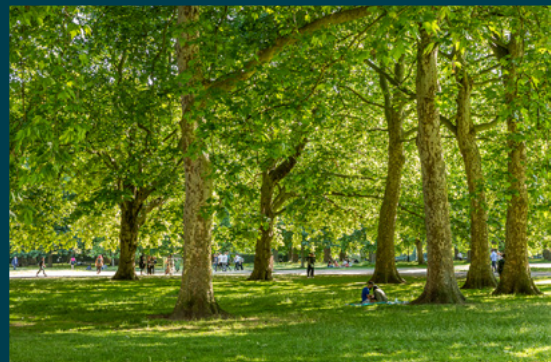


ST JAMES'S NEIGHBOURHOOD PLANNING FORUM

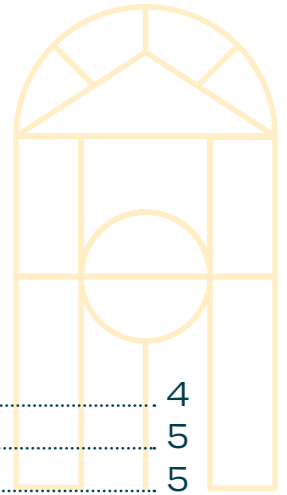
# St James's Neighbourhood Plan 2022-2040



**SUBMISSION**  
(REGULATION 16) CONSULTATION VERSION  
OCT 2024



St James's  
Neighbourhood  
Forum



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# Introduction

## 1. Introduction

### Purpose of the Plan

- 1.1** This document represents the Neighbourhood Plan for St James's for the period 2022-2040. The Plan contains a vision for the future of St James's and sets out clear planning policies to realise this vision.
- 1.2** The principal purpose of the Neighbourhood Plan is to guide development within the St James's Neighbourhood Area towards achieving its objectives. It also provides guidance to anyone wishing to submit a planning application for development within the Neighbourhood Area. The process of producing a plan has sought to involve the community as widely as possible. The different topic areas are reflective of matters that are of considerable importance to St James's, its residents, businesses and community groups. This is framed within the context of St James's heritage, infrastructure and day-to-day activities. Of particular relevance is the location of the neighbourhood area within the London Plan's Central Activities Zone (CAZ), defined as 'the vibrant heart and globally-iconic core of London'<sup>1</sup>.
- 1.3** Some of the Neighbourhood Plan policies are general and apply throughout the Plan area, whilst others are site- or area-specific and apply only to the appropriate areas illustrated on the relevant map. Nevertheless, in considering proposals for development, Westminster City Council will apply all relevant policies of the Plan. It is therefore assumed that the Plan will be read as a whole, although some cross-referencing between Plan policies has been provided.
- 1.4** The process of producing the Neighbourhood Plan has identified a number of actions and spending priorities which have been presented separately to the policies. This is because these are not specifically related to land use matters and therefore sit outside the jurisdiction of a Neighbourhood Plan. These actions and spending priorities will be addressed by the St James's Neighbourhood Forum outside of the Neighbourhood Plan process.

### Policy context

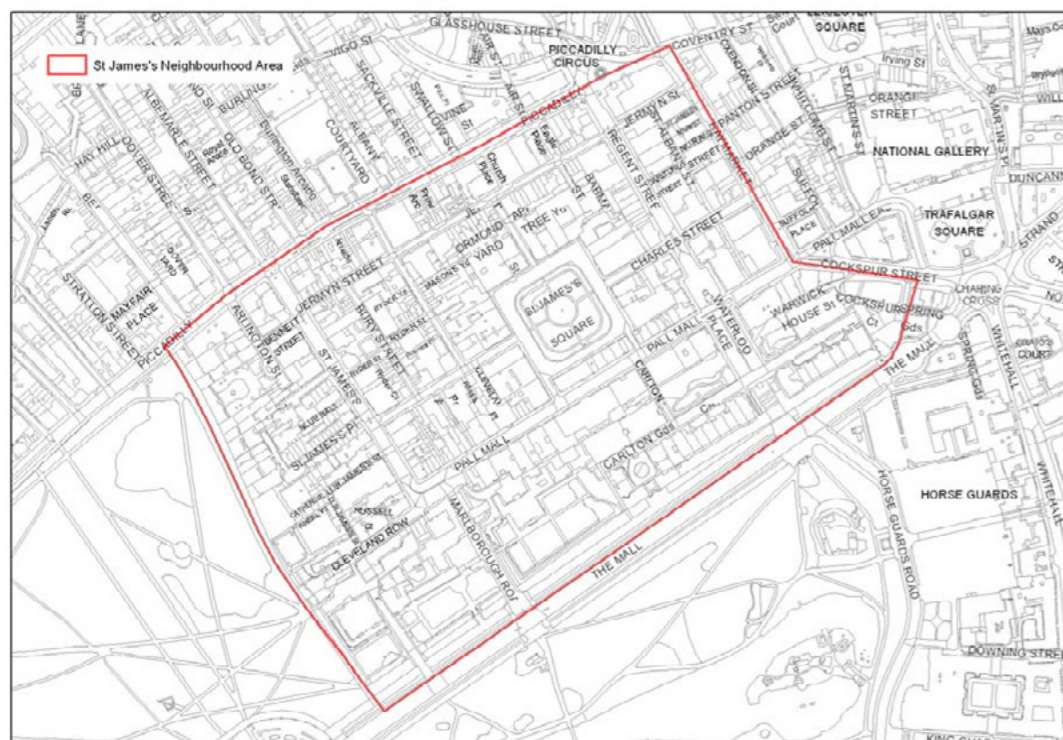
- 1.5** The Neighbourhood Plan represents one part of the development plan for the Neighbourhood Area over the period 2022-2040, the others being the Westminster City Plan 2021 and the London Plan 2021. The National Planning Policy Framework is also a material consideration as are various relevant supplementary planning documents (SPDs) prepared by Westminster City Council and guidance documents produced by the Mayor of London.

<sup>1</sup> London Plan 2021, paragraph 2.4.1

**1.6** Westminster City Council, as the local planning authority, designated the St James's Neighbourhood Area in April 2013 to enable the St James's Neighbourhood Forum to prepare the Neighbourhood Plan. This is a business-led Neighbourhood Plan, reflecting the fact that business and related matters are considered to be the priority matters to be addressed through planning policy in the St James's neighbourhood<sup>2</sup>. Nevertheless, the views and issues of the residential community have been appropriately reflected in shaping the vision, objectives and policies in the Neighbourhood Plan.

**1.7** The Neighbourhood Plan has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Planning Regulations 2012 (which were amended in 2015). The Neighbourhood Forum has prepared the plan to establish a vision for the future of the area and to set out how that vision will be realised through the planning of land use and development change over the plan period.

**1.8** The map in Figure 1.1 below shows the boundary of the Neighbourhood Plan area.



**Figure 1.1**  
St James's  
neighbourhood plan area

## Monitoring the Plan

**1.9** St James's Neighbourhood Forum, as the responsible body, will be responsible for monitoring the effectiveness and delivery of the plan and periodically reviewing it to ensure its continued relevance. This is likely to take the form of a review of the effectiveness of each planning policy in terms of outcomes (principally but not exclusively of planning application decisions) compared with the Plan's objectives. This will be undertaken at an appropriate time after the Plan has been made and outcomes can reasonably be considered.

<sup>2</sup> As described in Planning Practice Guidance paragraph 018 Reference ID: 41-018-20140306 (revision date 06.03.2014)





## Local context

## 2. Local context

### Historic context

**2.1** The history of St. James's, as a distinct area, dates back to 11th century when the first record can be found of St James's Leper Hospital on the site now occupied by St James's Palace. Since that first historical reference, there has been a period of evolution and change which has led to the formation of the area as recognised and understood today. Key points in the history of St James's include the creation of St. James's Park, recorded in John Stow's survey of 1598. St James's Street was first laid out during the 1600s. King Street and Bury Street were created in the 1670s, and the landmark retailer Fortnum and Mason was founded in 1707<sup>3</sup>.

**2.2** St James's Square is a focal point for the area and was built in 1663 by Henry Jermyn, to provide a residential quarter for nobles and courtiers to Charles II. In addition to the houses of nobles and courtiers, the secondary streets were the location for a number of more modest houses.



**2.3** As one of the first London squares, St James's Square formed a model for the subsequent pattern of urbanisation and residential development of London's West End, as the area grew in the eighteenth and nineteenth centuries.



**2.4** As the area developed, the 1700s marked an increase in coffee and chocolate houses in St James's. The proliferation of these houses was significant, as they evolved into proprietary subscription clubs. The proprietors of these clubs were key influential figures in the development of the social and architectural character of the area. The first of these houses, in 1693, was White's at no. 37 St James's Street and it remains the oldest of the London clubs. Sir Winston Churchill considered

<sup>3</sup> The St James's Conservation Society [now a Trust since 1999], 1999, p.3, Conserving Historic St James. [pdf] The St James's Conservation Society. Available at: <https://www.stjamestrust.london/conserving-historic-st-james-1999/>



White's to be the centre of London<sup>4</sup>. Throughout the 19th century, the proprietary subscription clubs became akin to the many private members clubs that define the St James's of today.

**2.5** The townscape of St James's has also evolved over time; however it has retained its historical form. The original field boundaries of the grid development remain largely unchanged, and continue to be centred on St James's Square. The effect of development immediately outside the Neighbourhood Area boundary has been noticeable on the architecture of St James's over time. The eastern edge of St James's has perhaps changed the most dramatically with John Nash's creation of Regent Street and Waterloo Place in 1818. Major redevelopments have taken place at Piccadilly Circus, the Crown Estate's neo-classical redevelopment of Regent Street and on the south side with Sir Aston Webb's 1910 layout of the Mall as a route to Trafalgar Square via Admiralty Arch.

**2.6** St James's has always been renowned as an important neighbourhood for both residents and businesses and involving many influential characters. These have included, but are not limited to, royalty, the aristocracy, leaders in politics, the military, literature, the arts and fashion<sup>5</sup>.

## St James's today

### Uses

**2.7** St James's retains today many of its historical uses, which set apart the area and give it its distinct identity. St James's contains a number of predominantly residential areas and Westminster City Plan policy has consistently endeavoured to protect the amenity of the area's residents.

**2.8** St James's prides itself on its specialist retailing offer with an international reputation for the provision of high quality menswear, art and antique dealing<sup>6</sup>. These uses are concentrated within Jermyn Street, Duke Street, St James's Street and King Street, where small distinctive shops, galleries and antiquarians are common on both the ground floor and upper floors.



Local people said that many of these shopfronts were valued because of their special nature, including their sometime unique royal warrants and cornices.

**2.9** The Jermyn Street area contains a concentration of well-established men's retailers such as Geo F. Trumper Ltd, Hilditch and Key, Turnbull and Asser, and New and Lingwood<sup>7</sup>, who together with notable specialist retailers have established the street as an internationally renowned street for men's outfitting, alongside, but more diversified than, Savile Row. Jermyn Street has seen an influx of complementary retailers to the very established brands, which are all in line with the focus of the street on high quality menswear.



**2.10** The world's oldest fine art auctioneer, Christie's, is located nearby in King Street, and surrounding it are a large number of art and antique galleries and firms specialising in a huge variety of art, craft and related services catering to all parts of this market. Often linked closely to the art trade are a number of cultural institutions which are important for the local area including the Institute of Contemporary Arts, the Royal Society and the British Academy. Together this unique offering is a magnet for high quality national and international visitors from across the world.

**2.11** More recently, Regent Street St James's retail and lifestyle offer has expanded with the development of the first phase of St James's Market by The Crown Estate. Regent Street St James's now provides destination retail stores with globally renowned names, alongside amenity and food and beverage uses.

<sup>4</sup> The St James's Conservation Society, *Conserving Historic St James*, p.5

<sup>5</sup> The St James's Conservation Society, *Conserving Historic St James*, p.8 <sup>4</sup> The St James's Conservation Society, *Conserving Historic St James*, p.28 <sup>5</sup> The St James's Conservation Society, *Conserving Historic St James*, p.7

<sup>6</sup> The St James's Conservation Society, *Conserving Historic St James*, p.28

<sup>7</sup> The St James's Conservation Society, *Conserving Historic St James*, p.7



**2.12** The private members clubs play a particularly significant role in the character of the area and they are firmly rooted within the areas built and social fabric. They have great historical and architectural significance and they continue to provide a network of facilities that contributes to the success of the area, as a place to live and work. In particular, the provision of architecturally unique space for meeting and overnight accommodation for members is a valued benefit of these facilities. The clubs have historically been, and continue to be, concentrated in Pall Mall and St James's Street and St James's Square. In many cases the private member clubs are housed in significant listed buildings, often purpose-built for the clubs that continue to occupy them. These include the Grade I listed Athenaeum, White's and Boodle's. These member club houses sit alongside a number of boutique hotels and the Ritz, which provide visitors views across Green Park.

**2.13** There are areas within St James's where the use has evolved over time and developed a more mainstream commercial offering. Of note is the development of Piccadilly, which now contains a mix of mainstream retail, office and commercial, hotel and restaurant uses. Although there are a number of mainstream retailers, this area has maintained a number of distinctive offerings, which are more reflective of the St. James's area as a whole. These include the distinctive retailer Fortnum and Mason and the historic arcades that are located within Piccadilly.



**2.14** St James's also provides a number of high quality commercial office spaces, as many of the buildings surrounding St. James's Square were converted from residential to office use from the 1920s onwards. There have been a number of other important commercial office developments in recent years, including Eagle Place, St James's Market and the Marq (formerly Duke's Court), on the junction of Jermyn Street and Duke Street. Commercial office use is the predominant land use in the area, which is home to many important financial and professional services companies.

## Architecture

**2.15** The prominent grid pattern of St. James's originates from the 17th century, when Henry Jermyn, 1st Earl of St. Albans was granted a lease and began its development in 1661. This unique 17th century grid lies in contrast to the surviving alley ways, courts and mews, which provide a compact and tight grain.

**2.16** The variety of architecture within the area of St. James's is visually rich and stimulating. Styles of architecture are represented from the area's pre-Victorian period of development up to, and including, 21st Century contemporary architecture. St. James's holds one of the highest concentrations of listed buildings in England with over 150 listed buildings and features<sup>8</sup>.

**2.17** Many of the mews, yards and alleyways within St. James's have retained their historical form, as most of the original 17th and 18th century small mews survive hidden between St. James's Street and Green Park. A number of the historic mews have been modernised such as Catherine Wheel Yard, where garages have been incorporated at the ground floor. This mews, however does retain the granite setts typical of the mews in this area. Examples of these mews can be found leading off from St. James's Street and Blue Ball Yard.



**2.18** St. James's is internationally known for St James's Palace, and the proximity of Buckingham Palace, as well as the large number of grand town houses. Of key importance is St. James's Palace, which takes a prominent position in the key view from Mayfair and has kept its original Tudor form. This architectural style is most evident in the Chapel Royal, the gatehouse and turrets. The Palace sits within a complex comprising Clarence House, Marlborough House and Lancaster House.

<sup>8</sup> The St James's Conservation Society, Conserving Historic St James, p.24



**2.19** The private members' clubhouses form some of the most architecturally important buildings in St. James's, and as a result the majority of them are listed to reflect their architectural and historic merits. Of most significance are the Grade I listed White's club and Grade I listed Boodles Club. White's Club was first constructed in 1674 and re-built in 1787-88. The house is constructed out of Portland stone with a slate roof including a Victorian version of Palladian façade with some French motifs<sup>9</sup>. Boodles Club was first built in 1775-76 by J. Crunden for the Savoir Vivre Club and alterations by J.B Papworth in 1821-24 were closely akin to the Adam manner<sup>10</sup>. Local consultation made clear that this type of architecture was important to many people. More modern building designs such as New Zealand House were seen as unattractive and out of character.

**2.20** Three of London's most distinguished traditional arcades are located in St. James's, including John Nash's Royal Opera Arcade (1816-1818), Prince's Arcade (1929-1933) and Piccadilly Arcade (1909). The Royal Opera Arcade is the earliest found in London. In addition to the arcades, St. James's boasts a high number of historic shopfronts. These include the 1690 shopfront of Berry Bros & Rudd located at 3 St. James's Street, Lock & Co. (founded in 1676), 6 St. James's Street (the oldest hat shop in the world), D.R Harris and Co (established in the St. James's area since 1790) and neo-classical shopfront design of John Lobb bootmakers, located on 9 St. James's Street. Throughout St James's, there is a variety of distinct retail frontages and shopfronts which reflect the character and scale of the area in which they are located and the type of retail that the area is renowned for.



**2.21** A significant post war listing was the Grade II\* listing of the Economist Tower and associated buildings. This office block, bank, residential block and linking podium was constructed in 1960-64 to the design of the 'New Brutalist' architects, Alison and Peter Smithson. The relevance of this listing lies in the building's use and dominance of Portland Stone cladding. The Economist Tower, in addition to New Zealand House, are key examples of recent developments in the St. James's area that used advance building techniques for their time.

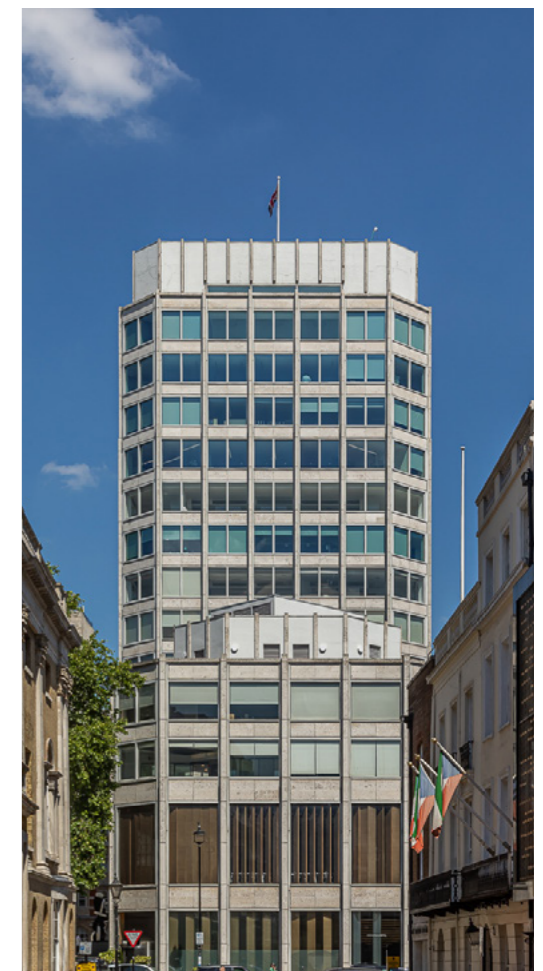
<sup>9</sup> Historic England. White's Club – List Entry Summary. [online]. Historic England. Available at: <<https://historicengland.org.uk/listing/the-list/list-entry/1264877>>

<sup>10</sup> Historic England. Boodle's Club – List Entry Summary. [online]. Historic England. Available at: <<https://historicengland.org.uk/listing/the-list/list-entry/1264870>>

**2.22** St. James's has also welcomed modern structures, most notably the construction of the 'White Cube' Gallery at the historic Mason's Yard in 1993. 'White Cube' is a single exhibition space, popular with mainstream and avant-garde artists. It is one of the smallest exhibition spaces in Europe, yet is arguably one of the most influential in recent times.

**2.23** Heights of the buildings range across the area. Although there is a prevailing height of five to six storeys there is considerable variation across the area. Primary routes through the area such as St. James's Street contain more varied heights. Those buildings in secondary streets, where there are a higher number of residential properties, are characterised by four storied properties with mansard additions. In Economist Plaza, the building presently referred to as Smithson Tower (22-25 Ryder Street) is one of the highest and most prominent buildings within St. James's, comprising 16 storeys (although the tallest building in the neighbourhood area is New Zealand House, which is right on the boundary of the area). Even with this variation in height, a number of the buildings in St. James's have a unique and distinctive roof profile. These include traditional and double mansard roof profiles. In some places the variation of roof profile is key to the characteristics of the area, however in many places the unaltered line of roof profiles is fundamental to the architectural integrity of the building and street.

**2.24** A large part of the Plan was prepared before the Covid pandemic which restricted activity over the period 2020-2022. Further consultation in late-2022 asked whether this had changed St James's. The answer was a resounding no; the things that make St James's such as special and unique place remain today and continue to attract a range of people to the area on a daily basis.







## Vision & Objectives

### 3. Vision & Objectives

**3.1** Through consultation with businesses, workers, residents and visitors, there were several words that shone through as describing St James's including 'elegant', 'prestige', 'heritage' and 'high end'. This Plan seeks to reflect these descriptions and expresses a clear vision for the future of St. James's to 2040:

**"St. James's is a unique treasure in the West End, whose area has retained its dignified character and heritage that makes it an area of quiet elegance and prestige.**

Over the period the area will have sustained a successful balance of commercial and residential quality and urban calm, distinct from and complementary to the neighbouring high intensity areas of Leicester Square, Soho, Mayfair, Trafalgar Square and the Royal Parks. The rectangular street grid that forms the core of the area remains a quiet and safe space for pedestrians and cyclists, complemented by increased pedestrianisation and high quality public realm improvements.

The mutually supporting, new and historic mix of specialist uses and buildings, around the the monarch's royal court at St. James's Palace, has been retained and enhanced, with the shops, galleries, hotels and clubs retaining the features that enable them to provide so much of what is quintessentially St James's. Yet this has been done in a manner which enables St James's' to remain relevant to today's central London high quality commercial, residential and cultural activities. It has also been done with the intention of maximising sustainability and resilience through the retrofitting of buildings to be low energy and low carbon and taking every opportunity to enhance the biodiversity value of St James's spaces and buildings."

**3.2** To realise this vision the following plan objectives have been set:

- **Retain and enhance the traditional, calm, dignified character and heritage of St. James's and its existing pattern of commercial, residential and cultural activity and associated land uses.** Development will respect and reflect the character and heritage of the distinct Character Areas in St James's, with growth and change being of a high quality of design that preserves the architectural quality of the area. Certain types of use will be focused upon those areas best able to accommodate them. In particular commercial activity will be focused in the Central Activities Zone (CAZ) Retail Clusters of Piccadilly and Jermyn Street. Development will provide the type of accommodation that 21st Century occupiers need.



- **To continue to be a destination which provides unique shopping, dining and socialising experiences for those that live and work in the area as well as to visitors.** This is both during the week and at weekends. The specialist and independent retailers and restaurants will be supported and encouraged, as will the heritage of established private members' clubs, which have a key role in fostering a sense of local community and the identity of the area.
- **Maintain the balance of heritage, dignity and commercial viability.** As more people seek to experience the unique environment of St. James's, the increase in footfall and commercial activity will need to be managed. This will require the location of facilities that attract such activity in areas that have the greatest existing capacity and improve access routes to them, without compromising the calm that characterises much of the district's character.
- **Make St. James's an even better place in which to live.** An improved public realm with fewer vehicles, creating less disturbance, noise and air pollution will complement the world-class mix of existing and new uses. The streets which can accommodate more growth will be managed so that they provide an improved experience for pedestrians and cyclists whilst protecting residential amenity.
- **Ensure development and change is genuinely sustainable and reflects the need for climate resilience.** Whilst retaining and enhancing the character and heritage of St James's is paramount to the area being able to thrive, development and growth must recognise the importance of minimising its impact on the climate and environment and being designed to be more resilient.

**3.3** This Plan is deliberately concise and focused. It does not seek to duplicate or re-state existing policies within the adopted Development Plan (consisting of the Westminster City Plan and the London Plan) or the National Planning Policy Framework where it is not necessary to provide additional detail specific to St James's.







# Character & Design in St James's

## 4. Character & Design in St James's

**4.1** St James's is an area of exceptional historic and townscape importance. Development within the area must take an approach which recognises this and which contributes to St James's tradition of excellence. Whilst this includes refurbishment which accounts for the majority of development, it should be recognised that this often does not require planning permission, in which case the policies below do not apply. The policy is therefore focused on new development and retrofitting which is a common type of development in St James's.

**4.2** The Westminster City Plan provides strategic principles that should guide design. This section of the St James's Neighbourhood Plan seeks to address matters of particular local interest where high quality design can enhance the built environment and enhance the setting of its heritage assets.

### Character Areas:

#### **POLICY STJ1: CHARACTER AND DESIGN**

All new buildings, conversions, extensions, retrofits and refurbishments<sup>11</sup> in St James's will be of architectural and functional excellence. Proposals should contribute towards the local distinctiveness of St James's townscape and streetscape. They should demonstrate high quality, sustainable and inclusive design and architecture that respects the St James's Conservation Area (if in or adjacent to it) and the relevant Character Area(s), as shown on Figure 4.1. Proposals should address the following criteria:

- A.** The importance of the design responding creatively to, and enhancing, the setting of the respective Character Area(s) identified on Figure 4.1. This should have regard to the character of adjacent buildings and spaces, including scale, orientation, height, massing and materials identified in the relevant Character Area(s).
- B.** To ensure sustainability is embedded into the design of any development, proposals are encouraged to respond to the principles in the St James's Sustainability Charter. In particular.
- C.** High quality, environmentally sustainable materials that respect the local setting and contribute positively to the particular Character Area(s) and/or the St James's Conservation Area should be used. The building materials used should have low embodied carbon, promote circular economy outcomes and aim for waste to be reduced, reused, repurposed or recycled.

<sup>11</sup> Where planning permission is required

**4.3** Most of the Neighbourhood Area is within the St James's Conservation Area which is well established, having been designated in 1969. Potentially because of its comparatively limited size, the Conservation Area Audit<sup>12</sup> does not sub-divide it into character areas.

**4.4** Work by the Forum has identified distinct differences in character across the Conservation Area and the Neighbourhood Area as a whole. The following character areas have been identified as contributing to the distinct character and balance of uses within St. James's. They are deliberately not rigidly defined. They are not land use designations and should be interpreted flexibly; they are designed to assist in identifying opportunities for development that will contribute towards delivering the spatial vision.

- St. James's Square
- Duke Street, St. James's & King Street
- Arlington Street to Cleveland Row
- Jermyn Street
- St. James's Street
- Piccadilly
- Regent Street, St. James's and Haymarket
- Pall Mall
- The Mall, Carlton Gardens and Carlton House Terrace
- St. James's Palace, Clarence House and Lancaster House

**4.5** These are shown on Figure 4.1. A separate description of each of the character areas is shown in Appendix A.



**4.6** Examples of appropriate architectural responses that have the potential to meet this standard of excellence may include:

- high quality contemporary retrofits to modern standards of construction, services and facilities, particularly where these are able to retain primary façades;
- wholly new, contemporary architecture, especially where it involves 'deep' retrofits that improve the appearance of existing buildings which otherwise do not contribute positively to the character and appearance of the Conservation Area (generally, although not exclusively, 1950s – 1990s developments). Excellent contemporary architecture will use first class materials with integrated craft and art, demonstrating intricacy, appropriate to neighbouring buildings, streets and spaces in scale and massing;
- incorporation of sustainability principles across all aspects of the architectural design and function of buildings, be they new or refurbishments of existing buildings. One recent example has been a major repurposing and refurbishment of the BP building in St James's Square, which has reduced its carbon footprint through the retention of much of the structural frame.

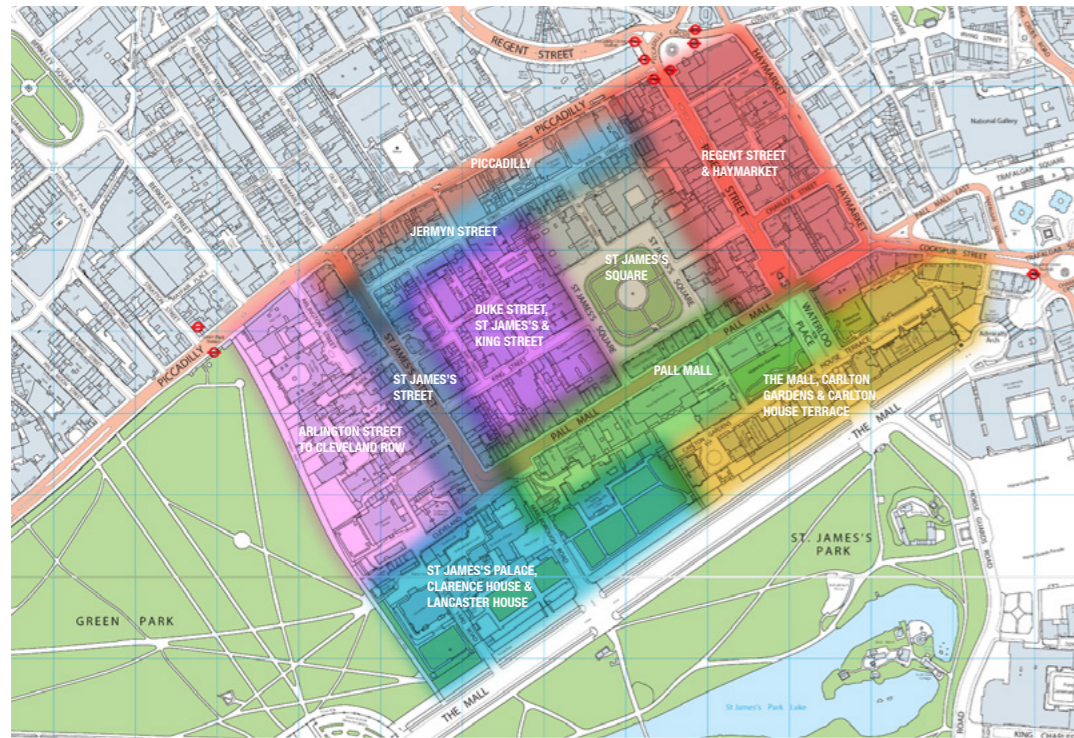
**4.7** Development must always apply high quality design and materials, ensuring that features are in keeping with the character and heritage of the area, irrespective of the use of the buildings.

**4.8** The requirement for low carbon buildings is addressed through national Building Regulations which set minimum standards. Whilst it is important that the carbon footprint of development is minimised, the Neighbourhood Plan can only 'encourage' (as opposed to 'require') the requirements in the Building Regulations. However, the design of development should, as a matter of principle, recognise the fundamental importance of minimising carbon emissions and maximising sustainability. The principles that need to inform the design of climate resilient buildings are laid out in the St James's Sustainability Charter (see below). Design and Access Statements that accompany planning applications provide an opportunity for applicants to demonstrate how they have sought to respond to the principles in the Sustainability Charter in their proposals.

<sup>12</sup> City of Westminster (2002) St James's Conservation Area Audit



**Figure 4.1: St James's Character Areas**



## Roof top plant and activity

### POLICY STJ2: ROOFTOP PLANT AND ACTIVITY

**A.** The need for plant to support the operation of a building must take into consideration the important role that roof-top locations play in providing green infrastructure which assists with the delivery of biodiversity net gain and pollution mitigation. The use of existing internal space to accommodate plant will be strongly encouraged, where practical and feasible, taking into account the operational nature of the building. This excludes balconies or terraces.

**B.** Where roof-top plant and – including machinery, ducts, tanks/tank rooms, satellite dishes, radio aerials, telecommunications infrastructure, lightning rods and lift over-runs - is proposed and requires planning permission, this must meet the requirements of Westminster City Plan Policy 40 (Townscape and architecture) in respect of its impact on visual amenity and townscape and should be provided as part of rooftop green infrastructure provision. As part of this, existing redundant rooftop plant and clutter should be removed.

- C.** The use of rooftops for activity ancillary to the main use of the building is supported subject to the following:
- The design meets the requirements of Westminster City Plan Policy 40 (Townscape and architecture) in respect of its impact on visual amenity and townscape.
  - It does not have a detrimental impact on any identified views (see Policy STJ4).
  - It does not have an unacceptable impact on the amenity of neighbouring occupiers.
  - It will not limit the ability to maximise the provision of rooftop greening (see Policy STJ10) or restrict its effectiveness, e.g. through damage to the greening through rooftop activity.

### ST JAMES'S SUSTAINABILITY CHARTER

- 1. do** construct buildings and spaces that **avoid high energy to run** (e.g. basements that require artificial lighting, ventilation etc; swimming pools that need heating, floodlighting, etc)
- 2. do** construct spaces that can easily be **naturally ventilated** (e.g. avoiding predominantly glass buildings which require mechanical ventilation; designing windows that can be fully opened, etc)
- 3. do** keep glass **window to wall ratios** as low as possible to minimise solar heating and the need to cool artificially whilst also taking into account the need to provide natural light and other design related matters
- 4. do** design buildings to **minimise the need for air conditioning**, including through reducing the need for equipment that generates high levels of heat and/or emissions
- 5. do** fit external **sun shading** devices to keep buildings cooler in summer (e.g. blinds and awnings), taking into account any implications on listed buildings and/or Conservation Areas
- 6. do** **insulate** against both summer heat and winter cold
- 7. do** install the **lowest possible energy consumption and emission** heating and cooking appliances (e.g. heat pumps in preference to gas boilers; electric boilers, induction hobs and microwave ovens)

- 8. do design features that maximise **free drainage** to permit rainwater to soak away and avoid features which could impede rainwater absorption (e.g. basement excavations which take up absorbent sub-soil, impermeable walkways, paved-over rear gardens)
- 9. do maximise **planting in natural earth** and provide appropriate drainage systems
- 10. do implement **Sustainable Drainage Systems** (SuDs) where possible (including raingardens, permeable paving and other solutions) to prevent excess water in the main drainage system
- 11. do integrate the use of **solar energy** where appropriate and feasible
- 12. do utilise **sustainable, recycled, or low-carbon impact materials** in construction and renovation projects wherever possible
- 13. do provide facilities for cycling and electric vehicle **charging stations** to encourage the use of greener modes of transport
- 14. do design **outdoor spaces** that include greenery, such as gardens, green roofs, or living walls, to improve air quality and provide habitats for local wildlife
- 15. do install **water-efficient** appliances and fixtures, and consider systems for rainwater harvesting or greywater recycling.

4.9 Incremental development and the continued installation of a range of roof clutter and rooftop plant has resulted in many of St James's roof profiles looking untidy and unattractive<sup>13</sup>. Rooftop plant can also cause amenity issues for residents through generating unacceptable levels of noise if it is not sited, screened or maintained properly<sup>14</sup>. Positioning new plant internally would assist in reducing these adverse impacts arising from new development. The creation of new basement spaces to facilitate such plant is generally not considered an appropriate solution and will only be acceptable if it meets the requirements of Westminster City Plan Policy 45 (Basement developments).

<sup>13</sup> St James's Conservation Trust, Rooftop Architecture in St James's: Visual and Aural Impacts Study

<sup>14</sup> St James's Conservation Trust, 2013, Rooftop Architecture in St James's: Visual and Aural Impacts Study. [pdf] St James's Conservation Trust. Available at: <<https://www.stjamestrust.org.uk/reports/Rooftop-Architecture-2014.pdf>>

4.10 In some instances, it will not be feasible to incorporate internal plant and certain items, such as lift over-runs and lightning rods – must be located on the roof of a building. The internal plant issue is particularly the case for a number of retailers and gallery owners who require ample storage space at basement level. Where roof-top plant is proposed, this should be sited in the least sensitive location and ensure that appropriate visual screening is incorporated to reduce visual impact for nearby residential occupiers and on the townscape more generally (thereby meeting the requirements of Westminster City Plan Policy 40 (Townscape and architecture)).

4.11 In London, particularly in a dense area like St James's, utilising roof space for amenity areas can be a sensible solution to improve the quality of accommodation provided and promote well-being whilst potentially reducing pressure on oversubscribed public spaces. For office buildings, roof top amenity space provides an additional benefit to office workers, which can provide well-being benefits for employees. This makes such buildings more attractive to a range of occupiers, which assists in promoting London as a world-class office and business location (recognising that St James's has a role to play in that). For other commercial 'destination' uses, such as hotels or restaurants, roof top amenity space can provide an exciting and unique offering for visitors, again which enhances St James's offering. For new residential uses, roof top amenity space can provide a valuable amenity space for new residents.

4.12 It is recognised that care needs to be taken in this matter as not all roof space may be appropriate for such uses or may result in detrimental impacts on neighbouring occupiers. Certainly it is important there are appropriate safeguarding measures are put in place relating, for example, to operating hours, screening and management. It is also vital that such provision does not hinder the vital provision of rooftop green infrastructure or result in damage to that provision due to the activity of rooftop users. This can be addressed through the use of planning conditions.





## Shopfronts and signage

### POLICY STJ3: SHOPFRONTS AND SIGNAGE

**A.** New, restored or adapted shopfronts must be designed in a manner which reflects the prevailing character of the area, in particular where there are existing shopfronts that are historic or traditional in style. Contemporary shopfronts are encouraged provided they demonstrate a design that is sympathetic to surrounding traditional buildings. In this regard the use of sustainable materials is strongly encouraged.

**B.** Where recessed shopfronts are proposed, these should be designed to minimise the potential for anti-social behaviour.

**C.** Where projecting board signs, flags and awnings are to be provided, they must reflect the prevailing character of other such features in the area, particularly in respect of materials, design and size.

**4.13** St James's has a particular retail character, distinguished by small, niche and specialist retail. This is reflected in Westminster City Plan Policy 21 which designates the St James's Special Policy Area and identifies it as a centre of the art trade and luxury retail where appropriate provision of floorspace will be encouraged. Whilst part of the Neighbourhood Area is within the West End Retail and Leisure Special Policy Area (WERLSPA), City Plan Policy 2F protects the unique character of its distinct and iconic places and heritage assets. The majority of the commercial areas in St James's that are within the WERLSPA fit this characterisation.



**4.14** Traditional shopfronts are a key architectural characteristic of parts of St James's. They contribute to the area's historic significance and assist in understanding and sustaining the niche and specialist retailing history of the area. They are of historic importance. Local consultation showed that people do like the more traditional shopfronts, with some people stating that they present a more human scale than some modern shopfronts.

**4.15** Where possible, existing shopfronts should be retained, adapted sensitively and incorporated into new development (either in their current location, or removed, stored and re-used elsewhere within the development). Where this is not practical or feasible, new shopfronts should seek to be complementary to the wider streetscape. This also includes other shopfront features such as projecting board signs, flags and awnings.

**4.16** In order to complement and build upon the cluster of historic shopfronts, new shopfronts should be informed by historic shopfront design in the surrounding area. Good examples of contemporary shopfront designs which have been well informed by historic designs include the facades on the ground floor of Eagle House at 22 Jermyn Street and Floris, at 91 Jermyn Street.

**4.17** Recessed shopfronts can encourage rough sleeping, litter and anti-social behaviour which detracts from the character of St James's. Proposals to remove and replace such shopfronts will be encouraged. Any proposals for recessed shopfronts must clearly be designed to minimise anti-social behaviour.

## Views

### POLICY STJ4: VIEWS

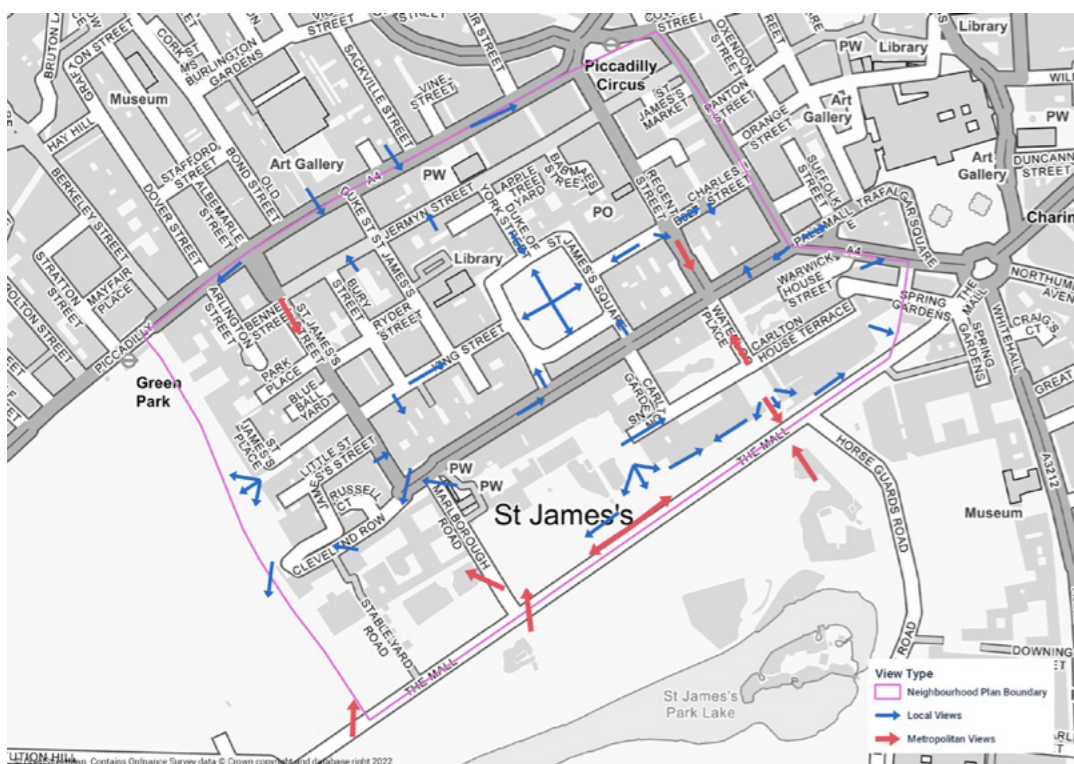
Development proposals are expected to respect or enhance the local and metropolitan views shown on Figure 4.2.

**4.18** In an iconic location such as St James's, it is inevitable that there will be a number of views which define the place. Whilst 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.



**4.19** The St James's Conservation Area Audit identifies a number of local and metropolitan views. City Plan Policy 40F requires development to contribute positively to their characteristics, composition and significance and, where possible, to remedy past damage. Policy STJ4 identifies the metropolitan and local views which are presented in Figure 4.2.

**Figure 4.2: Metropolitan and local views**



## LOCAL VIEWS

- View east down Pall Mall of the National Gallery dome
- View east from Haymarket/Pall Mall junction of National Gallery and Nelson's Column
- View west from Haymarket/Pall Mall junction of Institute of Directors and The Athenaeum
- View east of Duke of York Monument and Nelsons Column from Western Carlton Gardens
- View of Admiralty Arch and the Old Admiralty from raised walkway between The Mall and eastern end of Carlton House Terrace
- View of Buckingham Palace through Green Park from Cleveland Row gate onto Queens Walk
- View of R Norman Shaw's corner building and Nos. 88 & 86 St James Street from Gates to Marlborough Road
- View south east of Big Ben from western side of Waterloo Palace at junction with Charles II Street
- Views from inside, into and across St James Square
- Panoramas of St James Park from steps at Carlton Gardens and Waterloo Place
- View of Nelsons Column when you emerge from the alley between Cockspur Court and Cockspur Street
- Panoramas of Green Park from the open space at the western end of St James's Place
- View east from Queens Walk, Green Park between Spencer House and Sir Denis Lasdyn's flats
- View east along Piccadilly of Eros

## METROPOLITAN VIEWS

- View south down St James's Street towards St James's Palace
- View northwards up Waterloo Place to Piccadilly Circus & view southwards down Waterloo Place towards Duke of York Column and St James's Park beyond
- View east along Mall to Admiralty Arch & View west along Mall to Buckingham Palace and Queen Victoria Monument
- Carlton House Terrace from St James's Park and the Mall
- View of Palace of Westminster towers through St James Park from steps at southern end of Waterloo Place
- View of Lancaster House and Clarence House from The Mall
- View of St James's Palace from southern end of Marlborough Road with tower and deep set colonnade
- View of Marlborough House from Mall





## Particular uses across St James's

### 5. Particular uses across St James's

**5.1** St James's has a very unique range of uses that are particular to the Neighbourhood Area. From art galleries to niche retail (in locations such as Jermyn Street) and boutique hotels to private members' clubs, these uses often have very particular needs. Indeed Westminster City Plan Policy 21 designates the St James's Special Policy Area as a centre of the art trade and luxury retail where appropriate provision of floorspace will be encouraged. This section of the Neighbourhood Plan addresses the particular needs of these uses.

**5.2** This part of the Neighbourhood Plan seeks to recognise the needs of businesses of importance in the area. A key organisation that has been part of the Neighbourhood Plan Steering Group is the Heart of London Business Alliance (HOLBA) which is a membership organisation that champions its members' interests to cement the West End's position at the heart of 'London the world city'. At the current time it covers only part of the Neighbourhood Area, specifically the northern and eastern streets.

#### Hotels:

##### **POLICY STJ5: HOTELS**

New hotel development proposed in the immediate vicinity of residential properties must demonstrate how the design minimises the potential for hotel users to congregate outside the hotel late at night.

**5.3** The London Plan evidence base projects a need for 58,140 additional hotel bedrooms by 2041<sup>15</sup>. Hotel development should be in appropriate locations and give due consideration to potential impacts on local amenity and the balance of local land uses to ensure that an over-concentration of hotel uses would not be detrimental to the local area. None of the character areas in St James's are considered to be predominantly residential (as opposed to predominantly commercial or mixed use). As such, hotel uses are considered acceptable in the Neighbourhood Area. However, St James's is still a residential area and its residents have a right to have their amenity preserved.

<sup>15</sup> GLA Economics (2017) Projections of demand and supply for visitor accommodation in London to 2050, Working Paper 88 ([https://www.london.gov.uk/sites/default/files/visitor\\_accommodation\\_-\\_working\\_paper\\_88.pdf](https://www.london.gov.uk/sites/default/files/visitor_accommodation_-_working_paper_88.pdf))

**5.4** Where additional hotel uses are brought forward in this area, it cannot be at the expense of residential amenity. In particular, local residents report that the greatest disturbance to them is the congregation of hotel users outside the frontage of hotels late at night. Development should therefore be designed to minimise the potential for loitering by hotel guests and other users on the street at night. This could include for example the creation of a large foyer area where people can congregate before exiting onto the street. As is already required by the Westminster City Plan, this must be accompanied by adequate acoustic screening to ensure that internal noise does not affect residential amenity.



**5.5** Traditional private members' clubs have made an essential contribution to the character and function of St James's as a prestigious location within Central London. In 2023 there were 17 private members' clubs in the Neighbourhood Area, by far the greatest concentration anywhere in London (a list is provided overleaf). The majority are traditional, not-for-profit and non-competitive institutions borne out of the coffee houses of the 17th century being the social gathering places of their day. A small number are proprietorial, for-profit clubs. Whilst all the clubs are unique in the offer to their members and their guests, they are distinctly different from institutions such as gambling clubs or nightclubs. This is an important distinction.



**Private member's clubs:**

**POLICY STJ6: PRIVATE MEMBERS' CLUBS**

Proposals that support the retention of existing premises as traditional private members' clubs with a historic link to the area will be supported.

**5.6** The benefit of these clubs to St James's cannot be over-estimated. They create significant numbers of jobs and attract spending, both directly in the clubs and indirectly in the local economy whilst members and guests spend time in the area.

**5.7** Many of the clubs occupy landmark listed buildings which in practical terms are very difficult to convert to enable alternative uses. These buildings can be expensive to maintain, adapt and upkeep and these organisations' efforts in carrying out these works should be recognised as a public benefit.

**5.8** Indeed the traditional clubs in particular focus on a mix of protecting heritage and encouraging growth. The investment they make in their buildings is truly for the long term because these spaces are part of what makes the clubs the institutions they are. It is vital that they are not lost to St James's otherwise the character of the area will fundamentally change. Whilst the majority of the clubs have thrived for over 175 years, Boodle's and Brooks's are over 250 years old and White's is 330 years old. If the clubs are not allowed to adapt to the changing needs of their members, then they may leave the area. In such circumstances they would vacate buildings of immense heritage value that may be challenging for different users to convert into viable uses without causing potential harm to that heritage value. Therefore whilst proposals by the clubs to amend their existing premises must carefully consider any heritage impacts of such works, this should be balanced appropriately against the need for change to enable the club to thrive in their current premises.

Club	Founding Date
Army & Navy Club	1837
Athenaeum	1824
Boodle's	1762
Brooks's	1764
Carlton Club	1832
East India, Devonshire, Sports & Public Schools Club	1849
Naval & Military Club	1862
Oxford & Cambridge Club	1830
Reform Club	1836
Royal Automobile Club	1897
Royal Ocean Racing Club	1925
Royal-Overseas League	1910
Travellers Club	1819
Turf Club	1861
White's	1693





## Public spaces in St James's

### 6. Public spaces in St James's

**6.1** Alongside beautiful buildings, St James's is characterised by many beautiful public spaces. Local consultation revealed that for many people it is the high quality public realm in St James's that makes it elegant. 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. Local people agreed, saying that St James's needs more pedestrianised areas and for new public realm schemes to use better quality materials. There are ongoing proposals to improve the public realm, including the Heart of London Business Alliance's (HOLBA) proposals for Green Park and Piccadilly which will widen and declutter footways and improve the public realm generally on a number of streets. However, more improvements are needed and will be welcome. In addition, in the parts of the Neighbourhood Area that they cover, the Northbank and Whitehall Business Improvement Districts (BIDs) have ambitious public realm improvement plans.

**6.2** Movement, particularly on foot and by bicycle, is important in Central London neighbourhoods but is often subservient to the private car. Such non-vehicular movement and a high quality public realm generally helps to enhance safety as well as providing wider opportunities such as enhanced biodiversity (through planting) and public art. This was endorsed through the local consultation on the Plan, with people noting that the area suffered from too much vehicular traffic at the expense of walking and cycling. The Neighbourhood Plan seeks to identify the best routes and improvements that can be made to enhance the experience of moving through St James's.

**6.3** Despite the architectural quality and longstanding townscape significance of much of St James's, parts of the area have poor quality public realm, including inappropriate/poor quality materials, broken paving slabs, cluttered footways and poorly designed pedestrian routes. Streets and footways in some places are cluttered with items such as cycle bike stands and external waste stores.

Of particular concern are long stretches of bike stands which make road crossing hazardous for pedestrians, one example being outside St James's Church on Jermyn Street. New provision should be designed and sited with pedestrian safety in mind.



## Public realm:

### POLICY STJ7: PUBLIC REALM

**A.** Proposals to improve St James's public realm, streets and the spaces between buildings will be supported. This includes the relocation, consolidation or removal of existing street furniture where it obstructs footways or visually intrudes on the settings of key views and buildings. In particular, proposals to deliver the following public realm improvements will be supported (more detail is provided in Appendix B):

- a.** St James's Market and Haymarket.
- b.** Arlington Street and Bennet Street.
- c.** Jermyn Street.
- d.** St James's Church/Piccadilly.

**B.** Major development<sup>16</sup> is encouraged consider how it can improve the public realm within the immediate vicinity of the site. As a priority this should consider:

- a.** comprehensively repairing all adjacent damaged, broken or cracked footway or carriageway paving and kerb stones;
- b.** fully repaving adjacent footway or private forecourt paving, to match existing;
- c.** repair or replacement of listed or other local, authentic original street furnishings, including railings, lighting and features of townscape importance;
- d.** installation of good quality, consistent, traditionally detailed street and amenity or architectural lighting installations on the public highway or adjacent private land and frontages;
- e.** upgrading adjacent linked up areas of footways;
- f.** where possible, using ethically sourced, high quality materials with the lowest carbon cost possible;
- g.** new street clutter such as advertising structures and boxes on the footway containing telecommunications equipment, electricity supply equipment, and traffic light control equipment should be resisted in above ground boxes on the footway where there are alternative suitable locations for this equipment.

**6.4** Upgrading such streets and pavements, including the quality and layout of street furniture, will contribute to achieving the Neighbourhood Plan objective of improving the public realm. If St James's is to be subject to greater levels of development and pedestrian movement, it will increasingly become more important to upgrade and maintain the streets, pavements and spaces, so as to accommodate this additional growth. It is important that such improvements are undertaken with the lowest carbon cost possible, particularly in respect of the sourcing of materials. For example, York stone is a high quality material which has commonly been used for footways in the area, however alternatives should be used if such stone cannot be sourced or the alternative has a clearly lower carbon cost.



**6.5** Development should contribute to this work as it will generate some additional pressure on the existing streetscapes both during construction and also during operation. This will differ depending on the type of development; for example, a small residential development will create lower levels of day-to-day footfall than a retail development. Applications for major development must consider how it can improve the public realm within the immediate vicinity of the site.

**6.6** Westminster City Council will collect Community Infrastructure Levy (CIL) from development within the area. Of this, no less than 25% should be spent on projects within the Neighbourhood Forum area, in close consultation with the Neighbourhood Forum ('Neighbourhood CIL')<sup>17</sup>. The remaining percentage may also be spent within the area. CIL is an important mechanism by which development within the area will contribute to meeting its needs for improved infrastructure, and by having a designated Neighbourhood Forum and agreed public realm priorities, the Neighbourhood Plan can influence how 25% of Neighbourhood CIL generated in the area is spent and its allocation to projects essential for the long-term success of St James's.

**6.7** The Neighbourhood Forum will, in consultation with other stakeholders and the City Council, seek to direct the Neighbourhood CIL receipts to the public realm priority projects described in Appendix B.

<sup>16</sup> As defined in the NPPF

<sup>17</sup> In the absence of a neighbourhood plan, the figure would only be 15% and this would be capped at a maximum of £100/dwelling



## Pedestrian and cycling movement and connectivity

### POLICY STJ8: WALKING AND CYCLING

- All major development involving alterations to the public realm should adopt the Healthy Streets Approach so that its occupiers, users and members of the public can engage in safe active travel. This should be done by assessing the current active travel infrastructure and facilities and identifying improvements that are likely to support the 10 Healthy Streets indicators and encourage the uptake of active travel.
- In particular, proposals to deliver the following improvements will be supported (more detail is provided in Appendix B):
  - a. Arlington street footway widening.
  - b. Links to and from Jermyn Street, in particular:
    - the area to the east of Jermyn Street between Regent Street, St James's and Haymarket;
    - the western corner of Jermyn Street and Regent Street St James's;
    - the corner of St James's Street and Jermyn Street; and
    - public links to and from Piccadilly and Jermyn Street.
  - c. Widening of Piccadilly footway outside St James's Churchyard.
  - d. North-south (St James's Park to Mayfair) and east-west cycling routes through the Neighbourhood Area.
- Development that provides public access across previously inaccessible private land will be encouraged where it enhances the connectivity and capacity of the St James's Neighbourhood Area's pedestrian network. New routes should be designed so that they are adequately lit, signage is not necessary and it is clear to the public that access is permitted.
- For private development, the provision of secure internal long stay cycle parking in lieu of on-street parking will be supported, provided that this is in line with London Plan standards. Where feasible and accessible, external bike stores for public use will be encouraged, where these can be sensitively incorporated into the existing public realm.

**6.8** 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. Encouraging cycle use across St James's especially for those that live and/or work in the area or visitors, will assist in decreasing the amount of traffic through the local area.



**6.9** Local consultation identified that on-road cycling within the Neighbourhood Area was generally considered to be safe. The main exception is on the main routes that surround St James's where segregated cycle routes were considered necessary to increase levels of cycling.

**6.10** The London Mayor's Healthy Streets Approach is an evidence-based approach to improve health and reduce health inequalities, which will help people use cars less, and walk, cycle and use public transport more. It supports the delivery of the Mayor's aim that by 2041 all Londoners will be able to undertake at least the 20 minutes of active travel each day needed to stay healthy. It has 10 indicators (see Figure 6.1) that reflect the experience of being on the streets.

**Figure 6.1: The 10 Healthy Streets indicators**



Source: [www.healthystreets.com](http://www.healthystreets.com)



**6.11** To assist in delivering 'healthy streets', a number of potential improvements to walking and cycling in St James's have been identified. These are listed in Appendix B along with identified public realm improvements, many of which address both objectives.

**6.12** Together with Policy STJ7, this policy seeks to reduce street level clutter wherever possible. This will enable more pedestrian movement along streets which are more attractive.

**6.13** New development should provide cycle parking and appropriate related facilities in accordance with the relevant London Plan standards<sup>18</sup>. Encouraging this provision for private development to be within buildings will assist in providing the required amount and in de-cluttering the streets from cycle stands. Equally, for public provision to be taken up, it must provide parking that is secure.



<sup>18</sup> London Plan Policy T5





# Sustainability

## 7. Sustainability

**7.1** Sustainability was identified as important to those in St James's. Local consultation identified a desire for more retrofitting 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, sensitive interventions into improving the fabric of buildings are encouraged using materials and methods appropriate to the existing building and context. In particular, and recognising the improving technology influencing their design, the use of heritage-sensitive slimline double glazing may be supported in listed buildings where appropriate.

**7.5** A 'whole building' approach to retrofit is encouraged where possible. This will ensure a more effective reduction in emissions and avoid unintended harmful impacts to the building. Guidance is provided in WCC's Environmental Supplementary Planning Document. Guidance on how to make windows more energy efficient is also provided by WCC<sup>19</sup>.

### **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 construction emissions and maximise energy efficiency and the use of renewable energy to meet their needs. Where appropriate to the building and context, all new buildings<sup>20</sup>, conversions, extensions, retrofits and refurbishments<sup>21</sup> in St James's are encouraged to:

- a.** utilise low carbon technologies which provide energy efficient, renewable sources of energy;
- 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;
- c.** ensure materials that are low carbon, bio-based and with high reused or recycled content are prioritised for construction before products from raw or virgin resources.

**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 unacceptable harm to the significance of listed buildings or the character and appearance of the Conservation Area.

<sup>19</sup> WCC (2022) How to make your windows more energy efficient, Retrofit how-to guides

<sup>20</sup> This excludes major development (as defined in the NPPF) which is addressed by Westminster City Plan Policy 36 (Energy)

<sup>21</sup> Where planning permission is required

## **Green infrastructure**

**7.6** 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. This is particularly important given the requirements of the Environment Act for all development to provide a biodiversity net gain. Where possible this should be delivered on site and these types of opportunities can make a significant contribution towards meeting this requirement. Accordingly, 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.

**7.7** 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. The relevant British standards should be observed<sup>22</sup>.



<sup>22</sup> British Standards BS5250 and BS8616



## POLICY STJ10: GREEN ROOFS

The provision of green infrastructure on roofs is encouraged where appropriate to the building and context. 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 and species richness;
- 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;
- 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;
- g.** ensure that any planting would not result in unacceptable harm to the significance of listed buildings.







## Community Engagement

## 8. Community Engagement

- 8.1** In a dense area of activity such as St James's, it is important that proposals for new development are carefully considered and can evolve effectively. Part of ensuring this is through effective engagement with residents, businesses and property owners in the vicinity of a development. It is considered that all such parties should be properly engaged in proposals before they are finalised and sent to WCC.
- 8.2** Guidance is provided by the WCC note on Early Community Engagement 2022<sup>23</sup> but, for householder development, this only 'encourages' leaflets and online communication. The Forum considers that effective community engagement on householder developments which could have a detrimental impact on the amenity of residents needs further direction. The Forum has developed its own best practice guidance that householder development proposals (Level 3 projects in the Code of Construction Practice classification) are encouraged to follow in order to ensure positive and constructive engagement with the local community. This is shown in Appendix C.

<sup>23</sup> WCC (2022) Early Community Engagement in Westminster: Guidance Note for Applicants and Developers



# Appendix A

## St James's Character Areas

### 1. St James's Square

**1.1** St James's Square, and the buildings immediately surrounding it, is the historic heart of St James's. It is the archetypal London square and has been highly influential upon the subsequent development of London's West End, particularly in Mayfair and Belgravia.

**1.2** St James's Square has long been a key part of the St James's area and has a close connection with the history of the area and the current and past residents. The St James's Square development was begun in the 17<sup>th</sup> century by the first Earl of St Albans in the fields to the north of St James's Palace. Following neglect and a decline in the quality of space, residents petitioned Parliament for more control over the Square. The resulting St James's Square Act of 1726 gave residents the ability to **"clean, repair, adorn and beautify"** the Square and a plan for restoration was drawn up by Charles Bridgeman<sup>24</sup>.

**1.3** John Nash, the famous Regency architect, redesigned the garden in 1817-18, enlarging the enclosure and adding curving walks and a shrubbery around the perimeter. He produced plans and an estimate for a garden seat (the Summerhouse), to be presented to the Duke of Northumberland<sup>25</sup>. The Summerhouse was built in 1822 and is Grade II listed<sup>26</sup>.

**1.4** In the 1900s further work was carried out to the Square, including a restoration and replanting from 1909 to 19103. By the middle of the nineteenth century, tradesmen and clubs were beginning to encroach into the area and the centre of fashionable London moved to Belgravia. The Square retained its residential character up until the 1920s, with many of the private houses thereafter being converted to business uses<sup>27</sup>.

**1.5** Today, the Square provides a central oasis within the heart of St James's. It is a private square for use by residents living there but is open to the public during daylight hours on weekdays. Surrounded by an impressive collection of terraced 18<sup>th</sup> century Georgian townhouses (a number of which are listed), the Square retains a glimpse of historic London.

The 17<sup>th</sup> century grid layout is unique and remains intact<sup>35</sup>, linking to the wider grid layout of the area.

**1.6** Views into and from the Square are important. In particular the views into the Square from the surrounding streets give a welcome glimpse of trees and greenery. Duke of York Street provides a view of St James's Church from the Square. Charles II Street provides views of the façade of the Theatre Royal Haymarket. These views are both important in their own right but also provide useful wayfinding clues to pedestrians.

**1.7** The buildings surrounding the Square are now largely used as commercial offices, institutional uses, as well as clubs, and the Square itself provides a recreational green space for nearby workers and the St James's residents. The perimeter of the Square provides car, motorcycle and bicycle parking and hire at docking stations on the east side.

**1.8** The Square provides a useful space for modern day needs whilst at the same time, provides a treasured link to the architectural history of this part of London.

**1.9** New buildings and any extensions or alterations to existing buildings should be designed in a manner which is in-keeping with the historic character and scale of the buildings around the Square.

<sup>24</sup> London Parks & Gardens Trust. A Short History of London's Garden Squares 1700 to 1750. [online] London Parks & Gardens Trust. Available at: <<http://www.londongardenstrust.org/history/squares1700.htm>>

<sup>25</sup> Historic England. St James's Square – List Entry Summary. [online]. Historic England. Available at:<<https://historicengland.org.uk/listing/the-list/list-entry/1000833>>

<sup>26</sup> Historic England. Summerhouse To Centre Of South Side Of Square Garden – List Entry Summary. [online]. Historic England. Available at:<<https://historicengland.org.uk/listing/the-list/list-entry/1235856>>

<sup>27</sup> Historic England, St James's Square – List Entry Summary

## 2. Duke Street, St. James's & King Street

- 2.1** Duke Street, St James's, King Street and other secondary streets form the core of St James's special retail character, typified by small, distinctive shops, galleries and antiquarians. At upper floors, there are a range of commercial, gallery/antique and residential uses.
- 2.2** These streets have a particularly urban character, with relatively tall buildings (circa five to seven storeys) clustered around narrow streets. A number of the retailers accommodate traditional and attractive shopfronts<sup>28</sup>.
- 2.3** The area has an international reputation for fine art and is home to Christie's, the world's oldest fine art auctioneer, which moved from their original premises on Pall Mall (1776) to a new home at King Street in 1823. Whilst the area was already a centre for art, the development of Christies helped to develop London, and St James's in particular, as an international centre for fine art.
- 2.4** The area retains its reputation and association with art with a number of the retailers selling art or antiques, or offering complementary services such as conservation, restoration and framing. One of the most notable galleries, the White Cube, occupies a freestanding building within Masons Yard and opened in 2006.
- 2.5** The streets are generally quieter in nature than the main thoroughways surrounding them. On-street parking exists, although this is restricted through parking controls. These narrow streets are dominated by parked or servicing vehicles; and traffic with no business in the area, rather using St James's as a shortcut. Over time measures need to reduce this domination and to make the streets more attractive to those on foot and to serve the needs of local residents and businesses.
- 2.6** As recognised by the Special Policy Area policy in the Westminster City Plan (Policy 21), art galleries are a key sector of the retail offering in St James's and significant contributors to the area's character. In addition to the offer provided by galleries, there are also a number of craft workshops which also contribute to local character. Customers will often pre-plan their London visits around appointments with their favourite shirtmaker, shoemaker, gunsmith, tailor, or art gallery, or a specific auction, and the activity generated feeds into other uses in St James's such as restaurants, hotels and private members clubs.

<sup>28</sup> Westminster City Council, Conservation Area Audit: St James's, p.30

## 3. Arlington Street to Cleveland Row

- 3.1** The area between Arlington Street and Cleveland Row, to the west of St James's Street, is characterised by a greater concentration of residential and hotel uses than other parts of St James's, although the area is far from homogenous and retains a rich mix of uses as well as architectural styles. A number of established private members' clubs are located in this area and benefit from views across Green Park.
- 3.2** The western most edge of this area is located at the Queen's Walk, a public Royal Parks pedestrian footpath which connects Piccadilly with the Mall via Green Park. The Queen's Walk divides the St James's area from Green Park and provides a varied frontage which showcases grand Grade I listed façades including Spencer House, Bridge Water House and Vernon House. A number of the buildings along the Queens Walk are set back from the path, contributing to the green and open nature of Green Park.
- 3.3** The whole of this area is relatively impermeable, with only a few discreet public access routes from Green Park. The relatively dense interior section of this area houses a number of interesting backyard spaces with the feel of small mews streets. Hotels and private members' clubs have made use of some of these spaces to accommodate quiet dining and reception areas. In addition, many of these spaces serve as servicing areas for the commercial uses.
- 3.4** Proposals have been put forward by HOLBA to widen and declutter footways and improve the public realm generally on a number of streets, including Arlington Street.



## 4. Jermyn Street

**4.1** Jermyn Street is a principal shopping street within St James's. Jermyn Street has long been associated with gentlemen's outfitters goods and a number of the shirt-maker/retailers present along the street today have been established for some time, including Geo F. Trumper Ltd, men's hairdresser and perfumers (est. 1875), Hilditch and Key, shirtmakers (est. 1899) and New and Lingwood, shirtmakers and hosiers, boot and shoemakers (est. 1865)<sup>29</sup>. It retains much of this character and menswear association, which has been reinforced in recent years by distinctive retail occupiers moving to the street, many of which are focused at the men's quality market. The street is also home to other specialist, niche and historic retailers, such as specialist cheese merchants Paxton & Whitfield, who have been present on Jermyn Street since 1835<sup>30</sup>. Aside from specialist and historic retailers, the street also accommodates several art galleries, restaurants and a small theatre and at its centre, St. James's Church.

**4.2** Jermyn Street has a mix of architectural styles with a range of building widths and heights. The majority of buildings are relatively tall (circa three to seven storeys, save with the exception of much taller buildings towards the east and west ends of the street). Of particular focus is the Grade I listed Sir Christopher Wren Church of St James's, which occupies a prominent plot on Jermyn Street on axis with Duke of York Street and St James's Square.

**4.3** The street level retail is characterised by a number of traditional shopfronts, with many of the shops of the south side of the street retaining their nineteenth century shop fronts, including Paxton and Whitfield, Turnbull and Asser, Floris Perfumeries and Rowley's restaurant, which include features such as polished brass cills, thin mullions, panelled risers, pilaster, moulded cornices, window bays divided by piers and shopfronts decorated by carved capitals<sup>31</sup>.

**4.4** The east and western ends of the street have a more modern character and are more akin to the nature of Piccadilly and Regent Street, St. James's. Servicing and waste refuse arrangements on the corner of Jermyn Street and Regent Street, St. James's currently detract from the quality of the street. The very eastern section of Jermyn Street between Regent Street, St. James's and Haymarket does not have as strong a retail presence as the central section and suffers from relatively poor public realm and street frontages.

**4.5** With regard to physical connections through to Jermyn Street, connections from St James's are relatively good, with useful linkages to the western area of St James's (St James's Street), the east (Regent Street, St. James's) and the interior (Duke of York Street). The public realm and 'entrances' to the main section of Jermyn Street from St James's Street and from Regent Street, St. James's, could be improved through public realm improvements, wayfinding and creation of a more attractive street feel. Some improvements have been made along St James's Street. There are also pedestrian connections through alleyways and links, such as the Churchyard, Church Place and Eagle Place and the historic arcades (Piccadilly and Princes) through to Piccadilly. However, these are relatively hidden and not currently celebrated. Opportunities should be taken to activate key corners with retail frontage.

<sup>29</sup> The St James's Conservation Society, Conserving Historic St James, p.7

<sup>30</sup> Paxton and Whitfield London Cheesemongers. Est. 1797. Our Heritage. [online] Paxton and Whitfield London Cheesemongers. Est. 1797. Available at: <http://www.paxtonandwhitfield.co.uk/our-heritage>

<sup>31</sup> Westminster City Council, Conservation Area Audit: St James's, p.30

## 5. Pall Mall

**5.1** Pall Mall is characterised by a number of discrete private members' clubs, residential and commercial uses and some limited supporting retail uses.

**5.2** Pall Mall forms part of St James's historic private club offering and this use is a key and unique characteristic of the local area. The presence of the clubs has been long established, dating back to when Sir Henry Jermyn developed the area as a residential destination for members of the aristocracy, politicians and public figures. Debates between these key figures evolved into the formation of a number of private members' clubs, many of which still stand today.

**5.3** A number of the clubs located along Pall Mall are housed in notable listed buildings, including the Athenaeum, the Travellers Club and the Reform Club (all Grade I listed) and the Royal Automobile Club and the Oxford and Cambridge Club (both Grade II\* listed). The impressive façades and large street widths create a sense of grandeur for pedestrians and street users. Very generally speaking, the south side of the street is more historic and features the private clubs, whereas the north side of the street is more modern in nature and accommodates more residential and commercial office uses and there is not a great deal of street level activity. Connections are provided to and from St James's Square although the majority of street traffic runs through Pall Mall and on to St James's Street. The presence of vehicle traffic along Pall Mall creates a sense of the road being a thoroughfare.

**5.4** To the east of the Athenaeum and south of Regent Street, St. James's, lies Waterloo Place, which is characterised by its very wide street width and with its central reservations and numerous statues, all of which has recently been improved to be more like an area of public open space, rather than a transport junction and car parking area. At present, the space still does not live up to its potential to deliver a key area of high quality open space, befitting of its grand, historic environment. Poorly located parking spaces, cycle stands and cycle hire docking stations, signage and the presence of a pedestrian unfriendly road network, do not encourage sufficient public or pedestrian activity at street level. A plan of cultural, soft landscape and curated public art, as temporary or permanent installations or activities and outdoor management of seating could all help transform the spaces into unique high quality places. However, it is recognised that the provision of suitable cycle parking and cycle hire docking stations should be retained.

**5.5** The western section of Pall Mall runs into the corner junction with St James's Street and Marlborough Road. This corner benefits from one of the country's most historic and important settings, sitting alongside the Grade I listed St James's Palace, the official residence of the monarch. Recent improvements to address problems at traffic junctions and narrow street widths have helped to enhance the historic setting.



## 6. St. James's Street

**6.1** Along with Pall Mall, St James's Street accommodates the majority of private members' clubs in St James's. A number of these are in impressive listed buildings, including the Grade I listed White's, Boodle's, Brook's and the Grade II\* listed Carlton Club. The presence of the established gentlemen's clubs and proximity to the palaces and historic retailers provides the street with a unique established history. The street itself has a long history and is one of the earliest streets to be laid out in the late 1600s<sup>32</sup> and housed some of St. James's' earliest famous residents.

**6.2** Architecturally, the buildings along St James's Street are all relatively tall, deep and with limited spaces in between. This gives the street a more commercial/city centre feel. There is a mix of building styles, with some more modern buildings including the Grade II\* listed modernist Economist building group, which adds some variety to the street. The street is home to some of London's finest historic shopfronts with retailers long established on St James's Street, including Berry Brothers & Rudd (est. 1690), Lock's (est. 1726), John Lobb, James J. Fox (est. 1881), D.R. Harris and Co (est. 1790), Justerini and Brooks, William Evans (est. 1883), and Truefitt and Hill<sup>33</sup>.

**6.3** St James's Street is one of the main gateways into the area and views from Piccadilly and Mayfair down St James's Street are especially pronounced given the sloping gradient of the street. The views along the street are impressive, with a number of listed buildings flanking an axial view to the Tudor Gateway of St James's Palace. Recent improvements to the junction between St James's Street, Pall Mall and Marlborough Road has helped to enhance the important historic setting and views down St James's Street.

**6.4** Another factor which detracts from views down the street is the dominance of vehicular traffic. St James's Street, along with Pall Mall and Regent Street, St. James's are key pedestrian and vehicular thoroughfares bounding the rectangle of St James's. The street is wide, in contrast to the intimate scale of much of the rest of the area, and on-street servicing bays add to the depth and business of the road. The road is heavily trafficked, which detracts from the character of the street. The width of the street and the high volume of traffic dislocate the parts of St James's on either side of the street from each other. Measures that reduce this dislocation should be welcomed.

**6.5** For pedestrians, the footways are relatively wide and some pavement clutter detracts from the pedestrian environment.

**6.6** Although St James's has a number of shops and restaurants, the street is generally lacking in prominent active frontages. In parts of the street, the character has become more mixed and, to a certain extent, has been eroded by the introduction of other uses that, either because of the type of use or, in some cases, lack of an active frontage, do not contribute to the particular character and distinctiveness of St James's. The overall ambience is still historic.

<sup>32</sup> The St James's Conservation Society, *Conserving Historic St James*, p.3

<sup>33</sup> The St James's Conservation Society, *Conserving Historic St James*, p.3-4

## 7. Piccadilly

**7.1** Piccadilly is one of the West End's principal, strategic routes and forms the northern boundary of St James's. It extends beyond St James's and has a character quite different to that of other, more local, routes within St James's. It is busy with heavy eastbound vehicle traffic and does not currently, readily offer routes to and from St James's. Due to the increasing activity levels of the street, its character shares some characteristics of both the interior of St James's and of mixed use West End shopping streets, such as The Strand. Although generally regarded as the northern boundary of St James's, some uses on the north side of Piccadilly are complementary to St James's. The retail in Burlington Arcade, Old Bond Street and Savile Row are complementary to Jermyn Street. The art dealers of Cork Street and the Royal Academy are complementary to the art dealers in St James's. Links across Piccadilly are therefore important to St James's.

**7.2** Piccadilly has a much wider and diverse range of uses including important cultural, educational and institutional uses at Burlington House, (with improvements and improved connections in progress to enhance links to and from St. James's and Mayfair) and a different character from much of St James's, including mainstream retail, distinctive historic department stores (such as Fortnum & Mason), historic arcades, office and commercial, and hotel and restaurant uses. The street does not have an on-street, residential character or nature and therefore is an optimum location to deliver and develop appropriate commercial activity. As Piccadilly has been a boundary to St James's, rather than forming an integral part of it, there is scope for a much wider range of use, activity and development than in other parts of St James's.

**7.3** The street is home to some iconic buildings and spaces, including the Ritz (Grade II\*) and Burlington House (Grade II\*) and its impressive open forecourt. Piccadilly is also famous for its historic shopping arcades (Burlington and Piccadilly arcades, Grade II listed) which offer visitors attractive thoroughfares which provide an understanding of the architectural and commercial heritage of the area. The historic buildings provide an impressive street scene and many of the buildings adopt varied and unique architectural features, such as arches, colonnades and protruding bay windows, which add variety and interest to the street. Piccadilly is also home to more modern architecture, some of which seeks to reflect the classical nature of the historic buildings.

**7.4** Piccadilly's length means that the street changes in character and nature as it progresses. There is more of a sense of openness near Green Park and this immediately diminishes at the boundary of the Park. Generally, building heights along Piccadilly are high, with buildings comprising circa 8-10 storeys at the centre of Piccadilly, reducing to about 6-7 storeys at the eastern end of the street. Between the Ritz and Piccadilly Circus, the buildings along the southern side of the street form a physical 'barrier' to St James's which is only permeated through the two arcades and two very discreet passages. The retail offering in this location is generally more specialist than on the main shopping routes of the West End and is relatively quieter in terms of pedestrian traffic. Within the centre of Piccadilly sits St James's Church, which provides a visual break in the continuity of larger buildings along the street. The attractive forecourt provides a welcome area of open space within this location. At the eastern junction with Haymarket, Piccadilly Circus is a major tourist attraction which is heavily trafficked and accommodates wide footways and public spaces which are busy with pedestrians and visitors. The retail and entertainment offering in this location is generally more in line with that in Haymarket and Leicester Square, i.e. more mainstream and high intensity. Piccadilly Circus is home to the famous "Shaftesbury Memorial to Christian Charity" (also known as "Eros") and Piccadilly Advertisement Lights. These attractions mean this area is defined by bold advertising and a great deal of lighting. Westminster City Council's advertising and signage policies recognise the unique character of this area.

**7.5** At street level, Piccadilly provides activity and wide streets for pedestrians. Recent improvements to the vehicular road, restored to 2-way vehicle traffic working (2011), mean that pedestrian crossing has become less difficult although this is an area that could still be improved upon. The main quality which detracts from the experience of the street is the continued presence of vehicle traffic.

**7.6** Piccadilly's retail character is quite distinct from St James's. Although it forms part of the SPA area, the retail offer is less specialised and has a number of high street occupiers. Fortnum and Mason is a historic department store occupier on Piccadilly and is a key part of the character of the street.



## 8. Regent Street, St. James's to Haymarket

**8.1** Regent Street, St. James's and Waterloo Place mark the boundary of historic St James's as currently understood (originally Haymarket marked this eastern edge), although some uses that characterise St James's continue eastwards towards Trafalgar Square, such as the pioneering early 19th century Royal Opera Arcade and the listed Institute of Directors (originally the United Services Club). Much of this area, and particularly the eastern part onto Haymarket, has a much more diverse West End character, including a range of theatre, restaurant and evening-economy uses, reflecting the proximity of the area to Leicester Square, Coventry Street and Soho.

**8.2** Whilst the street widths along Haymarket and Regent Street, St. James's generally match those along St James's Street, the streets have a much busier, commercial feel due to the number of entertainment and commercial uses and pedestrian traffic. Generally speaking, these uses are clustered more towards the north of the streets, near Piccadilly Circus. These streets form part of the West End's cultural, dining and entertainment offer which is exceptional and of vital importance to Westminster, London and the UK economy more generally (for example, Westminster's night time economy generated £17 billion turnover in 2013<sup>34</sup>). As previously noted, part of this area is classed as a Strategic Cultural Area, which is recognised at London Plan level as having strategic importance.

**8.3** The London Plan also recognises the strategic importance of night time activities in strategic clusters in the CAZ. This expansion will need to be accommodated in appropriate areas to continue to deliver strategic employment and economic benefits.

**8.4** In recent years, the entertainment industry itself has changed, which has resulted in a change in the nature and operation of the area around Piccadilly Circus. The growth of food-led premises and a more varied spread of entertainment uses has aided the improvement of public areas and spaces, and helped to widen audience demographics in the local area. Whilst there are a number of late night drinking establishments around Piccadilly Circus, there are also a number of restaurants, theatres and cinemas which provide economic benefits without as many adverse social effects.

The recent introduction of the Night Tube, and the increased public access this provides to the local area, may change the nature of late night premises in the area. This different character, with a range of modern commercial and restaurant uses that goes beyond those traditionally found within St James's, has been reinforced by the successful completion of the first phase of The Crown Estate's St James's Market scheme, which has dramatically improved permeability and the range of uses within these blocks, streets and spaces. The St James's Market development re-introduces the memory of the historic market which was present in this location from the 1600s until the early nineteenth century<sup>35</sup>. Whilst of a different scale and nature to Haymarket and Regent Street St James's, the St James's Market development is a good example of how to effectively encourage commercial activity in the area in a manner which is sensitive to the local surroundings.

<sup>34</sup> TBR 2015 p.15. Westminster Evening & Night Time Economy: A cost-benefit study, for Westminster City Council. Available at: <[http://transact.westminster.gov.uk/docstores/publications\\_store/policy-docs/Westminster%20ENTE%20Cost%20Benefit%20Analysis%20Summary.pdf](http://transact.westminster.gov.uk/docstores/publications_store/policy-docs/Westminster%20ENTE%20Cost%20Benefit%20Analysis%20Summary.pdf)>

<sup>35</sup> Westminster City Council, Conservation Area Audit: St James's, p.4

## 9. The Mall, Carlton Gardens and Carlton House Terrace

**9.1** The Plan area encompasses the north side of the Mall. The established, formal composition of the Mall, and the relationship with Carlton House Terrace and Carlton Gardens is of local, national and international importance.

**9.2** The area is characterised by a mix of institutions, some commercial offices and private housing, with limited active frontages. There is relatively little activity despite the central location and the proximity to Trafalgar Square except for the regular police managed events each year, comprising state and ceremonial as well as other major events, such as the London Marathon, and City Council promoted filming uses. The institutions add significantly to the distinct character of Central London, Westminster and to St James's. There is a small cluster of offices, cafes, restaurants and a hotel in Cockspur Street and Spring Gardens.

**9.3** Carlton House Terrace in particular is relatively secluded and does not attract much street activity. The attractive gardens to the rear of clubs fronting Pall Mall add to the calm and ordered nature of the area and act as an appropriate backdrop to the grand Carlton House Terrace (Grade I listed), designed by Nash and built to replace Carlton House<sup>36</sup>. There are also a number of nationally significant listed buildings, statues, memorials and structures along the street (Grade I and Grade II\*). The grand listed Nash terraces are an important feature of St James's, and are important for views to and from St James's Park and the Mall<sup>37</sup>.

**9.4** The southern section of Waterloo Place and the Mall itself provide important pedestrian routes through the city, linking St James's with St James's Park, Trafalgar Square and Buckingham Palace. As noted in the St James's Conservation Area Audit:

**"Waterloo Place is laid out along a formal axis to the plans of Nash running southwards to join The Mall via the steps at the Duke of York Monument. These two primary routes are of national significance providing places where pedestrians can appreciate direct visual links between landmark buildings. Along their length are major monuments and sculptures adding richness to these grand processional routes with strong royal associations."<sup>38</sup>**

**9.5** The steps to the south of the Duke of York Column provide a valuable area of open space and carry on their original purpose to link Carlton House Terrace with Pall Mall<sup>39</sup>. The 38m high Duke of York monument (1830) marks the termination of an axis of statues up towards Regent Street St James's<sup>40</sup>. Today, the area has increasing levels of tourist activity and negative issues of unauthorised coach setting down/picking up in place of use on the Mall. To the east of Carlton House Terrace, a number of offices and institutions are located around Cockspur Court and Spring Gardens and to the south of Warwick House Street. This area in particular is relatively under-used and there are some useful secluded public walkways and courtyards.

<sup>36</sup> The St James's Conservation Society, Conserving Historic St James, p.3

<sup>37</sup> Westminster City Council, Conservation Area Audit: St James's, p.26

<sup>38</sup> Westminster City Council, Conservation Area Audit: St James's, p.11

<sup>39</sup> Westminster City Council, Conservation Area Audit: St James's, p.8

<sup>40</sup> Westminster City Council, Conservation Area Audit: St James's, p.30



## 10. St. James's Palace, Clarence House & Lancaster House

**10.1** Further down the Mall, the ancient St. James's Palace complex forms an impressive view from the Mall and from St James's Park. Views down St James's Street are also characterised by the complex, with the original Tudor Gateway of the Palace taking a prominent position in the key view south from Mayfair. The complex is central to the historic evolution of St James's and the monarchy. It is key to the area's significance and is of local, national and international importance. The Royal household of Clarence House forms part of the palace complex with Marlborough House and Lancaster House completing the blocks at the south eastern and south-western sides of the main Palace. St James's Palace itself was built largely between 1531 and 1536 by Henry VIII on the site of a hospital. Much of the original Tudor building remains today, including the Chapel Royal, the gatehouse and turrets<sup>41</sup>.

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<sup>41</sup> <sup>87</sup>The Royal Family. Royal Residences: St James's Palace. [online] The Royal Family. Available at: <<https://www.royal.uk/royal-residences-st-james-palace>>

## Appendix B

# Funding Priorities for CIL Payments

The matters listed below are examples of initiatives for which CIL payments and other funding will be directed. However, the list is not exhaustive and other issues may well arise which will take precedence for funding. The Forum will constantly keep the priorities for funding under review.

- **St James's Market & Haymarket.** Further improvements to the public realm in St James's Market, including routes between Haymarket and Regent Street St James's and Charles II Street, as well as crossing of Haymarket, will be supported.
- **Arlington Street and Bennet Street.** These key approach routes to and from Mayfair and St. James's have suffered from some uncoordinated developments, which did not reinstate or take up the opportunity to improve the public realm and townscape and landscape settings and arrangements of these historic spaces
- Improvements to **pedestrian linkages** and upgrading to soft and hard landscape of routes and settings as well as the quality of carriageway paving and footways, throughout St James's.
- **Jermyn Street improvements** to the public realm and to improve links to and from Jermyn Street and other areas of Mayfair/St James's. The particular areas of focus are:
  - a. the area to the east of Jermyn Street between Regent Street, St James's and Haymarket;
  - b. the western corner of Jermyn Street and Regent Street St James's;
  - c. the corner of St James's Street and Jermyn Street; and
  - d. public links to and from Piccadilly and Jermyn Street.
- Improvements to **St. James's Church/and Piccadilly footway frontage and improvements to the Churchyard landscaping and links.** Improvements to the facilities of the Church accommodation, including added value and restoration of the Listed Buildings and structures, the possible footway widening of the Piccadilly south side frontage adjacent the Churchyard, (originally planned as part of the 2-way traffic improvements, incomplete, due to budget constraints) the landscape setting and boundary to Jermyn Street and new and improved pedestrian links and spaces.
- An **area wayfinding project** linked to the Whitehall BIDs Hidden Gems Trail.
- 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.**
- **North-south and east-west cycle routes** through the Neighbourhood Area. The north-south route aims to link St James's Park with Mayfair (informed by Transport for London's Strategic Cycling Analysis).

## Appendix C

# Best practice guidance on community engagement

This is the St James's Neighbourhood Forum's 'Best practice guidance on community engagement'.

In preparing the St James's Neighbourhood Plan, the St James's Neighbourhood Forum (the Forum) has also produced best practice guidance on construction standards and procedures for Level 3 projects. The content of this guidance was consulted upon during the Regulation 16 consultation on the Neighbourhood Plan.

Where this guidance includes matters that relate to planning applications rather than procedural matters, they will be treated as material considerations. Unlike the Neighbourhood Plan however they do not have development plan status.

### 1.0 Introduction

- 1.1** This document represents the Neighbourhood Plan for St James's for the period 2022-2040. The Plan contains a vision for the future of St James's and sets out clear planning policies to realise this vision.
- 1.2** In particular, the Forum wants to ensure that there is active discussion and effective engagement with the public in relation to the development or use of land so that the best solutions are found to the challenges that face and will face the Area. The St James's Neighbourhood Plan therefore provides for a new and effective model of public participation grounded in the principles of the **Aarhus Convention**<sup>42</sup> which has been ratified by the UK and which provides for: **(a)** Access to information; **(b)** Public participation; and **(c)** Access to justice.
- 1.3** All development which requires approval by Westminster City Council (WCC) or planning permission is encouraged to comply with the Neighbourhood Forum's 'Best practice guidance on community engagement' when bringing forward projects, plans, or policies which may affect the environment in St James's.

<sup>42</sup> <https://aarhus.osce.org/about/aarhus-convention>



## 2.0 Information

**2.1** Proper consultation requires information. Members of the public should be given sufficient information in plain English to enable them to understand the proposals and engage properly and meaningfully in the decision-making processes at all stages. Therefore, for all decisions affecting the environment, members of the public should be given early access to a wide range of information to enable them to understand plans, programmes, projects and policies that are brought forward in the neighbourhood that relate to and impact on the environment. This means:

### DEVELOPERS

**2.2** Developers should provide the community with information about proposed projects during any pre-submission consultation period. This should include the Forum and the owners and occupiers of all properties within a 50-metre radius of the site address.

**2.3** Any information provided by developers as part of any development should be in a format which is easily understandable and any technical information must be explained in plain English. It should be provided in paper and/or electronic form as requested by the community.

**2.4** Developers should seek to be as transparent as possible about material information concerning their development. In particular, developers are encouraged to disclose documents such as viability or affordable housing assessments.

**2.5** Developers should, on an ongoing basis, monitor the impacts (adverse or positive) that the development has on the environment and human health and disclose the results of such monitoring to the Forum. In particular, developers or contractors of all new development or major refurbishment is encouraged to undertake an independent post-completion assessment to determine the 'real world' impacts on air, land, water, biota and human health.

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**2.6** WCC is encouraged to make as much information about the neighbourhood's environment freely accessible to the community as necessary to build an understanding of the St James's environment amongst its community.

**2.7** Any information concerning the environment provided by WCC to the community should be in a format which is easily understandable and with any technical information explained in plain English.

**2.8** WCC is encouraged to disseminate on a regular basis as much information about the neighbourhood and its environment as practicable to the St James's community either directly in writing or through events which are publicly advertised.

**2.9** Information which WCC provides to the community should ideally include, but not be limited to: (i) information and advice about bringing forward community-led development proposals which meet the objectives of the Plan; (ii) information and advice about ways in which members of the community can change their lifestyle through behaviour, best practice, opportunities or technology in order to reduce their impact on the environment within and outside the neighbourhood; (iii) information and advice about ways in which they can help the neighbourhood to best adapt and mitigate against environmental and other challenges for the benefit of future generations and without displacing significant negative environmental effects to another locality; and (iv) information concerning the real world impacts of development to enable the community to monitor and assess whether neighbourhood plan policies are achieving their intended aims to improve the environment of St James's.

**2.10** WCC is encouraged, where there is evidential uncertainty as to the impacts of any proposed project, plan or policy on the environment or human health, to adopt the precautionary principle in its decision-making process.

**2.11** WCC is encouraged to report annually to the community on the amount, form and use of planning obligations or Community Infrastructure Levy contributions from development within the Neighbourhood Area. Any such report should include separate details of the amount and use of the 'neighbourhood' portion of any Community Infrastructure Levy contributions.

### COMMUNITY

**2.12** The Forum is the designated neighbourhood forum for the St James's Neighbourhood Area. It focuses on fulfilling its duties under the Localism Act 2011, the Neighbourhood Planning Act 2017 and its constitution. It should be consulted by WCC to agree the use of the 'neighbourhood' portion of any contributions from the Community Infrastructure Levy or similar development monies within the Neighbourhood Area.

**2.13** For the avoidance of doubt, the rights to information, public participation and access to justice set out in this protocol are to be enjoyed by the whole community and not limited to the Forum.

### 3.0 Participation

**3.1** Members of the public should be able to participate in all stages of the decision-making processes which affect their environment. Members of the public should therefore be consulted on plans, projects and policies at the earliest possible stage. Early consultation is key to ensuring that any plans, projects or policies which may affect the community are beneficial.

**3.2** Public consultation is not just a box to be ticked. Meaningful and lawful consultation entails conscientiously taking into account the fruits of the consultation in the decision making process.

#### DEVELOPERS

**3.3** Developers should commit to true consultation so that comments received from members of the public are properly considered. This should include considering abandoning a plan or proposal which is strongly opposed with clear justification.

**3.4** Developers should invite the local community and relevant organisations, including but not limited to the Forum, to engage in early consultation. This should be done at least once before the submission of any application for planning permission and at least once during any public consultation period.

**3.5** Developers should consider whether to invite the local community or relevant organisations, including but not limited to the Forum, to bring the development forward as a community led partnership.

**3.6** Developers should continue to engage in consultation with the local community throughout the decision-making process, during the implementation of any development consent and after the development has been completed.

**3.7** Developers should submit a Statement of Community Engagement (Statement) to confirm in a legally binding document that they have and will continue to comply fully with the 'Best practice guidance on community engagement'. This Statement should include all relevant information concerning how they have engaged with the community and how they will continue to facilitate informed and effective community engagement. The Statement should also include, but not be limited to:

**A.** an explanation of how members of the public in the immediate locality and in the wider Neighbourhood Area have been consulted in a timely and meaningful fashion.

**B.** a description of the means used to involve and engage with the Forum and local people. Specifically, this should explain how provision was made for comments to be put forward in different ways; for example, a variety of publicity platforms and the opportunity to provide web-based comments as well as attending events in person.

**C.** a record of the views expressed by local people and the Forum.

**D.** an explanation of how the proposals being submitted following this consultation have addressed the views of and any issues or concerns raised by local people and the Forum.

**E.** a description of how members of the public will continue to be consulted during the implementation and after completion of the development.

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**3.8** WCC is encouraged to facilitate active public participation in the decision-making process by ensuring that the process is fully transparent and accessible to all. In particular, WCC is encouraged to invite the Forum and other relevant groups to participate in any meetings held with the developer and be copied in to all significant correspondence.

**3.9** WCC is encouraged to hold regular meetings to canvas the opinions of the local affected community on development proposals affecting the Neighbourhood Area.

**3.10** Any directly interested person should be given the opportunity to make representations at any hearing to determine the outcome of a planning application affecting the Neighbourhood Area.

#### COMMUNITY

**3.11** The Forum wishes to work with WCC and other relevant stakeholders in order to create new governance coalitions. In particular, the Forum will seek to develop new approaches to community engagement that ensure all levels of government engage with businesses, cultural and educational institutions and citizens on matters that impact on the Neighbourhood Area.

### 4.0 Access to justice

**4.1** WCC is encouraged to recognise the right of the members of the public to 'access to justice', which is not prohibitively expensive, where there has been a breach of their right to participate in decision making.





