



City of Westminster

Committee Agenda

Title: **Cabinet**

Meeting Date: **Monday 21st October, 2019**

Time: **7.00 pm**

Venue: **Rooms 18.01 & 18.03, 18th Floor, 64 Victoria Street, London, SW1E 6QP**

Members: **Councillors:**

| | |
|-------------------------|------------------|
| Nickie Aiken (Chairman) | Heather Acton |
| Ian Adams | Tim Mitchell |
| Timothy Barnes | Rachael Robathan |
| Richard Beddoe | Andrew Smith |
| Iain Bott | Paul Swaddle |

Members of the public are welcome to attend the meeting and listen to the discussion Part 1 of the Agenda

Admission to the public gallery is by ticket, issued from the ground floor reception at City Hall. If you have a disability and require any special assistance please contact the Committee Officer (details listed below) in advance of the meeting.



An Induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter. If you require any further information, please contact the Committee Officer, Reuben Segal, Head of Committee and Governance Services.

**Tel: 7641 3160; Email: rsegal@westminster.gov.uk
Corporate Website: www.westminster.gov.uk**

Note for Members: Members are reminded that Officer contacts are shown at the end of each report and Members are welcome to raise questions in advance of the meeting. With regard to item 2, guidance on declarations of interests is included in the Code of Governance; if Members and Officers have any particular questions they should contact the Director of Law in advance of the meeting please.

AGENDA

PART 1 (IN PUBLIC)

1. WELCOME

2. DECLARATIONS OF INTEREST

To receive declarations by Members and Officers of the existence and nature of any pecuniary interests or any other significant interest in matters on this agenda.

3. MINUTES

To approve the minutes of the meeting held on 15 July 2019.

(Pages 3 - 8)

4. PETITION TO NOT EXTEND THE VICTORIA OPPORTUNITY AREA BOUNDARY

Report of the Executive Director, Policy, Performance and Communications.

(Pages 9 - 18)

5. WESTMINSTER CITY PLAN SUBMISSION TO SECRETARY OF STATE

Report of the Executive Director of Policy, Performance and Communications

(Pages 19 - 60)

6. WESTMINSTER CITY COUNCIL CORPORATE PARENTING STRATEGY

Report of the Acting Bi-Borough Executive Director of Children's Services

(Pages 61 - 86)

**Stuart Love
Chief Executive
11 October 2019**



CITY OF WESTMINSTER

MINUTES

Cabinet

MINUTES OF PROCEEDINGS

Minutes of a meeting of the **Cabinet** held on **Monday 15th July, 2019**, Rooms 18.01 & 18.03, 18th Floor, 64 Victoria Street, London, SW1E 6QP.

Members Present: Councillors Nickie Aiken (Chairman), Timothy Barnes, Richard Beddoe, Iain Bott, Heather Acton, Tim Mitchell, Rachael Robathan, Andrew Smith and Paul Swaddle

Apologies for Absence: Councillor Ian Adams

1 MEMBERSHIP

1.1 There were no changes to the membership.

2 DECLARATIONS OF INTEREST

2.1 There were no declarations of interest.

3 MINUTES

3.1 **RESOLVED:** The Chairman, with the consent of the Members present, signed the minutes of the meeting held on 8th April 2019 as a true and correct copy of the proceedings.

4 OUTTURN AND ANNUAL ACCOUNTS 2018/19

4.1 Gerald Almeroth, Executive Director, Finance and Resources, introduced a report that presented the Statement of Accounts for the Council and its Pension Fund for 2018/19 and provided a narrative as to the outturn position for the financial year ending 31st of March 2019.

4.2 Mr Almeroth advised that in line with legislation the accounts are required to be signed off by the Council's Audit and Performance Committee and published by 31st July 2019. Officers presented the accounts to the Audit & Performance Committee on 17th June 2019 and this included a late change in the accounts as a result of the McCloud Court of Appeal Judgement which could impact the LGPS Pension Scheme. As a result of this the Council

included another note in its accounts and pension fund accounts for a contingent liability in relation to this judgement which it has agreed with the Council's Auditors, Grant Thornton, who are expected to issue the Council with a final audit certificate by the end of the week.

- 4.3 Councillor Rachael Robathan, Cabinet Member for Finance, Property and Regeneration, congratulated the Executive Director for Finance and Resources and his team for the successful delivery of the closure of accounts process. This was supported by the Leader of the Council who asked Mr Almeroth to extend this thanks to his team.

RESOLVED:

1. That the 2018/19 Annual Accounts be noted.
2. That slippage on the Council's 2018/19 capital programme as outlined in section 6 of the report be approved.

5 TREASURY MANAGEMENT OUTTURN 2018/19

- 5.1 Mr Almeroth introduced the Council's Annual Treasury Management Outturn Report for 2018/19 in accordance with the Council's treasury management practices. It is a regulatory requirement for this outturn report to be presented to Council by the 30 September each year.
- 5.2 Mr Almeroth advised Cabinet that the Council had complied with all elements of the Treasury Management Strategy Statement (TMSS) apart from two instances (already reported in the 2018/19 mid-year review) which arose because of exceptional banking receipts which were received too late in the day to be moved from the bank until the following day. This resulted in funds in excess of the strategy limit set for the Council's current bank account on two occasions:

RESOLVED:

That the annual treasury strategy final outturn 2018/19 be noted including the cases of non-compliance.

6 FEES AND CHARGES REPORT

- 6.1 Gerald Almeroth introduced the report which set out the outcome of an annual review of fees and charges for 2019/20. He explained that fees and charges contribute a number of benefits to the Council. They help manage demand and cover the costs of providing services whilst contributing to the Council's medium term planning (MTP) savings.
- 6.2 Councillor Rachael Robathan commended the report and its recommendations. She stressed that although an annual report on the review of Fees and Charges is submitted to Cabinet, fees and charges are monitored

and reviewed by all directorates throughout the year and can be changed as necessary.

RESOLVED:

1. That Appendix 2 and 3 of the report be exempt from public disclosure by virtue of paragraph 3 of Schedule 12A of the Local Government Act 1972, as amended – information relating to the financial and business affairs of the authority
2. That Cabinet:
 - a) Approved changes to fees and charges as outlined in Appendix 2 and 3 of the report.
 - b) Noted the changes already approved by other committees/members for 2019/20 highlighted in Appendix 2 of the report.
 - c) Noted the fees for which no increase is proposed for 2019/20. Details of these fees are included in Appendix 2 of the report.
 - d) Noted the overall proposed contribution from fees and charges to the Medium Term Plan (MTP) for 2019/20 and 2020/21 as highlighted in table 2 of section 7 of the report
 - e) Noted the fees and charges policy at Appendix 1

REASON FOR DECISION

To agree the Council's fees and charges position and changes for the coming year.

7 ADOPTION OF THE LONDON LIVING WAGE

- 7.1 Mr Almeroth introduced the report which set out considerations relating to the adoption of London Living Wage/National Living Wage Policy (LLW/NLW) for Westminster City Council and its application to third parties who provide goods and services under contract.
- 7.2 Mr Almeroth explained that to support the Council in its policy implementation the Council will seek Living Wage Foundation accreditation which will provide public recognition of the Council's commitment aligned to the City for All priorities. He further explained that, excluding apprentices, the Council already pays its directly employed London staff at least the LLW. The proposal before Cabinet was for the Council to work with its supply chain so that directly contracted staff are also able to benefit from the London living wage. The report outlined the expected benefits from adopting this policy.
- 7.3 Councillor Robathan supported the recommendations and stated that the adoption of the LLW/NLW will reflect the Council's commitment to contractors working on the Council's behalf through commissioned providers. It will also support the Leader's commitment to tackle gender and BME pay inequality. She further commented that the Council cannot continue delivering services to current standards without ensuring that all staff are paid fairly.

- 7.4 Councillor Mitchell highlighted that a number of contractors that had already agreed to pay their staff the LLW had not all passed on the extra costs to the Council. This is because many of the Council's contracts are output based. He anticipated that in some areas there may still be savings even though the contractor will move to paying the LLW, this will be through new innovative practice or reconfiguration of services.
- 7.5 Councillor Barnes asked about the average contract length and financial modelling undertaken by the Council to date. Mr Almeroth advised that the Council had undertaken research on the Council's key, higher value contracts in order to provide an indicative assessment of the future impacts, however, if members agreed the recommended policy then a more detailed review of contracts would be carried out as part of the phased implementation process.

RESOLVED: That Cabinet recommends that:

1. The Council takes steps to adopt a Living Wage policy whereby staff working for contractors delivering services on behalf of the Council are paid at least the London Living Wage or the National Living Wage outside of London.
2. The Council continues to pay its own London based staff LLW and to broaden this to apply to its apprentices.
3. The Council seeks Living Wage Foundation accreditation as a public pledge of its commitment.
4. A phased approach to implementation is adopted which means that the Living Wage will be incorporated as contracts are retendered with appropriate legal advice taken on a case by case basis.

Reasons for Decision

The resolutions directly supports the City for All priorities, specifically:

- Caring fairer City and
- City of opportunity

8 LUTON STREET PROJECT

- 8.1 Barbara Brownlee, Executive Director for Growth, Planning and Housing, presented the report. She explained that the Luton Street development is the first major housing development scheme forming part of the Church Street Regeneration Programme. It proposes to deliver 168 residential units of which 59 will be affordable housing.
- 8.2 Barbara Brownlee then outlined the scheme background including the vehicle for its delivery. She explained that in December 2014 the Council awarded the Developer Bouygues Development UK (BYUK) preferred bidder status as

developer for the development of the Luton Street site. An Agreement for Lease (AfL) was exchanged with the developer in August 2016. The AfL states that the Council will grant a long lease to a residential investor who will contract with the developer to deliver the development. In December 2018 the developer approached the Council stating that they had been unsuccessful in agreeing terms with a residential investor to provide funding for the development of the private sale homes. To safeguard the delivery of the project and ensure a start on site in 2019, a number of delivery scenarios between the Council and developer were considered in which they would jointly participate as residential investor.

8.3 The Executive Director for Growth, Planning & Housing advised that Council Officers are seeking Cabinet approval for the Council's wholly owned housing company to enter into a Limited Liability Partnership (LLP) with the appointed developer at a future date. Further to third party professional advice, the LLP is deemed to be the most effective and transparent corporate entity to ensure the delivery of the scheme, whilst offering the Council a robust and efficient governance and commercial structure in which to operate with potential for generating tax efficiencies of up to £2.3m.

8.4 Councillor Robathan stated that it is important that the Council progresses the scheme without delay and that residents see this to be the case. She noted the third party professional advice that entering into a LLP is the best arrangement for delivering the regeneration in a challenging development environment.

8.5 **RESOLVED:**

1. That the financial details of the transaction contained in Appendix 4 to this report be exempt from publication by virtue of paragraph 3 of Part 1 of Schedule 12a of the Local Government Act 1972, as amended, in that they contain information relating to information relating to the financial or business affairs of any particular person (including the authority).
2. Cabinet approved the principle of the Council's wholly owned housing company, Westminster Housing Investments Limited entering into a Limited Liability Partnership for the delivery of the Luton Street scheme only.
3. Cabinet to delegate approval of all final commercial terms and legal agreements to the Cabinet Member of for Finance, Property and Regeneration.

Reasons for Decision

1. The decision will create an efficient vehicle for the successful delivery of the Luton Street Scheme.
2. The vehicle structure will provide the best value for money for the Council.

3. Approval of the entity is required under the Council's Financial Regulations.

The Meeting ended at 6.51 pm

CHAIRMAN: _____ **DATE** _____



City of Westminster Cabinet Report

| | |
|---------------------------|---|
| Decision Maker: | Cabinet |
| Date: | 21 October 2019 |
| Classification: | General Release |
| Title: | Petition not to extend the Victoria Opportunity Area boundary |
| Wards Affected: | St James's, Vincent Square, Warwick |
| City for All: | The decision contributes to the following City for All commitment: 'City that celebrates its communities' – particularly the commitment to ensure local people are at the heart of every decision made by the Council. |
| Key Decision: | Yes |
| Financial Summary: | There are no financial implications associated with this report |
| Report of: | Executive Director of Policy, Performance and Communications |

1. Executive Summary

- 1.1 The draft City Plan 2019-2040 published for Regulation 19 consultation on 19 June 2019 proposed a series of minor changes to the Victoria Opportunity Area (VOA) boundary. On 29 July, a **'Petition to: not extend the Victoria Opportunity Area beyond the boundary adopted in the London Plan'** was set up to oppose such changes and ran until 5 September 2019 reaching a total of 534 signatures. As required by the Council's petition scheme constitution, a Cabinet Report is required in response to any petition that achieves 500 or more signatures.

2. Recommendations

- 2.1 That Cabinet agrees to revert to the VOA boundary as defined by the current Westminster City Plan (November 2016).

3. Reasons for Decision

The changes to the Victoria Opportunity Boundary proposed in the City Plan have been reviewed in light of the concerns raised by the petition as well as by comments received as part of the City Plan consultation. Officers have agreed that there is not a compelling case for such changes in light of the reasons for the opposition and recommend reverting to the boundary set by the current Westminster City Plan (November 2016).

4. Background, including Policy Context

The petition

- 4.1 The 'Petition to: not extend the Victoria Opportunity Area beyond the boundary adopted in the London Plan' was created on 29 July 2019 by Peter Roberts, who is the chair of the Cathedral Area Residents Group (CARG). The petition ran until 5 September 2019 and had 534 signatures.
- 4.2 The petition raised objections against *"any extensions of the Victoria Opportunity Area (VOA) adjacent to or encroaching on existing residential or conservation areas"* that *"will encourage further intensive developments which would have unacceptable impact on those areas"*.
- 4.3 The text of the petition particularly stressed that *"extensions of the VOA in the WCC Plan encroach on Belgravia, Westminster Cathedral and the Christchurch Gardens and Broadway areas. They extend on both sides of Victoria Street from Palace Street to Great Smith Street where they threaten the setting of Westminster Abbey and the Palace of Westminster"*.
- 4.4 The request of the petitioners is that the VOA boundary should not change from what is adopted in the London Plan.

The Victoria Opportunity Area

- 4.5 The London Plan defines Opportunity Areas as London's major source of brownfield land which have significant capacity for development and existing or potentially improved public transport access.
- 4.6 While the London Plan defines the VOA by saying that *"The station, the airspace above its tracks and approaches, and nearby sites have significant potential for mixed-use intensification, capitalising on enhancement to the public transport interchange and improvements to accessibility and capacity"*, this description does not set out the spatially detailed boundaries i.e. there is no 'line on a map'. It is the council's responsibility to define the boundary line through the City Plan and to ensure this designation remains up to date and effective in delivering the objective of the policies. For this reason, the draft City Plan 2019-2040 includes some minor proposed changes to the VOA boundary.

- 4.7 The VOA boundary has been subject to little change since 2011, when the council adopted Westminster's Core Strategy (the precursor to the City Plan). It already comprised not only the Victoria Transport Interchange, but other areas surrounding the station to the west and east, and a number of sites north and south of Victoria Street as far east as to meet the boundary of the World Heritage Site. A map from Westminster's Core Strategy showing the extent of VOA is provided in Appendix C of this report. The map shows how some overlapping between VOA and Conservation Area already occurs.
- 4.8 The proposed boundary changes proposed by the draft City Plan 2019-2040 are shown in Appendix D and are as follows:
1. Relocating the boundary from the west side of Vauxhall Bridge Road (between Victoria Street and Gillingham Street) to the east side, to run along the northern portion of Carlisle Place and King's Scholar Passage.
 2. Incorporating an additional site on Greencoat Place and the site to the north of the block bounded by Greencoat Place, Artillery Row and Rochester Row.
 3. Incorporating the sites bounded by Victoria Street to the north, and Strutton Ground, Old Pye Street, Abbey Orchard Street and Great Smith Street to the south.
- 4.9 The proposed boundary changes intended to recognise development opportunities that are either buildings which are considerably smaller than their context and could benefit from upwards extensions or are outdated and for which redevelopment could contribute to the VOA's growth objectives, but also the other objectives of the policy such as improved public realm and local environmental quality, legibility and enhanced social and community facilities. Inclusion in the VOA also sought to ensure these sites were developed coherently along with other sites in the area to contribute collectively to the objectives of the Opportunity Area policy.

Final considerations

- 4.10 In line with the ambitions of 'City for All 2018/19', the Council is committed to ensuring local people are listened to and put at the heart of decision-making. The concerns raised by the petition signatories have been considered as have all responses received as part of the City Plan consultation. This has led to a review of the proposed boundary changes.
- 4.11 Officers are of the opinion that there is not a compelling case to justify the proposed changes to the VOA boundary in light of the comments received on the proposal. The sites that were recommended for inclusion have not been identified as key development sites which could make a major contribution to the objectives of the policy and therefore it is not essential to the success of the policy that they are included in the VOA designation.

4.12 It is therefore advised to revert to the boundary that was set by the current Westminster City Plan (November 2016).

5. Financial Implications

5.1 There are no current financial implications for the City Council to consider.

6. Legal Implications

6.1 In accordance with Chapter 2 of the City Council's Constitution (Council Procedures (Standing Orders)), and the relevant provisions in the Council's Petition Scheme as set out in Chapter 9, Section 42, petitions which receive more than 500 signatures will be debated at the next available meeting of the Cabinet.

6.2 The Cabinet will decide how to respond to the petition at this meeting. They may decide to take the action the petition requests, not to take the action requested for reasons put forward in the debate, or to commission further investigation into the matter, for example by a relevant committee. The petition organiser will receive written confirmation of this decision. This confirmation will also be published on our website.

6.3 The City Council when making its final decision on the Extension of the Victoria Opportunities Area is obliged to consider the arguments set out in the Petition in a fair, reasonable and proportionate way as part of the decision-making process. This measured approach needs to be balanced against the City Council's general power of Competence under Part 1 of the Localism Act 2011 to improve the well-being of its area (the former power being under section 2 of the Local Government Act 2000).

6.4 The Cabinet, during the decision-making process, is required to take into account fully the arguments for and against extending the VOA as amplified within the body of this report and by attaching the necessary weight to those considerations.

6.5 The Director of Law has considered this report and is satisfied that its contents and proposed recommendations are consistent with 6.1 – 6.4 above

If you have any queries about this Report or wish to inspect any of the Background Papers please contact:
*Michela Leoni, Policy Officer (Planning), mleoni@westminster.gov.uk
020 7641 3635*

APPENDICES:

Appendix A: Other Implications

Appendix B: Screenshot of online petition

Appendix C: Victoria Opportunity Area boundary as defined by Westminster's Core Strategy (2011)

Appendix D: Proposed changes to the Victoria Opportunity Area boundary in the draft City Plan 2019-2040 (Regulation 19 consultation stage)

Other Implications

1. **Resources Implications** – no implication
2. **Business Plan Implications** – no implication
3. **Risk Management Implications** – no implication
4. **Health and Wellbeing Impact Assessment including Health and Safety Implications**
– no implication
5. **Crime and Disorder Implications** – no implication
6. **Impact on the Environment** – no implication
7. **Equalities Implications** – no implication
8. **Staffing Implications** – no implication
9. **Human Rights Implications** – no implication
10. **Energy Measure Implications** – no implication
11. **Communications Implications** – no implication

Screenshot of online petition



Petition to: not extend the Victoria Opportunity Area beyond the boundary adopted in the London Plan.

This petition is now closed, as its deadline has passed.

We the undersigned petition Westminster City Council to not extend the Victoria Opportunity Area beyond the boundary adopted in the London Plan. [More details](#)

Submitted by Peter Roberts – **Deadline to sign up by:** 05 September 2019 – **Signatures:** 534

Current signatories

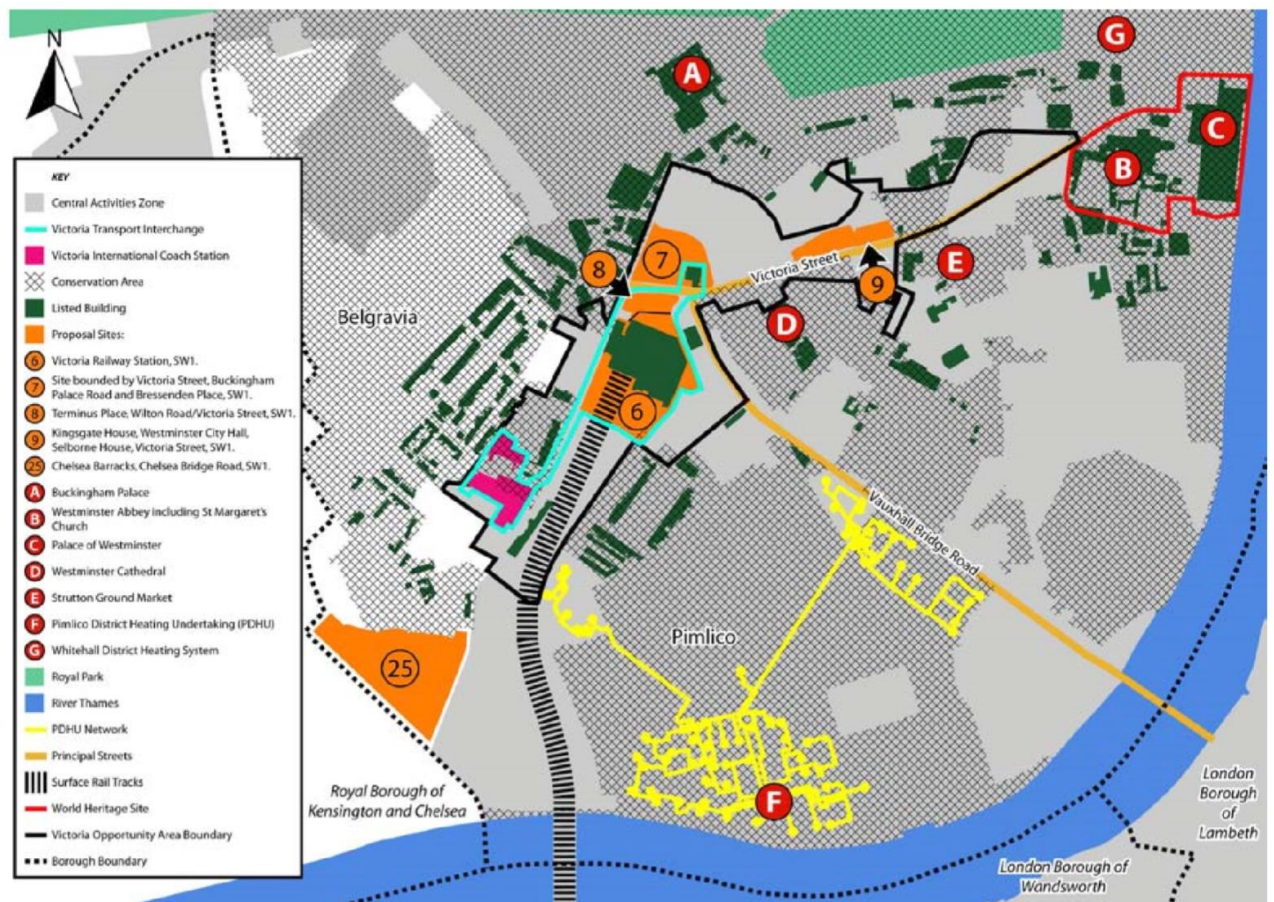
Peter Roberts, the petition creator, joined by:

- Lisa Seidel
- Michael Woodside
- S K Lee
- F Lee
- D Lee
- Brian Wadsworth
- David Jacob
- Alison Yeo
- Andrew Brown
- James Eyers
- brian miller
- Fiona Geddes
- Robin Schlee
- Rob Pinchbeck
- Lynette Braithwaite
- Luanne Thornber
- Caroline Griffith
- Graeme Cottam
- Fiona Wray

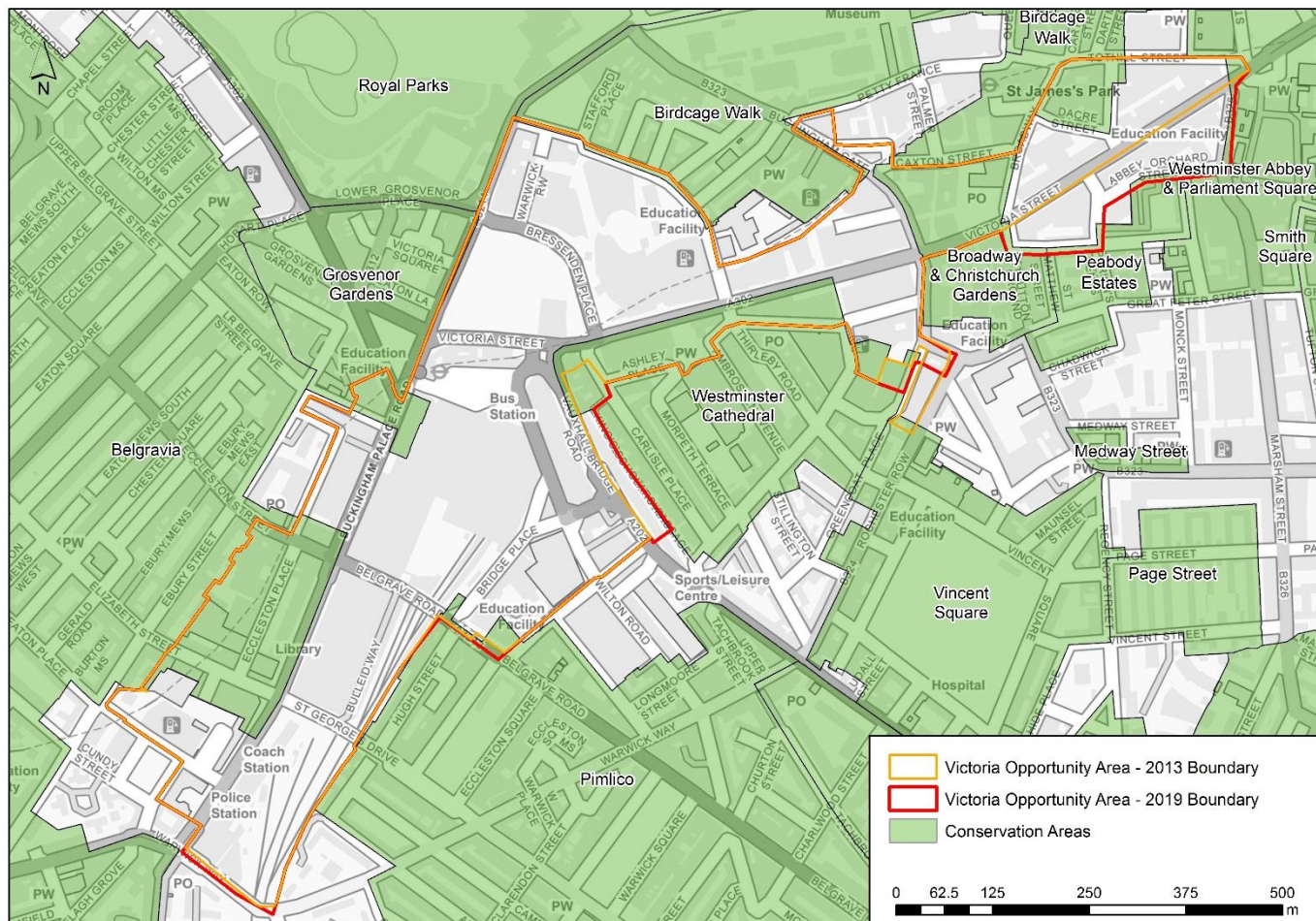
More details from petition creator

Any extension of the Victoria Opportunity Area (VOA) adjacent to or encroaching on existing residential or conservation areas will encourage further intensive developments which would have unacceptable impacts on those areas. Therefore the signatories to this petition strongly request that, in the City Plan 2040 currently being prepared, no part of the VOA should be extended beyond the boundary adopted in the London Plan (and proposed to be retained in the updated Plan). The VOA is described as follows for the London Plan: "The station, the airspace above its tracks and approaches, and nearby sites have significant potential for mixed-use intensification, capitalising on enhancement to the public transport interchange and improvements to accessibility and capacity." Extensions of the VOA in the WCC Plan encroach on Belgravia, Westminster Cathedral and the Christchurch Gardens and Broadway areas. They extend on both sides of Victoria Street from Palace Street to Great Smith Street where they threaten the setting of Westminster Abbey and the Palace of Westminster. Email peter@harley1.net for a map of the proposed VOA changes.

Victoria Opportunity Area boundary as defined by Westminster's Core Strategy (2011)



Proposed changes to the Victoria Opportunity Area boundary in the draft City Plan 2019-2040 (Regulation 19 consultation stage)



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City of Westminster

Cabinet Report

| | |
|---------------------------|--|
| Decision Maker: | Cabinet |
| Date: | 21 st October 2019 |
| Classification: | General Release |
| Title: | Westminster City Plan - Regulation 19 consultation and next steps |
| Wards Affected: | All |
| City for All: | The City Plan provides the 20 year spatial strategy for delivering the council's City for All priorities. |
| Key Decision: | Yes |
| Financial Summary: | The resourcing of the submission of the draft City Plan to the Secretary of State and funding of the examinations will be met from existing budgets. |
| Report of: | Executive Director Policy, Performance and Communication. Executive Director, Growth, Planning & Housing |

1. Executive Summary

This report asks Cabinet to consider the responses to the Regulation 19 consultation on the draft City Plan policies and to note the policies where minor modifications will be made to improve the clarity, understanding and application of these policies. The full schedule of minor modifications will then be published alongside the draft City Plan and other supporting documents required for Regulation 22 submission prior to Full Council on 13 November.

2. Recommendations

That Cabinet resolves:

- i. to consider the public responses to the Regulation 19 consultation on the draft City Plan policies (shown in the Appendix 1).

- ii. to note the schedule of policies where minor modifications will be made in response to the consultation feedback (shown in Appendix 2);
- iii. to delegate to the Cabinet Member for Place Shaping and Planning responsibility for the preparation of the draft City Plan and the supporting documents required for Regulation 22 submission to the Secretary of State. This will include publication of the schedule of minor modifications as well as addressing in full the other responses to the Regulation 19 consultation (including the legal compliance of the draft Plan and the duty to co-operate in producing the draft plan).

3. Reasons for Decision

- 3.1 The council's corporate strategy, City for All, sets an ambition for Westminster to be a place where people are born into a supportive and safe environment, grow and learn throughout their lives, build fantastic careers in world-leading industries, have access to high quality, affordable homes and retire into the community with dignity and pride.
- 3.2 The City Plan is the spatial interpretation of this strategy, providing a framework for all future development in the city. To provide a robust and up to date policy framework for the taking of planning decisions across the city, the council has undertaken a full revision to the City Plan pursuant to Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

4. Background, including Policy Context

- 4.1 The initial notification of, and consultation on the intention to, revise the adopted City Plan (Regulation 18) was carried out from 16th June 2017 to 28th July 2017. A draft informal City Plan was then consulted on between 12th November and 21st December 2018.
- 4.2 In accordance with Regulation 19, formal consultation on the Publication Draft of the Plan was subsequently carried out between 19th June and 31st July 2019. This formal consultation stage was accompanied by a Consultation Statement, Duty to Co-operate Statement, an Integrated Impact Assessment (including the Sustainability Appraisal and Strategic Environmental Assessment) and supporting evidence and topic papers.
- 4.3 The Regulation 19 consultation asked for feedback on whether the draft City Plan was sound. Paragraph 35 of the National Planning Policy Framework 2019 sets out the four tests for soundness:
 - “Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

4.4 Consultation responses received have been considered in terms of the extent to which they raise issues of soundness.

4.5 The Council does not consider that any of the objections or comments suggest the Publication Draft City Plan is not ‘sound’

Regulation 19 consultation responses

160 consultees submitted responses on the Publication Draft City Plan from a wide range of organisations – as shown in Table 1 below.

| Consultee Type | Number of responses |
|---|----------------------------|
| Members and political parties | 1 |
| Healthcare institutions and providers | 2 |
| Other public sector institutions and bodies | 3 |
| Neighbouring boroughs | 4 |
| Cultural and Education institutions | 6 |
| BIDs | 8 |
| Charities, campaign groups and other clubs/associations | 9 |
| Consultancy firms and professional networks | 9 |
| Statutory consultees | 12 |
| Business and trade associations | 22 |
| Neighbourhood Forums, Amenity Societies and Residents' Associations | 22 |
| Individuals | 23 |
| Developers, landowners and real estate companies | 39 |

4.6 A number of stakeholders said they consider the plan to be sound and 12 policies¹ attracted no direct soundness comments at all. 64 consultees raised issues which they considered to be related to the soundness of the Plan, however none of these are considered by the council to give rise to concerns about the ‘soundness’ of the revision.

4.7 Where soundness issues were raised by statutory consultees the council has engaged closely with these bodies to draw up Statements of Common Ground setting out our respective positions and, where appropriate, we have agreed

to proposing minor modifications to the Plan to resolve the objections. These will be published in full in the upcoming Cabinet Member Report.

- 4.8 The majority of comments on the Plan did not relate to soundness, however many comments pointed out where we can improve the clarity, understanding and application of our policies. These will be addressed through a series of minor modifications to the plan. A schedule of the policies where minor modifications will be made is set out in Appendix 2.
- 4.9 Four consultation responses were submitted on the Integrated Impact Assessment which was subject to consultation at the same time as the City Plan.
- 4.10 Responses were also received regarding the legal compliance of the draft Plan and the duty to co-operate in producing the draft plan. These will be addressed in full in the upcoming Cabinet Member Report.

Regulation 22 Submission to the Secretary of State of the draft City Plan

- 4.11 The pre-submission modifications will not change the meaning or approach of the Plan and the policies it contains are appropriate to be considered as part of the examination process. They are not considered to be sufficiently major to require a further stage of consultation and nor does their inclusion affect the 'soundness' or otherwise of the revisions i.e. the minor modifications are not necessary to make the revisions sound, albeit that they improve the revision.
- 4.12 Therefore, it is proposed that the Cabinet Member for Planning & Place-shaping publishes a Cabinet Member decision report to seek approval from Full Council on 13 November for the submission of the draft City Plan and its supporting documents to the Secretary of State for consideration by an independent Inspector under Regulation 22 of the Town and Country (Local Planning)(England) Regulations 2012.

5. Financial Implications

- 5.1 There are limited financial implications with the continued progression of the revision to the City Plan. The costs associated with the examination are to be met from existing budgets.

6. Legal Implications

- 6.1 The procedures set out in the Town and Country Planning (Local Planning)(England) Regulations 2012 have been carried out and the council is satisfied that all legal requirements have been met.
- 6.2 Section 26 of the Planning and Compulsory Purchase Act 2004 requires that revisions to development plan documents (DPDs) go through the same statutory procedures as new DPDs. These consultation requirements have been carried out. It is considered that the draft City Plan appended to this report meets the 'soundness'

tests as set out in paragraph 35 of the National Planning Policy Framework.

- 6.3 Following completion of the Regulation 19 consultation, the revised draft of the City Plan was considered by counsel who advised, amongst other things, as to the compliance of the draft with the NPPF soundness test as set out in paragraph 4 above.

7. Business Plan Implications

- 7.1 Delivery of a new City Plan is a key measure in the Policy Performance and Communications Business Plan 2018-2019. It is also a specific City for All commitment. It will also contribute towards other City for All commitments:

- delivery of affordable housing through the new policy approach, support for the creation of more jobs (*City for Opportunity*);
- improvements to air quality and the development of healthy places through policies to mitigate and limit air pollution and to develop greener, healthier places (*Healthier and Greener City*);
- development of proposals for the Oxford Street District through a renewed approach to retail in the West End (*City that Celebrates its Communities*).

8. Impact on the environment

- 8.1 A formal Integrated Impact Assessment (IIA) was published alongside the Publication Draft City Plan. The IIA assesses in detail the impact on the environment and sustainability. The IIA shows that overall the draft policies will be beneficial for environmental quality in Westminster.

9. Health, wellbeing impact assessment, including health and safety implications

- 9.1 The health and well-being assessment was undertaken as part of the Integrated Impact Assessment (see section 8 of this report). The IIA also includes a crime safety assessment. The IIA shows that overall the draft policies will be beneficial for health and wellbeing in Westminster.

10. Equalities implications

- 10.1 Under the Equalities Act 2010 the council has a “public sector equality duty”. This means that in taking decisions and carrying out its functions it must have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act;
- to advance equality of opportunity between persons who share a relevant protected characteristic (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and those who do not share it; and to

- foster good relations between persons who share a relevant protected characteristic and those who do not share it.
- 10.2 The council is also required to have due regard to the need to take steps to take account of disabled persons' disabilities even where that involves more favourable treatment; to promote more positive attitudes toward disabled persons; and to encourage participation by disabled persons in public life. The 2010 Act states that "having due regard" to the need to promote equality of opportunity involves in particular having regard to:
- the need to remove or minimise disadvantages suffered by persons sharing a protected characteristic;
 - take steps to meet the needs of persons sharing a protected characteristic that are connected with it;
 - take steps to meet the needs of persons who share a protected characteristic that are different from those who do not; and
 - encourage persons with a protected characteristic to participate in public life or any other activity in which participation by such persons is disproportionately low.
- 10.3 The courts have held that "due regard" in this context requires an analysis of the issue under consideration with the specific requirements set out above in mind. It does not require that considerations raised in the analysis should be decisive; it is for the decision-maker to decide what weight should be given to the equalities implications of the decision.
- 10.4 The equalities implications of the policies in the draft City Plan have been assessed as part of the Integrated Impact Assessment. This shows that none of the proposed policies are expected to have a negative impact on any of the groups with protected characteristics under the 2010 Act and the Public Sector Equalities Duty has been met. Completion of the IIA is an iterative process, so the document will be kept updated as the plan proceeds through examination, ensuring that any equalities issues that arise as modifications are made to the Plan will be identified and can be considered.

11. Consultation

- 11.1 All required and appropriate consultation in accordance with the Town and Country (Local Planning)(England) Regulations 2012 has been carried out and in accordance with the Council's Statement of Community Involvement (June 2014). Consultation with the following groups was undertaken on the proposed submission documents for a period of six weeks from 17th June 2019:

- All Members
- Statutory consultees, including those subject to the statutory duty to cooperate (Section 4 of the Town and Country Planning (Local Planning)(England) Regulations 2012) and the ‘specific consultation bodies’ as defined in regulation 2 of those Regulations.
- The Mayor of London and the GLA family.
- Neighbouring boroughs.
- The “general consultation bodies” defined in regulation 2 of the 2012 Regulations – voluntary bodies and those representing different racial, ethnic or national groups; those representing different religious groups; disabled people; and the interests of those carrying out business in Westminster. This will be done through the Planning Policy database. The database currently comprises about 1,700 consultees including members of the public, businesses and residents’ groups.
- Internal consultees within the city council, including the Executive Leadership Team and senior managers.

11.2 In addition to this, all submission documents and supporting documents will be accessible to all on the Council’s Planning Policy webpage - <https://www.westminster.gov.uk/revision-westminsters-city-plan> and on a dedicated consultation site <https://www.westminster.gov.uk/cityplan2040> as the Plan proceeds through examination.

**If you have any queries about this report or wish to inspect one of the background papers please contact: Kimberley Hopkins
khopkin@westminster.gov.uk**

Appendices

1. Summary of Regulation 19 responses to the draft City Plan policies.
2. Schedule of policies where minor modification will be made (N.B. The full schedule of minor modifications will be published alongside the draft City Plan and other supporting documents required for Regulation 22 submission prior to Full Council on 13 November).

Background Papers

1. Formal notification of intention to make a number of revisions to Westminster's City Plan (Regulation 18) (June 2017)
2. Localism Act 2011
3. Planning and Compulsory Purchase Act 2004 (as amended)
4. Town & Country Planning Act 1990 (as amended)
5. Town & Country Planning (Local Planning)(England) Regulations 2012

¹ Housing renewal areas, innovative housing, education and skills, digital infrastructure, Harley Street and Savile Row SPAs, sustainable transport, public transport, heritage, building height in the housing renewal areas and security measures

Appendix 1: Summary of responses to the Regulation 19 consultation

Summary of City Plan consultation responses at Regulation 19 on the draft policies

Objectives & Context

| | SUMMARY OF RESPONSES |
|-------------------|---|
| Context chapter | <ul style="list-style-type: none"> • There are three passenger piers in Westminster rather than four¹ • Crossrail 2 should be included within the timeline for Westminster. The date for the Elizabeth line should also be updated to say 2020/21.² • Welcome recognition of the role of physical activity³ • Welcome the support for neighbourhood planning⁴ • Request use of median income to calculate affordability, want to know figures for empty properties and believe that City Plan assessment of need focusses too much on intermediate level housing⁵ • The council should consider a rooftop policy to provide more green roofs⁶ |
| Vision Page 27 | <ul style="list-style-type: none"> • There is not a clear plan to support ageing/elderly population⁷ • Welcome the aim to develop the North Bank of the Thames.⁸ • Support for cycle friendly places⁹ • Support for recognition of heritage¹⁰ • There is no mention of sport and recreation in the 'Our approach' section of the plan¹¹ • Unclear how the policies of the plan will improve health, reduce health inequalities and benefit residents¹² |

¹ Port of London Authority

² Transport for London

³ Sport England

⁴ Fitzrovia West Neighbourhood Forum

⁵ Maida Hill Neighbourhood Forum

⁶ Notting Hill East Neighbourhood Forum

⁷ Cathedral Area Residents Group, Fitzrovia West Neighbourhood Forum

⁸ Port of London Authority

⁹ Kildare Gardens and Kildare Terrace Residents Association

¹⁰ The Howard De Walden Estate

¹¹ Sport England

¹² NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups.

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| Objectives | <ul style="list-style-type: none"> • Support for the commitment to improve air quality¹³ • Tackling climate change should be a distinct objective¹⁴ • No objective relating to community infrastructure and access to services¹⁵ • General support for the objectives¹⁶ |
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Spatial Strategy

| POLICY | SUMMARY OF RESPONSES |
|--|--|
| Policy 1 Westminster's Spatial Strategy | <ul style="list-style-type: none"> • General support. ¹⁷ • Some criticism too focussed on growth that is not balanced against residential amenity.¹⁸ • Some issues raised regarding non land-use planning matters such as levels of policing, and highways speeds.³ • Some requests for more detail on matters such as heritage considerations and energy standards ¹⁹ • Should be greater recognition of the role of town centres as a place to live is needed. ²⁰ • Should refer to prioritising the development brownfield land.²¹ • Should be greater recognition of the role of hotels to the character of the CAZ. ²² • CAZ boundary should exclude Belgravia. ²³ • Some comments that more infrastructure investment is required to support proposed levels of growth. |

¹³ City of London

¹⁴ Graeme Cottam

¹⁵ NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups

¹⁶ The Belgravia Society, Heart of London Business Alliance, The Board of Trustees of the Tate Britain Gallery, Dolphin Living

¹⁷ AYR Projects Limited, Church Commissioners for England, City of London Corporation, Defence Infrastructure Organisation, Heart of London Business Alliance, Landsec, Lazari Investments Ltd, London School of Economics and Political Science (LSE), Mayor of London, New West End Company, Palace of Westminster Restoration and Renewal Programme, Shaw Corporation Limited, TfL Commercial Development, The Crown Estate, The Howard de Walden Estate, The Northbank BID, Westminster Property Association (WPA)

¹⁸ Cathedral Area Residents Group, Grosvenor Britain & Ireland (Graig McWilliam CEO)

¹⁹ Cathedral Area Residents Group, Fitzrovia West Neighbourhood Forum

²⁰ Shaw Corporation Limited, Marble Arch BID, Cathedral Area Residents Group, Knightsbridge Neighbourhood Forum, Church Commissioners for England

²¹ TfL Commercial Development

²² 4C Hotel Group

²³ The Belgravia Society

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| | <ul style="list-style-type: none"> • Some suggestions that housing and affordable targets in clause A2 should be minimums²⁴, and that reference should be made to Mayors 50% affordable housing target²⁵. Others raise concerns that affordable housing requirements will stifle commercial growth.²⁶ • Clause A3 should include a total jobs rather than office based jobs target.²⁷ • Clause A7 should also reference the importance of settings of heritage assets.²⁸ • Some concerns about the potential impact on heritage of proposals for the North Bank referred to in clause A8.²⁹ • Clause B should also support growth outside the areas listed in criteria 1-4.³⁰ |
| <p>Policy 2 West End Retail and Leisure Special Policy Area</p> | <ul style="list-style-type: none"> • General support.³¹ • Paragraph 2.10 is too negative about the role of alcohol in the evening and night-time economy.³² • There is insufficient recognition that the West End dominated by cars.³³ • There is a lack of recognition of the need to protect resident's quality of life, or to support SMEs.³⁴ • Growth targets for Tottenham Court Road not ambitious enough.³⁵ • Affordable housing requirements will undermine commercial growth potential.³⁶ • The 30m height limit may restrict commercial growth potential.³⁷ • Policy should specifically refer to safeguarding and intensification of Crossrail sites.³⁸ |

²⁴ Shaw Corporation Limited, Cathedral Area Residents Group, TfL Commercial Development

²⁵ Cathedral Area Residents Group

²⁶ Grosvenor Britain & Ireland (Graig McWilliam CEO)

²⁷ Cathedral Area Residents Group, West End Partnership

²⁸ Historic England

²⁹ Historic England

³⁰ Church Commissioners for England

³¹ Beaumont Hotel Properties Limited (BHLP), Church Commissioners for England, Criterion Capital, Historic England, John Lewis Partnership, New West End Company, Royal London Asset Management, Shaw Corporation Limited, TfL Commercial Development, The Freight Transport Association (FTA), The Northbank BID, West End Partnership, Westminster Property Association (WPA)

³² Shaftesbury Plc, Longmartin Properties

³³ Westminster Cycling Campaign

³⁴ Marylebone Association

³⁵ Shaw Corporation Limited

³⁶ TfL Commercial Development

³⁷ The Portman Estate

³⁸ TfL Commercial Development

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| | <ul style="list-style-type: none"> • Greater emphasis on areas of cultural heritage should be included.³⁹ • Suggested inclusion of Strand Aldwych and Mount St within the WERLSPA.⁴⁰ • Some suggested additions to International Centre boundary.⁴¹ • Deliverability of West End Good Growth targets questioned.⁴² • Suggested inclusion of additional designations including Conservation Areas to figure 8.⁴³ • Policy support for residential development within the WERLSPA should be provided. • A management plan for the West End is needed.⁴⁴ • Greater reference should be made to Oxford St proposals.⁴⁵ |
| <p>Policy 3 Paddington Opportunity Area</p> | <ul style="list-style-type: none"> • Policy priorities are supported.⁴⁶ • The plan should recognise positive actions in which Westminster Council and the community are involved.⁴⁷ • The Royal Oak site should be included in the Paddington Opportunity Area (POA) boundary.⁴⁸ • Justification for removal of the Edgware Road Growth Area from the POA (as included in the previous draft plan) should be provided.⁴⁹ • Reference to improvements to the pedestrian and cycling environment is welcome.⁵⁰ • Inclusion of cycling at point 3.10 in supporting text is welcome.⁵¹ • Reference to the positive contribution hotels development can make to the OAs is supported.⁵² • Policies 10 and 42 will undermine the deliverability of the employment targets for the POA.⁵³ |

³⁹ Historic England

⁴⁰ The Northbank BID

⁴¹ The Portman Estate, Grosvenor Britain & Ireland (Graig McWilliam CEO)

⁴² Royal London Asset Management, Lazari Investments Ltd

⁴³ West End Partnership

⁴⁴ New West End Company

⁴⁵ Transport for London

⁴⁶ Landsec, British Land, Westminster Property Association (WPA)

⁴⁷ Paddington Development Trust (PDT)

⁴⁸ TfL Commercial Development

⁴⁹ Marble Arch BID

⁵⁰ Westminster Cycling Campaign

⁵¹ Canal and River Trust

⁵² 4C Hotel Group

⁵³ British Land, Westminster Property Association (WPA)

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| | <ul style="list-style-type: none"> • Concerns that the rigid application of mixed-use policy will constrain office development in the POA.⁵⁴ • The policy should also support new and improved community infrastructure in the POA.⁵⁵ • The policy should be more supportive of maximising the development potential of KDS within the POA. Supporting text should clarify that a range of types of housing, including specialist housing and student accommodation would be supported in principle in the POA.⁵⁶ |
| <p>Policy 4 Victoria Opportunity Area</p> | <ul style="list-style-type: none"> • Support for the plan's ambitions for the area.⁵⁷ • Policy should clarify that growth targets should be a minimum, to be exceeded.⁵⁸ • Changes to the Victoria Opportunity Area (VOA) boundary are not supported.⁵⁹ • The continued inclusion of parts of Belgravia in the VOA are opposed to.⁶⁰ • The VOA boundary should be widened to align with the eastern boundary of the VOA.⁶¹ • Not enough prominence is given to the strategic relevance of the redevelopment of Victoria Station. The plan should clearly support the regeneration of Victoria Station and Environs.⁶² • A flexible approach to height at the station and interchange boundary would be welcome.⁶³ • Reference to the positive contribution hotels development can make to the OAs is supported.⁶⁴ • Support for practical changes and measures at Victoria to promote and reallocate space to walking, cycling and public transport.⁶⁵ • Policy point on enhanced sustainable travel mode is welcome.⁶⁶ • The issues posed by the Inner Ring Road must be addressed.⁶⁷ • The challenges of coach traffic in Victoria should be recognised.⁶⁸ |

⁵⁴ British Land

⁵⁵ NHS London Healthy Urban Development Unit / Central London and West London CCG

⁵⁶ Travis Perkins

⁵⁷ TfL Commercial Development, Landsec, RIU Hotels, Grosvenor

⁵⁸ Victoria Gardens Development Ltd/Stockley House, TfL Commercial Development

⁵⁹ Thane Freehold, Cathedral Area Residents Group (CARG), Diana C C Colvin (individual), Thorney Island Society, Graeme Cottam, Belgravia Society

⁶⁰ Belgravia Society

⁶¹ Grosvenor

⁶² Network Rail, Victoria BID and Victoria Westminster BID, Victoria Gardens Development Ltd/Stockley House, Landsec, Grosvenor, Westminster Property Association (WPA)

⁶³ Network Rail

⁶⁴ 4C Hotel Group

⁶⁵ TfL

⁶⁶ Westminster Cycling Campaign

⁶⁷ Westminster Cycling Campaign, Victoria BID and Victoria Westminster BID, Grosvenor

⁶⁸ Victoria BID and Victoria Westminster BID

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| | <ul style="list-style-type: none"> • The Plan should set out ambitions and support for improvements to Parliament Square through enhanced pedestrian priority and reduced traffic domination.⁶⁹ • While enhancements to sustainable travel modes are supported, this should not be limited to the routes within the VOA but also to those connecting it to surrounding areas. The VOA is in close proximity to the VNEB OA and this will very likely lead to increased demand between the two which risks putting existing networks and corridors under pressure.⁷⁰ • City Plan should aim for the continued use and upgrade of the station until TfL formally confirms there is no longer a need for a coach station at the site.⁷¹ • New public realm improvements should accommodate access for deliveries and servicing activity.⁷² • Additional wording should be provided to encourage active frontages at ground floor level in retail developments.⁷³ • Added references to the protection of heritage in policy text are welcome, however the policy justification could expand further on the impacts of the OUV and the WWHS.⁷⁴ • The policy should reflect that development in the VOA could affect the setting of the Pimlico Conservation Area (which is outside the VOA).⁷⁵ • Given that other sites are already developed or are open spaces, the policy almost encourages proposals involving the demolition of existing buildings or the loss of open space. Development of tall buildings in the areas of the VOA which fall between CAs would cause harm to heritage assets.⁷⁶ • The station, its tracks, approaches and airspace are all effectively public assets and should remain in the public realm.⁷⁷ |
| Policy 5 North West Economic Development Area | <ul style="list-style-type: none"> • General support for the principles of the policy⁷⁸ • Policy should include hotels as an accepted use close to transport hubs⁷⁹ |

⁶⁹ Victoria BID and Victoria Westminster BID

⁷⁰ Wandsworth Borough Council

⁷¹ TfL Commercial Development

⁷² Freight Transport Association (FTA)

⁷³ Bentall Greenoack

⁷⁴ Historic England

⁷⁵ Pimlico Neighbourhood Forum

⁷⁶ Graeme Cottam

⁷⁷ Graeme Cottam

⁷⁸ The Canal and River Trust, AYR Projects Limited, TfL Commercial Development

⁷⁹ Wildstone Planning

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| | <ul style="list-style-type: none"> • Request that the Royal Oak Key Development Site is explicitly mentioned in the supporting text and is added to the Paddington Opportunity Area⁸⁰ • Request for more affordable office or work space⁸¹ • Request to allow more flexibility on loss of SME space⁸² • Request to alter policy to encourage the creation of more green spaces⁸³ • Request reference to be made to the Kensal Canalside Opportunity⁸⁴ • Requests creation of a planning framework covering all developments in the Woodfield Road area⁸⁵ • Requests to extend the Harrow Road District Centre designation⁸⁶ • Concern that the policy may prejudice major new developments⁸⁷ • Opposition to underpasses in the NWEDA⁸⁸ |
| <p>Policy 6 Church Street/Edgware Road and Ebury Bridge Road Estate Housing Renewal Areas</p> | <ul style="list-style-type: none"> • General support for the principles of the policy⁸⁹ • lack of consultation in the development of the Church Street Masterplan⁹⁰ • Concerns over the risk of losing affordable housing when existing estates are demolished and rebuilt for regeneration purposes⁹¹ • Concerns that the policy does not address wider improvements to the Edgware Road Housing Renewal Area⁹² • Potential of development and investment due to regeneration area's proximity to CAZ and transport hubs should be maximized⁹³ |

⁸⁰ TfL Commercial Development

⁸¹ Maida Hill Neighbourhood Forum

⁸² AYR Projects Limited

⁸³ Maida Hill Neighbourhood Forum

⁸⁴ RBKC

⁸⁵ Maida Hill Neighbourhood Forum

⁸⁶ Maida Hill Neighbourhood Forum

⁸⁷ Notting Hill East Neighbourhood Forum

⁸⁸ Maida Hill Neighbourhood Forum

⁸⁹ Westminster Cycling Campaign (the local group of the London Cycling Campaign), TfL Commercial Development, Church Street Ward Neighbourhood Forum, Berkeley Group, Achim von Malotki, NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups

⁹⁰ Church Street Ward Neighbourhood Forum and Achim Von Malotki

⁹¹ Westminster Labour Group

⁹² Church Commissioners for England

⁹³ Church Street Ward Neighbourhood Forum and Achim von Malotki

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| <p>Policy 7 Managing development for Westminster's people</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 34</p> | <ul style="list-style-type: none"> • Policy ambition is supported.⁹⁴ • Reference to 'while each of the policies hold equal weight, particular attention should be paid to Policy 7' on page 4 should be removed, as it suggests that equal weight to policies will not be applied.⁹⁵ • The policy has the potential to prejudice and restrict otherwise appropriate development proposals. A balanced approach will be needed to ensure the requirement to protect and enhance residents' amenity does not compromise good growth/ the wider ambitions and delivery of the plan.⁹⁶ • The policy should be applied flexibly given that the requirements to protect and enhance might not always be possible in a dense urban environment.⁹⁷ • Daylight and sunlight standards should be treated flexibly.⁹⁸ • The reference to sense of enclosure to be deleted as notional and subjective.⁹⁹ • Uncertainty around the wording of this policy will lead to inconsistency in decision making given the flexibility of the interpretation.¹⁰⁰ • Concerns about the absence of the requirement to minimise construction impacts as a function to delivering neighbourly development.¹⁰¹ • Concerned that the policy has been watered down by the addition of "where appropriate" with regards to enhancing amenity.¹⁰² • Inclusion of Agent of Change principle welcomed, however it is not clear how the policy will be enforced in the long term.¹⁰³ • The policy would benefit from an additional clause ensuring the health and wellbeing impacts of development proposals are addressed.¹⁰⁴ |
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⁹⁴ Fitzrovia West Neighbourhood Forum, Knightsbridge Neighbourhood Forum, Howard De Walden Estate, Church Commissioners, Wandsworth Borough Council, Westminster Labour Group, Ferleigh Properties Limited

⁹⁵ Soho Data Holdings, RIU Hotels, Shaftesbury, Victoria Gardens Development Limited/ Stockley House, Grosvenor, Westminster Property Association (WPA), Clivedale, Motcomb Estates, Ferleigh Properties Limited

⁹⁶ Howard De Walden Estate, Marble Arch BID, Westminster Property Association (WPA), 4C Hotel Group, RIU Hotels, Shiva Hotels, Soho Data Holdings, Marble Arch BID, Marks & Spencer PLC, Victoria Gardens Development Limited/ Stockley House, Grosvenor, Clivedale, New West End Company (NWEC), Wandsworth Borough Council, Portman Estate, Motcomb Estates

⁹⁷ Imperial College Healthcare NHS Trust, Trophaeum Asset Management, Church Commissioners

⁹⁸ Land Securities, 4C Hotel Group, GIA Chartered Surveyors, Marks & Spencer PLC, Capco Capital & Counties, Westminster Property Association (WPA), Clivedale, Portman Estate

⁹⁹ 4C Hotel Group

¹⁰⁰ Whitbread, John Lewis Partnership

¹⁰¹ Knightsbridge Neighbourhood Forum, Soho Society

¹⁰² Covent Garden Community Association, West End Partnership (WEP)

¹⁰³ Freight Transport Association (FTA)

¹⁰⁴ NHS London Healthy Urban Development Unit/ Central London and West London Clinical Commissioning Groups

Housing

| POLICY | SUMMARY OF RESPONSES |
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| Policy 8 Stepping up housing delivery | <ul style="list-style-type: none"> • Concerns over 200sq m limit on new homes¹⁰⁵ • Concerns over delivery of targets and how commercial and residential targets will interact, alongside building height and amenity policies¹⁰⁶ • Concerns over redevelopment of existing affordable housing – that like-for-like replacement will not happen¹⁰⁷ • Objection to restriction of short term letting of student accommodation¹⁰⁸ |
| Policy 9 Affordable housing | <ul style="list-style-type: none"> • Concerns over lack of 50% strategic affordable housing target¹⁰⁹ • Concerns over lack of reference to Mayor's 50% target on public land and threshold approach¹¹⁰ • Concerns over lack of clarity on how contributions are calculated - units/floorspace and gross/net¹¹¹ • Concerns over lack of flexibility on viability¹¹² • Concerns over lack of Payment in Lieu figures on which to base viability calculations¹¹³ • Questioning evidence underlying tenure split¹¹⁴ • Object to the ban on tenure change from affordable to private. ¹¹⁵ • Concerns over lack of clarity on affordable housing credits and land swaps¹¹⁶ |
| Policy 10 | <ul style="list-style-type: none"> • Concerns over practicality of on-site delivery of affordable housing¹¹⁷ |

¹⁰⁵ Church Commissioners for England, Taylor Wimpey Central, Berkeley Group, Defence Infrastructure Organisation, Clivedale, Marylebone Association

¹⁰⁶ TfL Commercial Development, Victoria Gardens Development Limited / Stockley House

¹⁰⁷ Maida Hill Neighbourhood Forum

¹⁰⁸ Unite Students

¹⁰⁹ Mayor of London, Maida Hill Neighbourhood Forum

¹¹⁰ Mayor of London, Westminster Property Association (WPA)

¹¹¹ Defence Infrastructure Organisation, Berkeley Group, Shaftesbury Plc, Church Commissioners for England, Clivedale, Shaw Corporation Limited, TfL Commercial Development, Victoria BID and Victoria Westminster BID, Westminster Property Association (WPA)

¹¹² Clivedale, Shaw Corporation Limited, Criterion Capital

¹¹³ Berkeley Group, Clivedale, Fitzrovia West Neighbourhood Forum, Marks and Spencer PLC, Shaw Corporation Limited

¹¹⁴ Achim von Malotki, Maida Hill Neighbourhood Forum, Mayor of London, Westminster Labour Group

¹¹⁵ Grosvenor Britain & Ireland (Graig McWilliam CEO)

¹¹⁶ Landsec

¹¹⁷ Shaw Corporation Limited, Capco Capital & Counties, Great Portland Estates plc, Lazari Investments Ltd, Legal & General Property (L&G), Planning Resolution, TfL Commercial Development, The Portman Estate, UK Hospitality, West End Partnership, Westminster BIDs, Westminster Property Association (WPA), Whitbread Plc.

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| Affordable housing contributions in the CAZ | <ul style="list-style-type: none"> • Concerns over how this policy interacts with commercial growth policies and the London Plan¹¹⁸ • Concerns over a lack of clarity over whether this applies to changes of use¹¹⁹ • Uncertainty on the area of measurement to which the floorspace increase applies (NIA, GIA or GEA).¹²⁰ • Concerns over lack of Payment in Lieu figures on which to base viability calculations¹²¹ • Concerns over lack of clarity on affordable housing credits and land swaps¹²² • Concerns over ambiguity as to whether the international centres are excluded from the requirement to provide affordable housing on site • Questioning the 1,000 sq.m. threshold at which the policy applies and the stepped approach to contributions |
| Policy 11 Housing for specific groups | <ul style="list-style-type: none"> • Object to specialist housing being allowed to convert to affordable housing only and lack of clarity over Clause D3¹²³ • Concerns over lack of clarity over 25% family housing target and whether it is strategic, or required on a site-by-site basis¹²⁴ • Concerns over lack of evidence to identify sufficient capacity to meet the need for Gypsies and Travellers accommodation over the plan period¹²⁵ • Concerns that the council are only planning to meet local rather than strategic need for student accommodation¹²⁶ • Concerns that approach to affordable student accommodation is not in line with the Mayor's¹²⁷ |
| Policy 12 Innovative housing delivery | <ul style="list-style-type: none"> • General support¹²⁸ • The policy should include the type of products that the council considers to be innovative models of housing¹²⁹ • Large-scale purpose-built units should be protected by strict legal agreements from converting to other housing types¹³⁰ |

¹¹⁸ Lazari Investments Ltd, Capco Capital & Counties, Westminster Property Association (WPA), West End Partnership, The Portman Estate

¹¹⁹ Imperial College Healthcare NHS Trust, Imperial College London, Westminster Property Association (WPA)

¹²⁰ Shaftesbury Plc

¹²¹ Berkeley Group, Clivedale, Fitzrovia West Neighbourhood Forum, Marks and Spencer PLC, Shaw Corporation Limited

¹²² Landsec

¹²³ Grosvenor Britain & Ireland, Shaw Corporation Limited

¹²⁴ BMO Real Estate Partners and SCP Estate Ltd., Defence Infrastructure Organisation, Shaftesbury Plc, Shaw Corporation Limited, TfL Commercial Development, Wildstone Planning

¹²⁵ Mayor of London

¹²⁶ Mayor of London, Unite Students

¹²⁷ Unite Students, Imperial College London

¹²⁸ Fitzrovia West Neighbourhood Forum, Berkeley Group

¹²⁹ Transport for London Development

¹³⁰ Church Street Neighbourhood Forum, Achim von Malotki

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| | <ul style="list-style-type: none"> • The council should consider a separate and more detailed policy focussed on Build to Rent¹³¹ • The policy should not seek to regulate rental levels¹³² • 12(B) may give a 'blank cheque' to developers because it is not caveated¹³³ • The council should consider how Modern Methods of Construction will be applied in practice for heritage assets¹³⁴ |
| Policy 13 Housing quality | <ul style="list-style-type: none"> • General support for the policy principles¹³⁵ • The council should consider that it may not be possible for heritage assets to meet the Nationally Described Minimum Space Standards¹³⁶ • The Plan should correspond with the London Plan policy on tenure integration and adapt the principles of tenure-blindness and non-segregated play space for all new developments.¹³⁷ |

Economy & Employment

| POLICY | SUMMARY OF RESPONSES |
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| Policy 14 Supporting economic growth Page 37 | <ul style="list-style-type: none"> • Plan should be explicit that there should be no net loss of office floorspace from the CAZ.¹³⁸ • While aspirations of commercial growth are supported, other policy requirements such as approach to height, and affordable housing are likely to compromise growth opportunities.¹³⁹ • Commercial growth targets are not ambitious enough and fail to recognise the role of non-office employment.¹⁴⁰ • Existing West End office market is functioning well, so policy does not need to be so protective. • Clause D should offer further exceptions for loss of office stock from the CAZ, including: scope for ground floor loss of office to retail and other key town centre uses in the town centre hierarchy¹⁴¹; small scale reformatting of |

¹³¹ Transport for London Development

¹³² Unite Students

¹³³ Knightsbridge Neighbourhood Forum

¹³⁴ Church Commissioners for England

¹³⁵ Shaw Corporation Limited, Maida Hill Neighbourhood Forum, Shaftesbury, BMO Real Estate, Clivedale, NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups

¹³⁶ Church Commissioners for England

¹³⁷ Church Street Neighbourhood Forum, Achim Von Malotki

¹³⁸ Mayor of London

¹³⁹ Shaw Corporation Limited, TfL Commercial Development, Westminster Property Association (WPA), The Portman Estate, Bentall Greenoak

¹⁴⁰ Westminster Property Association (WPA), West End Partnership, Bentall Greenoak, London First

¹⁴¹ British Land, Westminster Property Association (WPA)

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| | <p>mixed-use buildings; e.g. some loss of upper floors to extra retail/ residential etc¹⁴²; the loss of offices to residential or hotels ¹⁴³; and the conversion of offices to educational use without marketing requirements where part of a university strategy.¹⁴⁴</p> <ul style="list-style-type: none"> • 18 month marketing/ vacancy of offices as required under Clause D3 excessive.¹⁴⁵ • Some consultees state the plan should protect SMEs in areas beyond the NWEDA; e.g. Soho and Fitzrovia¹⁴⁶ whilst others support the proposed approach. ¹⁴⁷ • Provision should be made for land swaps. ¹⁴⁸ |
| <p>Policy 15 Town centres, high streets and the CAZ</p> | <ul style="list-style-type: none"> • Narrative of retail diversification supported. ¹⁴⁹ • Some detailed comments on town centre health check findings and suggestions for boundary alterations. ¹⁵⁰ • Charlotte St/ Fitzrovia CAZ retail cluster drawn too wide and covers an area with little retail character. ¹⁵¹ • 18-month marketing period is excessive, will lead to vacancies, and is contrary to the narrative about diversification of the sector. ¹⁵² • Marketing of vacant units under clause D should be at rates used before the unit became empty. ¹⁵³ • Should be clearer recognition that some loss of A1 units may be necessary – both from upper floors and in ground floors. ¹⁵⁴ • It is unclear how A1 uses can be protected against permitted development rights. ¹⁵⁵ |

¹⁴² Shaftesbury Plc

¹⁴³ Shaftesbury Plc

¹⁴⁴ London School of Economics and Political Science (LSE)

¹⁴⁵ Berners Allsopp Estate, Shaftesbury Plc, Victoria BID and Victoria Westminster BID, The Northbank BID, Criterion Capital

¹⁴⁶ Fitzrovia West Neighbourhood Forum, Marylebone Association

¹⁴⁷ The Crown Estate, Westminster Property Association (WPA)

¹⁴⁸ The Howard de Walden Estate, Westminster Property Association (WPA), Motcomb Estates

¹⁴⁹ British Land, C&C1 Ltd, Capco Capital & Counties, Heart of London Business Alliance, Knightsbridge Neighbourhood Forum, Legal & General Property (L&G), Montagu Evans, New West End Company, RBKC, St Marylebone Society, The Crown Estate, UK Hospitality, Westminster BIDs, Westminster Property Association (WPA)

¹⁵⁰ Longmartin Properties, Knightsbridge Neighbourhood Forum, Marble Arch BID, Shaftesbury Plc, Baker Street Quarter Partnership, Berners Allsopp Estate

¹⁵¹ Shaftesbury Plc, Berners Allsopp Estate

¹⁵² Church Commissioners for England, Capco Capital & Counties, Landsec, New West End Company, Bentall Greenoak

¹⁵³ Maida Hill Neighbourhood Forum

¹⁵⁴ New West End Company, Westminster Property Association (WPA)

¹⁵⁵ Landsec, Marble Arch BID

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| | <ul style="list-style-type: none"> • Suggestions that clause C3 is too restrictive in not allowing more than 2 non-A1 in a row in International Centres, or 3 in a row elsewhere¹⁵⁶, though also opposing views supporting the approach¹⁵⁷. • All references to shisha are too negative and unsubstantiated. • Some support for the approach of no residential in International Centres¹⁵⁸, whilst others suggest there should be greater recognition of the role of town centres as places to live.¹⁵⁹ • It is unclear how retail growth will be accommodated.¹⁶⁰ • Some comments on the council's approach to Oxford Street Place Plan or any forthcoming West End SPD.¹⁶¹ • Temporary uses will need to be carefully managed.¹⁶² • Support for town centre uses throughout the CAZ should not include parts that are mainly residential in character.¹⁶³ • Community uses should be supported alongside retail in Queensway. • Workspaces should be supported, and ground floor residential resisted, in local centres.¹⁶⁴ • Some references to opening hours and events.¹⁶⁵ • Policy does not appear to address the issue of proliferation of bureaux de change through unit sub-divisions.¹⁶⁶ |
| <p>Policy 16 Visitor economy</p> | <ul style="list-style-type: none"> • Expressed support to the approach to the visitor economy¹⁶⁷. • Believe the Lord's Cricket Ground is not given the required protection and attention.¹⁶⁸ • Should encourage innovation in the delivery of new space for cultural and leisure uses¹⁶⁹. |

¹⁵⁶ Church Commissioners for England, Royal London Asset Management, BMO Real Estate Partners and SCP Estate Ltd., New West End Company

¹⁵⁷ Knightsbridge Neighbourhood Forum

¹⁵⁸ New West End Company, Maida Hill Neighbourhood Forum, The Crown Estate

¹⁵⁹ Shaw Corporation Limited, Carter Jonas

¹⁶⁰ Mayor of London

¹⁶¹ Margaret Lister, New West End Company, Mayor of London

¹⁶² Capco Capital & Counties

¹⁶³ Knightsbridge Neighbourhood Forum

¹⁶⁴ Maida Hill Neighbourhood Forum

¹⁶⁵ Grosvenor Britain & Ireland, Capco Capital & Counties

¹⁶⁶ Marble Arch BID

¹⁶⁷ Beaumont Hotel Properties (BHLP), Exhibition Road Cultural Group, Knightsbridge Neighbourhood Forum, Whitbread Plc., 4C Hotel Group, Pimlico Neighbourhood Forum, Church Commissioners for England, Church Street Ward Neighbourhood Forum, Westminster BIDs (Baker Street Quarter Partnership / Heart of London Business Alliance / Marble Arch Partnership / New West End Company / The Northbank / PaddingtonNow / Victoria BID / Victoria Westminster BID), RIU Hotels, Baker Street Quarter Partnership, The Northbank BID, C&C1 Ltd, Achim von Malotki, Notting Hill East Neighbourhood Forum, Marble Arch BID, Heart of London Business Alliance, UK Hospitality, Palace of Westminster Restoration and Renewal Programme.

¹⁶⁸ Marylebone Cricket Club / Lord's Cricket Ground.

¹⁶⁹ Beaumont Hotel Properties (BHLP).

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| | <ul style="list-style-type: none"> • To highlight the concentration of theatres, music venues and LGBTQ+ venues, as indicated on the Mayor's Cultural Infrastructure Map¹⁷⁰. • Produce a supplementary planning document to protect theatres¹⁷¹ that play an important role in civil society¹⁷² and integrate the existing plan with other initiatives and plans¹⁷³. • Should recognize the cross-boundary nature of the Knightsbridge International Centre and work with RBKC to protect the area¹⁷⁴, and include reference to Imperial College facilities in the Knightsbridge Strategic Cultural Area¹⁷⁵. • Concerned that the policy may allow events on playing fields/pitches¹⁷⁶, and that the policy should be strengthened to prevent a wider range of impacts caused by events on historic places¹⁷⁷. • Different views on if hotels should be supported outside the areas identified in the policy¹⁷⁸, or further restricted to within the town centre boundaries¹⁷⁹, further preventing development of new hotels in residential streets¹⁸⁰, addressing their negative impact¹⁸¹. • Conflict between the approach to affordable housing in the CAZ and restricting the siting of hotels in residential streets¹⁸². • Against restriction of loss of office space to hotels in the CAZ¹⁸³. • Opposition to the justification linking the need to deliver extensions alongside 'upgrades'.¹⁸⁴ |
| <p>Policy 17 Food, drink and entertainment</p> | <ul style="list-style-type: none"> • Expressed support for the approach to food, drink and entertainment¹⁸⁵. • Guidance needed on requirements for applications to demonstrate benefits for community¹⁸⁶, and it may not always be appropriate¹⁸⁷. |

¹⁷⁰ Mayor of London.

¹⁷¹ Society of London Theatre.

¹⁷² Society of London Theatre.

¹⁷³ Society of London Theatre.

¹⁷⁴ Exhibition Road Cultural Group.

¹⁷⁵ Imperial College London.

¹⁷⁶ Sport England.

¹⁷⁷ Historic England.

¹⁷⁸ Wildstone Planning, 4C Hotel Group.

¹⁷⁹ Maida Hill Neighbourhood Forum

¹⁸⁰ Pimlico Neighbourhood Forum.

¹⁸¹ Graeme Cottam.

¹⁸² Whitbread Plc.

¹⁸³ Whitbread Plc.

¹⁸⁴ Westbury Hotel.

¹⁸⁵ Shaw Corporation Limited, Knightsbridge Neighbourhood Forum, Marylebone Association, Maida Hill Neighbourhood Forum, Capco Capital & Counties, Westminster Property Association (WPA), NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups, Heart of London Business Alliance, RBKC.

¹⁸⁶ British Land.

¹⁸⁷ Westminster Property Association (WPA).

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| | <ul style="list-style-type: none"> • Insufficient consultation with those offering shisha smoking in Westminster, the approach is discriminatory, and overly restrictive¹⁸⁸. • The policy should refer to detrimental impacts on public health of alcohol consumption¹⁸⁹. • Consider if the policy should further align with the draft new London Plan approach to the projection of pubs¹⁹⁰ • Should remove 18-month clause for risk of long vacancy of public houses¹⁹¹. Others suggest marketing should be at the previous rent¹⁹². • More needs to be done to protect traditional pubs in Westminster¹⁹³; the policy may have the unintended consequence of causing more public houses to be lost¹⁹⁴. • The policy approach to takeaways is unsound and fails to provide an evidence-based way of achieving the policy's objective.¹⁹⁵ • Suggest to add a set distance from residential properties to regulate and restrict shisha smoking¹⁹⁶, and consider the impact of shisha smoking on commercial premises¹⁹⁷. • The management plan required by the policy should be submit later at a pre-occupation stage¹⁹⁸. • Further clarity needed on measures to prevent over concentration of food, drink, entertainment uses¹⁹⁹ to manage the impacts on residential amenity. • The policy is not sufficient in limiting shisha smoking²⁰⁰. |
| <p>Policy 18 Community Infrastructure and facilities</p> | <ul style="list-style-type: none"> • General support for the principles of the policy²⁰¹ • Consider the plan contradicts the NPPF²⁰² • Requests to view and comment on the Infrastructure Delivery Plan²⁰³ |

¹⁸⁸ Amypro Limited trading as Sara Café, Mir Ali Faraj, Mr Ahmad Al-Husseini and Shaymaa Faraj submit 19 comments on this matter, together with Donise Limited trading as Al Balad Restaurant and (1) Mr Hussein Harim, (2) Mr Ali Hakim, (3) MrKhodor Hakim, and Donise Limited that submit the same 19 comments of the previous business on the same topic and Café N1 trading at 1 Church Street and Mr Hakim Gholam and family.

¹⁸⁹ NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups.

¹⁹⁰ Mayor of London, Historic England.¹⁹¹ Church Commissioners for England.

¹⁹¹ Church Commissioners for England.

¹⁹² Maida Hill Neighbourhood Forum.

¹⁹³ Campaign for Real Ale Limited (CAMRA) West London branch.

¹⁹⁴ BMO Real Estate Partners and SCP Estate Ltd and Shaftesbury Plc.

¹⁹⁵ McDonalds.

¹⁹⁶ Marylebone Association.

¹⁹⁷ Marble Arch BID

¹⁹⁸ BMO Real Estate Partners and SCP Estate Ltd and Shaftesbury Plc.

¹⁹⁹ Soho Society.

²⁰⁰ Marylebone Association.

²⁰¹ Knightsbridge Neighbourhood Forum, NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups

²⁰² Sport England

²⁰³ Port of London Authority

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| | <ul style="list-style-type: none"> • Request clarification to confirm that policy does not apply to MoD facilities²⁰⁴ • Questions evidence base for indoor and outdoor sports facilities that identifies need and sets out a strategy to address this²⁰⁵ • Policy should distinguish between public and private uses²⁰⁶ • Not clear if gyms would be protected²⁰⁷ • Suggestion to add separate policy on health infrastructure, health and wellbeing²⁰⁸ • Suggestion policy should allow for loss of sports facilities if they have been identified as surplus in the emerging PPS or BFS²⁰⁹ • Suggests separating sport facilities from other community facilities²¹⁰ • Suggestion that the policy is inconsistent with London Plan Policy S1²¹¹ • Lack of demand should be evidenced²¹² • Suggestion that strategies for provision of infrastructure should be publicly consulted upon²¹³ |
| <p>Policy 19 Education and skills</p> | <ul style="list-style-type: none"> • Policy should insist on community use of facilities in new education provision.²¹⁴ • Further support for Imperial College expansion should be provided, and education uses shouldn't need to make financial contributions towards employment and skills.²¹⁵ • Provision should be made for developers to meet employment and skills requirements themselves without requiring a financial contribution.²¹⁶ |
| <p>Policy 20 Digital infrastructure, Information and</p> | <ul style="list-style-type: none"> • Suggestion of supporting changes on national level, with regards to the marketing means that affect the public realm²¹⁷ |

²⁰⁴ Defence Infrastructure Organisation

²⁰⁵ Sport England

²⁰⁶ Westminster Property Association (WPA)

²⁰⁷ Westminster Property Association (WPA)

²⁰⁸ NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups

²⁰⁹ Sport England

²¹⁰ Sport England

²¹¹ NHS Property Services (NHSPS) and the Department of Health and Social Care (DHSC)

²¹² Maida Hill Neighbourhood Forum

²¹³ Soho Society

²¹⁴ Sport England

²¹⁵ Imperial College London

²¹⁶ London School of Economics and Political Science (LSE)

²¹⁷ Victoria BID and Victoria Westminster BID

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| communications technology | <ul style="list-style-type: none"> • Urges the council to produce a robust strategy that contains guidelines and criteria on how the developments can benefit from and use the digital infrastructure. |
| Policy 21 Soho Special Policy Area | <ul style="list-style-type: none"> • Disagreement about the blanket approach for the large hotels²¹⁸ • Questions on how the policy measures the mix and character of the uses in Soho²¹⁹ • Request clarity on prevention of overconcentration of food, drink, entertainment uses²²⁰ • Comments on licenced premises that may be degrading the street environment²²¹ • Comments regarding developments and amalgamation of units behind retained facades²²² • Concerns over clarity regarding the small-scale hotels definition²²³ |
| Policy 22 Mayfair & St James's Special Policy Area | <ul style="list-style-type: none"> • Policy should support flexibility of uses between art galleries and antiques traders, and support land use swaps. ²²⁴ • Some further flexibility within the SPA required.²²⁵ • Policy should only seek to protect base level of specialist floorspace upon adoption of plan.²²⁶ |
| Policy 23 Harley Street Special Policy Area | <ul style="list-style-type: none"> • Policy broadly supported, though provision should be made for land use swaps.²²⁷ |
| Policy 24 Davile Row Special Policy Area | <ul style="list-style-type: none"> • Policy should offer scope for some loss of tailoring space subject to marketing, not restrict size of retail where it is provided, and only seek to protect base level of specialist floorspace upon adoption of plan. ²²⁸ |

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²¹⁸ UK Hospitality

²¹⁹ Shaftesbury Plc, Meard & Dean Street RA

²²⁰ Church Commissioners for England

²²¹ Meard & Dean Street RA

²²² Marylebone Association, Soho Society

²²³ Soho Society, Shiva Hotels

²²⁴ The Pollen Estate

²²⁵ Trophaeum Asset Management

²²⁶ The Pollen Estate

²²⁷ The Howard de Walden Estate

²²⁸ The Pollen Estate

Connections

| POLICY | SUMMARY OF RESPONSES |
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| Policy 25 Sustainable transport | <ul style="list-style-type: none"> • General support for the policy principles²²⁹ • A Transport Strategy should accompany the plan²³⁰ • Policy could be more ambitious to prioritise active travel over cars, reduce car use and require contributions (other than CIL) to reduce poor air quality²³¹ • Policy is too high level and needs examples²³² • The plan should include a diagram on Healthy Streets, the policy could be clearer how to apply it to development proposals and should include a reference to the remodelling of healthy streets²³³ • This Policy contradicts policy 32 regarding new river crossings²³⁴ • Financial contributions should apply to all transport modes²³⁵ • Negative impacts of disused telephone boxes are not addressed by the policy²³⁶ • Delivery and servicing - policy should encourage smaller vehicles for deliveries to reduce congestion, require delivery and servicing plans, and deliveries should be included in Transport Network Servicing Plans; Policy should also encourage out of peak deliveries and support a review of London Lorries Services Plan²³⁷ • Impact of re-allocating road space needs to be considered²³⁸ |
| Policy 26 | <ul style="list-style-type: none"> • General support for the principles of the policy²³⁹ |

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²²⁹ Port of London Authority, Westminster Cycling Campaign, Transport for London, TfL Commercial Development, Church Commissioners for England, Sport England, Westminster BIDs, The Northbank BID, West End Partnership, Freight Transport Association, Heart of London Business Alliance

²³⁰ West End Partnership, Freight Transport Association, Port of London Authority, Westminster Cycling Campaign, Transport for London, Westminster BIDS (Baker Street Quarter Partnerships, Heart of London Business Alliance, Marble Arch Partnership, New West End Company, The Northbank, Paddington Now, Victoria BID, Victoria Westminster BID, Marble Arch BID)

²³¹ Church Commissioners for England, Transport for London, Westminster Cycling Campaign

²³² Transport for London

²³³ Marble Arch BID, Knightsbridge Neighbourhood Forum, NHS Healthy Urban Development Unit/Central London and West London Clinical Commissioning Groups, Transport for London

²³⁴ Wandsworth Borough Council

²³⁵ Transport for London

²³⁶ Westminster BIDS (Baker Street Quarter Partnerships, Heart of London Business Alliance, Marble Arch Partnership, New West End Company, The Northbank, Paddington Now, Victoria BID, Victoria Westminster BID, Marble Arch BID)

²³⁷ Freight Transport Association, Transport for London

²³⁸ Freight Transport Association

²³⁹ Port of London Authority, Westminster Cycling Campaign, TfL Commercial Development, Knightsbridge Neighbourhood Forum, Church Commissioners for England, Margaret Lister, West End Partnership, New West End Company, Wandsworth Borough Council, The Belgravia Society, Notting Hill East Neighbourhood Forum, Transport for London, The Canal and River Trust, Heart of London Business Alliance, Momentum Transport Consultancy, Westminster Property Association

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| Walking and cycling | <ul style="list-style-type: none"> • Policy could go further to be more effective by referring to Thames Path, seeking to reduce car use and make walking routes accessible 24/7²⁴⁰ • Disagreement that short stay parking may not be appropriate in some cases - consultees want to see more short stay cycle parking²⁴¹ • On the one hand more contributions to cycle routes are sought but on the other hand there are concerns about the safety for pedestrians and other impacts with the introduction of more cycle routes (particular concerns around Bayswater Road, Harewood Avenue, Enford Street, Wyndham Place)²⁴² • Policy should reference the Mayor's 'Healthy Streets' approach²⁴³ • Policy should go further to reduce traffic²⁴⁴ • Policy should consider safety and encourage better links between walking, cycling & public transport²⁴⁵ • Cycle space requirements for residential development are excessive²⁴⁶ |
| Policy 27 Public transport and infrastructure | <ul style="list-style-type: none"> • General support for the principles of the policy²⁴⁷ • Funding for public transport should only be through CIL and should also include contributions to rail infrastructure (Part 1 C)²⁴⁸ • Policy should also mention river buses, the role of buses in Westminster and the need for car and coach drop off points in the West End²⁴⁹ • New electric vehicle charging points should be for taxis, not private cars²⁵⁰ • Streamlining of bus services should be subject to maintaining due connectivity²⁵¹ • Policy should reference the Piccadilly line upgrades and mention the entrance to Knightsbridge underground station²⁵² |

²⁴⁰ Port of London Authority, London Cycling Campaign, Transport for London, Westminster Cycling Campaign

²⁴¹ Mayor of London, Transport for London

²⁴² St Marylebone Society, The Belgravia Society, Andy Beverley, Transport for London

²⁴³ Transport for London

²⁴⁴ Westminster Cycling Campaign

²⁴⁵ Transport for London, Freight Transport Association

²⁴⁶ Unite Students

²⁴⁷ Church Commissioners for England, Momentum Transport Consultancy, The Northbank BID, West End Partnership, Freight Transport Association, New West End Company, Wandsworth Borough Council

²⁴⁸ Church Commissioners for England, Transport for London

²⁴⁹ Port of London Authority, Heart of London Business Alliance

²⁵⁰ Transport for London

²⁵¹ Royal Borough of Kensington & Chelsea

²⁵² Transport for London, Knightsbridge Neighbourhood Forum

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| | <ul style="list-style-type: none"> • Coach and bus standing facilities should be relocated to non-residential areas (including the relocation of Victoria Coach Station)²⁵³ |
| <p>Policy 28 Parking</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 46</p> | <ul style="list-style-type: none"> • General support for the principles of the policy (including adoption of cycle parking standards in line with the draft London Plan)²⁵⁴ • Exceptions in Parking Zones B&F objected to: new development shouldn't have car parking, consultees query using the 'over the 80%' threshold to determine parking stress and how this policy will help reduce car use. There is opposition to justifying of on-site parking based on it providing a more convenient and cheaper alternative to public transport for families; policy should go further to encourage sustainable transport uptake²⁵⁵ • On street parking spaces should be prioritised for more sustainable modes of transport such as footway widening / public realm improvement schemes²⁵⁶ • Major development should provide cycle parking²⁵⁷ • Residents of new development should be restricted from having a parking permit²⁵⁸ • New car parks should be let only to residents²⁵⁹ • Concerns that car free areas/ parking restrictions mustn't adversely impact servicing and deliveries or needs of commercial businesses - consolidation and depot centres will need parking spaces off street, especially if electric vehicles are used that need charging. Micro consolidation centres should be considered as an alternative use (clause C)²⁶⁰ • Part A 2 should say 100% not 50% to reflect latest government guidance and more resident spaces should have electric vehicle charging infrastructure. It is also not clear what on street requirements are (Part E) - does it apply to the whole city? If not, it should²⁶¹ • Objection to re-provision of car parking on housing estates²⁶² |

²⁵³ Heart of London Business Alliance, Graeme Cotton

²⁵⁴ Maida Hill Neighbourhood Forum, Westminster Cycling Campaign, Marylebone Association, Heart of London Business Alliance

²⁵⁵ Transport for London, Mayor of London, Grosvenor Britain & Ireland Church Commissioners for England, Westminster Property Association, Westminster Labour Group, Fitzrovia West Neighbourhood Forum, Andy Beverley, Westminster Cycling Campaign, Achim von Malotki, Marylebone Forum, West End Partnership, Church Street Neighbourhood Forum, Momentum Transport Consultancy, Baker Street Quarter Partnership, TfL Commercial Development, Knightsbridge Neighbourhood Forum, Clivedale

²⁵⁶ New West End Company, Transport for London

²⁵⁷ Berkeley Group

²⁵⁸ Westminster Cycling Campaign, Westminster Labour Group

²⁵⁹ Westminster Cycling Campaign

²⁶⁰ Freight Transport Association, Covent Garden Community Association, Soho Society,

²⁶¹ Knightsbridge Neighbourhood Forum, Marble Arch BID, Transport for London

²⁶² Transport for London

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| <p>Policy 29 Highway Access and management</p> | <ul style="list-style-type: none"> • General support for the principles of the policy²⁶³ • Part A (and paragraph 29.2) need clarification on the intention²⁶⁴ • Coach and taxi parking should not adversely affect residential amenity²⁶⁵ • Policy is not evidenced²⁶⁶ • Strategic Road Network (SRN) map (Figure 28) needs correcting: Oxford Street is not part of the SRN and Great Western Road and Chepstow Place are²⁶⁷. |
| <p>Policy 30 Freight and servicing</p> | <ul style="list-style-type: none"> • General support for the principles of the policy, but it should encourage more sustainable solutions²⁶⁸ • Include reference to River Thames in relation to freight²⁶⁹ • Policy is too prescriptive (particularly on measures that could improve air quality & the requirements for the Freight Operator Recognition Scheme)²⁷⁰ • Requirement for deliveries could be improved by, for example, more taking place at night (but also noting not all logistics and deliveries can be re-timed), more cycle and foot deliveries (including converting car parks to cycle delivery space and using space more flexibly), greater provision for micro-consolidation centres in off street car parks and acknowledgment that while they can reduce freight, breaking down deliveries into smaller vans creates more congestion.²⁷¹ • Footway should be prioritised for pedestrians and servicing restricted where there is conflict with pedestrians²⁷² • Transport assessments, delivery and servicing plans and construction logistics plans should be better monitored²⁷³ |

²⁶³ Freight Transport Association, Northbank BID

²⁶⁴ Transport for London, Church Commissioners for England

²⁶⁵ Church Commissioners for England

²⁶⁶ Grosvenor Britain & Ireland

²⁶⁷ Notting Hill East Neighbourhood Forum, New West End Company

²⁶⁸ City of London Corporation, Westminster Cycling Campaign, the Northbank BID, West End Partnership, Freight Transport Association, Soho Society, Grosvenor Britain and Ireland

²⁶⁹ Port of London Authority

²⁷⁰ John Lewis Partnership, Freight Transport Association

²⁷¹ Notting Hill East Neighbourhood Forum, Freight Transport Association, Westminster BIDS (Baker Street Quarter Partnership, Heart of London Business Alliance, Marble Arch Partnership, New West End Company, Northbank BID, Paddington Now, Victoria BID, Victoria Westminster BID), West End Partnership, Westminster Property Association, Transport for London, Momentum Transport Consultancy

²⁷² LandSec, Westminster Property Association

²⁷³ West End Partnership, Freight Transport Association

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| | <ul style="list-style-type: none"> • Development in WERLSPA should be required to provide a transport strategy and Policy 7 should refer to the need for a construction logistics plan²⁷⁴ • Commuted sums should be paid if servicing is not provided²⁷⁵ |
| Policy 31 Technological innovation in transport | <ul style="list-style-type: none"> • General support for the principles of the policy²⁷⁶ • Concerns about additional street clutter from Electric Vehicle charging infrastructure - walking and cycling should be prioritised over EVs²⁷⁷ • New/replacement refuelling facilities should be on the strategic road network²⁷⁸ • References to refuelling stations should include provision of electric vehicle infrastructure (including for commercial vehicles)²⁷⁹ • On street electric vehicle infrastructure should be available for both residential and commercial users²⁸⁰ |
| Policy 32 Waterways and waterbodies | <ul style="list-style-type: none"> • General support for the principles of the policy²⁸¹ • Better connectivity should be recognised as a strategic benefit of new river crossings²⁸² • Port of London Authority's Thames Vision document should be referenced²⁸³ • Access to rivers and wharves should be protected and inclusive step-free, walking and cycling access should be ensured²⁸⁴ |

²⁷⁴ Covent Garden Community Association, Transport for London

²⁷⁵ Amy Rogers, Marylebone Association

²⁷⁶ Soho Data Holdings, Freight Transport Association, Marylebone Association, Northbank BID

²⁷⁷ Momentum Transport Consultancy, Westminster BIDs (Baker Street Quarter Partnership, Heart of London Business Alliance, Marble Arch Partnership, New West End Company, Northbank BID, Paddington Now, Victoria BID, Victoria Westminster BID)

²⁷⁸ Soho Data Holdings, Environment Agency

²⁷⁹ Soho Data Holdings,

²⁸⁰ Freight Transport Association

²⁸¹ Port of London Authority, City of London Corporation, Transport for London, Sport England, The Northbank BID

²⁸² Wandsworth Borough Council

²⁸³ Port of London Authority

²⁸⁴ Transport for London, Freight Transport Association

Environment

| POLICY | SUMMARY OF RESPONSES |
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| <p>Policy 33 Air quality</p> | <ul style="list-style-type: none"> • Expressed support to the air quality approach²⁸⁵ • Should consider impact of aviation- and ground-generated emission²⁸⁶ • Ensure policy reflects updated Policy SI1 of New London Plan²⁸⁷ • The approach to parking could impede the objectives of this policy²⁸⁸ • The Air Quality Assessment threshold should be changed to 1,000 sqm or more of new build space²⁸⁹, and extend to include 'all areas of poor air quality'²⁹⁰ • More clarity on the standards needed for assessing change in air quality is needed²⁹¹ • The approach to air quality should be more ambitious²⁹², including by encouraging developers to achieve zero emissions²⁹³ • Make explicit that achieving Air Quality Positive status is required of all major developments in Air Quality Focus Areas²⁹⁴ • Clarity needed on Air Quality Focus Area (AQFA) boundaries²⁹⁵ • Council should re-consider approach to outdoor seating in areas of poor air quality²⁹⁶ |
| <p>Policy 34 Local environmental impacts</p> | <ul style="list-style-type: none"> • Expressed support for the approach to managing local environmental effects²⁹⁷ • Wording changes to ensure amenity of occupiers of new developments is also protected should be made²⁹⁸ |

²⁸⁵ South East Bayswater Residents Association (SEBRA), City of London Corporation, The Howard de Walden Estate, Church Commissioners for England, Landsec, Baker Street Quarter Partnership, The Northbank BID, Marylebone Forum, New West End Company, Environment Agency

²⁸⁶ South East Bayswater Residents Association

²⁸⁷ Knightsbridge Neighbourhood Forum

²⁸⁸ Church Commissioners for England

²⁸⁹ Church Commissioners for England

²⁹⁰ Knightsbridge Neighbourhood Forum

²⁹¹ Westminster Property Association, Grosvenor Britain & Ireland (Graig McWilliam CEO)

²⁹² Notting Hill East Neighbourhood Forum

²⁹³ Knightsbridge Neighbourhood Forum

²⁹⁴ Baker Street Quarter Partnership, Marylebone Forum

²⁹⁵ Shaftesbury Plc

²⁹⁶ Marylebone Forum

²⁹⁷ Port of London Authority, Knightsbridge Neighbourhood Forum, Sport England, Thames Water, Landsec, Freight Transport Association (FTA) NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups

²⁹⁸ Thames Water

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| | <ul style="list-style-type: none"> • Council should explore lighting technologies²⁹⁹ • Should include measures for noise from aviation and ground-based development^{300 301} • Council should support review of the London Lorry Control Scheme (LLCS)³⁰² |
| Policy 35 Green infrastructure | <ul style="list-style-type: none"> • Expressed support to the green infrastructure approach³⁰³ • Additional references to the Draft London Plan's Urban Greening Factor policy and to sustainable water use needed³⁰⁴ • Tree planting in new developments requires strategic support elsewhere in the Plan regarding Public Realm³⁰⁵ • Provision of space for children's active play should be considered on a site-specific basis³⁰⁶ • Small loss of space should be acceptable for ancillary uses (such as toilet or café)³⁰⁷ • A policy specific to the Royal Parks should be included³⁰⁸ • Policy should also address quality of green infrastructure³⁰⁹ • Trees and open space should not impede access to loading bays/ entrances³¹⁰ • City Plan not linked to protected open spaces in previous Open Space Strategy³¹¹ • Approach to trees should be refined³¹² • Suggested policy for closing streets for play streets and community events should be included³¹³ |

²⁹⁹ Notting Hill East Neighbourhood Forum

³⁰⁰ South East Bayswater Residents Association (SEBRA)

³⁰¹ Kildare Gardens and Kildare Terrace Residents Association

³⁰² Freight Transport Association (FTA)

³⁰³ Port of London Authority, City of London Corporation, Fitzrovia West Neighbourhood Forum, Knightsbridge Neighbourhood Forum, Church Commissioners for England, Landsec, Baker Street Quarter Partnership, The Northbank BID, Grosvenor Britain and Ireland (Graig McWilliam CEO), Westminster Property Association (WPA), New West End Company, Marble Arch BID

³⁰⁴ City of London Corporation

³⁰⁵ Landsec

³⁰⁶ Church Commissioners for England

³⁰⁷ Baker Street Quarter Partnership, Marble Arch BID

³⁰⁸ The Royal Parks

³⁰⁹ Grosvenor Britain and Ireland (Graig McWilliam CEO)

³¹⁰ Freight Transport Association (FTA)

³¹¹ Martin Scott

³¹² The Portman Estate, Knightsbridge Neighbourhood Forum, Notting Hill East Neighbourhood Forum

³¹³ Notting Hill East Neighbourhood Forum

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| <p>Policy 36 Flood risk</p> | <ul style="list-style-type: none"> • Expressed support for the approach to flood risk management^{314 315 316 317} • Impractical to target greenfield run-off rates³¹⁸ • Updates to the Strategic Flood Risk Assessments will be required³¹⁹. • Amendments to the criteria for site-specific Flood Risk Assessments are suggested³²⁰ • Approach to SuDS is too limiting, other drainage measures should also be considered³²¹ |
| <p>Policy 37 Energy</p> | <ul style="list-style-type: none"> • Expressed support for the approach to Energy³²² • Policy should be more ambitious³²³ and further align with industry guidance³²⁴ • Policy should permit an estate-wide approach to carbon reduction³²⁵ • Consider development targets' energy demand on infrastructure³²⁶ • Details for calculating financial contributions needed³²⁷ • Plan should not encourage one-size fits all approach to building retrofits³²⁸ • Allowing carbon offset payment for failure to meet emission targets should not be appropriate • Expand policy to clearly promote building retrofitting³²⁹ |
| <p>Policy 38 Waste management</p> | <ul style="list-style-type: none"> • Expressed support to the waste management approach³³⁰ • Plan does not conform to London Plan strategic waste planning approach, and the evidence is insufficient³³¹ |

³¹⁴ Knightsbridge Neighbourhood Forum

³¹⁵ The Northbank BID

³¹⁶ Royal Borough of Kensington and Chelsea (RBKC)

³¹⁷ Notting Hill East Neighbourhood Forum

³¹⁸ Westminster Property Association (WPA)

³¹⁹ Environment Agency, Royal Borough of Kensington and Chelsea

³²⁰ Knightsbridge Neighbourhood Forum

³²¹ Knightsbridge Neighbourhood Forum

³²² The Howard de Walden Estate, Church Commissioners for England, Berkeley Group, Landsec, Baker Street Quarter Partnership, The Northbank BID, Marks and Spencer PLC, West End Partnership, NHS London Healthy Urban Development Unit/ Central London and West London Clinical Commissioning Groups

³²³ West End Partnership, Knightsbridge Neighbourhood Forum

³²⁴ Landsec

³²⁵ The Howard de Walden Estate, The Crown Estate, Grosvenor Britain & Ireland (GRAig McWilliam CEO), Westminster Property Association (WPA)

³²⁶ Baker Street Quarter Partnership

³²⁷ John Lewis Partnership, Royal London Asset Management

³²⁸ Historic England

³²⁹ Soho Society

³³⁰ Mayor of London, West End Partnership, Knightsbridge Neighbourhood Forum, The Northbank BID, West End Partnership, New West End Company, Heart of London Business Alliance

³³¹ Mayor of London, North London Waste Authority

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| | <ul style="list-style-type: none"> • Should explicitly commit towards circular economy³³² • More detail and guidance on waste management will be welcomed, seeking to minimise negative effects³³³ • Suggested provision that major developments should be required to participate in wider scheme³³⁴ |
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Design & Heritage

| POLICY | SUMMARY OF RESPONSES |
|---|--|
| Policy 39 Design principles Page 52 | <ul style="list-style-type: none"> • General support for the principles of the policy³³⁵ • Water efficiency targets/Westminster position on areas of water stress should be mentioned and emphasise maximum water credits, or that buildings meet best practice level of the Association for Environment Conscious Buildings (AECB, Water Standards).³³⁶ • Specific references to appropriate upwards extensions is supported but alterations and extensions do not always need to be subordinate to the existing building and approvals should be more flexible for listed buildings³³⁷ • Need to balance employment and housing targets and opportunities to diversify the character of areas through upwards extensions³³⁸ • Requirements for extensions to buildings to trigger a requirements for the whole building to meet BREEAM standards is considered unreasonable and greater flexibility and amendments to the 500sqm threshold are therefore suggested³³⁹ • Provision of an operational management plan should be a material consideration³⁴⁰ • Clarity is needed for collaborative and participatory design approaches³⁴¹ • Double glazing should be considered in conservation areas and listed buildings³⁴² |

³³² West End Partnership

³³³ New West End Company, Simon Osborne Smith, the North Bank BID

³³⁴ Heart of London Business Alliance

³³⁵ Soho Housing Association, Fitzrovia West Neighbourhood Forum, The Howard de Walden Estate, Marylebone Association, Sport England, Maida Hill Neighbourhood Forum, Royal London Asset Management, NHS London Healthy Urban Development Unit/Central London and West London Clinical Commissioning Groups, Wandsworth Borough Council, Berkeley Group

³³⁶ Environment Agency

³³⁷ Portman Estate, Soho Housing Association, Howard de Walden Estate

³³⁸ Westminster Property Association

³³⁹ Church Commissioners for England, Berners Allsopp Estate, Shaftesbury Plc, BMO Real Estate Partners, SCP Estate Ltd

³⁴⁰ The Northbank BID

³⁴¹ John Lewis Partnership

³⁴² Marylebone Forum

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| | <ul style="list-style-type: none"> • Policy should balance the need for heritage conservation against ambitions for improved sustainability³⁴³ • Higher BREEAM standards should be required and recognition that BREEAM standards can be met without water efficiency measures³⁴⁴ |
| <p>Policy 40 Heritage</p> | <ul style="list-style-type: none"> • General support for the principles of the policy³⁴⁵ • Policy is too conservative especially compared to other policies in the plan. But on the other hand, the policy provides insufficient protection for unlisted buildings of merit and the policy should be strengthened to required conservation enhancements (Clause Q)³⁴⁶ • Westminster World Heritage Site- The policy should include a commitment to require an updated management plan and reference cumulative harm; the Council should consider producing a Westminster World Heritage Site SPD. 'Setting' should feature more prominently in the policy and maximum weight be given to the consideration of Westminster World Heritage Site³⁴⁷ • Clarify that Heritage Impact Assessment are not a heritage statement³⁴⁸ • Policy needs to be applied in a balanced way whilst fully engaging with harm and benefit³⁴⁹ • Aspirations for Parliament Square should be mentioned³⁵⁰ • Applicants should demonstrate improvements to environmental performance³⁵¹ • Policy should be clearer that significance of historic buildings is not limited to front façade, facadism is discouraged and re-development of unlisted buildings should be case by case. Where there are non-designated heritage assets these should be kept/ restored as much as possible³⁵² • Concern about relying on a future Heritage SPD to properly apply the policy³⁵³ • Clause R is unsound given that non-designated assets have no statutory protection³⁵⁴ |

³⁴³ Westminster Labour Group

³⁴⁴ Knightsbridge Neighbourhood Forum, Environment Agency

³⁴⁵ Knightsbridge Neighbourhood Forum, Church Commissioners for England, John Lewis Partnership, Historic England, Landsec, Palace of Westminster Restoration and Renewal Programme, City of London Corporation, Planning & Conservation Working Group (London Parks & Gardens Trust)

³⁴⁶ Church Commissioners for England, LandSec

³⁴⁷ Historic England, Marylebone Association

³⁴⁸ Historic England

³⁴⁹ Westminster Property Association, Church Commissioners for England, Portman Estate, London School of Economics and Political Science

³⁵⁰ Victoria BID, Victoria Westminster BID

³⁵¹ Knightsbridge Neighbourhood Forum

³⁵² Historic England, Shaw Corporation Ltd, Fitzrovia West Neighbourhood Forum

³⁵³ Shaftesbury Plc

³⁵⁴ Church Commissioners for England

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| <p>Policy 41 Townscape and architecture</p> | <ul style="list-style-type: none"> • General support for the principles of the policy³⁵⁵ • Policy is too restrictive in commercial locations. The locations where upwards extensions are allowed should be widened out to include other parts of the CAZ. To have a more positive strategy for growth in the city, this policy should positively consider upwards extensions - otherwise the growth strategy in the Plan will be prejudiced³⁵⁶ • The policy is not clear where commercial upwards extensions are allowed³⁵⁷ • Extensive development should be identified and the Plan should support the potential for extensive development³⁵⁸ • Policy should more positively encourage high quality architecture and alterations and extensions that provide residential and commercial growth³⁵⁹ • Policy should resist development of amenity spaces to the rear of buildings³⁶⁰ • Stating 'one or more additional storeys' and the requirement for uniformity could constrain capacity of a number of sites and represents a failure to make the most efficient use for land³⁶¹ |
| <p>Policy 42 Building height</p> | <ul style="list-style-type: none"> • Expressed support for the principles of the building height approach³⁶² • Further guidance on the prevailing building heights and general approach will be appreciated³⁶³ • Concerns with the approach to building height including definition of tall buildings as above 30m, as this may be too restrictive in parts of the city.³⁶⁴ |

³⁵⁵ City of London Corporation, Knightsbridge Neighbourhood Forum, Mayor of London, Howard de Walden Estate, Church Commissioners for England, John Lewis Partnership, Historic England, Berners Allsopp Estate, Royal Borough of Kensington and Chelsea, Baker Street Quarter Partnership, Shaftesbury Plc, BMO Real Estate Partners and SCP Estate Ltd, Notting Hill East Neighbourhood Forum.

³⁵⁶ Crown Estate, EEH Ventures, Howard de Walden Estate, Church Commissioners for England, LandSec, London First, Montagu Evans, Pollen Estate, West End Partnership, Portman Estate, Berners Allsop Estate, Shaftesbury Plc, BMO Real Estate Partnership, SCP Estate Ltd

³⁵⁷ Capco Capital & Counties

³⁵⁸ Wildstone Planning, Shaw Corporation Ltd

³⁵⁹ Shaw Corporation Ltd, Westminster Property Association

³⁶⁰ Marylebone Association

³⁶¹ Westminster Property Association

³⁶² Miles Barber, Mayor of London, TfL Commercial Development, Knightsbridge Neighbourhood Forum, St Marylebone Society, Graeme Cottam, Marble Arch BID, Westminster Labour Group, 4C Hotel Group,

³⁶³ Victoria BID and Westminster BID, Planning & Conservation Working Group (London Parks & Gardens Trust), The Belgravia Society, Berkeley Group

³⁶⁴ Taylor Wimpey Central, The Belgravia Society, Citizen M, Wildstone Planning, Hanover House Ltd, Viridian Property Ltd, Montau Evans, Whitbread Plc, John Lewis Partnership, Network Rail, Shiva Hotels, Clivedale, Victoria Gardens Development Limited / Stockley House, Montagu Evans, The Pollen Estate, West End Partnership, Westminster Property Association, London First, Pimlico Neighbourhood Forum, Church Commissioners for England, Legal & General Property (L&G), Great Portland Estates Plc, The Crown Estate, Legal and General Property (L&G), Royal London Asset Management, Legal and General Property (L&G), Westbury Hotel, Historic England, Westminster BIDs (Baker Street Quarter Partnership, Heart of London Business

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| | <ul style="list-style-type: none"> • Questions the setting of prevailing height at 6 residential storeys in Victoria Opportunity Area³⁶⁵ and the approach to Paddington Opportunity Area³⁶⁶ • Building heights should be considered according to metres and volume rather than storeys³⁶⁷ • Concerned about potential harm to the historic environment, the evidence base and urban design approach to tall buildings.³⁶⁸ • Approach to tall buildings is contrary to City Plan and sustainable growth and constrain development³⁶⁹ • Review wording to create more flexibility for taller buildings across the borough³⁷⁰ • Requested Edgware Road Junction / Marylebone Flyover Opportunity Area is expanded³⁷¹ • Unclear how tall buildings will help frame Victoria Station and Victoria Street³⁷² • Criteria-based policy more appropriate and expected need for helipad³⁷³ • Does not reference Royal Oak as suitable for tall building³⁷⁴ • References to maximum heights at and around Victoria station should be deleted and sites should be marked as suitable for tall buildings³⁷⁵ • POA and VOA should consider accommodating District Landmarks at least³⁷⁶ • Include railway stations, underground stations and bus garages as suitable locations for tall buildings³⁷⁷ |
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 Alliance, Marble Arch Partnership, New West End Company, The Northbank BID, Paddington Now, Victoria BID, Victoria Westminster BID), Montagu Evans, Travis Perkins, AYR Projects Limited

³⁶⁵ Victoria BID and Victoria Westminster BID, Bentall Greenoak

³⁶⁶ Travis Perkins, Historic England

³⁶⁷ The Belgravia Society

³⁶⁸ Historic England

³⁶⁹ The London School of Economics, Westbury Hotel, Imperial College Healthcare NHS Trust, NHS Property Services (NHSPS) and the Department of Health and Social Care (DHSC), Landsec, Marks and Spencer Plc, Legal & General Property (L&G), Great Portland Estates plc, Soho Housing Association, Stanway Little Associates, Fitzrovia West Neighbourhood Forum, Marylebone Forum, Capco Capital & Counties, Audley Property, West End Partnership, Great Portland Estates Plc, Bentall Greenoak

³⁷⁰ Westminster BIDs (Baker Street Quarter Partnership, Heart of London Business Alliance, Marble Arch Partnership, New West End Company, The Northbank BID, Paddington Now, Victoria BID, Victoria Westminster BID), British Land

³⁷¹ Westminster BIDs (Baker Street Quarter Partnership, Heart of London Business Alliance, Marble Arch Partnership, New West End Company, The Northbank BID, Paddington Now, Victoria BID, Victoria Westminster BID), Marble Arch BID

³⁷² Graeme Cottam

³⁷³ Imperial College Healthcare NHS Trust

³⁷⁴ TfL Commercial Development

³⁷⁵ Network Rail LUKAS

³⁷⁶ TfL Commercial Development

³⁷⁷ TfL Commercial Development

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| <p>Policy 43 Building height in the housing renewal areas</p> | <ul style="list-style-type: none"> • Strengthen policy by requiring proposals to clearly demonstrate neighbourly development³⁷⁸ • Wording compromises Policy 42 and assigns lower standard of amenity and shading protection for people living in housing renewal areas³⁷⁹ • Concerns about the lawfulness of having a different policy approach to height for housing renewal areas compared to other areas.³⁸⁰ • Concerns that specifying the tallest element of the Ebury redevelopment be towards the northern end suggests the impacts on the other site of the railway line have not been taken into account³⁸¹ |
| <p>Policy 44 Public realm</p> | <ul style="list-style-type: none"> • General support for the principles of the policy³⁸² • Improvements to policy suggested include: including reference to the size of memorials, quality materials being required for street furniture, the policy supporting signage, and events information management plans for the West End³⁸³ • Policy should address reduction of existing retail kiosks and should require sufficient footway widths by re-allocating road space to pedestrians and ensuring sufficient space is created between tables and chairs on the highway and the carriageway for the convenience of pedestrians³⁸⁴ • Policy should enhance management of public realm³⁸⁵ • Negative wording around high level adverts should be removed³⁸⁶ and temporary advertisement permissions should be extended (para 44.12) to encourage higher quality installations; temporary signage should be supported where it encourages retail growth³⁸⁷ |
| <p>Policy 45 Security measures in the public realm</p> | <ul style="list-style-type: none"> • General support for the principles of the policy³⁸⁸ • The policy should refer to the setting of heritage assets alongside historic townscape³⁸⁹ • The policy should refer to archaeology³⁹⁰ |

³⁷⁸ Knightsbridge Neighbourhood Forum

³⁷⁹ Church Street Ward Neighbourhood Forum, Achim von Malotki

³⁸⁰ Achim von Malotki

³⁸¹ Pimlico Neighbourhood Forum

³⁸² Knightsbridge Neighbourhood Forum, Baker Street Quarter Partnership, Northbank BID, Royal London Asset Management, Heart of London Business Alliance, Blow Up Media Ltd

³⁸³ Graeme Cotton, Northbank BID, Notting Hill East Neighbourhood Forum, Heart of London Business Alliance

³⁸⁴ Knightsbridge Neighbourhood Forum, Heart of London Business Alliance, Soho Society, Meard & Dean Street Residents Association

³⁸⁵ Baker Street Quarter Partnership

³⁸⁶ Blow Up Media Ltd

³⁸⁷ The Northbank BID, LandSec

³⁸⁸ Historic England, Baker Street Quarter Partnership, Marble Arch BID, The Northbank BID

³⁸⁹ Historic England

³⁹⁰ Historic England

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| | <ul style="list-style-type: none"> • The council should go further in developing a hostile vehicle mitigation strategy for the Central Activities Zone³⁹¹ |
| Policy 46 Basement development | <ul style="list-style-type: none"> • Clarification is needed on whether (parts of the) policy applies to commercial developments³⁹² • All sleeping accommodation must be at or above modelled tidal breach flood level.³⁹³ • Supports policy approach to basement development³⁹⁴ • Clarification is requested on if the policy applies to Class D1 medical buildings in SPAs • Request a more comprehensive basement policy similar to Kensington and Chelsea restricting basements under listed buildings³⁹⁵. • Policy should give additional flexibility, request insertion to original wording of exception to 1.8m encroachment limit if possible to demonstrate no impact on services³⁹⁶. • Detailed policy more appropriate for SPD³⁹⁷ |

³⁹¹ Baker Street Quarter Partnership, Marble Arch BID

³⁹² Trophaeum Asset Management, Westbury Hotel, Westminster Property Association (WPA)

³⁹³ Environment Agency

³⁹⁴ Mayor of London

³⁹⁵ Marylebone Association

³⁹⁶ Church Commissioners for England

³⁹⁷ London First, Montagu Evans

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Appendix 2: Schedule of policies where minor modifications will be made

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| Policy 1 Spatial Strategy |
| Policy 3 Paddington Opportunity Area |
| Policy 4 Victoria Opportunity Area |
| Policy 7 Managing development for Westminster's people |
| Policy 9 Affordable Housing |
| Policy 10 Affordable Contributions in the CAZ |
| Policy 11 Housing for specific groups |
| Policy 14 Supporting economic growth |
| Policy 15 Town centres, high streets and the CAZ |
| Policy 16 Visitor economy |
| Policy 22 Mayfair and St James's Special Policy Area |
| Policy 25 Sustainable transport |
| Policy 26 Walking and cycling |
| Policy 27 Public transport and infrastructure |
| Policy 29 Highway access and management |
| Policy 32 Waterways and waterbodies |
| Policy 35 Green infrastructure |
| Policy 36 Flood risk |
| Policy 41 Townscape and architecture |
| Policy 40 Heritage |
| Policy 42 Building height |
| Policy 43 Building height in the housing renewal areas |
| Implementation - Land use swaps |

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City of Westminster Cabinet Report

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|---------------------------|---|
| Decision Maker: | Cabinet |
| Date: | 21st October 2019 |
| Classification: | General Release |
| Title: | Corporate Parenting strategy |
| Wards Affected: | All |
| City for All: | The Corporate Parenting Strategy will support the City for All priority of a caring and fairer city by supporting the most vulnerable within our community |
| Key Decision: Yes | Yes |
| Financial Summary: | No financial implications are associated with decision |
| Report of: | Nicky Crouch Director of Family Services Tel: 7641 5324 Email: ncrouch@westminster.gov.uk |

1. Executive Summary

- 1.1 The corporate parenting strategy sets out the partnerships between the local authority departments, services and associated agencies who are collectively responsible for meeting the needs of looked after children, young people and care leavers.
- 1.2 The expectation in this strategy is that we care about our looked after children, not just care for them.

2. Recommendations

- 2.1 That Cabinet recommend to Council that the Corporate Parenting Strategy be adopted.
- 2.1 The corporate parenting plan is reviewed and refreshed annually to drive our corporate responsibility to ensure looked after children and care leavers get the very best experiences in life.

3. Reasons for Decision

3.1 This corporate parenting strategy outlines our commitment to meeting the needs of Westminster's looked after children. It is our responsibility to ensure they receive excellent parenting which promotes good health and educational attainment; and to offer a wide range of opportunities to develop their skills and talents.

3.2 The corporate parenting strategy has been developed with young people in care and care leavers, who have helped us understand what is important to them. The underlying principles informing our approach are:

- Full participation, involvement and contribution of looked after children, young people and care leavers up to the age of 25
- Ownership and leadership at a senior level, including elected members. Councillors and officers must have a clear understanding and awareness of the issues for looked after children and care leavers so that they can ensure that their responsibilities as corporate parents are reflected in all aspects of the work of the council.
- All services have mechanisms in place to continually monitor and review the contribution they make to looked after children and care leavers.
- The strategy is promoted across the council at all levels
- Measurable commitment through the improvement in life chances of looked after children and care leavers. These outcomes are reported to and quality assured by the Corporate Parenting Board and Children in Care Council.

4. Background, including Policy Context

4.1 In order to thrive, children and young people have certain key needs that good parents generally meet. There are seven needs that local authorities must have regard to when exercising their functions to looked after children:

- To act in the best interests, and promote the physical and mental health and well-being, of those children and young people
- To encourage those children and young people to express their views, wishes and feelings.
- To take into account the views, wishes and feelings of those children and young people.
- To help those children and young people gain access to, and make the best use of, services provided by the local authority and its relevant partners.
- To promote high aspirations, and seek to secure the best outcomes, for those children and young people.

- For those young people to be safe, and for stability in their home lives, relationships, education or work; and
- To prepare those children and young people for adulthood and independent living.

5. Financial Implications

- 5.1 Delivering the corporate parenting strategy should support family services to deliver support to looked after children and care leavers within the allocated budget and assist with the medium term financial plan.
- 5.2 The virtual school will continue to promote good education, training and employment opportunities for these children; managing within the dedicated schools grant amount.

6. Legal Implications

- 6.1 Local Authorities must have regard to the seven needs identified in the Children and Social Work Act 2017 when exercising their functions in relation to looked after children and care leavers. It should be understood applied alongside the Children Act 1989 Guidance and Regulations Volume 2: care planning, placement and case review and The Children Act 1989 Guidance and Regulations Volume 3: planning transition to adulthood for care leavers.
- 6.2 Statutory guidance: applying corporate parenting principles to looked after children and care leavers was issued in February 2018 to help local authorities consider the kinds of services that may be offered when having regard to the corporate parenting principles.

If you have any queries about this Report or wish to inspect any of the Background Papers please contact:

Nicky Crouch

Director of Family Services

Tel: 7641 5324

Email: ncrouch@westminster.gov.uk

APPENDICES:

Appendix 1: The Corporate Parenting Strategy – April 2019

Appendix 2: The Corporate Parenting Plan

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CORPORATE PARENTING STRATEGY

April 2019

Sarah Newman, Director of Westminster Family Services

Contents

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| 2. Letter from the Cabinet Member for Family Services and Public Health | 2 |
| 3. Our Commitment and Vision | 3 |
| 4. The Westminster Context - Looked After Children and Care Leavers | 4 |
| 5. The role and responsibilities of councillors, council departments and our partners | 6 |
| 6. Leadership and the Priorities of the Corporate Parenting Board | 9 |
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| 8. Appendix | 12 |

1. Foreword by young people



Saphia Streek, *The Young People of Westminster*

“We, as the children and young people of Westminster City Council, are delighted to contribute our views of what a good 'corporate parent' should be. Amongst supportive, optimistic and organised, we expect to be treated with as much affection as any other child in a typical family unit, helping to maximise our happiness under the difficult circumstances we are already experiencing.

Educational aid is vital to help us progress into the prosperous individuals we truly are, hence extra help in the areas that we struggle with will equip us with the knowledge needed to succeed. Additionally, feeling safe and secure around our home and social areas is necessary to grant us a stable peace of mind, enabling other parts of our life to settle and giving us the best possible opportunity to thrive.

Most importantly, our views need to be respected, taken seriously and actively used to improve the care system. Our ideas, opinions and perspectives contain such a wealth of experience it would ludicrous to waste them. In short, we just want to be valued as individuals and have our interests and passions nurtured in a safe, loving environment.

We are very excited to be working with you to achieve great outcomes from complicated beginnings.”

2. Letter from the Cabinet Member for Family Services and Public Health



“We want Westminster to be the very best place for our children to grow up. All parents want the very best for their children, and as the Cabinet Member for Family Services and Public Health I want to ensure that we are doing all we can to support you, as our looked after children.

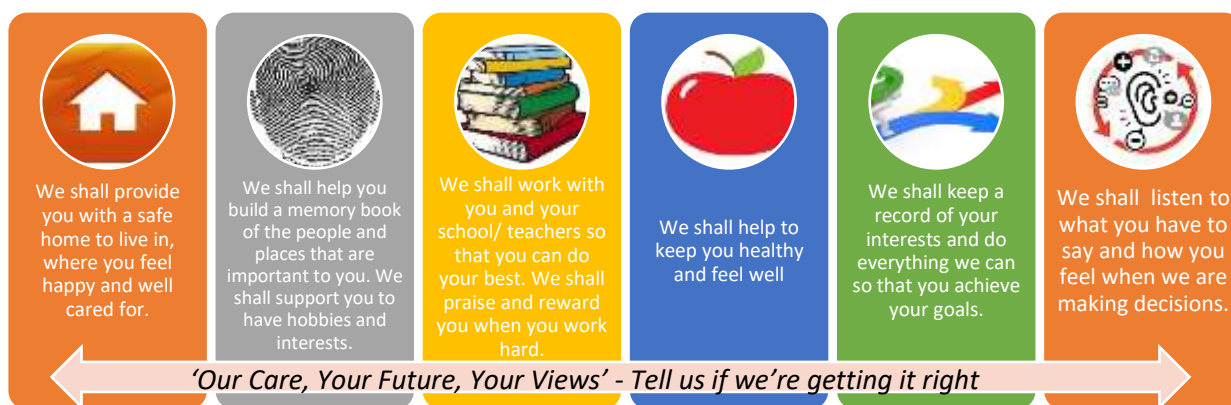
As corporate parents we want the optimum care and affection for you, as children in our care and to build you a brighter future. To do this we need to be ambitious and we need to work together, so that you can all fulfil your full potential.

In order to outline our commitment as corporate parents to you, we have developed this strategy. It sets out how we shall seek to provide the very best care, support and guidance for you. We want to hear the views of young people in care, so that, together, we create the right environment for our staff and our carers to do the very best for you.”

3. Our Commitment and Vision

This strategy sets out Westminster City Council's commitment, explaining how we shall be an effective and trustworthy corporate parent for any child or young person who is in our care irrespective of their age, gender, sexuality, ethnicity, faith or disability. We shall also ensure our young people receive good-quality advice and support when they leave care. The offer of support to care leavers will be transparent and shared with all young people before they leave care as part of their care planning.

Every good parent knows that children need a safe and secure environment in which to grow and thrive. Parents protect and support their children against the dangers and risks of life. Parents are ambitious for them and want them to reach their full potential. Parents celebrate and share their children's achievements. A good parent is also a good listener responding positively to what their children say. A child who is cared for by the council has the right to expect everything from a corporate parent that would be expected from a good parent. *Our Pledge* sets out our commitment to looked after children and care leavers (see Appendix 1):



To deliver this we shall preface all our thinking, planning, actions and decision-making with: *"if this was my child I would..."*. We shall:

- know our children; their needs, talents and aspirations, and promote their interests.
- hold high aspirations for their future and expect the best for and from them.
- take an interest in their successes and problems and celebrate their achievements.
- listen to their views and ensure these views influence practice, service and policy-changes.
- recognise, support and respect their identity in all aspects.
- promote and support high academic and vocational achievement.
- support their health, emotional wellbeing and resilience through access to the right services at the right time.
- support their transition to adulthood by promoting their economic prospects and preparing them to become responsible citizens.
- learn from compliments and complaints from children and young people.

For corporate parenting to be effective it needs commitment from all elected members and council employees in a council-wide approach. The whole council needs to be involved, as well as our partners, all acting as good parents, committing resources and working together to improve the lives of all children and young people in our care and

our care leavers. The council must listen to what children and young people want, support them to make the most of their lives and provide services that meet their needs.

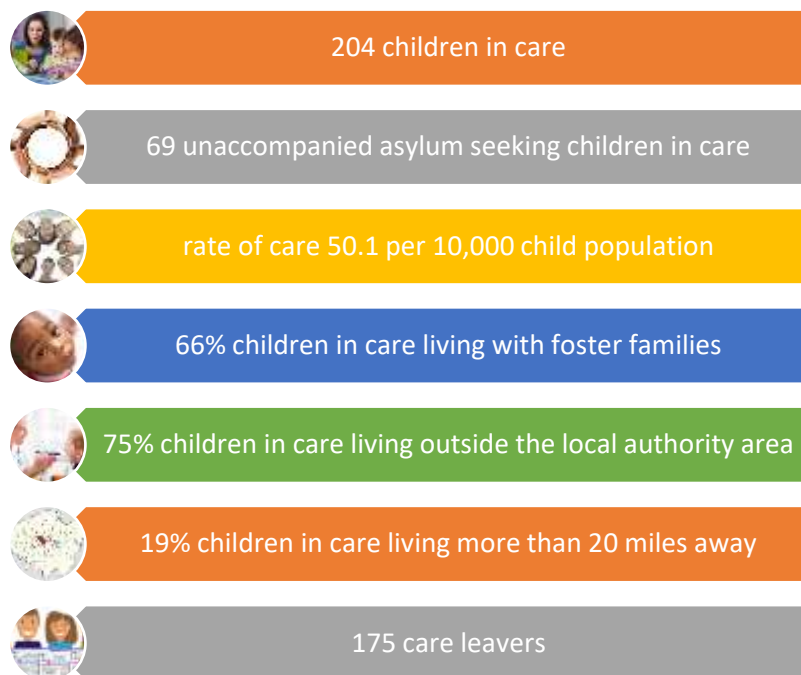
4. The Westminster Context - Looked After Children and Care Leavers

We aim to support most of our children and young people within their own families and communities. However, for a small number of them, this is not possible, and they require alternative care arrangements (either in the short term or long term).

Children and young people are in care either by a court order or with the agreement of their parent(s) or guardian(s). A child or a young person may come into care as a result of temporary or permanent problems facing their parents, as a result of abuse, neglect or a range of difficulties. The delivery of support for children and young people who are in care and care leavers is underpinned by a number of key pieces of legislation and guidance, which are listed at Appendix 2.

Children and young people in care are individuals who come from all walks of life and have different aspirations, ambitions and cultural identities. Corporate parenting is the term used for the collective responsibility of the council and partners to ensure safe, meaningful and effective protection of children and young people in care and of care leavers. Many looked after children and care leavers are at greater risk of social exclusion than their peers, because of their experiences prior to coming into care or being in care. As a corporate parent, we shall ensure that their experience of being in care is a positive and supportive one that maximises their full potential as they transition to adulthood.

Westminster's children in care and care leavers placement profile (March 2018)



The number of children in the care of Westminster City Council has remained stable over the past 3 years. However, the profile of the children in care population has changed over the last 18 months, with fewer children from Westminster needing alternative care arrangements and a significant rise in the number of unaccompanied minors coming into the local authority area.

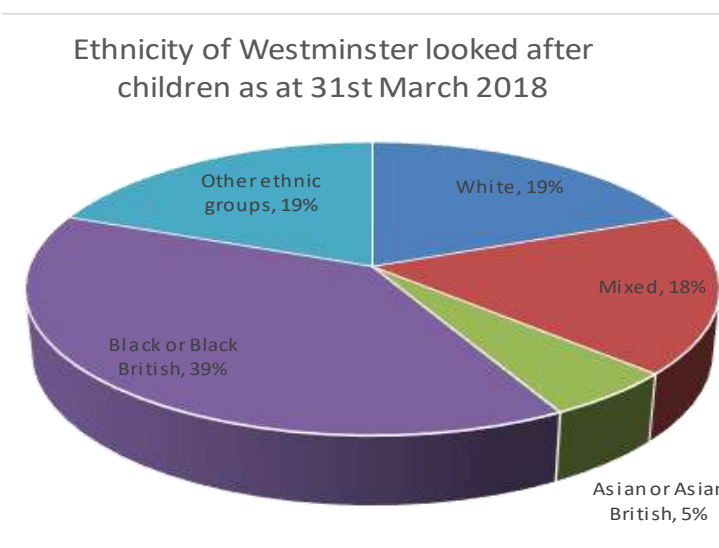
At the end of March 2018 there were 204 children in care (a rate of 50.1 per 10,000). This 'rate of care' is below the average for our statistical neighbour group and is lower than the national average of 62 per 10,000.

Of all our children in care, 38 (19%) live within the local authority area and most of our children in care (135 or 66%) live with foster families. The majority of children who live out of the area live within a 20-mile radius (165 or 81%). The percentage of children living in children's homes remains at 3%.

The composition of our looked after children population has changed over the last 3 years with higher numbers of children aged between 14 and 17 years being in care. This age group now make up 63% of the total looked after children population.

At 31 March 2018 the ratio of looked after girls to boys was 67% to 33%, which remains comparable to previous years at 66% to 34%. This is above the national rates of 56% and 44%.

The pattern of ethnicity of looked after children in Westminster is changing-reflecting the increasing number of unaccompanied asylum-seeking children.



The educational achievement of our looked after children is improving particularly at Key Stages 2 and at Key Stage 4 where the number of looked after children achieving five or more GCSE's grade A-C including English and Maths increased to 45% of the cohort.

The table below shows the attainment data in 2017/18 and 2016/17:

| | 5 A-C incl. English and Maths | 5 A-C | 5 A-G | 1 A-G |
|-------------------|-------------------------------|-------|-------|-------|
| WCC LAC (2017/18) | 45% | 45% | 73% | 82% |
| WCC LAC (2016/17) | 23% | 31% | 46% | 62% |

72% of our 16 and 17-year olds in care are in education, employment or training. 58% of care leavers were in education, employment or training at the end of March 2018.

5. The role and responsibilities of councillors, council departments and our partners

All those who provide leadership for the support for looked after children need to act as 'conscious' corporate parents and understand that they are accountable to the children and young people who are looked after in Westminster. We must all strive for children in our care to succeed in the same way that any parent would strive for their own child. This can mean providing advice and guidance to a young person who is starting to live independently, supporting carers, ensuring that children's mental health is safeguarded, helping a young person to find a job, or listening to their hopes, dreams, problems and insecurities. There is a wide range of people and organisations who need to work together to make this happen starting with those at the very top of the council.

The Leader of the Council and the Chief Executive:

- provide the political and professional leadership of our corporate parenting commitment. They are accountable through their Cabinet Members and Directors for meeting the commitments set out in *Our Pledge*, through the Care Leavers Charter and for setting the culture of the council as a conscious and dedicated corporate parent.

All councillors need to be aware of their corporate parenting responsibilities and must:

- have a clear understanding and awareness of the issues for children in care and care leavers in Westminster city council and those placed outside Westminster.
- champion the interests of looked after children and care leavers and ask questions about their outcomes.
- listen to children in care and care leavers and ensure that they are consulted on and can influence decisions made about the services that affect them.
- help secure work-based training opportunities, including apprenticeships for care leavers within the council, its contractors and partners to improve their life chances through securing purposeful rewarding work.
- question whether the council as corporate parent is keeping the promises made in the Corporate Parenting Pledge (see Appendix 1) and the Care Leavers' Charter.
- be equally mindful and responsive to children placed out of the city and demand evidence of positive outcomes for all children in care and care leavers.
- ask how all elements of council business has an impact for children in care and care leavers and make connections and links between council plans, strategies and decision-making for children in care and care leavers.
- consistently ask '*Would this be good enough for my own child?*'

All Council Departments:

All councillors and council officers share corporate parenting responsibilities and council departments cannot abdicate this responsibility. Westminster's most important

collective contribution to corporate parenting is how we as the 'family firm' in all council departments, can deliver better graduate schemes, employment, apprenticeship, traineeship and work experience opportunities for looked after children and most importantly care leavers up to the age of 25 years. These opportunities are designed to:

- offer care leaver graduates the opportunities to work in a graduate scheme.
- help young people to meet their potential and achieve their ambitions, hopes and aspirations.
- help young people become confident individuals and give them the taste of the world of work.
- broaden young people's horizons from little or no work experience or employment options to a breadth of choice.
- help young people to become economically and socially contributing citizens.

Children and Families Services:

Those leading, developing and delivering work in Children and Families Services are likely to have most important direct contact with children in care and care leavers. Corporate parenting principles will form part of the staff induction programme. The quality of relationships that young people have with their carers and the professionals closest to them is crucial to their success whilst in and leaving care.

Young people who are looked after have repeatedly told us about their need for good relationships that provide love, stability and continuity in the home and in learning. Their need to be listened to and involved in decision-making and most of all, their need to be parented like other children. This is the basis of our strategy.

A good corporate parent encompasses *Our Pledge* to looked after children (see Appendix 1) and supports the gap between being parented by birth parents to being in the care of, or leaving the care of, the Local Authority.

The Virtual School and College:

Westminster's virtual school for looked after children is responsible for providing leadership, strategic direction and foster partnership-working with schools to secure successful educational outcomes for all looked after children and young people. It maintains an overview of all looked after children to ensure they can sustain a school place and that there is support in place designed to meet their individual needs.

The relationship between being looked after children and poor educational outcomes can be explained in part by the trauma of pre-care experiences such as physical or sexual abuse and neglect. In addition, many looked after children have had gaps in their education, which can sometimes be a continuing significant factor whilst they are looked after. Looked after children are more likely to be excluded from education than their peers. However, the assumption being that being looked after leads to poor outcomes is incorrect.

Educational targets for children in care and care leavers are often set too low, are not sufficiently challenging, or the support required for a child who is not attaining educationally is not provided. Accelerated progress targets must reflect our ambition

for looked after children, accompanied by appropriate and targeted support-utilising the pupil premium for every child and young person in our care.

Schools, Colleges and other Education Providers:

- have a range of responsibilities including ensuring that every looked after child has a Personal Education Plan (PEP) and is supported to achieve educational success.

Making sure that looked after children and care leavers are in school and working hard to avoid exclusions is an important part of achieving such educational success. All schools should have a designated teacher with special responsibility for looked after children. School governors have statutory responsibilities, which include monitoring the progress made by looked after children. Schools must engage with the Virtual School and respect the role of the Corporate Parent.

Health Service Providers:

- have important responsibilities for improving the health, physical, mental and emotional, of all looked after children.

Health assessments must be undertaken and specialist nurses for looked after children must ensure that Personal Health Plans (Health Passports) are developed with the child or young person and that they are fully implemented. Transitions to adult health services will be managed sensitively and with full cooperation with young people.

Housing Providers:

- have an essential role to play in working with Westminster City Council to provide enough good-quality accommodation for care leavers who are ready to live more independently and provide a range of 'move-on' accommodation for care leavers wanting to move from more supported accommodation.

Community Organisations:

There is a wide range of community organisations across Westminster, which provide important services and support for looked after children and care leavers, including advice and guidance, mentoring, supported housing, and drug and alcohol services.

These services are vital to the task of preventing care leavers from needing the intervention of statutory services.

Children in Care Council (CiCC):

In Westminster we are committed to listening to the views of the children we work with and working with them in the design and delivery of services. The Children in Care Council (CiCC) will continue to be a key group in assisting the council to deliver our corporate parenting strategy.

The group will undertake specific tasks and projects on behalf of all our looked after children and care leavers and continue to represent Westminster at various national forums. CiCC will play a key role in the recruitment of staff and carers; and contribute to service developments.

Foster carers:

In Westminster we value our foster carers and acknowledge the work that they do. We have a strong fostering liaison group and this group will continue to assist us in developing the best care arrangements for our children and young people. We are working with foster carers to strengthen 'staying put'.

6. Leadership and the Priorities of the Corporate Parenting Board

This strategy will be adopted by Full Council. The Westminster City Council Cabinet Member for Family Services and Public Health has the lead political role for the strategy and the Director of Family Services provides the strategic service leadership.

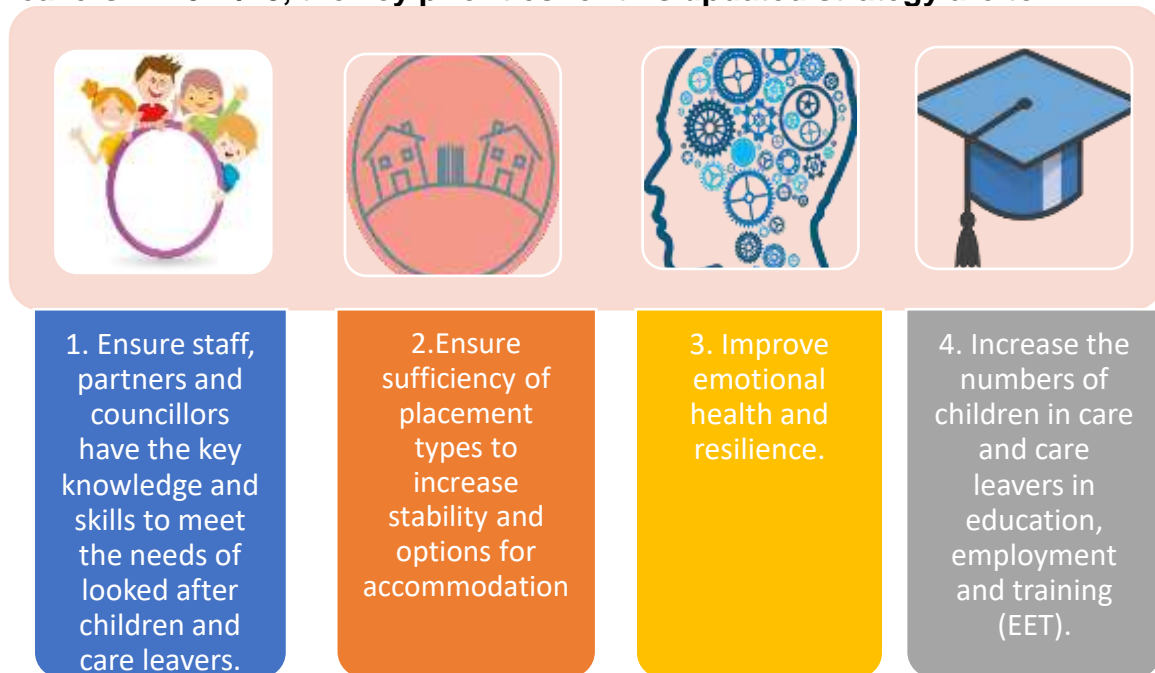
The Westminster Corporate Parenting Board will be responsible for the delivery of the identified key objectives and the Board's annual plan. The Westminster Corporate Parenting Board will lead and support all corporate parenting activity of Westminster City Council and its partner organisations. The Board will have wide representation including elected members and officers. The Board has formal accountabilities to Westminster City Council and it has important relationships with the Health Service and Metropolitan Police, as well as partnerships such as the Local Safeguarding Children Board (LSCB).

The Westminster Corporate Parenting Board will act as a leadership, advisory and consultative body to the Council and its partners and will challenge them to ensure that Corporate Parenting duties are carried out effectively and consistently. It will ensure that the outcomes and life chances of looked after children and care leavers are maximised, to be in line with their peers, and will act as the champion for these children and young people.

It is the role of the Westminster Corporate Parenting Board to monitor the delivery of the Corporate Parenting Strategy and make sure services for our looked after children and the care leavers continue to improve. The Board will hold the Council and its partners to account if there are gaps in service provision to looked after children, or in the performance of their corporate parenting responsibilities.

The Board will have access to good qualitative and quantitative management information to monitor performance effectively against outcomes, and track delivery of the Pledge commitments. Individual Board members must attend appropriate training to be prepared for their task. See Appendix 3 for the Terms of Reference for the Board.

Taking account of the performance outcomes for looked after children and care leavers in 2017/18, the key priorities for this updated strategy are to:



7. Measures of success

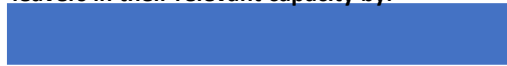
Last year 50% of children in care completed an annual survey to tell us about the standard of our care. Of these children:

- 96.3% of looked after children who completed the survey stated they feel safe and well cared for.
- 89% of young people felt they were well supported by children's services in working towards their aspirations and education goals.
- 91.2 % children and young people who completed the survey said the health support provided was good.
- 84.8% of care leavers who completed the survey feel involved in their Pathway Plans.

Whilst we are making progress against these key performance indicators, our data last year indicates that we can do more to achieve greater stability for children in care (both through placements and fewer changes in social workers) and provide better learning outcomes and work opportunities for children in care and our care leavers.

To determine the success of this strategy we shall:

1. Ensure staff, partners and councillors have the key knowledge and skills to meet the needs of looked after children and care leavers in their relevant capacity by:



Providing regular training to staff, partners and councillors

Debating the motion at Full Council

Embedding systemic practice across the partnership

2. Ensure sufficiency of placement types to increase stability and options for accommodation by:



Increasing the numbers of in-house foster care placements and re-profile carers to meet anticipated need/ to match anticipated demand.

Improving care planning in support of much better matching.

Strengthening placement planning and support

Targeting support at children experiencing multiple placement disruptions.

Strengthening the learning support.

Improving the commissioning arrangements for external placements to reduce cost and increase stability.

Developing a wider range of accommodation options in line with the new care leavers offer including Staying Put placements.

3. Recognise that the key to success for many young people is emotional wellbeing and resilience by:



Increasing the numbers of in-house foster care placements and re-profile carers to meet anticipated need/ to match anticipated demand.

Expecting to see improvement in Strengths and Difficulties Questionnaire scores.

4. Increase the numbers of children in care and care leavers in education, employment and training by:



Improving education attendance and attainment and through our Virtual School

Creating more opportunities for our looked after children and care leavers to remain in education or gain access to training and employment.

This document should be read in conjunction with:

- *The Placement Sufficiency Strategy*
- *Care Leavers Offer*
- *The Action Plan for the Virtual School*
- *The Action Plan for the Health of Looked After Children*

8. Appendices

Appendix 1 - Our Pledge to looked after children and care leavers



Your home

- We shall provide you with a safe home to live in, where you feel happy and well cared for.
- As you get older we shall look at housing options to support you to move into independence – when it is right to so



Your identity

- We shall help you build a memory book of the people and places that are important to you. We shall support you to have hobbies and interests. Where it is possible we will place you with your family.
- We shall make sure we understand your needs in relation to gender, religion, culture, disability and sexuality.
- We shall support you to stay in contact with your family and friends; If this isn't possible we will explain the reasons why.



Your Education

- We shall work with you and your school/ teachers so that you can do your best. We shall praise and reward you when you work hard.
- We shall make sure you have a place at a good school that is local to where you live, unless it is agreed there is a more suitable school to meet your needs.
- We shall ensure you have the right support to achieve your ambitions
- We shall use the council's networks and connections to support your career aspirations and gain the right employment



Your Health

- We shall help you to keep healthy and feel well
- We shall provide a named nurse to support you and your carers to promote your healthy development – physically and emotionally.
- We shall ensure you have access to local facilities including leisure and art activities and libraries and museums.
- We shall support you to manage your own health needs as you get older, providing information, advice and support about relationships, sexual health and wellbeing.



Your Future

- We shall keep a record of your interests and do everything we can so that you achieve your goals.
- We shall make sure you have opportunities to achieve your goals.
- We shall support you to develop skills to live independently, healthily and happily.
- We shall making sure you have ongoing access to support, guidance, and advice until you are 25
- We shall promote work experience, apprenticeships and employment within the council, its partners and any contract provider



Your Involvement

- We shall listen to what you have to say and how you feel when we are making decisions.
- We shall listen to your views and opinions and involve you in decisions that affect you
- We shall talk to you and other children/young people in care to help us develop and improve our services
- We shall set up opportunities for groups of children and young people to meet with senior managers and councillors to talk about what it's like being in our care and share ideas for making things better. THIS WILL BE THE CHILDREN IN CARE COUNCIL
- We shall involve the Children in Care Council in developing, monitoring and reviewing this pledge

'Our Care, Your Future, Your Views' - Tell us if we're getting it right

Appendix 2 - Legislation

In Westminster we are careful to implement the reforms that have been introduced by the Children & Families Act 2014 and the Adoption and Care Planning amendments (Fostering and Adoption).

- Adoption and Children Act 2002
- Care Leavers (England) Regulations 2010
- Children Act 1989
- Children (Leaving Care) 2000
- Children and Adoption Act 2006
- Children and Families Act 2014
- Children and Social Work Act 2017
- Children and Young Persons Act 2008
- Education Act 2002
- Equality Act 2010
- Human Rights Act 1998
- Independent Review of Determinations (Adoption and Fostering) Regulations 2009
- Mental Capacity Act 2005
- Protection of Freedoms Act 2012
- Safeguarding Vulnerable Groups Act 2006
- SEND Code of Practice, 0–25 years 2015
- The Adoption Agencies Regulations 2005 (as amended by the Adoption and Care Planning (Miscellaneous Amendments) Regulations 2014.
- The Children's Homes (England) Regulations 2015
- The Care Planning, Placement and Case Review and Fostering Services (Miscellaneous Amendments) Regulations 2013.
- Adoption and Care Planning (Miscellaneous Amendments) Regulations 2014.
- The Care Planning and Fostering (Miscellaneous Amendments) (England) Regulations 2015.
- Working Together to Safeguard Children 2018.
- Borders, Citizenship and Immigration Act 2000

Appendix 3- Corporate Parenting Board – Terms of Reference

1. Purpose

1.1 To be the accountable body for the City Council and its partners in the discharge of corporate parenting responsibilities for children in care and care leavers in Westminster as set out in legislation and guidance.

1.2 To champion children in care and care leavers, ensuring a strategic oversight of needs and outcomes and appropriate high-quality responses from all partners.

1.3 To provide challenge and scrutiny to all partners in securing the best outcomes for children in care and care leavers by being aspirational and innovative

1.4 To ensure the voice of children and young people in care and care leavers is central to the functioning of the Board and there is effective involvement in the development of policies, services recruitment of staff and improving practice.

2. Functions

2.1 To develop, lead, manage and monitor the Corporate Parenting Strategy.

2.2 To receive and use high quality data to understand where outcomes for children in care and care leavers are good and where they require attention. To agree activity in response to underperformance and drive improvement.

2.3 To support and develop systems and processes to ensure the views and opinions of children and young people in care inform, shape and evaluate services for children in care.

2.4 To make commissioning recommendations based on a good understanding of current service delivery for children in care and care leavers, including specialist, targeted and universal services.

2.5 To identify and address gaps in service and where there are blockages to service access.

2.6 To ensure that all services within Westminster City Council are aware of their corporate parenting responsibility and can evidence in Business Plans their contribution to improving life chances of children in care and care leavers.

2.7 To ensure that all elected Council Members receive regular updates on the well-being of children in care and Care Leavers

3. Membership

3.1 The Corporate Parenting Board will include the following post holders:

- The Lead Member for Family Services
- Opposition spokespeople for Family Services
- The Director of Family Services

3.2 There will be representation from:

- Children and young people through the Children in Care Council (CiCC)
- Foster carers through the Foster carer Liaison group

3.3 Senior representatives from the following agencies and services are members of the Board through the wider working group structure:

4. Structure

4.1 The Corporate Parenting Board will be made up of 3 working groups and 2 consultative groups which will report into the Board.

- Education, Training and Employment
- Housing, Placements & Transitions
- Health, Emotional & Wellbeing

5. How the Corporate Parenting Board operates

5.1 The Board will meet as a minimum four times a year for 1.5 hours with opportunity for development at least annually.

5.2 The Board Chair will be the Lead Member for Family Services of the City Council / Director Family Services – with aspiration that a Young Person will chair on occasion.

5.3 Additional members can be co-opted on to the Board for specific periods of time or for specific agenda items.

5.4 There will be additional extraordinary meetings, working groups and workshops when necessary.

5.5. The Director of Family Services will ensure the Board is effectively administered including the setting of agenda, minutes and distribution of paperwork.

5.6 All Board members will contribute to an annual schedule of reporting.

5.7 The Board will be quorate with the attendance of representatives from 3 agencies.

5.8 The Board will have a thematic approach to its reporting cycle as follows:

- Education/Employment and Training outcomes
- Housing, Placements and transitions
- Health outcomes
- Qualitative feedback through CIC surveys/IROs/Carers and developmental activities

5.9 Reports that are for information only will be circulated with the agenda and noted, but not for discussion that are focused on the quarterly theme.

5.10 Reports will be written in plain English, presented imaginatively and will have a brief executive summary attached, with clear recommendations to the Board.

5.11 Board meetings will include 15-minute dedicated time for the CiCC to ask any questions that are focused on the quarterly theme.

5.12 The three thematic working groups (Education, Health and Transitions) will meet quarterly. Each group will provide a report to the Board as per 5.8 above.

5.13 This allows Board members the opportunity to scrutinise these areas in detail.

5.14 Minutes will be circulated 2 weeks after the Board.

5.15 Reports will be shared with the CiCC 3 weeks prior to the Board meetings.

5.16 Members will receive an agenda and papers 5 working days in advance of each meeting.

6. Interface with other Boards

6.1 The Safeguarding Children Board monitors and challenges inter- agency practice in relation to safeguarding outcomes for children in care and care leavers and sometimes reports on performance.

6.2 The Youth Offending Board monitors and challenges inter- agency practice in relation to children-in-care and care leavers and their involvement with the criminal justice system.

7. The Role of Board members

7.1 Corporate Parenting Board members will be clear about their responsibilities as Corporate Parents to our Children in Care and Care Leavers. They must be able to:

- Act as an ambassador for our CiCC and Care Leavers.
- Speak for their organisation or network with authority
- Commit their organisation on policy and practice matters.
- Champion the needs of CiCC and Care Leavers within their organisation and network
- Challenge partners and their own organisation or network to ensure we strive to achieve good outcomes for our children.
- Ensure they attend the Board at least 75% of the time and send a nominated representative from their organisation or network to ensure 100% attendance overall.
- Members will be respectful of others and will ensure their methods of working are cognisant of any confidential matters that arise at the Board.

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Corporate Parenting Board Action Plan



Priority 1:

Our staff, partners and councillors will have the knowledge and skills to attend to the needs of look after children and care leavers

To achieve this we shall:

Provide regular training to staff, partners and councillors

Audit the quality of our intervention, paying attention to the care plan, health plan and personal education plan

Ensure that LAC reviews are happening at the required frequency, attended by the right people and that there is an annual report by the Independent Reviewing Officers to the Corporate Parenting Board

Embed systemic practice across the partnership

We shall measure success by:

The number of staff who have attended training

Young people are contributing to the planning process and engaging in their LAC reviews

Young people telling us they feel listened to

Improved outcomes for children in care and care leavers through key performance indicators

Seeing an increased number of children returning home from care

We shall review and revise our priorities every year

We shall continue to check with young people what is important to them

We shall continuously ask ourselves what difference we are making

Corporate Parenting Board Action Plan



Priority 2:
Ensuring sufficiency of placement types to increase stability and provide options for move-on accommodation

To achieve this we shall:

Continue to recruit, assess and approve foster carers who can provide short-term, long-term and respite care

Provide robust training and support to carers at all levels

Use a matching tool that allows us to place children with carers best able to meet their needs

Increase the number of staying put and staying close arrangements

Ensure we have a range of housing options that support independence

We shall measure success by:

Increased numbers of carers

A reduction in the number of children living more than 20 miles away

Increased short-term and long-term stability

The number of young people remaining with their foster carers post 18 years

The range of housing options including shared housing opportunities

The number of days in care/ until permanence

We shall review and revise our priorities every year

We shall continue to check with young people what is important to them

We shall continuously ask ourselves what difference we are making



**Priority 3:
Improved emotional health and resilience**

To achieve this we shall:

Ensure strength and difficulties questionnaires (SDQs) are completed routinely

Promote systemic approaches to ensure the right supports are in place

Utilise the speech and language therapist in the virtual school

Ensure children have appropriate and meaningful contact with family and friends

Enable sibling groups to be placed together

Ensure access to early years support

We shall measure success by:

The number of SDQs completed and the average SDQ score

The numbers of 3 and 4 year olds receiving early years support

Feedback from children and young people about contact arrangements

The number of children placed together with their siblings

We shall review and revise our priorities every year

We shall continue to check with young people what is important to them

We shall continuously ask ourselves what difference we are making



Priority 4:
Increased numbers of children in care and care leavers in education, employment and training

To achieve this we shall:

- Have high aspirations
- Ensure PEPs are used to drive achievement and attainment
- Complete pathway plans is partnership with young people
- Promote work experience opportunities
- Offer focused careers advice, interview and skills work
- Ensure that children in care and care leavers are given priority consideration for vacancies across the council/ contracts
- Hold an annual celebration event

We shall measure success by

- The number of young people engaging in the PEP process
- The educational attainment of children in care and care leavers
- The number of young people participating in the pathway plan
- The number of children and young people accessing education, employment and training
- The number of children and young people attending the celebration event

We shall review and revise our priorities every year

We shall continue to check with young people what is important to them

We shall continuously ask ourselves what difference we are making