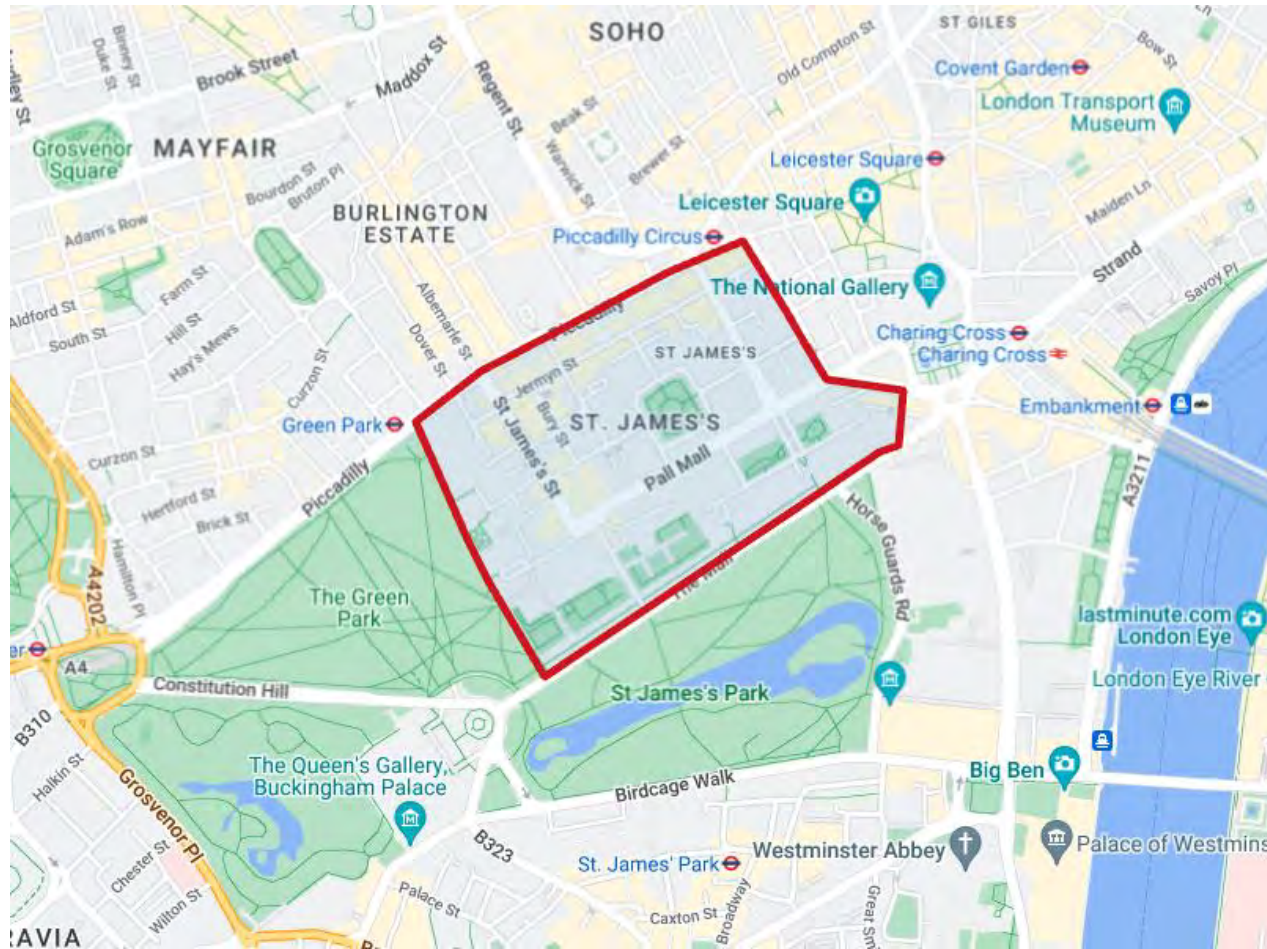
City Council. The SJNF contact details remain on the website and the team will respond to any enquiries received.

Once the draft plan has been submitted, there will be a period where those who are interested can visit the Westminster City Council's Public Access System to view all of the documents submitted as part of the submission. There will also be an option for residents to submit comments to the Council that will be taken into consideration ahead of the planning committee.

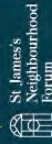
Following submission, the Neighbourhood Plan will enter a statutory Regulation 16 consultation from Westminster City Council to gain further feedback from the local community, businesses and stakeholders.

6.0 Appendices

Appendix A: Distribution area



What is the St James's Neighbourhood Forum?



The St James's Neighbourhood Forum is open to all residents and businesses in the area. It is the responsible body for monitoring the effectiveness and delivery of the plan and periodically reviewing it to ensure its continued relevance.

The Forum was initially set up by the St James's Conservation Trust and consists of members living and working in the St James's Neighbourhood Plan area.

It comprises residents' representatives, private members clubs, retailers, restaurateurs, office occupiers, The Crown Estate, the St James's Conservation Trust, Heart of Business Alliance, and Ward Councillors.

What is a Neighbourhood Plan?

Neighbourhood Plans were introduced by the Localism Act 2011, to enable communities to have a say in the development of their areas. The purpose of the Neighbourhood Plan is to guide development within the St James's Neighbourhood Area as well as providing guidance on submitting planning applications.

When made, the St James's Neighbourhood Plan will be used alongside the Westminster City Plan and London Plan to determine planning applications in the area.

What Area Does it Cover?

The Forum covers some of the world's most famous streets and iconic buildings. The full designated area is below:



The Consultation Process

We are currently consulting on the vision for St James's ahead of developing our plan.

Once we have developed our plan there will be a further opportunity for you to get involved and have your say as part of a more formal, Pre-Submission (Regulation 14) consultation before the plan is submitted to Westminster City Council for independent examination.

There are different ways you can get involved in our consultation:

ATTEND OUR IN-PERSON EVENT

Come along to our in-person event to learn more about the vision for the plan and provide your feedback to help shape it.

**Wednesday
30th November**
3-7pm
Venue

ATTEND OUR ONLINE WORKSHOP

Join us for an online workshop to discuss the vision for the future of St James's.

**Monday
5th December**
6-7pm

FILL IN OUR SURVEY

Please visit our website at and provide us with your feedback.

The survey will be available until **Friday 6th January**.



Scan to go to the website

stjamesforum.org

If you have any questions or require a printed version of the survey, please email info@stjamesforum.org or call 0800 994 9322.



Help Shape the Future of St James's

The St James's Neighbourhood Forum is developing a Neighbourhood Plan to shape the future of St James's and guide future development and growth in the area up to 2040.

To help the Forum develop the plan, we want to hear from you to get your thoughts on how we can ensure the long-term success of St James's as a place to live, work and visit.

Turnover to find out more about the St James's Neighbourhood Forum and the plan and how you can get involved.



**St James's
Neighbourhood
Forum**

Appendix C: Pre-consultation report

St James's Neighbourhood Plan Initial Consultation Feedback

January 2023

Contents

1. Executive Summary
2. Street stall feedback
3. Online workshop feedback
4. Survey feedback



Executive Summary

1. Executive Summary

Summary of Consultation

The purpose of the initial consultation was to gather feedback on the vision for St James's ahead of the formal Regulation 14 Consultation on the draft plan. Our initial consultation comprised an informative in-person drop-in event, a collaborative virtual workshop, street stall and an in-depth online survey.

The consultation was advertised through a brochure which was distributed to all addresses within the St James's Neighbourhood Plan Area. The consultation was also advertised through social media advertisements and was shared via councillor mailing lists and social media pages.

On Wednesday 30th November, we held a drop-in event at Sofitel St James's, which was attended by 8 people. At this event, attendees were able to learn more about the vision for the new Neighbourhood Plan and provide their feedback.

On Saturday 3rd December 2022 we spoke to residents, employers and visitors on location in St James's to learn more about what they like about the area and what they would like to change.

We then hosted a virtual Zoom workshop on Monday 5th December 2022 which allowed members of the local community to discuss their thoughts on the area and ways it could be improved through the new Neighbourhood Plan.

Additionally, an online survey was available between 22nd November 2022 and 6th January 2023 to enable residents, local business owners/employees and visitors to leave in-depth feedback on the area and the measures that they would like to see in a new Neighbourhood Plan.

Summary of Feedback

Overall, we received wide-ranging feedback from residents, business owners and visitors eager to share their priorities for the future of St James's. Our online survey received 38 responses the majority of which (23) were from businesses in the area. We also received 11 responses from local residents, 3 responses from visitors and one response from a community representative.

Across all three stages of the consultation, respondents' top priority was protecting and enhancing the character and traditional heritage of St James's in any future development. There was a high degree of approval for the independent shops and restaurants in St James's and for the area's traditional architecture.

There was also strong support for the provision of improved public realm and a higher volume of green spaces as part of the Neighbourhood Plan.

Overall, respondents' complaints about the area centred around the volume of traffic and the number of chain shops and cafés. There were also calls to make St James's more cycle and pedestrian friendly. Some respondents also noted that the area was very expensive, and called for the provision of more affordable housing, dining and retail options in the new Neighbourhood Plan.

A number of those consulted also identified sustainable development as a priority for St James's, with the provision features that maximise biodiversity proving the most popular option to aid green development.





Street Stall Feedback

2. Street Stall Feedback

We spoke to visitors to the area and local businesspeople and employees at our Street Stall in St James's. We asked them what they like and would change about the area to understand their priorities. Their feedback is below.



Visitors:

What do you like about St James's?

St James's Church, St James's square, nice buildings	St James's Park, Christmas decorations, mix of residential and commercial, clean streets	Clothes and shoe shops, sense of calm	Longstanding manufacturer of men's shoes
Nice area, expensive historic buildings, clean, nice shops, traditional	Bony brothers, nice place to walk around	Very typically British, like walking around, green spaces, appearance of old houses	All lovely, heritage, much nicer than lots of places where everything is being torn down
I like it in the mornings when it is not too crowded	I like St James's Church	I like the style of all the buildings and the mix	Nice shops
The mix of shops, the mix of restaurants and the buildings. Very classic architecture.	The shops	Shops, heritage – range of different shops, like the classic shops	Private members clubs, architecture
The East India Club	Nice private members clubs	Loves the shoes and restaurants	First time here – love the shopping
Unique shops, Christmas, it's just very successful because it's historic	Shops, independent shops, restaurants, bars, the whole vibe is so unique	All buildings – don't want the likes of Primark here, independent shops, lots of history, keep it unique and village feel	Rollings on St James's are great, keep it historic, pedestrianised areas are great
Shops, pedestrian, buildings are all great – I've been to many places in Europe and this is the best part of town			



Visitors:

What would you change about St James's?

Too many people on Piccadilly	Small of Piccadilly	Nothing really	Prices
Too expensive	Nothing	Rubbish bins can be a bit of an eyesore	Nothing!
Nothing – the atmosphere and sense of Britishness is great	Sometimes it can be too busy, but nothing I would like to change	The less you change the better	Protect some of the traditional pubs
Don't let it change too much	You really don't want to lose the history of the area	Nothing we would change, keep it as it is	Protect the heritage – messed up traffic! More balance for pedestrians/cyclists/cars.



Local Business Person/Employee:

What do you like about St James's?

Traditional architecture, pubs, proper London, well connected, the buildings, mix of shops is great	Peaceful and calm	Nice mix of architecture and different buildings are great	Safe, the place to be, keeps it fancy, mix of shops, love the small businesses
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Q

Local Business Person/Employee:

What would you change about St James's?

Pedestrianisation,
more Christmas lights

Protect the traditional
businesses - unique
members clubs

Empty shops

Would be nice if there
were more coffee shops

Restrict the bigger
brands coming in



**Online Workshop
Feedback**

3. Online Workshop Feedback

We held a virtual workshop with 13 attendees, which included local businessowners and residents. The workshop was also attended by the local ward councillors, Cllr Tim Mitchell, Cllr Louise Hyams and Cllr Mark Shearer. The workshop consisted of a presentation and an interactive whiteboard session where attendees could provide their feedback and share ideas. Their feedback is below:

What words come to mind when you think of St James's?

Elegant	Prestige	Quiet
History	Art	Authentic
Heritage	Very British	Residential
High-End	Quais	

What do you use in St James's, what would you like to see more or less of?

LESS OF

Financial businesses
Less speeding traffic (particularly bad on the main roads and on the edges of St James's)
Stop speeding cars on pall mall

MORE OF

Pedestrian Areas	Better lighting
More police patrolling the area	Invite workers to garden party to grow sense of community
Promotion of galleries in the area	Amenities over 24 hr period given international make up of offices
Places to go for a quick meal	Elegant traffic calming measures
Local shops to nip out to	
More better-quality materials in public realm	
Green outdoor areas	

Is there anything specifically you would like to see from the public realm in the area?

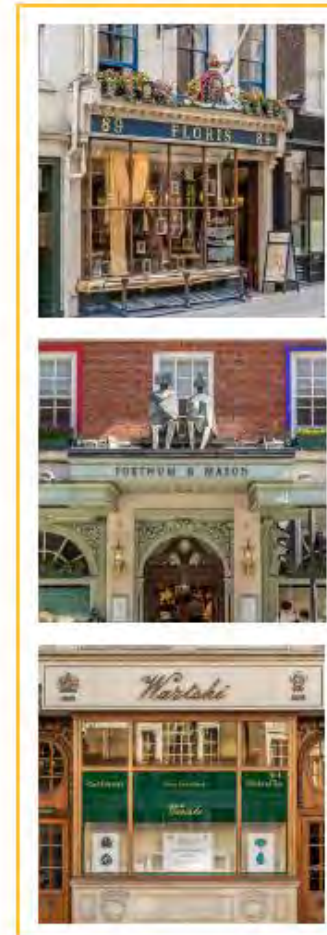
More greening	Quiet spaces	Decluttering
Seating	Bringing art out onto street for residents and workers to enjoy	Ambient lighting also from safety point of view
More higher quality material to reflect the quality on offer in the area	Fix falling letters on the street signs	

What would you like to see to improve sustainability in the area?

 <p>More attention to retrofitting buildings - particularly older buildings so they become more energy efficient</p>	 <p>EV Charging points and finding ways to make this elegant</p>
 <p>Focus on biodiversity opportunities in gardens</p>	 <p>More opportunities to recycle from businesses and residents in the area</p>
 <p>Funding for retrofitting</p>	 <p>More trees and planting in general</p>
 <p>Joint procurement opportunities to reduce volume of vehicles</p>	 <p>A coordinated plan for the area to reduce emissions</p>
 <p>Use the area to pilot sustainability initiatives and a model of sustainability</p>	 <p>Solar panel opportunities</p>

Character & Design Shopfronts

We asked attendees which of the following shopfronts was their favourite and why.



This was attendees' favourite option - open, love the red brick, flowers and planting, royal warrants and cornices

This option had some support from attendees - the history of F&M retained, Black iron railings, everything traditional, the heritage tiles

This option had some support from attendees - green colour symbolic with higher end communities



This was attendees' least favourite option

There was agreement that all shop fronts seem fairly accessible. There was also agreement that when shops close their fronts, they should remain lit and attractive.

Building Design

We also asked them which buildings were their favourite and why.



This was attendees' favourite option - personality, detailing on the masonry



This option had some support from attendees



This option had some support from attendees



This was attendees' least favourite option.

What don't you like about St James's?

Car racing on Pall Mall	Accessibility - public transport. With limited bus routes a challenge to get to and from work/visit - this promotes more cars in area	Struggles to welcome people from diverse communities
Rubbish left around	Poor quality street materials - broken pavers etc.	A bit bland - not a bad place you wander through, you go to a specific shop/restaurant
Rubbish out of pub - cigarettes and rubbish spilling out	Not as accessible as it could be around the footways for parents with children, those with disabilities etc.	Pollution

Any other thoughts?

- How will the plan be funded - The expansion of HOLBA into the area could help fund the plan
- Sustainability - Where are we now? What is the baseline and how can we improve?
- Tenant mix strategy?
- The need to plan ahead

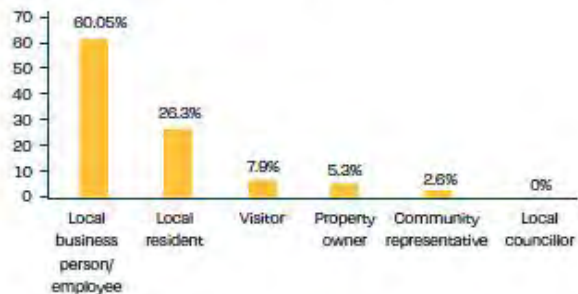


Survey Responses

4. Survey Responses

We received 38 responses to the survey in total. This includes surveys that were filled in online and in-person at the drop-in event. The feedback from the surveys is detailed below:

1. What is your relationship to the area?

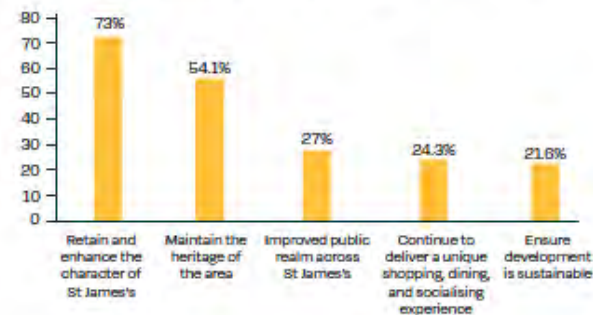


2. What is your postcode?

Respondents were from a range of areas, but the majority were focused in the St James's area. The addresses in the St James's area can be seen below.



3. When thinking about the neighbourhood plan, which two of the following objectives are most important to you?



4. Is there any thing else you feel the plan should focus on?

Balancing the old with the new

- Retaining the heritage and tradition, while ensuring the area remains relevant to a modern audience
- Balancing character with keeping up with the times



Safety

- Make it safe for women to move around the area- there are gentlemen's clubs here which I find deeply offensive. It is not a good look and deeply offensive to women who work in the area. Improve the alley ways and make them safe and brighter to enhance safety
- Anti-social behaviour



Cleanliness and less cluttered

- Focus on ensuring the area remains clean
- Litter
- Take into account the wishes of the resident and not the tourist- uncluttered the pavements from lime cycles



Traffic

- Reduction of or improvement in the flow of traffic
- Less cars passing through Marlborough road and Pall Mall, pedestrian area
- Primarily improving active travel including bus services and dedicated lanes for cycling & micromobility.
- Better accessibility
- Being pedestrian friendly, less aggressive & loud driving
- Safer walking and cycling infrastructure through the area, particularly for employees working in or next to the area.



Retail uses

- World class centre of art/antique dealing
- Prevent chain stores and encourage art dealers
- Cohesion of retailers making sure we work together
- Retention of unique/original retailers, such as art galleries and bespoke tailors/shoemakers
- In the Retail arena, focus on art market priorities; curtail men's clothes & frock shops
- Independent retailers
- Food & coffee availability for people who work locally.



Sustainability and green spaces

- Extend greening
- Sustainability
- Promote re-cycling among the residents and businesses
- Recycling
- Health of trees
- Air quality



Other

- Enhanced experiences all round
- Homelessness
- The clients of Three Crowns in Babmaes Street!
- Diversity and inclusion in the area - all welcome



Has the way you use the area changed since Covid-19? If so, how?

Of the 29 people who answered this question, 18 people said there has been no change in the way they use the area, 3 people said they or their staff work from home more and 3 people said they come into the area less.

One person commented a number of convenience shops have closed down since Covid-19 so it is difficult to survive using establishments just in St James's.

Other changes in the way respondents use St James's are listed below:

- Greater use of parks
- More walking, using local shops
- It is nice that Marlborough road is closed on Saturdays now (before it was only Sundays) so we can use more the street to play with the children but we don't like that the congestion charge ends at 18:00 while it was 22:00 before

5. What three words would you use to describe the St James's area?

TRADITIONAL, WELCOMING, WARM

CALM, ROYAL,
HISTORIC

QUALITY,
SERVICE,
RELIABILITY

BEAUTIFUL, HISTORIC, VIBRANT

HERITAGE, CENTRAL, SPECIALIST-RETAIL

HISTORICAL,
DESIRABLE,
CULTURAL

COLD, REMOTE &
UNWELCOMING
TO WOMEN

BEAUTIFUL, CHARACTERFUL, CHARMING

SMART, SOPHISTICATED, UNIQUE

SPECIAL, UNIQUE,
ELEGANT

ELEGANT, RESPECTABLE, POSH	HERITAGE SHOPPING, SMART
BEAUTIFUL, HISTORIC, CULTURAL	HERITAGE, TRADITION, STATELY
CLASSY, EXPENSIVE, GREEN	GENTLEMEN'S CLUBS
GENTEEL YET VIBRANT	HISTORIC, HIDDEN, CHARMING
TIMELESS, TRANQUIL, VIBRANT	HISTORIC, IMPORTANT AND POPULAR
POSH, TOURISTY, CLASSY, HISTORIC	TRADITIONAL, VIBRANT, LUXURY
HISTORICAL, EASILY ACCESSIBLE, BUSINESS	FORGOTTEN, HIDDEN, EXCLUSIVE
ELEGANT, CLEAN, QUIET	EXCITING, TRADITIONAL, BEAUTIFUL
HISTORIC, WELCOMING, HOMEY	PRESTIGIOUS, ELEGANT, AUTHENTIC
INACCESSIBLE BY BIKE	BEAUTIFUL, HERITAGE, POSH

6. Which of the following buildings around St James's do you like the most?



CHOICE 1
50%



CHOICE 2
25%



CHOICE 3
5.6%



CHOICE 4
5.6%

13.6% of respondents selected 'Other'. Those responses are below:

- St James's Church and Jermyn Street variety
- New Zealand House
- 146 Cleveland Row
- Does not matter to me
- I like modern buildings that are well designed and built

CHOICE 3

- It's pleasing on the eye

CHOICE 4

- It's a very clever use of brutalism in a traditional area
- It's iconic of it's time
- Because London as a city needs to move forward, keeping in mind it's past but embracing the future.

ST JAMES'S CHURCH AND JERMYN STREET VARIETY

- Focus of history and community

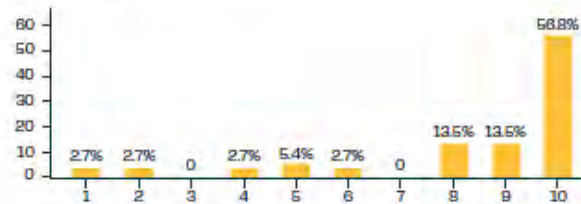
NEW ZEALAND HOUSE

- It brings a point of difference and diversity to the area

146 CLEVELAND ROW

- Light blue colour and the architecture, authentic and colourful

9. Do you believe it is important that future development respects the heritage of St James's?



1 being not at all important and 10 being very important



CHOICE 1
45.0%



CHOICE 2
10.8%



CHOICE 3
24.3%



CHOICE 4
8.1%

10. Of the following shopfronts, which do you like the most?

10.8% of respondents selected 'Other'. Those responses are below:

- 186 Piccadilly
- Paxton & Whitfield
- Does not matter to me
- They're all great

11. Why do you like that shopfront the most?

CHOICE 1

- Fits in with surrounding buildings, traditional
- Heritage, welcoming, human scale
- It is very iconic.
- Combining elegance with a sensible retail window
- It has a desirable character, which encourages visitors to explore its interior
- It gives a light but traditional impression
- Historic!
- I liked them all. But that looked most Dickensian
- It is unique and recognisable
- Style and personal love of books
- Independent retailer with lots of character
- Design, tradition
- classic, clean
- It's traditional and welcoming

CHOICE 2

- It's very welcoming
- Aesthetics
- They are all wonderful

CHOICE 3

- Synonymous with London
- Historic...
- Always pretty
- I would put in Berry Bros but I haven't a photo
- Major magnet to the area

- High effort, iconic to the area
- It's well-maintained interesting appropriate windows and a wonderful working clock

CHOICE 4

- I find it inviting
- It's unique
- As previous - traditional without being flashy

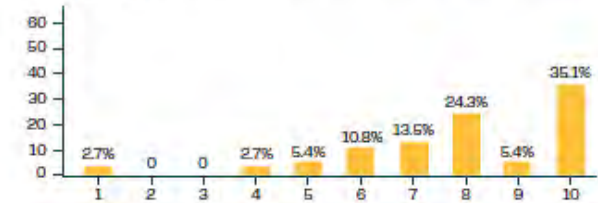
186 PICCADILLY

- Culture, history, authenticity

PAXTON & WHITFIELD

- Traditional without being over the top luxury (which risk damaging the area)

12. Do you believe it is important that there is a diverse range of uses in St James's?



1 being not at all important and 10 being very important

13. What types of use would you like to see more of in St James's?

Residential

- Higher residential use
- Affordable housing
- Slightly more residential some of the offices
- Residential
- Residential
- Affordable houses



Food & Drink Retail

- Butcher, Fishmonger
- Wine merchants
- Supermarket that's affordable and more shops useful to residents than tourists
- Affordable food



Clothing Retail

- Wildsmith's



Variety of shops

- Different shops
- More contemporary shopping
- More shops geared for women, give it a little bit of a feminine feel



Art

- More art galleries/antiques dealers
- Art market
- Gallery space
- As many art galleries as possible



Dining

- Lunch places, such as independent cafes that aren't horrid chains like Pret
- Lunchtime offerings
- More casual outdoor cafes
- More coffee shops, affordable lunch options



Night-time economy

- The area becomes rather quiet at night. Appropriate, independent, prestige restaurants might add value
- The mix is right but the night-time economy needs to be looked after



Outdoor spaces

- No major changes...more outdoor social areas would be nice though.
- Public realm
- More and better use of St James square for public events - summer fair etc
- Family friendly, pedestrian, more trees and plants, fountains, more green, make St James like a village, no cars, just pedestrians so there will be piazza with café terrace and street with cobblestones, affordable farmer markets and kids running around safely More plants on the pavements Make St James a leading area in London



Transport Infrastructure

- Protected Cycle/Micromobility lanes and parking infrastructure... I don't want to have to cab into St James.



Nothing

- None . Let's keep the current character
- Actually the diversity is impressive, from food and post office right through to luxury goods and galleries
- It has everything so I wouldn't change it.



Other

- Pop ups, creative uses
- Community engagement
- Homeless shelters
- Leisure
- Commercial (non-office)



14. What types of use would you like to see less of in St James's?

Cars & Traffic

- Motorised traffic
- Cars. Way fewer private cars please!
- Pall Mall is not a racing track please.
- Less cars and trucks / vans
- Aggressive driving, large number of cars



Dinning

- Cafes
- Gregarious restaurants
- Cheap places to eat



Chains

- Chain restaurants
- Chain stores
- Chain retail
- Chain cafes



Tourist Shops

- Fewer tourist gimmicks, it is transient trade and causes congestion and mess.
- Souvenir shops



Clothing Shops

- Shirt shops!
- Clothes- and frock-shops
- Men's shops



Other Retail

- Hunting shops
- Luxury retail



Private Clubs/Events

- Private members clubs
- Private members clubs
- Private art events in the square



Littering

- Less rubbish left by passers-by



Nothing

- None
- no complaints
- Nothing
- NA

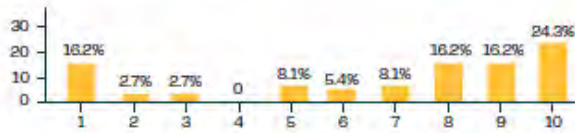


Other

- Offices
- Gentlemen's clubs- women's bodies should be respected

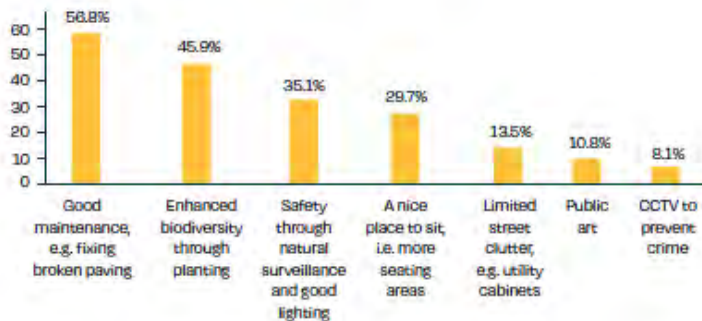


15. Do you believe it is important that St James's becomes more cycle and pedestrian friendly?

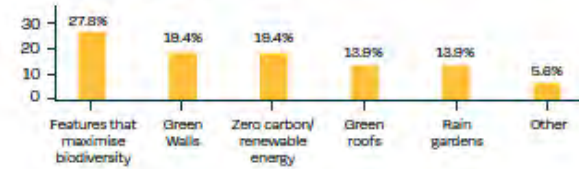


1 being not at all important and 10 being very important

16. Which two are most important to you when thinking about public realm improvements?



17. What sustainability features would you like to see incorporated as part of new developments?



Those who selected other gave the following feedback:

- Do not care
- Low Emission Zone, with drivers fined if they leave their engines running. Needs to be enforced 24/7

18. Are there any other sustainable initiatives you would like to see in St James's?

Planting

- Green streets with plants
- More tree planting

EV chargers

- More car charging points
- Electric vehicle chargers
- More electric charging points

Active travel

- Much more support for active travel (walking, cycling, public transit, etc).
- Cycling facilitated, especially on Pall Mall
- Fewer cars
- Pedestrianise Jermyn street and turn it in to a street garden - would encourage as a shopping destination whilst providing an additional outdoor space
- Cycling roads
- More bike hangars

Other

- There are CO2 air suckers that clean the air. They exist in several other world leading cities
- Any really...
- Make our pavements safer and stop these bikes and scooters
- Green roof + green walls + solar panel + beehives + little St James farm + farmer market + a house 100% ecological that can be used also as a museum, plenty of pedestrian areas, maximum speed of 10 mph per hour if cannot make it all pedestrian, some fountains, use innovative ideas and propose space for start-up which are focussed on sustainability. We need a focus on recycling and launch a program to help all the shops to become sustainable please



St James's
Neighbourhood
Forum

Get Involved!

We want to hear from you as part of our Regulation 14 Consultation to get your feedback on the Draft Plan before it is finalised and submitted to Westminster City Council.

Your feedback will play a crucial role in helping to guide future development and growth in St James's up to 2040. You can get involved in our consultation by filling in the survey which is available on our website or by scanning the QR code at the bottom of this page. On our website you will also find a downloadable copy of the Draft Plan and further information.

The consultation closes at Midnight on Sunday 10th September 2023.

stjamesforum.org



Take our survey!

If you would like printed copies of the Neighbourhood Plan or survey and would like to contact the project team with questions, please email info@stjamesforum.org or call our freephone number 0800 994 9322.

Written responses should be sent to our freepost address: ST JAMES'S NEIGHBOURHOOD PLAN CONSULTATION.



Have Your Say on the Future of St. James's

The St James's Neighbourhood Forum is developing a Neighbourhood Plan to guide future development and growth in the area up to 2040. Following earlier consultation with the local community and key stakeholders, we are now pleased to present our Draft Plan.

We are now launching our Regulation 14 Consultation on the Draft Plan to gather your feedback ahead of submitting it to Westminster City Council to fulfil the requirements of Regulation 15.

Turn over to find out more information and find out how you can get involved.



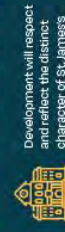
Our Plan for St. James's

As part of our earlier consultation, we asked for your thoughts and ideas to help shape the future of St James's ahead of developing the Plan. Your feedback highlighted the importance of preserving and enhancing the area's character and traditional heritage, as well as the need for additional green spaces, improved cycle and pedestrian infrastructure, and sustainable development.

This feedback has been crucial in helping to shape the Plan. Using this feedback, we have developed five core objectives that will serve as the foundation of the Plan.



Our core objectives



Development will respect and reflect the distinct character of St James's



Make St. James's and even better places to live



Maintain the unique shopping, dining and socialising experiences of St James's



Ensure development and change is truly sustainable



Balance heritage, identity and commercial viability

You can read the full plan and find out more on our website: stjamesforum.org

What area does the Plan Cover?

The Forum covers some of the world's most famous streets and iconic buildings. The full designated area is below:



Appendix E – Regulation 14 launch letter



Wednesday 21st June 2023

Dear Sir/Madam,

RE: Launch of Regulation 14 Consultation on St. James's Neighbourhood Plan

I am writing to inform you about the launch of the Regulation 14 Consultation on the draft Neighbourhood Plan for St. James's. As Chairman of the St. James's Neighbourhood Forum, I am pleased to invite you to participate in this important consultation process.

Our previous consultation involved engaging local residents, businesses, and stakeholders to gather their valuable thoughts and ideas for the development of the Plan, which will shape the future of St. James's. The feedback we received emphasised the significance of preserving and enhancing the area's character and traditional heritage, as well as the need for additional green spaces, improved cycle and pedestrian infrastructure, and sustainable development.

Taking into account this feedback, we have prepared the Draft Plan, which is now available in its entirety on our website.

www.stjamesforum.org

The website provides detailed information about the consultation and includes a survey where you can share your feedback. The input received through this consultation will be instrumental in finalising the Plan before its submission to the Westminster City Council.

If you prefer to provide a written response, please send it to our freepost address: ST JAMES'S NEIGHBOURHOOD PLAN CONSULTATION.

The consultation period will conclude at **Midnight on Sunday 10th September**.

Should you have any enquiries regarding the consultation or the Plan or require printed materials, please do not hesitate to contact us. You can reach us by email at info@stjamesforum.com or by calling our freephone number: 0800 994 932.

Thank you for your involvement and support in this significant endeavour. We look forward to receiving your valuable feedback, which will help us shape the future of St. James's in accordance with the aspirations and needs of the community.

Yours Sincerely,

Roger Sharpley

Chairman of the St. James's Neighbourhood Forum

Appendix F: AGM notification letter



Dear Sir/Madame,

RE: St. James's Neighbourhood Forum Annual General Meeting

I am writing to inform you that the St. James's Neighbourhood Forum will be hosting its AGM at **5pm on Wednesday 13th September at SMEG St. James's** (14 Regent Street, SW1Y 4PH). Our AGM is open to all members of the St. James's community, as such, we would encourage you to attend and join us in our discussions regarding the progress of the draft St. James's Neighbourhood Plan. As the consultation on the draft plan concludes on the **10th September**, this meeting will be the first opportunity to take stock and discuss the feedback we have received from all the residents, businesses and stakeholders of St. James's.

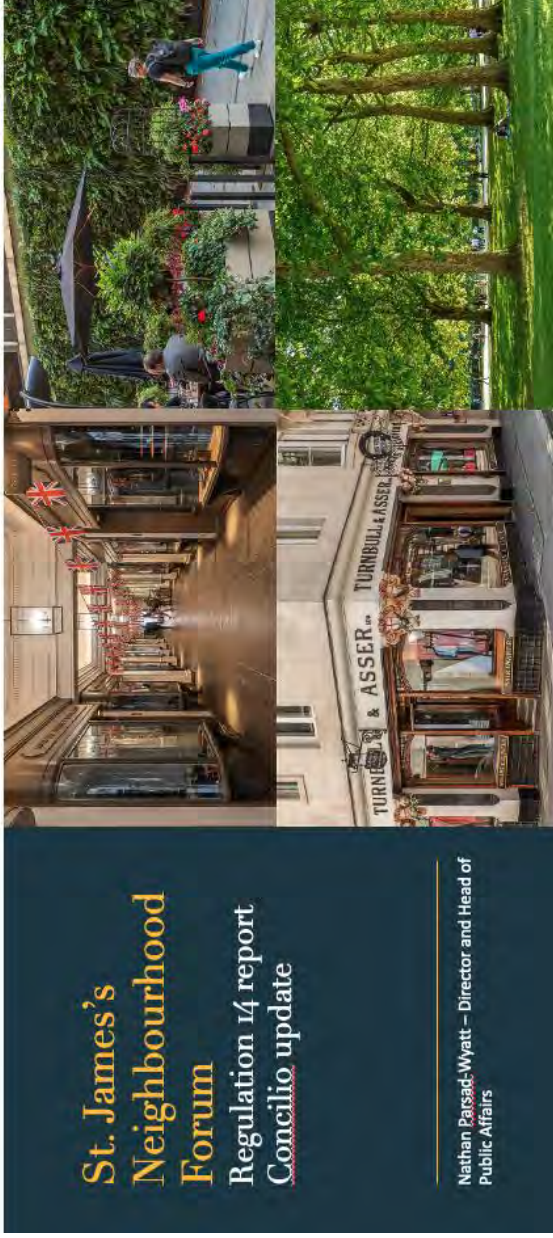
Throughout the summer, we have engaged with various stakeholders, including residents, businesses, and community members. Our efforts have included hosting street stalls across St. James's, conducting business outreach, and participating in the St. James's Conservation Trust's Garden party.

We encourage you to explore the comprehensive details of the plan on our website at stjamesforum.org/get-involved. Your input is crucial, and you still have until September 10th at midnight to formally share your thoughts and feedback with us. Should you have any inquiries or require further information, please do not hesitate to reach out.

Yours sincerely,

Roger Sharpley

Chairman of the St. James's Neighbourhood Forum



St. James's Neighbourhood Forum

Regulation 14 report Concilio update

Nathan Paisáid-Wyatt – Director and Head of Public Affairs

Presentation overview

This presentation will provide an update on the consultation activities that Concilio has been conducting over the last three months as part of the Regulation 14 Consultation on the Draft Neighbourhood Plan for St. James's, before being submitted to Westminster City Council for scrutiny.

We will also present the feedback that we have received from the St. James's community on their thoughts on the draft plan.

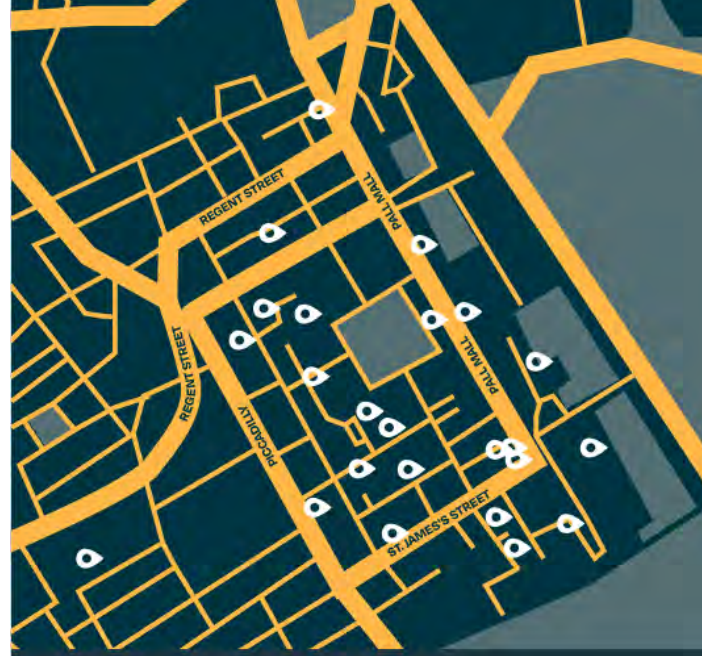
Contents:

- KEY FIGURES
- OUR OUTREACH
- DETAILED SURVEY FEEDBACK
- NEXT STEPS

Our outreach

Concilio raised the profile of the St. James's Neighbourhood Plan through several in-person sessions around St. James's

- St. James's Garden Party
- 3 street stalls
- More than 100 businesses door-knocked
- 41 survey responses from across St. James's



St. James's Garden Party



- Concilio attended the St. James's Conservation Trust's annual garden party in St. James's Square
- We were able to speak to more than 30 people regarding the draft plan and Regulation 14 consultation



Street Stalls

Concilio held three street stalls in the St. James's area, talking to members of the public about the draft plan and encouraging them to read more and fill in the survey.

WHERE AND WHEN?

Jermyn Street – Thursday 29th June

Pall Mall – Saturday July 1st

St. James's Market – Wednesday 19th July



Door knocking

After each street stall the Concilio team walked into the businesses of St. James's to hand out flyers and discuss the proposed Neighbourhood Plan.

We had constructive discussions with business owners and employees while encouraging them to leave their feedback formally in the survey.



Consultation key figures

More than half of respondents identified as [local business people](#)

92% believe the neighbourhood plan will have a positive impact on St. James's

All policies received a majority answer of "support" from respondents

"I really like the emphasis on protecting the look and style of the local area"

"All very sensible to preserve this lovely part of London"

"The plan seeks to enhance existing heritage and architectural merit whilst seeking to harness and facilitate innovation in the built environment."

Survey Responses

Launched on [June 21st](#), our survey was made available to the St. James's community through our website, a brochure and in-person methods.

The survey requires respondents to read through the 11 policies in the draft plan and for each signal their:

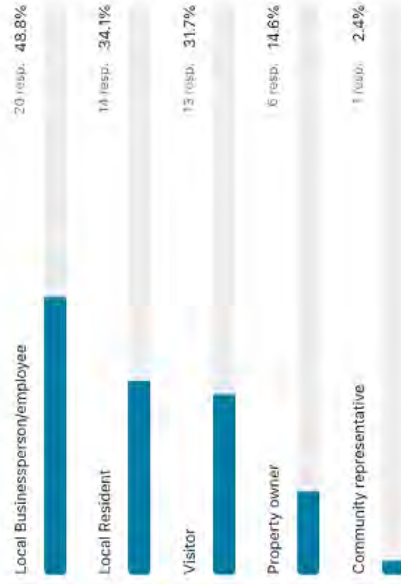
- Support
- Objection or,
- Neither the two

Objectors were invited to explain what about a particular policy they had issue with. People were forthcoming with their thoughts, both in this regard and with raising other ideas for the plan.

In the following slides we will display the responses received to each of these questions and more in the survey.

What is your relationship to the area?

41 out of 41 people answered this question (with multiple choice)



Building Design in St. James's



The plan proposes that all new buildings, conversion and refurbishments in St. James's will be of architectural excellence and should contribute to the local distinctiveness of St. James's. What do you think of this proposal?

41 out of 41 people answered this question.



Character Areas



The Plan has identified separate areas within St. James's that share similar characteristics. These areas will guide development to ensure it is cohesive with the existing spatial environment. What do you think of this proposal?

41 out of 41 people answered this question.



Sustainable Development



The Plan states that environmentally sustainable materials should be used in development works. Building materials should promote a circular economy and aim to be net zero. What do you think of this proposal?

41 out of 41 people answered this question.



1 objection:

"Higher density residential property should be prioritised."

2 objections:

"Each of these areas is already far more heterogeneous than the zoning would suggest. They're maybe a majority style in an area but certainly not a unique one."

"If 'cohesive' means that more such clubs will be concentrated in my area designated 'Duke St, King St', residential life will be made impossible. If having an all-night club means the plan will designate the area as suitable for more of the same, residents' committees will strongly object."

3 objections:

"Removal of the term 'aim". New construction should have to be demonstrably consistent with Net Zero in order to proceed."

"Over emphasis on Zero Carbon."

"These measures have a habit of resulting in viability issues that then effect build quality, the provision of affordable housing and workspace. Further thought should be given to the compatibility of the design excellence/build quality policy and this one."

Roof-top Plant



The Plan will encourage that roof-top plant and clutter is mitigated or located away from any areas it may cause disturbances. Planning proposals will be directed (where possible) to install plant and building infrastructure in basements or enclosed spaces. What do you think of this proposal?

41 out of 41 people answered this question.

Support



Neither support nor object



Object



Traditional Shopfronts



The Plan will ensure that new, restored or adapted shopfronts must be designed in a manner that is complementary to the prevailing character of the area. What do you think of this proposal?

41 out of 41 people answered this question.

Support



Object



Neither support nor object



1 objection:

"Use of sustainable materials should be mandatory for new, restored or adapted shopfronts."

Views



The Plan identifies and aims to protect iconic views in St. James's. Proposals will be expected to respect and enhance these local and metropolitan views. What do you think of this proposal?

41 out of 41 people answered this question.

Support



Neither support nor object



Object



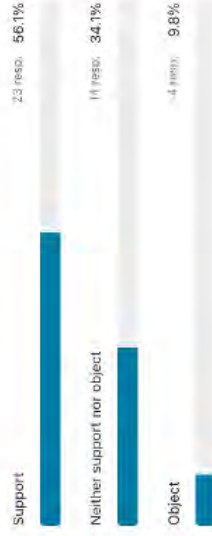
1 objection:

"Views should be a secondary consideration as opposed to a priority."

Hotels

The Plan will allow for new hotel development primarily in commercial areas of St. James's. In areas where there are local residents, proposals must demonstrate how they will mitigate any adverse impact on residential amenity. What do you think of this proposal?

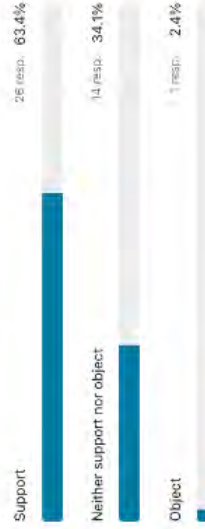
41 out of 41 people answered this question



Private Members' Clubs

The Plan will aim to protect the existence of Private Members' Clubs that occupy some of the most architecturally important buildings in St. James's. PMCs can only be closed if it can be demonstrated that there is no demand for another operator of such a club. What do you think of this proposal?

41 out of 41 people answered this question



Public Realm

Any major development will be required to provide or support the public realm in the immediate vicinity of the site. This includes – but is not limited to – upgrading/repairing public footways or replacing listed and historic street furniture. What do you think of this proposal?

41 out of 41 people answered this question



3 objections:

"I simply cannot understand why another hotel is needed ahead of other uses for the building/spaces in the area."

"Development would be harmful, and mitigation would be inadequate."

"It is already extremely noisy in Duke of York Street, there is no room for any more through/commercial traffic. Leaving only a few hours of rest during summer months when windows need to be open."

1 objection:

"Whilst PMCs represent an important historical aspect of the area, their operations are a matter for their members and trustees I don't see why this plan should be singling out this type of organisation for particular treatment or seen as more advantageous to the area than any other type of organisation. Indeed, given that some clubs still operate outdated and sexist membership policies are they really to be protected and encouraged in this way?"

1 objection:

"The policy needs to account for organisations - charities, not-for-profits etc which wouldn't be able to support public realm works. Also, making developers provide may lead to uncoordinated investment."

Active Travel



The Plan will encourage the facilitation of walking and cycling. New developments should provide new or improve existing infrastructure which supports safe and active travel. What do you think of this proposal?

41 out of 41 people answered this question

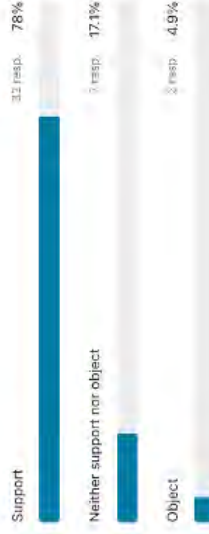


Sustainable Policies



The Plan endorses the sustainable policies as outlined in the Westminster City Plan 2021 and London Plan 2021 in order to reduce emissions and improve bio-diversity. What do you think of this proposal?

41 out of 41 people answered this question



6 objections (sample below)

"We should encourage walking not cycling. I am sick and tired of cyclist riding the wrong way down one way streets and riding on our footpaths"

"I am concerned about the quantity of rental e-bikes, pedal bikes and electronic scooters being deposited in the area. This clutters the pavements and roads and obscures shopfronts."

"A desirable objective-but only if in conjunction with serious measures taken to stop on pavement and against traffic flow cycling"

2 objections:

"We already have effective emissions controls. No need for this policy to be extended here"

"This area has remained sustainable for years. If it ain't broke, don't fix it!"

Other comments on the plan

These quotes are taken from the offer to comment further at the end of the survey.

"More trees and fountains as well as pedestrian roads"

"Clean up alleyways, find ways to stop anti social cyclists riding on pavements, cycling the wrong way - ie on the roundabout the wrong way. Knocking people over on the crossing by Marlborough road."

"More tree and wildflower planting if possible"

"Thanking everybody concerned, always a wonderful place to visit beautifully maintained."

"Further moves towards pedestrianising busy areas"

"Better policing to keep parks pavements safe for all including disabled blind and elderly"

"Please install speed cameras and/or speed bumps on pall mall leading into St. James's street."

"I would like to see an active encouragement system in place for independent shops and galleries. Customers do not come to St. James's for the chain stores. They come for the speciality shops that are only found here"

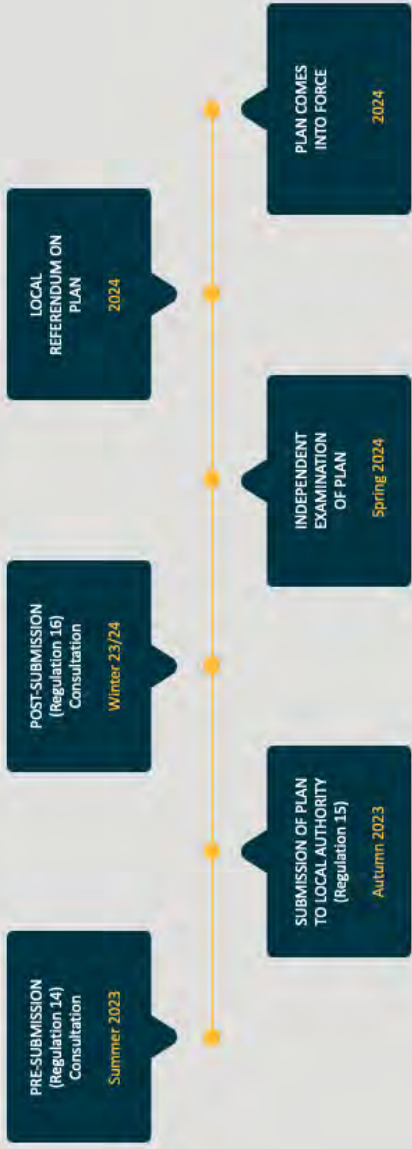
"Really like the emphasis on protecting the look and style of the local area, I hope this extends up above street level"

"Flexibility to allow energy efficiency improvements that are not visible from public spaces, e.g. double glazing in the back of buildings."

"I think [the plan] it has all it needs"

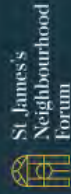
Next Steps

The following is the expected timeline for the progression of the St. James's Neighbourhood Plan

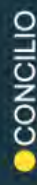


**Thank you
for listening
this evening**

**We will now take any
questions that you
may have**



St. James's
Neighbourhood
Forum



Appendix H – Social media ad

St James's Neighbourhood Forum

Have your say on the
long-term success of St
James's as a place to live,
work and visit



Appendix I – Consultation website

St James's
Neighbourhood
Forum

PROPOSALS ▾

GET INVOLVED

Help shape the future of St James's

The St James's Neighbourhood Forum is developing a Neighbourhood Plan to shape the future of St James's and guide future development and growth in the area up to 2040.

To help the Forum ensure the plan is influenced by local people, we want to hear from you to get your thoughts on how we can ensure the long-term success of St James's as a place to live, work and visit.

Following earlier consultation with the local community and key stakeholders, we are now pleased to present our Draft Plan.

You can read the plan in its latest form by clicking below

READ THE DRAFT PLAN

What is the St. James's Neighbourhood Forum?

The St James's Neighbourhood Forum is open to all residents and businesses in the area. It is the responsible body for monitoring the effectiveness and delivery of the plan and periodically reviewing it to ensure its continued relevance.

The Forum was initially set up by the St James's Conservation Trust and consists of members living and working in the St James's Neighbourhood Plan area.

It comprises residents' representatives, private members clubs, retailers, restaurateurs, office occupiers, The Crown Estate, the St James's Conservation Trust, Heart of Business Alliance, and Ward Councillors.



St James's
Neighbourhood
Forum

What is the Neighbourhood Plan?

Neighbourhood Plans were introduced by the Localism Act 2011, to enable communities to have a say in the development of their areas. The purpose of the Neighbourhood Plan is to guide development within the St James's Neighbourhood Area as well as providing guidance on submitting planning applications.

When made, the St James's Neighbourhood Plan will be used alongside the Westminster City Plan and London Plan to determine planning applications in the area.

The Consultation Process

The latest round of consultation (Reg 14) on the Draft Plan concluded at midnight on September 10th, following a summer of activities to gather feedback from the St James's Community.

We are currently in the process of incorporating the feedback from our Regulation 14 consultation into the Plan in preparation for submission to Westminster City Council. As the Plan continues to progress on its path to adoption by Westminster City Council this website will continue to be updated accordingly.



Character Areas

St James's is an area of exceptional historic and townscape importance. The Plan proposes that development within the area, including refurbishment, which accounts for the majority of development, should adopt an approach that acknowledges and contributes to St. James's tradition of excellence. Additionally, the Plan suggests that high-quality, environmentally sustainable materials should be used, respecting and positively contributing to the local setting.

The Forum has identified distinct differences in character across the Conservation Area and Neighbourhood Area. Character areas have been identified as contributing to the unique character and balance of uses within St. James's.

The designation of these character areas is intentionally flexible, aiming to assist in identifying future development opportunities that will contribute to a cohesive spatial vision.

Roof-top plant

Incremental development and the continued installation of a range of roof clutter and roof-top plant has resulted in many of St James's roof profiles looking untidy and unattractive.

Roof-top locations play an important role in providing green infrastructure which assists with the delivery of biodiversity net gain and pollution mitigation.

The Plan therefore encourages the use of basements, and other enclosed areas, to accommodate plant, where practical and feasible, taking into account the operational nature of the building.





Shopfronts and signage

The Plan proposes that where possible, existing shopfronts should be retained, adapted sensitively and incorporated into new development.

To complement and enhance the cluster of historic shopfronts, the Plan recommends that new shopfronts should draw inspiration from the design of historic shopfronts in the surrounding area.

Views

While there are strategic, long distance views across St James's – which are classified as 'protected vistas' in Westminster City Plan Policy 40, the views that are iconic to St James's are much more localised.

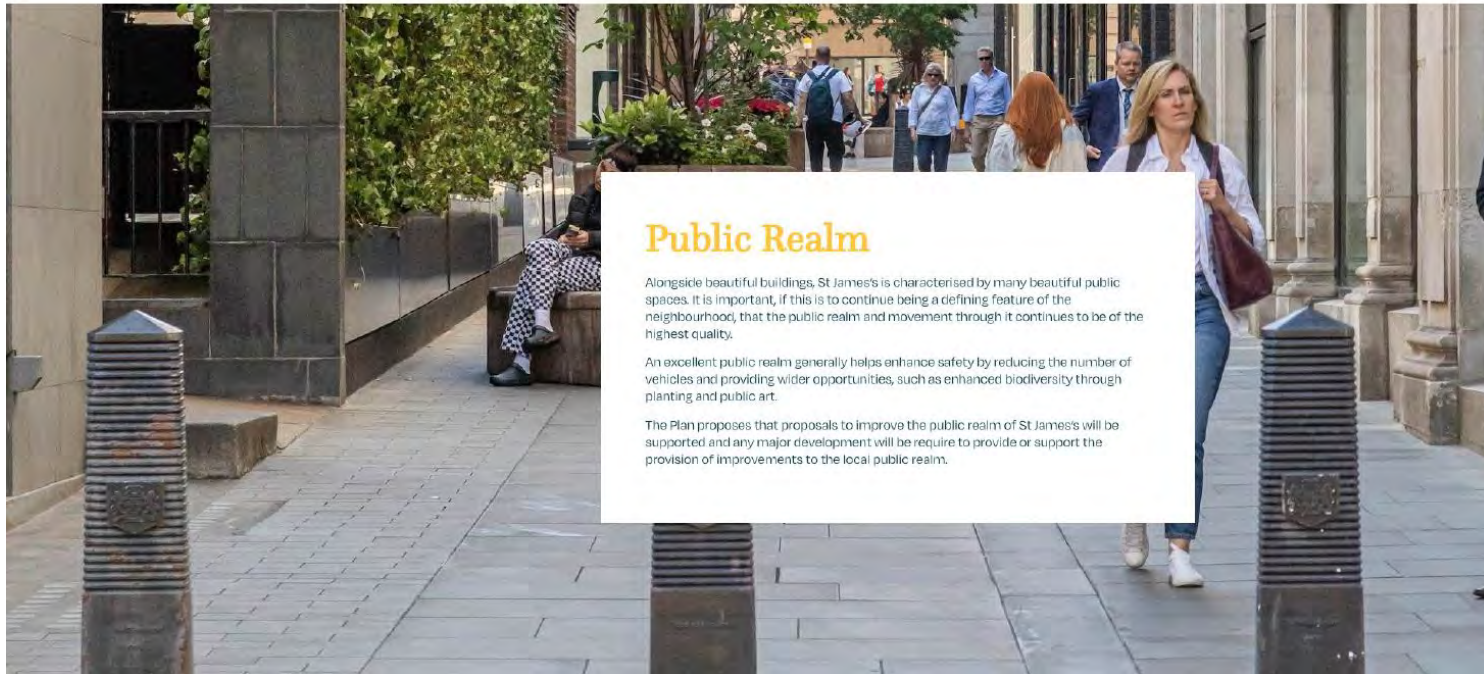
The Plan proposes that development should respect or enhance these views.



Read the Neighbourhood Plan

Read more about the character and design policies in the Neighbourhood Plan

[VIEW ST JAMES NEIGHBOURHOOD PLAN](#)



Public Realm

Alongside beautiful buildings, St James's is characterised by many beautiful public spaces. It is important, if this is to continue being a defining feature of the neighbourhood, that the public realm and movement through it continues to be of the highest quality.

An excellent public realm generally helps enhance safety by reducing the number of vehicles and providing wider opportunities, such as enhanced biodiversity through planting and public art.

The Plan proposes that proposals to improve the public realm of St James's will be supported and any major development will be required to provide or support the provision of improvements to the local public realm.



Pedestrian and cycling movement and connectivity

Encouraging more sustainable modes of transport and travel, including cycle parking, is a key strategic objective of both the London Plan and Westminster's City Plan.

The Neighbourhood Plan proposes that all major development should adhere to the Healthy Streets Approach, promoting safe active travel. Additionally, it recommends that new development should either provide new infrastructure or enhance existing facilities to support this objective.

Read the Neighbourhood Plan

Read more about the public spaces policies in the Neighbourhood Plan

[© VIEW ST JAMES NEIGHBOURHOOD PLAN](#)

Sustainability

Sustainability was identified as important to those in St James's. The sustainability objectives of the Neighbourhood Plan are fully aligned with the policies outlined in the London Plan 2021 and the Westminster City Plan 2021. Within the City Plan, specific policies address sustainability matters that are highly relevant to St James's and are in line with the vision and objectives of the Neighbourhood Plan. These are summarised below and supported by the Neighbourhood Forum.

Local Environmental Impacts

Westminster City Plan Policy 33 says that the City Council will make sure that quality of life, health and wellbeing of existing and future occupiers, and the natural environment are not adversely affected by harmful pollutants and other negative impacts on the local environment.



Green Infrastructure

Westminster City Plan Policy 34 says that Developments will, wherever possible, contribute to the greening of Westminster by incorporating trees, green walls, green roofs, rain gardens and other green features and spaces into the design of the scheme. Developments will also achieve a net gain in biodiversity alongside the planting of trees to optimise the city's canopy cover.

Energy

Westminster City Plan Policy 30 says that the City Council will promote zero carbon development and expects all development to reduce on-site energy demand and maximise the use of low carbon energy sources to minimise the effects of climate change.



Design Principles

Westminster City Plan Policy 38 says that Development is expected to extend the lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design.

Read the Neighbourhood Plan

Read more about sustainability policies in the Neighbourhood Plan

[VIEW ST. JAMES NEIGHBOURHOOD PLAN](#)



Hotels

The plan proposes that new hotel development will be permitted in the predominantly commercial areas of St James's, although new hotels must not come at the expense of residential amenity.

The Plan proposes that any negative impact on residential amenity, especially concerning noise (including late-night activity), odour, deliveries, and servicing arrangements, should be minimised through the provision of a detailed servicing and operational plan.



Private members' clubs

Traditional private members' clubs are an essential part of the character of the Pall Mall and St. James's Street Character Areas where they are particularly concentrated. In 2023, there were 22 private members' clubs in the Neighbourhood Area. The majority of which are traditional, non-profit and non-competitive institutions. It is important that they are distinguished from different businesses such as gambling or night clubs. In 2023, there were 17 private members' clubs in the Neighbourhood Area. The majority of which are traditional, non-profit and non-competitive institutions. It is important that they are distinguished from different businesses such as gambling or night clubs.

The Plan states that proposals that would lead to a loss of the use of existing members' club buildings will only be acceptable where it has been demonstrated that there is no demand for another operator of such a club.

Read the Neighbourhood Plan

Read more about the policies relating to particular uses in the Neighbourhood Plan

[VIEW ST JAMES NEIGHBOURHOOD PLAN](#)

Get Involved

Sign up and
stay up to
date

To stay up to date with the Draft Neighbourhood Plan as it develops and hear about upcoming events first, email info@stjamesforum.com to join our mailing list.


*Any information you choose to provide will be processed in accordance with our Privacy Notice which you should read carefully.



Have your say on the
future of St James's

CONTACT US

 0800 594 9322

 info@stjamesforum.org

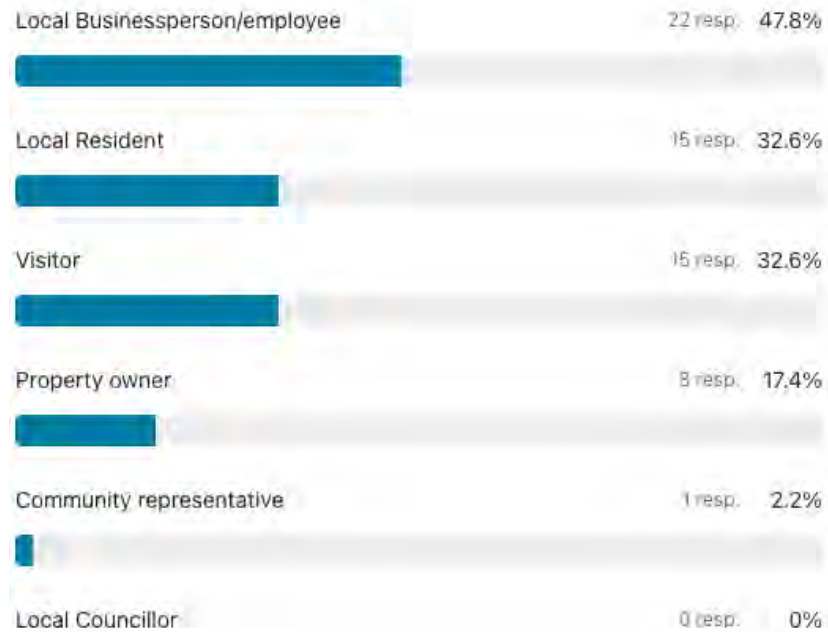
 Freepost address: ST JAMES'S
NEIGHBOURHOOD PLAN
CONSULTATION

Appendix J – Full survey responses

Question 1

What is your relationship to the area?

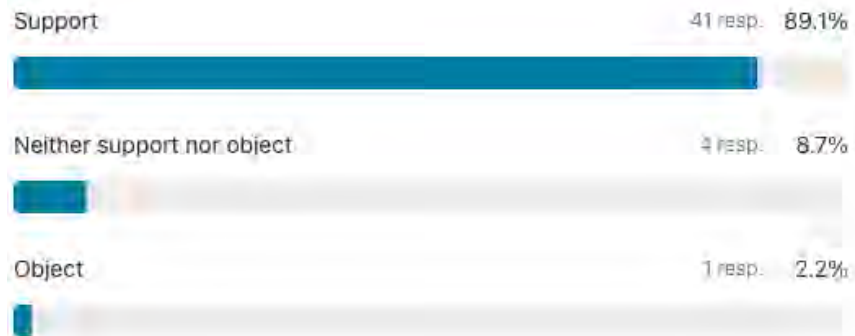
45 out of 45 people answered this question (with multiple choice)



Question 2

The plan proposes that all new buildings, conversion and refurbishments in St. James's will be of architectural excellence and should contribute to the local distinctiveness of St. James's. What do you think of this proposal?

46 out of 46 people answered this question



Comments from those that objected:

“Higher density residential property should be prioritised”

Question 3

The Plan has identified separate areas within St. James's that share similar characteristics. These areas will guide development to ensure it is cohesive with the existing spatial environment. What do you think of this proposal?

46 out of 46 people answered this question



Comments from those that objected:

“Each of these areas is already far more heterogeneous than the zoning would suggest. They’re maybe a majority style in an area but certainly not a unique one.

I am a resident in Duke St. where an all night club, Scotch St James’s, was given permission to operate in Masons Yard. The subsequent noise and anti social behaviour between 3 and 5 am has had a terrible effect on residential life here.

If “cohesive” means that more such clubs will be concentrated in my area designated “Duke St, King St” , residential life will be made impossible.

There are many high end restaurants, pubs in the area but their operating hours respect residential living.

If having 1 all night club means the plan will designate the area as suitable for more of the same, residents committees will strongly object.

Question 4

The Plan states that environmentally sustainable materials should be used in development works. Building materials should promote a circular economy and aim to be net zero. What do you think of this proposal?

46 out of 46 people answered this question



Comments from those that objected:

“These measures have a habit of resulting in viability issues that then effect build quality, the provision of affordable housing and workspace. Further thought should be given to the compatibility of the design excellence/build quality policy and this one.”

“Over emphasis on Zero Carbon”

“Removal of the term "aim". New construction should have to be demonstrably consistent with Net Zero in order to proceed.”

Question 5

The Plan will encourage that roof-top plant and clutter is mitigated or located away from any areas it may cause disturbances. Planning proposals will be directed (where possible) to install plant and building infrastructure in basements or enclosed spaces. What do you think of this proposal?

46 out of 46 people answered this question



Question 6

The Plan will ensure that new, restored or adapted shopfronts must be designed in a manner that is complementary to the prevailing character of the area. What do you think of this proposal?

46 out of 46 people answered this question



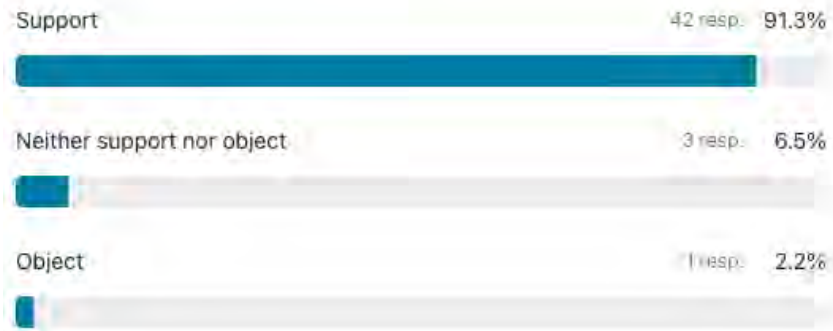
Comments from those that objected:

“Use of sustainable materials should be mandatory for new, restored or adapted shopfronts”

Question 7

The Plan identifies and aims to protect iconic views in St. James's. Proposals will be expected to respect and enhance these local and metropolitan views. What do you think of this proposal?

46 out of 46 people answered this question.



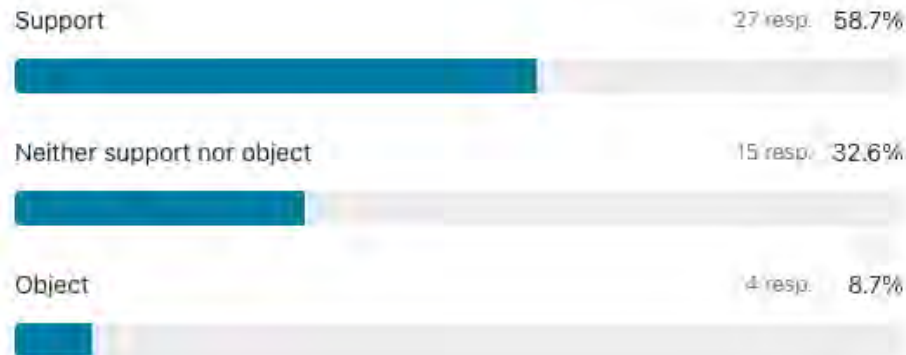
Comments from those that objected:

"Views should be a secondary consideration as opposed to a priority."

Question 8

The Plan will allow for new hotel development primarily in commercial areas of St. James's. In areas where there are local residents, proposals must demonstrate how they will mitigate any adverse impact on residential amenity. What do you think of this proposal?

46 out of 46 people answered this question



Comments from those that objected:

"I simply cannot understand why another hotel is needed ahead of other uses for the building/spaces in the area."

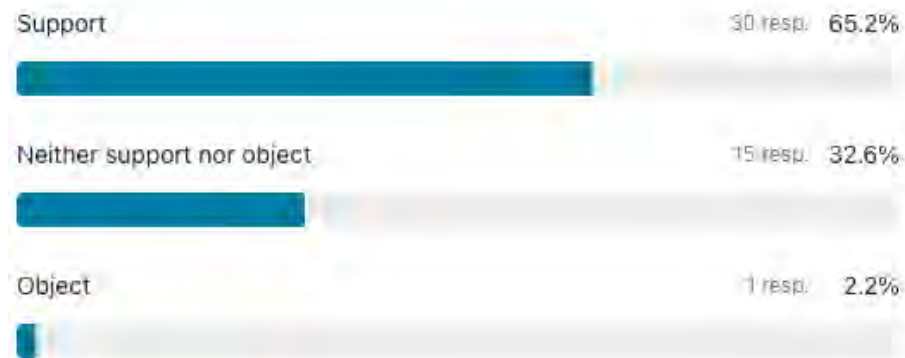
"Development would be harmful, and mitigation would be inadequate."

"It is already extremely noisy in Duke of York Street, there is no room for any more through/commercial traffic - the sound of broken shop windows (bin/bottle collection around 02:30 in the morning) and high pressure water cleaning in Jeremyn Street 05:30 in the morning - leaving only a few hours of rest during summer months when windows need to be open..."

Question 9

The Plan will aim to protect the existence of Private Members' Clubs that occupy some of the most architecturally important buildings in St. James's. PMCs can only be closed if it can be demonstrated that there is no demand for another operator of such a club. What do you think of this proposal?

46 out of 46 people answered this question



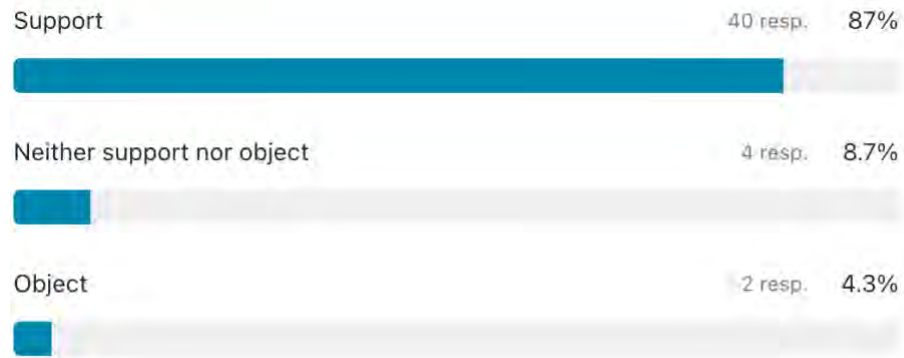
Comments from those that objected:

“Whilst PMCs represent an important historical aspect of the area, their operations are a matter for their members and trustees. I don’t see why this plan should be singling out this type of organisation for particular treatment or seen as more advantageous to the area than any other type of organisation. Indeed, given that some clubs still operate outdated and sexist membership policies are they really to be protected and encouraged in this way?”

Question 10

Any major development will be required to provide or support the public realm in the immediate vicinity of the site. This includes – but is not limited to – upgrading/repairing public footways or replacing listed and historic street furniture. What do you think of this proposal?

46 out of 46 people answered this question



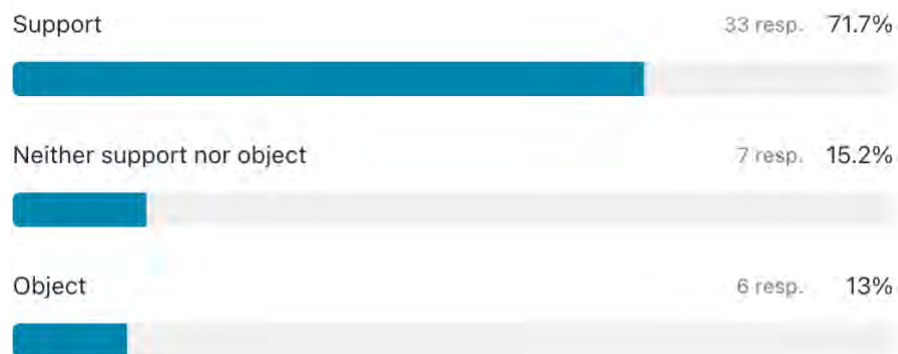
Comments from those that objected:

“The policy needs to account for organisations - charities, not-for-profits etc which couldn't be able to support public realm works. Also, making developers provide may lead to uncoordinated investment.”

Question 11

The Plan will encourage the facilitation of walking and cycling. New developments should provide new or improve existing infrastructure which supports safe and active travel. What do you think of this proposal?

46 out of 46 people answered this question



Comments from those that objected:

"Cyclists often have little or no respect for pedestrians. Older or disabled members of the public may be disadvantaged as walking may be an issue for them"

"London as a whole is having its traffic circulation destroyed for the sake of bicycle lanes . No more restrictions for car /taxi traffic please"

"We should encourage walking not cycling. I am sick and tired of cyclist riding the wrong way down one way streets and riding on our footpaths"

"People need to be able to drive - not everyone is able to walk, carry shopping or use public transport"

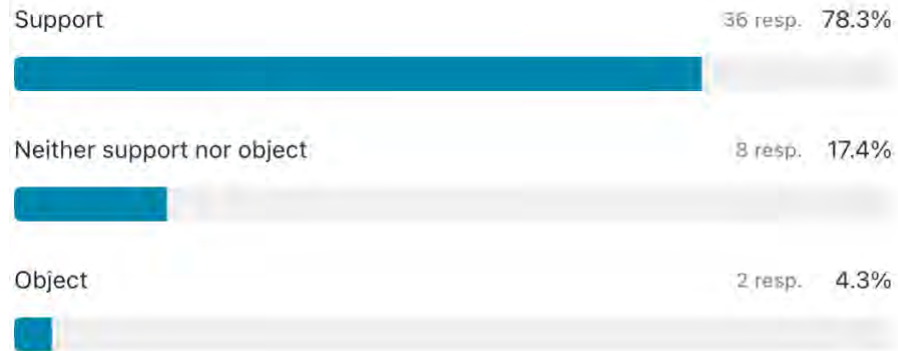
"I am concerned about the quantity of rental e-bikes, pedal bikes and electronic scooters being deposited in the area. This clutters the pavements and roads and obscures shopfronts."

"A desirable objective-but only if in conjunction with serious measures taken to stop on pavement and against traffic flow cu=cycling"

Question 12

The Plan endorses the sustainable policies as outlined in the Westminster City Plan 2021 and London Plan 2021 in order to reduce emissions and improve bio-diversity. What do you think of this proposal?

46 out of 46 people answered this question



Comments from those that objected:

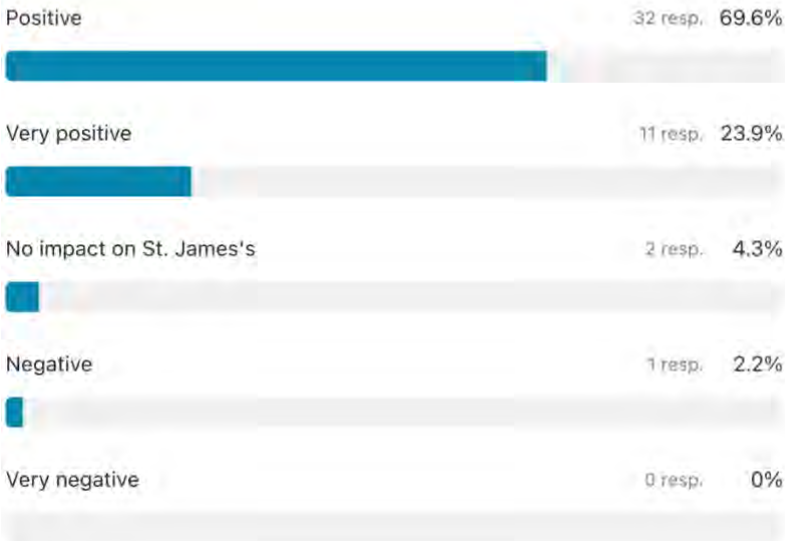
“We already have effective emissions controls .
No need for this policy to be extended here”

“This area has remained sustainable for years.
If it ain't broke, don't fix it!”

Question 13a

Overall, what impact do you think the St. James's Neighbourhood Plan will have on St. James's?

46 out of 46 people answered this question



Question 13b (optional)

Could you explain why you selected your answer?

Very positive

- What I have read confirms my belief that St James's is a special area and needs protection and development to ensure it remains the best for residents and enhances a visitor's experience. We need to keep pavements safe by keeping bikes and scooters off the road and out of the parks.
- All very sensible to preserve this lovely part of London.
- I was born and raised in Pimlico (1946) and grew up with all these beautiful buildings so to stay with the style is perfect. I also enjoy going to Fortnum and Mason's.
- The plan sounds common sense. The survey would have been better if participants could have done more than box ticking.
- "The plan, 'FIRST' considers the existing inhabitants /traders(visitors etc) within the area with regard to their surroundings for future proposed developments, which I think is the fair ,best and morally responsible option. Although economical understanding is required and business must progress for the benefit of all. We all understand (as myself having the good fortune to migrate to living and working in London from Yorkshire since 1983) it is a

Universal fact, that our USP -is the historical, unique and genuine heritage (landmarks etc) that ALL of London offers the world and therefore the historical integrity of London structures must be maintained as much as possible. (or at least future intention must align with the same etc). We pay homage, to our creative ancestral past -cherish and care for it, as it reminds us, of the greatness in ourselves with such achievement and therefore ,encourages and inspires future greatness in its citizens."

- St James's is the best place to live in London. The streets, architecture and spaces have history, beauty and human scale. It is also full of life and variety. A plan that can recognise and perpetuate these qualities, while still keeping the place alive, is to be supported.
- I want the character to stay as it is and the vile buildings from the 60s replaced with classical designs

Positive

- St James's has a unique architectural and social heritage which must be conserved. The policy seems to support this conservation.

- I don't think it will be transformational as many building have already been modified which don't conform to these guidelines but it will help limit future "damage"
- It may make it easier to walk and cycle when visiting the area with children.
- "If all that is proposed in this document is carried out to the letter then yes it should be positive. You are however powerless to address the lawless nuisance of high performance motor cars revving their engines to impress drunken revellers at 03.30, of unlicensed dangerous rickshaws blaring out music and ripping off tourists, of Lime Bikes littering the pavements, of Deliveroo riders cycling the wrong way down streets, of cyclists cycling on the pavement, of food outlets increasing encroachment onto public realm, of the litter of cheap kiosks around Piccadilly Circus one of which ruins the beautiful view down Regents St South from Sherwood St. My own flat has large windows overlooking Eagle Passage. There is a proposal for outside tables for one new fast food outlet, what is to stop all property on Eagle Passage following the same example. Is such an outcome protecting your much vaunted protection of public realm. I'm sure your intentions are admirable but no one is able to address these issues that really do have impact on people's lives."
- Well it all seems to retain its historical / current look
- The Fact that you Mention Eco Surely that is Good For Everybody and the Environment. I Strongly Support this.
- Because I believe the improvements will help the area.

- Some of the questions prompt obvious answers. One important thing : please put speed camera on Pall Mall and St James's street!
- Hopefully not too much change to the beautiful area
- Providing all the building work is in keeping as laid out in the plans
- Prioritisation of public space and pedestrian use
- A more pedestrianised area will be more pleasant to live and work in
- Implementation may take many years to achieve by which time cost or other issues will have had an impact upon proposals
- I think it's key to retain the character of the Neighbour hood if the galleries and shops are to survive . Retail is already struggling because of congestion charges and traffic restrictions . The only reason to come to St.James's is the unique character of its shops, galleries and clubs . If we lose this then why would anyone bother to come ? Just go to a shopping mall outside of London where you can park, not pay congestion charges and the traffic actually flows because someone sensible has designed the road systems.
- Better to have a plan and implement it quickly
- I support all development in westminster as I am business owner in the area last 13 years
- We need to maintain our inheritance in such unique & historic area as the priority. Yes evo friendly but not at the expense of what we are privileged to enjoy & bring income to tourists, UK & international area & not
- Answered based on the understanding that the plan is to ensure a coherent design in the area while improving walkability.

- Difficult to be SO very positive until there is more information forthcoming and clearer plans for the areas involved
- You have to consider residents views ,and keep the area in keeping.
- Retaining the character whilst improving sustainability, biodiversity and active travel can only be a good thing
- The plan seeks to enhance existing heritage and architectural merit whilst seeking to harness and facilitate innovation in the built environment. Good in this respect.
- More coherence would be good. Small local businesses should be cherished.
- All the questions were extremely pre-loaded and give no chance of providing real alternatives or concerns
- I regularly visit this area as my partner attends meetings there. So comforting to be surrounded by so much history. Keep the past alive please.
- "I hope the plan will preserve and not destroy the historic mix of residential properties, art galleries, book shops, high end restaurants, food and clothing shops. I fear that the “cohesion” of types of property could mean “ghetto”. As I said earlier, my immediate area already has 1 noisy, all night club in my designated area, I don't want it to become a ghetto for more. As local policemen no longer patrol our streets, the St James's scheme should strengthen relationships with the excellent environmental / noise/ anti social behaviour team at Westminster Council. Residents and local hotels could be encouraged to support extra patrols during the night, even contribute to funding additional security patrols specifically in St James's. Our streets in St

James's are narrow so the introduction of cycle lanes would make traffic congestion even worse. I hope they won't be introduced here. The current policy of reducing street furniture/ signage has had a welcome visual effect on the area. I hope this minimalistic approach to signage etc will continue. Our local street sweepers do excellent work continuously gathering visitor and commercial refuse during the day. This policy should continue. When a building development taking up to 3 years to complete from demolition to completion, developers should be asked to provide a visually pleasing camouflage masking the work and dust, as they do in Mayfair. Noise from plant which makes a building function is an especially important feature of the proposal. As we no longer have local policemen on the street, could St James's residents and property owners contribute to funding a security guard patrolling our specific area during the night ? I favour any policy which will enhance residential experience - either for apartment residents or hotel visitors."

No impact on St. James's

- What exactly has been proposed? Colouring a few neighbour streets in the same colour - with intention of co-planning... Deal with the A noise pollution in the area, B allow residents access to St James's Square during weekends, C sort out the homeless problem in St James's, D restore St James's Church

original entrance leading down to the Square, E make Pall Mall a alle of cafes and small shops again..on the opposite side of the Clubs :)

Negative

- **No comment left by respondent**

Very negative

- **Not selected by any respondent**

Appendix K – Regulation 14 Focused Consultation launch letter



Dear Sir/Madam,

RE: Launch of St. James's Neighbourhood Plan Pre-Submission (Regulation 14) Focused Consultation

I am pleased to inform you that the St. James's Neighbourhood Forum is launching a limited consultation on two proposed additional policies that have been added to the draft St. James's Neighbourhood Plan. As you may remember the draft Plan was initially consulted on at Pre-Submission (Regulation 14) Stage between July and September 2023. These additions arose as a result of feedback from local consultees, both in the commercial sector and residents during our previous phase of consultation.

To ensure that consultation at the Pre-Submission (Regulation 14) Stage has been undertaken on all policies that the St James's Neighbourhood Forum intends to include in the Submission Stage (Regulation 15) version, it is necessary to undertake a focused Regulation 14 consultation on the new policies that have been proposed.

Two new policies have been proposed as follows:

- Policy STJ9: Energy and Building Fabric
- Policy STJ10: Green Roofs

These new policies are available to read in the attached document. In order to gain your feedback on them we are hosting a limited consultation from 31st May until midnight on the 28th June. In order to leave your feedback you can complete our survey, alternatively you can email, call or send a submission through our freepost:

- **Email:** info@stjamesforum.com
- **Online:** stjamesforum.org
- **Freephone:** 0800 193 0884
- **Freepost:** ST JAMES'S NEIGHBOURHOOD PLAN CONSULTATION (must be in all caps)

Yours sincerely,


Roger Sharpley

Chairman of the St. James's Neighbourhood Forum


Appendix L – Proposed new polices briefing document

St James's Neighbourhood Planning Forum

St James's Neighbourhood Plan 2022-2040



PRE-SUBMISSION
PRESUBMISSION (REGULATION 14)
FOCUSED CONSULTATION
MAY 2024

 St James's
Neighbourhood
Forum

This document presents proposed additions to the St James's Neighbourhood Plan that was initially consulted on at Pre-Submission (Regulation 14) Stage between July and September 2023. These additions arose as a result of feedback from local consultees, both in the commercial sector and residents. In order to ensure that consultation at the Pre-Submission (Regulation 14) Stage has been undertaken on all policies that the St James's Neighbourhood Forum intends to include in the Submission Stage (Regulation 15) version, it is necessary to undertake a focused Regulation 14 consultation on the new policies that have been proposed.

Two new policies have been proposed as follows:

- Policy STJ9: Energy and Building Fabric
- Policy STJ10: Green Roofs

This consultation seeks representations on these two new policies and their supporting text alone. At this time the St James's Neighbourhood Forum is not inviting representations on any other aspects of the plan, all of which were the subject of the previous Pre-Submission (Regulation 14) consultation.

7 SUSTAINABILITY

7.1 Sustainability was identified as important to those in St James's. Local consultation identified a desire for more retro-fitting of buildings, use of solar panels, a coordinated plan to reduce emissions and a focus on maximising biodiversity opportunities, including trees and general planting. Both the London Plan 2021 and the Westminster City Plan 2021 identify the climate and environmental crises as significant issues that planning needs to help address. Both plans have a number of policies covering matters such as sustainable construction, green infrastructure, water provision, overheating, air pollution and renewable energy that seek to address these matters. Following focused consultation with key local business stakeholders the Neighbourhood Plan has focused on providing policy guidance on particular local issues related to sustainability.

Energy and building fabric

7.2 Major interests such as the Crown Estate have committed to leading on environmental and sustainability matters and have set ambitious targets to help contribute to net zero, including decarbonising real estate assets. It is important that such significant stakeholders are assisted by planning policy to optimise carbon savings and maximise sustainability. Specifically there is considered to be a need to encourage use of low carbon technologies which maximise the efficient capture and use of renewable energy. At the present time in many situations, this may be in the form of an air source heat pump. However, this is not always the best solution and the speed of technological change in this field means that it may be superseded by superior technology over the lifetime of the plan. As such, specific solutions are not identified.

7.3 Whilst Westminster City Plan Policy 36 (Energy) requires all major development to be net zero carbon, much development in St James's is below this threshold, often being just refurbishment. The Neighbourhood Plan therefore encourages the use of low carbon technologies for all development that is not classified as 'major'.

7.4 Development which is designed to operate using low energy inputs is important but buildings must also be well insulated to take full advantage of this. Often there is a delicate balance to be struck between taking all opportunities to maximise insulation and ensuring that heritage is not harmed. However, the growing extent and severity of the climate crisis does require urgent action which arguably calls for a shift in the way we view change to our heritage assets. Westminster City Plan Policy 38 (Design principles) expects development to enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design. In recognition of this and the continuing need for development to preserve our heritage, subtle interventions into improving the fabric of buildings are encouraged. In particular, and recognising the improving technology influencing their design, the use of heritage-sensitive slimline double glazing is encouraged in all listed buildings.

POLICY STJ9: ENERGY AND BUILDING FABRIC

- A.** To mitigate emissions that worsen climate change it is essential that all buildings in the St James's Neighbourhood Area minimise energy use and emissions and maximise energy efficiency and the use of renewable energy to meet their needs. All new buildings¹, conversions, extensions, retro-fits and refurbishments² in St James's are encouraged to:
- a.** utilise low carbon technologies which provide energy efficient, renewable sources of energy; and
 - b.** maximise the energy efficiency of the building through the use of appropriate technologies and techniques to maximise insulation of the fabric of a building.
- B.** The sensitive retrofitting of energy efficiency measures in historic buildings will be encouraged, including the retrofitting of listed buildings and buildings in the St James's Conservation Area, provided that it safeguards the historic characteristics of these heritage assets. This could include heritage-sensitive slimline double glazing where it is demonstrated that such interventions would not result in harm to the significance of listed buildings or the character and appearance of the Conservation Area.

Green infrastructure

7.5 The environment crisis is equally significant and closely related to the climate crisis. In major cities, green infrastructure is vital because opportunities to provide it are limited and it performs multiple roles – for enhancing biodiversity, CO₂ reduction, pollution mitigation (noise and air) and cooling. In an area such as St James's, rooftops in particular offer a significant opportunity for green infrastructure provision.

Westminster City Plan Policy 34 (Green infrastructure) requires developments, wherever possible, to contribute to greening by incorporating trees, green walls, green roofs, rain gardens and other green features and spaces into the design of the scheme.



¹ This excludes major development (as defined in the NPPF) which is addressed by Westminster City Plan Policy 36 (Energy)

² Where planning permission is required

- 7.0 What is particularly important about the relatively novel solution of greening hard spaces is that they are designed to endure and with relatively little maintenance.

POLICY STJ10: GREEN ROOFS

The provision of green infrastructure on roofs is encouraged. In order to ensure that these green assets are technically feasible and commercially viable and can thrive over the long term, development proposals are encouraged to:

- a. provide the maximum practicable coverage;
- b. include a clear planting plan demonstrating resilience to disease, pests and climate change;
- c. include a watering system, particularly where this utilises rainwater harvesting techniques to minimise mains water usage;
- d. comply with all relevant structural design requirements;
- e. incorporate a contingency strategy for failure to ensure that the fabric of the building is not damaged if the planting fails or is not properly maintained; and
- f. be designed to ensure low maintenance effort and cost and, where possible, be visible in whole or part from the public realm to capture associated wellbeing benefits.

Appendix M – Regulation 14 Focused Consultation survey

1 → What is your relationship to the area?*

Please select all that apply

Choose as many as you like

- A Local Resident
- B Local Businessperson/employee
- C Local Councillor
- D Visitor
- E Community representative
- F Property owner

OK press Enter ↵

3 → Policy STJ9 will encourage that all new buildings, conversions, extensions, retro-fits and refurbishments utilise low carbon technologies and maximise energy efficiency of buildings. Additionally, sensitive retrofitting of energy efficiency measures in historic buildings will be encouraged

What do you think of this proposal?*

- A Support
 - B Neither support nor object
 - C Object
- OK**

POLICY STJ9: ENERGY AND BUILDING FABRIC

A. To mitigate emissions that worsen climate change it is essential that all buildings in the St James's Neighbourhood Area minimise energy use and emissions and maximise energy efficiency and the use of renewable energy to meet their needs. All new buildings¹, conversions, extensions, retro-fits and refurbishments² in St James's are encouraged to:

a. utilise low carbon technologies which provide energy efficient, renewable sources of energy; and

b. maximise the energy efficiency of the building through the use of appropriate technologies and techniques to maximise insulation of the fabric of a building.

B. The sensitive retrofitting of energy efficiency measures in historic buildings will be encouraged, including the retrofitting of listed buildings and buildings in the St James's Conservation Area, provided that it safeguards the historic characteristics of these heritage assets. This could include heritage-sensitive slimline double glazing where it is demonstrated that such interventions would not result in harm to the significance of listed buildings or the character of the St James's Conservation Area.

4 → The Plan will encourage the provision of green infrastructure on roofs. In order to ensure that these green assets are viable, Policy STJ10 encourages planning proposals to include a series of considerations in any proposals for green roofs.

What do you think of this proposal?*

- A Support
- B Neither support nor object
- C Object

OK

POLICY STJ10: GREEN ROOFS

The provision of green infrastructure on roofs is encouraged. In order to ensure that these green assets are technically feasible and commercially viable and can thrive over the long term, development proposals are encouraged to:

- a. provide the maximum practicable coverage;
- b. include a clear planting plan demonstrating resilience to disease, pests and climate change;
- c. include a watering system, particularly where this utilises rainwater harvesting techniques to minimise mains water usage;
- d. comply with all relevant structural design requirements;
- e. incorporate a contingency strategy for failure to ensure that the fabric of the building is not damaged if the planting fails or is not properly maintained; and
- f. be designed to ensure low maintenance effort and cost and, where possible, be visible in whole or part from the public realm to capture associated wellbeing benefits.

Powered by Typeform

5 → Do you have any other comments on these new policies?

Type your answer here...

Shift ⌘ + Enter ↵ to make a line break

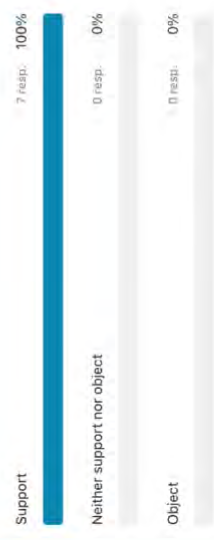
Submit

press Cmd ⌘ + Enter ↵

Appendix N – Full feedback summary

Energy and Building Fabric

?
Policy ST19 will encourage that all new buildings, conversions, extensions, retro-fits and refurbishments utilise low carbon technologies and maximise energy efficiency of buildings. Additionally, sensitive retrofitting of energy efficiency measures in historic buildings will be encouraged. What do you think of this proposal?



No objections

Further thoughts

?
Do you have any other comments on these new policies?

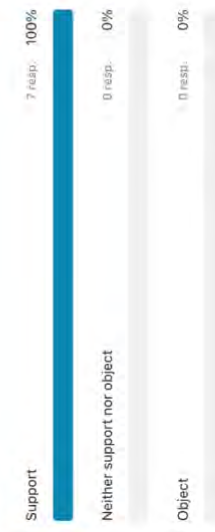
Two comments:

"Stop knocking down sound buildings, just to put up a new structure save the fronts keep our heritage."

"Support for bees and wildlife integrated in these green rooftops would be good"

Green Roofs

?
The Plan will encourage the provision of green infrastructure on roofs. In order to ensure that these green assets are viable, Policy ST110 encourages planning proposals to include a series of considerations in any proposals for green roofs. What do you think of this proposal?



No objections

Appendix O – Regulation 14 Stakeholder representation and responses

Respondent	Policy/para	Summary of rep	Suggested response	Amendment to Plan
Westminster City Council	Vision & objectives	General: further detail about with whom the Forum consulted, and what form this consultation took, when preparing the vision needs to be included.	Noted. This has been addressed but is principally explained in the Consultation Statement.	Para 3.1 amended.
Westminster City Council	Vision & objectives	There is nothing about the environment or sustainability in the vision, but the Plans' objectives include an objective about sustainability.	Noted. The vision has been expanded.	Vision amended.
Westminster City Council	STJ1	For clarity, the policy should be reworded to "should be" rather than "will be".	Disagree. The City Plan uses will be and therefore it is unclear why the intention of a neighbourhood plan should be different.	No change
Westminster City Council	STJ1	The bullet points could be merged slightly, as they are repetitive. It may be helpful to have one that focusses on character areas and the design of buildings; and another that focuses on the use of sustainable materials. The last paragraph could be improved by explicitly encouraging materials which have a low embodied carbon.	Agreed	STJ1 amended
Westminster City Council	STJ1	It would be helpful for "net-zero waste" to be defined, as it is a novel term.	Noted. An alternative approach has been taken.	STJ1 amended
Westminster City Council	Para 4.6	Bullet point 1: It may be more appropriate to identify specific "lost" building which the Forum would like to see restored, assuming that the Forum has specific buildings in mind. If there are not particular building/s in mind, then it is recommended that this line is removed.	Noted. This point has been deleted.	

Westminster City Council	Para 4.6	Bullet point 2: Instead of promoting primary or relevant façade retention (and by implication, demolition behind these retentions), it may be more appropriate to promote high-quality retrofits which can improve older buildings performance and support them in being fit for purpose for contemporary uses.	Agreed	Para 4.6 amended
Westminster City Council	Para 4.6	Bullet point 3: Again, rather than encouraging demolition and redevelopment – which is a carbon intensive form of development and can also have negative impacts on heritage assets, it may be more in line with the plans’ objectives (and the council’s policy approach) to support high quality deep retrofits which improve the appearance of buildings.	Agreed	Para 4.6 amended
Westminster City Council	Para 4.6	Bullet point 4: It may be helpful to elaborate as to why the BP Building is a good example	Noted. Further explanation has been provided.	Para 4.6 amended
Westminster City Council	STJ2(A)	There is a concern that the wording of this policy may encourage basement development purely for the construction of plant equipment. Basement construction is extremely disruptive, costly and generally carbon intensive and may not be appropriate for new buildings. Re-wording to state the “use of existing basements” may be more appropriate. Alternatively, encouraging the internal placement of plant (rather than in basements specifically) could achieve the policy aims without creating this difficulty. This may contradict the City Plan’s policy 45.	This point is acknowledged and agreed	STJ2(A) amended

Westminster City Council	STJ2(B)	The term “sensitive receptors” is usually used to refer to potential noise related amenity issues. It is unclear what sensitive receptors could be for tanks/tank rooms, satellite dishes, radio aerials, telecommunications infrastructure, lightning rods. It would be more appropriate to separate design and potential noise issues. For example, refer to roof top equipment which has a detrimental impact on visual amenity/townscape, and encourage visual screening, and refer to noise generating equipment separately.	This point is acknowledged and agreed	STJ2(B) amended
Westminster City Council	STJ2	It should also be noted that some of these items do not always require express planning permission, and so the policy should clarify “Where planning permission is required for these items...”.	This point is acknowledged and agreed	STJ2(A) amended
Westminster City Council	STJ2	There is also a concern that the policy will restrict the installation of low energy heating systems, such as air-source heat pumps, which require a certain amount of air-flow to operate optimally. There is concern that this may conflict with the council’s strategic City Plan Policy 36, and so the Plan’s policy will need to be amended to reflect this.	STJ2(A) is clear that the siting of plant in an internal space [amended wording] should only occur ‘where practical and feasible’. If this is not possible for a heat pump (because it would cause over-heating and therefore be in breach of City Plan Policy 36) then it will not be required to be located internally.	No change
Westminster City Council	STJ2(B)	City Plan Policies 33 and 40 already require noise and visual mitigation measures, where this is considered appropriate to prevent townscape impacts or mitigate local environmental quality – it is unclear therefore if this policy is necessary. The policy could be refined to just add local specificity by requiring that where screening is provided it should (rather than just encourage) be part of a rooftop green infrastructure provision.	This point is acknowledged and agreed	STJ2(B) amended

Westminster City Council	Para 4.10	The current reasoned justification goes beyond the policy wording by stating that development “ <i>should, where appropriate, look to incorporate the provision of roof-top green infrastructure</i> ”. Consider the amendment suggested above to bring the policy in line with this text.	This point is acknowledged and agreed	Para 4.10 amended
Westminster City Council	STJ3(A)	The policy wording is slightly contradictory, in that new shopfronts must be complementary, while contemporary are to be sympathetic.	It is acknowledged that the use of the word 'complementary' is misleading and should be amended. However, it is perfectly possible for contemporary design to be sympathetic to more traditional existing designs. The fact that something is contemporary in design does not mean it must look and feel different from existing features.	STJ2(A) amended
Westminster City Council	STJ3(A)	It may be helpful for the Plan to provide examples of high quality contemporary shopfronts within the Area as exemplars, alongside the historic examples shown.	Noted. Examples have been provided.	
Westminster City Council	STJ3(B)	It is recommended that this policy is reworded to be positive, for example: “Where recessed shopfronts are proposed, these should be designed to minimise anti-social behaviour”.	This point is acknowledged and agreed	STJ3(B) amended
Westminster City Council	STJ4	The policy text lists the views as being in Figure 4, so there is no need to list the views in the policy text.	Agreed although for ease of reference, the name of each view will be provided following Figure 4.3.	STJ4 amended

Westminster City Council	STJ5	City Plan Policy 15 covers hotels and restricts their location to commercial areas of the CAZ. The City Plan does welcome (in para 13.7 and 14.25) that Neighbourhood Plans support the identification of predominantly residential areas of the CAZ, however it is expected that this should be supported by local evidence. Evidence justifying the designation of these areas must be provided, this could take the form of a surveys showing the concentration of residential uses (and in particular ground floor level residential) in particular areas.	This point is acknowledged and agreed	STJ5 amended
Westminster City Council	STJ5	It may also be advisable to include a caveat that these are the predominantly residential areas that have been identified at the time of the Plan's making, and that the Plan supports other areas of the Neighbourhood Area being identified as residential in future decisions – the policy needs to acknowledge that the city will change.	Given the response to the previous representation, this is no longer relevant.	
Westminster City Council	STJ5	Serving and operational plans are already required by the City Plan – there is no need to repeat it.	This point is acknowledged and agreed. The policy will be adjusted to be more precise about the nature of the issue and the way in which development must address this.	STJ5 amended

Westminster City Council	STJ6	<p>There is concern that this policy may have several unintended consequences:</p> <ul style="list-style-type: none"> - firstly, one of the justifications of the policy is to prevent vacancy, yet the planning system cannot prevent a business from abandoning or leaving a site. The 12 month marketing period would mean that in this situation the building would have to remain vacant for 12 months before any other use could occur. - secondly, while the traditional members' club that operate in St James's are distinct from gambling or night clubs, many other clubs across Westminster do operate in a manner which could be described as more akin to a nightclub (especially more recently founded clubs). The vacancy policy may encourage these newer operators to take up one of the historic buildings in St James's, which may not have an appropriate design to contain noise from internal activity from these uses. As there would be no land use change, it would be difficult to control the amenity harm from this outside of environmental health legislation. <p>It is therefore recommended that the policy is re-worded to encourage development which supports the retention of clubs with a historic link to the area, and it may be a more effective way to support these clubs to promote development which can help these traditional clubs to continue to operate, rather than prevent a change of use. This is especially the case given the concerns raised in para 5.8 about ensuring clubs can adapt to changing needs.</p>	This point is acknowledged and agreed	STJ6 amended
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Westminster City Council	STJ7	The policy doesn't add too much to the existing City Plan/ London Plan approach. Unless the policy focus on issues specific to St James's, the Forum should consider its deletion.	Noted. The locally specific detail was included in Appendix B so this has been brought into Policy STJ7.	STJ7(A) amended
Westminster City Council	STJ7(B)	Major development is already required to contribute towards public realm, and also does this through CIL payments. This requirement is therefore unnecessary. It may be better for the policy to simply state that public realm improvements identified as a priority are: a- f	This point is acknowledged and agreed	STJ7(B) amended
Westminster City Council	STJ7(B)	The carbon cost of materials is an important consideration, and this should have greater emphasis in the Plan rather than just referring to sustainability.	This point is acknowledged and agreed	STJ7(B) amended
Westminster City Council	Appendix A, para 5.4	Street clutter: this is mentioned a few times, including in the character area appendices. The council support the removal of clutter, however there is some concern over the plan's definition of clutter, which includes cycle stands and signage. Essential street furniture (signage), and items which support highways functions (cycle stands) should be removed from any definition of street clutter.	This point is acknowledged and agreed	Para 5.4 in Appendix A amended
Westminster City Council	Para 6.3	The data used to support this statement is from 2008. More recent data is needed. It is also important to note that cycle storage is not street clutter.	Noted. This reference has been removed.	Para 6.3 amended
Westminster City Council	Para 6.4	York stone is usually sourced in Yorkshire and does not usually have ethical issues related to its sourcing (although replicas can) – so it should be clarified that alternatives to Yorkstone should be ethically sourced and have a low carbon impact.	This point is acknowledged and agreed	Para 6.4 amended

Westminster City Council	STJ8	The wording of this policy needs to state “All major development involving alterations to the public realm should adopt...”. Major schemes without any new highway creation would struggle to adopt the Mayor’s Healthy Streets’ approach, which is public realm/highway specific guidance.	This point is acknowledged and agreed	STJ8(A) amended
Westminster City Council	STJ8	The City Plan already requires development to provide facilities for active travel, so the Forum should consider its deletion.	Noted. However, this is not specific. The Neighbourhood Plan seeks to identify specific priorities. These were included in Appendix B so have been brought into Policy STJ8.	STJ8(A) amended
Westminster City Council	Sustainability	It is recommended that a policy is introduced in this section to compliment the City Plan, and provide locally specific guidance – for example support for retrofitting historic buildings, or installing low-carbon technologies. Alternatively, this section could set out how NCIL could be spent on improving low-carbon/sustainable initiatives in the area, and highlighting the policies in the Plan that contribute towards sustainability. Listing City Plan policies is not necessary, and this approach is not taken elsewhere in the Plan.	This point is acknowledged and agreed	Sustainability section enhanced through inclusion of new policies.
The Crown Estate	Energy and Sustainability	We consider that the Neighbourhood Plan could do more to encourage low-carbon solutions for development. Specifically, we consider that a policy could be included which encourages the use of heat pumps and other low-carbon technologies to remove the need for the use of fossil fuels in buildings.	This point is acknowledged and agreed	New policy included to address energy and building fabric

The Crown Estate	Biodiversity	We consider that the Neighbourhood Plan could also include a policy which encourages solutions to incorporate greening into the built environment. Any such policy would obviously need to be complementary to policies within the development plan, and the emerging biodiversity net gain regime.	This point is acknowledged and agreed	New policy included to address green roofs
The Crown Estate	Amenity roof space	We consider that it would be appropriate for the Neighbourhood Plan to include a policy encouraging the provision of amenity roof spaces, where appropriate. This could include guidance as to when such space would be likely to be acceptable in principle, and what matters an applicant would need to consider in bringing forward any proposals.	This point is acknowledged and agreed	STJ2 amended
Knightsbridge NF	STJ2	The policy is encouraged to go further to recognise that balconies or terraces are generally unsuitable as locations for 'plant and machinery' (such as air conditioning units and heat pumps), which should be hidden from street view in and adjacent to Conservation Areas and listed buildings.	This point is acknowledged and agreed	STJ2(A) amended
Knightsbridge NF	STJ7	You might consider discouraging formally the placing of new telecom or other infrastructure in the public realm in St James's and include controls on advertising.	Telecoms is already addressed in STJ7(B)(g). It is agreed that this could be extended to advertising.	STJ7(B) amended
Knightsbridge NF	Sustainability	The SJNP is invited to consider the inclusion of a 'Sustainability Charter' such as that in the Belgravia Neighbourhood Plan, which has recently reached examination stage.	This point is acknowledged and agreed	STJ1 amended
Knightsbridge NF	Zero air emissions	The SJNP is encouraged to use the SJNP to push for development to achieve zero air emissions locally and ensure no further deterioration in local air quality, including during construction.	This point is acknowledged and agreed	Included in new policy on energy and building fabric

Knightsbridge NF	Sustainability	Please support the use of heritage sensitive slimline double glazing, including in listed buildings, to help reduce high-energy losses in Westminster.	This point is acknowledged and agreed	Included in new policy STJ9
Knightsbridge NF	Engagement	The SJNP emphasises the importance of effective engagement with the community by development. It is encouraged to create a best practice guidance for this which could be referred to in the SJNP.	This point is acknowledged and agreed	Include new section on community engagement
London HQ	Section 2	Section 2 of the draft, addressing St James's today would benefit from the inclusion of a plan showing the mix and balance of land uses to be found within the area, also highlighting clusters of current business activity, community uses, al fresco, as well as streets and spaces suited for well managed events and curation.	In practice, this is a major piece of work and it is unclear how it would directly benefit the policies in the plan.	No change
London HQ	Vision & objectives	The vision for St James's drafted in paragraph 3.1 is supported. The inclusion of 'Trafalgar Square' could be added to the areas characterized as high intensity.	This point is acknowledged and agreed	Vision amended.

London HQ	Vision & objectives	The objectives drafted in paragraph 3.2 are supported. Additionally, the inclusion of support for 'high quality contemporary design and architecture incorporating public art and climate resilient greening' is seen as beneficial to ensure that new development responds to the five objectives listed.	High quality design is already included. Focusing this on contemporary design would not reflect the views of businesses and the community. Whilst public art is supported, it is a specific solution to address several of the objectives rather than a specific objective. The point about climate resilience is acknowledged and agreed.	Objectives amended
London HQ	STJ2	Draft policy STJ2 should encourage the removal of redundant roof top plant and clutter. Opportunities to tidy up roofscapes should be a clear aspiration of the policy and encourage where practical and feasible roof top greening, subject to residential amenity considerations.	This point is acknowledged and agreed	STJ2(B) amended
London HQ	STJ3	Draft policy STJ3 should also cover other features such as tables and chairs, heaters and planters to provide clear guidance as to the design standards to be followed for ground floor uses.	Westminster City Plan Policy 43 already addresses proposals for trading extending into the street. This specifically identifies tables and chairs but would also extend to heaters and planters.	No change
London HQ	STJ4	Draft policy STJ4 and accompanying figure 4.2 should note the long-distance views towards the neighbourhood area from Trafalgar Square, referencing WCC assessment of adjacent local conservation area townscape views.	From review of the Trafalgar Square Conservation Area Audit, it is unclear how views from Trafalgar Square could be impacted by development within the neighbourhood area.	No change
London HQ	Para 5.2	Para 5.2 should make mention of the adjacent Nordbank and Whitehall BIDs, in addition to the Heart of London Business Alliance (HOLBA)	This is acknowledged but it is more suitable to reference the bids in Section 6.	Para 6.1 amended

London HQ	Para 5.8	<p>Para 5.8, related to private members clubs would be benefit from clarification. It is understood and appreciated that the needs and requirements of private members clubs and the buildings in which they are housed continues to evolve. It would be beneficial if these needs were further explained in summary from a physical, environmental and social perspectives. For example, what are the changes that need to be accommodated over the duration of the plan period and how will the Neighbourhood Plan policies respond positively to these, to enable the private members clubs to plan for their future?</p>	This point is acknowledged and agreed	STJ6 amended
London HQ	New policy	<p>Aligned to the above, the draft plan would benefit from the inclusion of a policy on freight, servicing and deliveries with the aim to reduce the impact of these traffic movements on the public realm and environmental quality of neighbourhood streets. Opportunities for increased freight and waste consolidation between similar uses (e.g. restaurants, bars, hotels and private members clubs) should be encouraged and greater use of timed hours for deliveries sought to create a safer place for all users.</p>	It is considered that this is addressed in detail by City Plan Policy 29 and that there is little scope for the local specificity required to justify a policy in the neighbourhood plan. The matters raised of better consolidation and timed hours are not specifically planning matters.	No change
London HQ	Para 6.6	<p>Para 6.6 of the draft plan refers to the Community Infrastructure Levy (CIL). The Neighbourhood Forum may wish to set out the percentage of CIL receipts that could be applied for in the absence of a Neighbourhood Plan.</p> <p>The position in the absence of adoption of a neighbourhood plan should also be included to ensure that the revenues generated by the levy are accurately explained and to allow discussions with Westminster City Council to proceed over the availability of funding for expenditure.</p>	This point is acknowledged and agreed	Para 6.6 amended

London HQ	New policy	The BIDs are actively working to promote opportunities for area greening and sustainable development, in line with the City Council's Sustainable City Agenda. We would recommend including a policy to strongly promote and enhance Green Infrastructure across the neighbourhood strengthening local biodiversity, green cover and climate resilience. The draft plan should also acknowledge the Wild West End Vision and objectives along with those of Westminster City Council and other area partners and stakeholders in relation to green infrastructure provision and enhancement.	It is considered that the promotion and enhancement of green infrastructure is addressed in detail by City Plan Policy 34. However, the amended neighbourhood plan will address green infrastructure on roof spaces in more detail.	No change
London HQ	Appendix A, para 9.2	Appendix A, para 9.2 would benefit from inclusion of a mention of Cockspur Street and Spring Gardens and the business cluster (including offices, cafes, restaurants and hotel) found in this southeastern portion of the character area.	This point is acknowledged and agreed	Appendix A, para 9.2 amended
London HQ	Appendix A, para 9.2	The ease of ability to reach Whitehall and the St James's Park would also benefit acknowledgement in para 9.2.	This point is already addressed in para 9.4	No change
London HQ	Appendix B	It is felt that Appendix B of the draft Neighbourhood Plan (Funding Priorities for CIL Payments) would benefit from an indication of funding priorities for CIL projects.	It is not considered appropriate at this stage to prioritise these projects as in practice this is very difficult and may be influenced by the level of CIL receipts at any point in time.	No change

London HQ	Appendix B	<p>We would also like to suggest the inclusion of two additional projects relevant to 'The Mall, Carlton Gardens and Carlton House character area -</p> <p>(i) An area wayfinding project linked to the Whitehall BIDs Hidden Gems Trail as set out in the BIDs Public Realm Strategy – People Wanted, and;</p> <p>(ii) Improvements to the character areas focused around improvements to the pedestrian experience of Cockspur Street, Pall Mall East and Spring Gardens connecting to the Mall.</p>	The Forum welcomes additional project proposals which can be added to Appendix B.	Appendix B amended
TfL	STJ8(D)	<p>While we agree that cycle parking should be accommodated on site wherever possible, short stay cycle parking for visitors should be located so that it is easily accessed from the street. Reference could also be made to the application of London Plan standards for cycle parking including guidance in the London Cycling Design Standards. We suggest the wording should be amended to read 'For private development, secure cycle parking should be provided within the site boundary in line with London Plan standards.'</p>	The purpose of the policy is to encourage internal storage - being the safest kind - for regular users of buildings (i.e. for long stay users). It is acknowledged that provision needs to meet the London Plan standards and that visitor parking needs to be accessible.	STJ8(D) amended
TfL	Section 8, Appendix B	<p>TfL's Strategic Cycling Analysis has identified a north-south top cycling potential corridor from St James's Park to Mayfair. It would be useful to reference this as an aspirational cycling route in the Neighbourhood Plan. The potential for an east west cycling corridor avoiding Piccadilly could also be explored.</p>	This point is acknowledged and agreed	STJ8 and Appendix B amended

TfL	Section 8, new policies	The St James neighbourhood area is a very important one for London's bus network and a number of streets in the area include essential bus infrastructure such as stops, stands and priority measures. We would therefore welcome recognition in the Neighbourhood Plan of the area's significance for the capital's bus network and a policy that aimed to protect and enhance bus infrastructure and provided mitigation for any impacts during construction works. This could be linked to a policy that sought to reduce the negative impact of private vehicles on the area and encouraged reallocation of street space to active travel and public transport. Redevelopment and public realm works can provide the opportunity to improve facilities for pedestrians, cyclists and bus users as part of wider public realm projects, reduce the impact of private vehicles and assist bus operations.	Whilst the points are acknowledged, it is not clear how any policy could be sufficiently locally specific to avoid duplicating City Plan Policies 24 and 26.	No change
TfL	Appendix A, para 5.4	Waterloo Place is currently a very large area of asphalt and acts as a severance point for cyclists and pedestrians. Further improvements in this location would be supported in principle. However we would not support removal of cycle parking or the cycle hire docking station unless suitable alternative locations could be found.	This point is acknowledged and agreed	Appendix A, para 5.4 amended
TfL	Appendix B	Haymarket represents a major severance point between Leicester Square and St. James's. There is scope to make this street far easier to cross as a pedestrian and a cyclist.	This point is acknowledged and agreed	Appendix B amended



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