

CITY PLAN 2019 - 2040

**CONSULTATION
STATEMENT
SUBMISSION VERSION**

NOVEMBER 2019

Table of contents

1	Introduction	4
2	Regulation 19 consultation process	6
2.1	Notification	6
	Website	6
	Emails	6
	Social media	6
	Hard copies	7
2.2	Coverage	7
	Media coverage	7
	Scrutiny Committee	8
	Petitions	8
2.3	Representors	8
	Submission of representations	8
	Representors and representations received	9
2.4	Full representations	9
3	Key issues and how these have been taken into account	10
3.1	Context & Objectives	10
3.2	Spatial Strategy Policies	12
3.3	Housing Policies	22
3.4	Economy & Employment Policies	26
3.5	Connections Policies	35
3.6	Environment Policies	42
3.7	Design & Heritage Policies	46
3.8	Implementation & Monitoring	56
3.9	Appendix 1: Key Development Sites	58
3.10	Appendix 3: Schedule of Strategic Policies	60
3.11	General comments on the City Plan	61
3.12	Comments on meeting the legal duties of producing a Local Plan	62
3.13	Comments on meeting the duty to co-operate in producing a Local Plan	63
	Appendix 1 Consultation website (Reg 19 consultation, 2019)	64
	Appendix 2 Planning policy website (Reg 19 consultation, 2019)	66
	Appendix 3 Statement of Representations Procedure (Reg 19 consultation, 2019)	67
	Appendix 4 Notice email (Reg 19 consultation, 2019)	71
	Appendix 5 Second email (Reg 19 consultation, 2019)	72
	Appendix 6 Articles in newspapers (Reg 19 consultation, 2019)	73
	Appendix 7 Letters received in relation to the “Petition to: not extend the Victoria Opportunity Area beyond the boundary adopted in the London Plan”	79
	Appendix 8 Consultation form (Reg 19 consultation, 2019)	87
	Appendix 9 Respondents (Reg 19 consultation, 2019)	98
	Endnotes	105

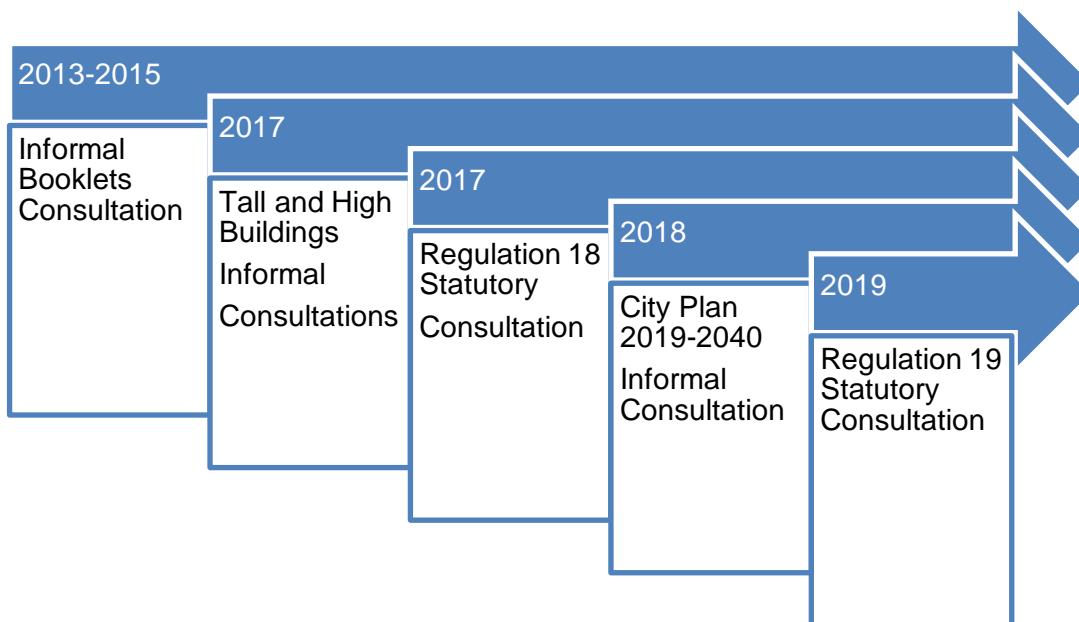
1 Introduction

This document summarises the Regulation 19 consultation undertaken for the full revision to Westminster's City Plan. This statement has been prepared to meet legal requirementsⁱ and accompanies the Regulation 19 Publication Draft City Plan in its submission to the Secretary of State. It also helps inform the independent Inspector appointed to examine the plan and advise whether it is 'sound'.

The Westminster City Plan was first adopted in November 2013 and has been subject to several partial revisions. The latest version of the City Plan was adopted in November 2016 and includes the Special Policy Areas and Policies Map Revision, as well as the previously adopted Basements revision and the Mixed-Use revision.

This full revision of the City Plan updates the strategic planning policies in the City Plan and fully replaces saved policies from the Unitary Development Plan (2007). It takes account of several years of engagement and consultation with the purpose to update Westminster's planning policies. Initially, detailed development management policies were being developed as a separate Development Plan Document (DPD) to be called the 'City Management Plan' (CMP). Consultation on policies intended to form this separate DPD have informed the policies in the Regulation 19 Publication Draft City Plan.

The council published a Consultation Statement to accompany the Regulation 19 version of the Plan in June 2019. That statement covered the consultation responses at the formal consultation stagesⁱⁱ but also other planning policy consultation



ⁱ Regulation 22 of the Town and Country Planning (Local Development) (England) Regulations 2012 ("The Regulations"), Section 110 of the Localism Act 2011 (and explanatory notes), Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and National Planning Policy Framework (2018).

ⁱⁱ Regulation 18, which notifies people of our intention to revise the plan and Regulation 19 which is the formal, pre-submission consultation

processes run by the council. It also set out who was consulted, for how long and how they were invited to make representations. A summary of the key issues raised by the responses to the different consultation processes was also provided and details as to how these representations have been considered in the Regulation 19 Publication Draft City Plan.

This Consultation Statement covers the statutory Regulation 19 consultation on the Regulation 19 Publication Draft City Plan that took place between 19th June and 31st July 2019. It explains how the consultation process was run, presents a summary of key issues and finally explains all raised issues and how these have been taken into account when preparing the submission of the Westminster City Plan.

All consultations have been carried out in compliance with the council's Statement of Community Involvementⁱⁱⁱ.

ⁱⁱⁱ This is a legal requirement under Regulation 19 of the Planning and Compulsory Purchase Act 2004 (as amended)

2 Regulation 19 consultation process

A draft City Plan 2019-2040 was published under Regulation 19 consultation between 19th June and 31st July 2019, for a period of just over six weeks. The goals of the statutory consultation were to obtain the views of Westminster's stakeholders, residents and statutory consultees as to whether the council's Regulation 19 Publication Draft City Plan (2019) for Westminster has been produced in accordance with the council's duty-to-cooperate, is legally compliant and meets the "test of soundness", as set out in the National Planning Policy Framework.

2.1 Notification

Website

The council's website advertised this stage of consultation on the page relating to the consultation process (a screenshot of the website is attached as Appendix 1). The Revision to Westminster's City Plan (a screenshot of the website is attached as Appendix 2) was also updated with further information.

A Statement of Representations Procedure was published on the website which explained how representations to the draft City Plan 2019-2040 needed to be made. It also included a note on Data Protection. A copy is attached as Appendix 3.

Emails

Notification was made by email to the vast majority of consultees that were on the council's planning policy database^{iv}. About 1,660 consultees were consulted together including:

- all specific consultees including the Mayor of London, Historic England, Thames Water, Network Rail, the Environment Agency, Natural England, the Homes and Communities Agency, the National Health Service, the Marine Management Organisation, the Highways Agency and the Coal authority,
- all ward councillors,
- all neighbouring boroughs,
- all neighbourhood forums,
- and other specific consultees.

A copy of the email sent on the 19th June 2019 is attached as Appendix 4. A second email was sent on the 29th July 2019 and is attached as Appendix 5.

Social media

During the consultation process, a number of posts and videos in relation to the City Plan 2019-2040 were posted online and promoted on social media. A series of tweets published using the council's Twitter account included links to the City Plan

^{iv} The information on the planning policy database is updated on a continual basis, with contacts being added, removed or amended on request.

consultation website as well as promotional videos. Figure 1 shows how the council's tweets were read and shared by a large amount of people.

Figure 1 - City Plan activity on Twitter (informal consultation)

Social media network	No. tweets	Overall impressions ^v	Overall engagement	Average impression per tweet
Twitter @CityWestminster	12	24,523	335	2043

Hard copies

During the consultation process, a hard-copy of the draft City Plan 2019-2040, the Policies Map and the Integrated Impact Assessment was available to be viewed at all Westminster's libraries. Consultation forms were also available.

Copies of the documents were also available at Westminster's offices at Westminster City Hall (64 Victoria Street).

2.2 Coverage

Media coverage

The Regulation 19 Publication Draft City Plan 2019-2040 was covered in the media and articles about its revision and specific draft policies were published in several newspapers and planning architecture magazines (screenshots of some articles are attached as Appendix 6). The London Evening Standard's published an article which story focused on the council's target to provide a large number of affordable homes and its new building height policy. Homes and Property produced a double page spread featuring details of the council's flagship policies including policies on Soho, intermediate homes and the North Bank.

Most of the press around the Regulation 19 Publication Draft City Plan 2019-2040 positively covered the plan's policies.

Meetings, workshops, presentations and the duty to co-operate

During the consultation process, the draft City Plan 2019-2040 was discussed at a number of meetings and engagement events organised by different partners. The goal of all these meetings was to engage with a wide range of stakeholders and partners and obtain their views in relation to the revised planning policies.

A number of meetings were carried out in compliance with the council's duty to co-operate. Further details on how the council has met the duty to co-operate can be found in the Duty to co-operate Statement.

^v Impressions are the number of times a tweet has been displayed, no matter if it was clicked or not.

Scrutiny Committee

On 3 April 2019, the Cabinet Member for Planning and Place Shaping Cllr Richard Beddoe provided a written update on the draft City Plan 2019-2040 at the Economic Development, Education and Place Shaping Policy and Scrutiny Committee. Members of the Committee briefly discussed the draft City Plan 2019-2040 and the further engagement with stakeholders taking place, which included amendments to the heritage and design policies and a different approach to private residential car parking to bring Westminster in line with the rest of London.

The meeting's minutes can be read online^{vi}.

Petitions

In addition to representations, 540 individuals and local organisations in the Victoria area considered that the extent of the Victoria Opportunity Area should be significantly reduced at several sites. This was set out in a petition received by the council called “Petition to: not extend the Victoria Opportunity Area beyond the boundary adopted in the London Plan” which ran until 5 September 2019.

As required by the council’s petition scheme constitution, the council’s Cabinet was informed, and a decision was requested. The report has been published on the council’s website^{vii}. Letters sent to the council regarding the petition as shown at Appendix 7 of this report.

The council believes that Policy 4 “Spatial Development Priorities: Victoria Opportunity Area” (VOA) is sound. The City Plan sets ambitious targets to build 22,000 new homes and create space for at least 63,000 new office-based jobs across the city over the life of the Plan.

The City Plan identifies areas where these jobs will be provided and homes will be built, including the VOA. The London Plan identifies Victoria as an Opportunity Area (as defined by the boundary adopted in Westminster’s Core Strategy in 2011). The London Plan also sets an indicative target for the VOA to provide least 4,000 additional jobs and 1,000 new homes over the period 2016-2041.

There is therefore a compelling reason to maintain the boundary of the VOA (as defined by the boundary adopted in Westminster’s Core Strategy in 2011) so as to enable the area to deliver the new homes and jobs required by both the City Plan and London Plan.

2.3 Representors

Submission of representations

^{vi} <https://committees.westminster.gov.uk/ieListDocuments.aspx?CId=417&MId=4867&Ver=4>

^{vii} <https://committees.westminster.gov.uk/documents/s34529/Cabinet%20Report%20-%20VOA%20boundary%20petition%2017.09.19.pdf>

The dedicated website for the consultation process contained a link to an online consultation form created using Smart Survey. The consultation form was also available in printed formats at Westminster's libraries and at City Hall (a screenshot of the form is attached as Appendix 8). The council welcomed online responses but also representations made via email to planningpolicy@westminster.gov.uk and letters sent to council offices at:

City Plan 2019 - 2040 Consultation
Westminster City Council
6th Floor, 5 Strand
London
WC2N 5HR.

Representors and representations received

The council received 159 responses.

- 17 responses were received online and via email,
- 41 responses were received only online,
- 101 responses were received only via email, and
- a small number of letters were also received.

A list of respondents is attached as Appendix 9. Figure 2 shows the types of consultees who responded:

Figure 2 – Number of responses by representor type



2.4 Full representations

All received representations have been published in a separate document called "Regulation 19 Representations Full". Personal contact details have been redacted following the council's Data Protection policy.

3 Key issues and how these have been taken into account

This section provides a detailed summary of all the comments received during the Regulation 19 consultation on the draft City Plan 2019-2040 and also explains how these have informed the proposed submission Minor Modifications.

The name of the respondents that submitted the comments can be found in the End notes section at the end of document.

3.1 Context & Objectives

Policy	Summary of responses	Council response
Context chapter	There are three passenger piers in Westminster rather than four ¹	Minor modifications reflect this correction.
	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	Minor modifications reflect this correction.
	Welcome recognition of the role of physical activity ³ .	Support noted.
	Welcome the support for neighbourhood planning ⁴ .	Support noted.
	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 housing ⁵ .	The council defends its position on affordable calculations, it is not considered that any change is necessary. The council recognises the issue of empty homes however the exact figures are not required to be published within the City Plan.
	The council should consider a rooftop policy to provide more green roofs ⁶ .	Unreasonable to consider major policy change at this stage, Policies 7 and 35 address city greening.
Vision	There is not a clear plan to support ageing/elderly population ⁷ .	Comment noted however the council are satisfied that the plan addresses this.
	Welcome the aim to develop the North Bank of the Thames. ⁸	Support noted.
	Support for cycle friendly places ⁹ .	Support noted.
	Support for recognition of heritage ¹⁰ .	Support noted.
	There is no mention of sport and recreation in the 'Our approach' section of the plan ¹¹ .	Comment noted, this is considered to be too detailed – healthier lifestyles are referenced.
	Unclear how the policies of the plan will improve health, reduce health inequalities and benefit residents ¹²	The council is satisfied that the plan will improve health in Westminster.

Objectives	Support for the commitment to improve air quality ¹³	Support noted.
	Tackling climate change should be a distinct objective ¹⁴	Objective 6 addresses climate change.
	No objective relating to community infrastructure and access to services ¹⁵ .	This is sufficiently covered by the health and wellbeing objective which overarches all 10 City Plan objectives.
	Given the value of heritage to Westminster, Objective 10 should consider the need to conserve or enhance the historic environment, while the focus on building technologies would be better served by a separate objective ¹⁶ .	Minor modification to wording of objective 10 and reference to building technologies moved and incorporated within separate objective.
	General support for the objectives ¹⁷ .	Support noted.

3.2 Spatial Strategy Policies

Policy	Summary of responses	Council response
Policy 1 Westminster's Spatial Strategy	<p>General support.¹⁸</p> <p>Some criticism too focussed on growth that is not balanced against residential amenity.¹⁹</p>	<p>Support noted.</p> <p>All policies should be read in conjunction – policy 7 (managing development for Westminster's people) seeks to ensure future growth respects residential amenity.</p>
	<p>Some issues raised regarding non land-use planning matters such as levels of policing, and highways speeds.³</p> <p>Some requests for more detail on matters such as heritage considerations and energy standards²⁰</p>	<p>Non land-use planning matters fall outside the remit of the City Plan.</p> <p>All policies should be read in conjunction – heritage considerations are set out in more detail in policy 40 (Westminster's heritage), whilst energy considerations are set out in policy 37 (energy).</p>
	<p>Should be greater recognition of the role of town centres as a place to live is needed.²¹</p>	<p>Commercial activity is the priority in town centres, in accordance with the NPPF and London Plan. Policy 15 (town centres, high streets and the CAZ) recognises scope for use of upper floors in some town centres for residential purposes, and policy 7 (managing development for Westminster's people) seeks to ensure future growth respects residential amenity.</p>
	<p>Should refer to prioritising the development brownfield land.²²</p>	<p>Paragraph 1.3 explains that Westminster is already densely developed, and that additional growth will require the intensification of existing urbanised areas – i.e. the development of brownfield land.</p>
	<p>Should be greater recognition of the role of hotels to the character of the CAZ.²³</p>	<p>Minor modification proposed to reflect.</p>
	<p>CAZ boundary should exclude Belgravia.²⁴</p>	<p>CAZ boundary is established through the London Plan, then defined in more detail through the City Plan. Belgravia contains several uses that make a positive contribution to the strategic functions of the CAZ, as defined in the London Plan.</p>

	<p>Some comments that more infrastructure investment is required to support proposed levels of growth.</p> <p>Some suggestions that housing and affordable targets in clause A2 should be minimums²⁵, and that reference should be made to Mayor's 50% strategic target for affordable housing²⁶. Others raise concerns that affordable housing requirements will stifle commercial growth.²⁷</p> <p>Clause A3 should include a total jobs rather than office based jobs target.²⁸</p> <p>Clause A7 should also reference the importance of settings of heritage assets.²⁹</p> <p>Some concerns about the potential impact on heritage of proposals for the North Bank referred to in clause A8.³⁰</p> <p>Clause B should also support growth outside the areas listed in criteria 1-4.³¹</p>	<p>Plan is supported by an Infrastructure Delivery Plan that details investment in infrastructure to support growth over the plan period.</p> <p>Minor modifications proposed to clarify targets are minimums and compatibility with the Mayor's 50% strategic target for affordable housing. The plan has been subject to a viability test which concludes that policy requirements will not undermine the overall viability of development in Westminster.</p> <p>A total jobs target is not required under the NPPF or London Plan. The absence of such a target does not rule out jobs growth through other forms of commercial development that are supported through the plan -such as in the retail and leisure industries.</p> <p>Minor modification proposed to reflect.</p> <p>Any detailed proposals for the North Bank will be subject to further consultation with key stakeholders as appropriate.</p> <p>Minor modification proposed to reflect.</p>
Policy 2 West End Retail and Leisure Special Policy Area	<p>General support.³²</p> <p>Paragraph 2.10 is too negative about the role of alcohol in the evening and night-time economy.³³</p> <p>Greater reference should be made to Oxford St proposals.³⁴</p> <p>There is insufficient recognition that the West End dominated by cars.³⁵</p> <p>There is a lack of recognition of the need to protect resident's quality of life, or to support SMEs.³⁶</p>	<p>Support noted.</p> <p>Minor modification proposed to reflect.</p> <p>Clause C and paragraph 2.8 refer to proposals for Oxford Street, which are set out in more detail outside the City Plan in the Oxford Street District Place Strategy and Delivery Plan.</p> <p>Clause F and paragraph 2.11 emphasise the importance of investment in an environment that supports walking, cycling, and public transport use.</p> <p>All policies should be read in conjunction. Policy 7 (managing development for Westminster's people) emphasises the importance of residential amenity,</p>

		while Policy 14 (supporting economic growth) supports a range of workspaces that can support SME's, included co-working space.
	A management plan for the West End is needed. ³⁷	A comprehensive management plan for the entire West End, covering matters such as licensing arrangements, street cleansing, and levels of policing, and the funding mechanisms behind it, falls beyond the scope of the City Plan – which focusses on matters that can be controlled through land use planning.
	Growth targets for Tottenham Court Road not ambitious enough. ³⁸	Growth targets for Tottenham Court Road align with the London Plan.
	Affordable housing requirements will undermine commercial growth potential. ³⁹	The plan has been subject to a viability test which concludes that policy requirements will not undermine the overall viability of development in Westminster.
	Policy support for residential development within the WERLSPA should be provided.	Policy focusses on the priorities for growth in this area of predominantly commercial character. It does not explicitly exclude residential development, which could come forward as part of mixed-use schemes – particularly where the level of commercial growth proposed meets affordable housing thresholds set out in policy 10 (affordable contributions in the CAZ).
	The 30m height limit may restrict commercial growth potential. ⁴⁰	Minor modification proposed to policy 42 (building height) to clarify definition of tall buildings.
	Policy should specifically refer to safeguarding and intensification of Crossrail sites. ⁴¹	Paragraph 2.5 refers to the development of Crossrail 2 safeguarded sites. Their future intensification is compatible with the priorities for the area as set out in policy wording – a specific policy reference is therefore unnecessary.
	Greater emphasis on areas of cultural heritage should be included. ⁴²	All policies should be read in conjunction. Policy 16 (visitor economy) recognises the cultural heritage of the West End through much of its designation as a Strategic Cultural Area.
	Suggested inclusion of Strand Aldwych and Mount St within the WERLSPA. ⁴³	Suggested extension to eastern boundary of Strand Aldwych does not reflect the commercial character of

		the WERLSPA designation. Its exclusion from the designation will not compromise proposed public realm improvements in the area. Mount Street is designated as a CAZ retail cluster as shown on figure 15. See "Schedule of changes to Westminster's spatial designations" and "Submission Policies Map".
	Some suggested additions to International Centre boundary. ⁴⁴	Suggested additions include areas sufficiently covered by designation within the WERLSPA. Such designation allows greater flexibility of uses applies than within the International Centres designations, as set out in policy 15 (town centres, high streets and the CAZ).
	Deliverability of West End Good Growth targets questioned. ⁴⁵	Paragraph 2.7 refers to scenario testing that has been carried out for the West End, including parts outside of Westminster, as context for potential growth. It does not set out a specific target for Westminster that the City Plan seeks to deliver.
	Suggested inclusion of additional designations including Conservation Areas to figure 8. ⁴⁶	Designations shown on figure 8 seek to avoid unnecessarily cluttering map with additional designations that may make it less legible. Conservation Areas are included on the policies map that accompanies the City Plan.
Policy 3 Paddington Opportunity Area	Policy priorities are supported. ⁴⁷	Support noted.
	The plan should recognise positive actions in which Westminster Council and the community are involved. ⁴⁸	The supporting text to the policy expresses the council's commitment to continue working in partnership with local stakeholders to deliver shared ambitions for the area, particularly through the Paddington Place Plan.
	The Royal Oak site should be included in the Paddington Opportunity Area (POA) boundary. ⁴⁹	The council does not consider it appropriate to extend the Paddington Opportunity Area boundary given the implications for building height of doing so and the sensitivities with adjacent conservation areas and townscape (as identified in Westminster's Building Height Study) of a building of the height likely necessary to make development viable.

Policy 4 Victoria Opportunity Area	Justification for removal of the Edgware Road Growth Area from the POA (as included in the previous draft plan) should be provided. ⁵⁰	The Edgware Road Growth Area has been removed as it is now considered as part of the Marylebone flyover / Edgware Road Junction as identified by the building height study and subsequent policy, which has defined the principles for this location.
	Reference to improvements to the pedestrian and cycling environment is welcome. ⁵¹	Support noted.
	Inclusion of cycling at point 3.10 in supporting text is welcome. ⁵² Reference to the positive contribution hotels development can make to the OAs is supported. ⁵³	Support noted.
	Policies 10 and 42 will undermine the deliverability of the employment targets for the POA. ⁵⁴	The plan has been subject to a viability test which concludes that policy requirements will not undermine the overall viability of development in Westminster. Furthermore, the commercial growth evidence topic paper provides scenario testing that indicates employment targets are deliverable, taking into account the building heights approach included within the plan.
	Concerns that the rigid application of mixed-use policy will constrain office development in the POA. ⁵⁵	The revised supporting text to Policy 10 (Affordable contributions in the CAZ) sets out how affordable housing should be delivered on-site, where it is practicable and viable to do so.
	The policy should also support new and improved community infrastructure in the POA. ⁵⁶	Further emphasis on provision of community infrastructure in the POA has been added to the policy text.
	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. ⁵⁷	Additional supporting text clarifying the potential of KDS to contribute to the delivery of policy priorities for the POA has been added.
	Support for the plan's ambitions for the area. ⁵⁸	Support noted.
	Policy should clarify that growth targets should be a minimum, to be exceeded. ⁵⁹	The targets are indicative. Development proposals that optimise the site capacity while contributing to the City Plan objectives will be supported.

<p>Changes to the Victoria Opportunity Area (VOA) boundary are not supported.⁶⁰</p> <p>The continued inclusion of parts of Belgravia in the VOA are opposed to.⁶¹</p> <p>The VOA boundary should be widened to align with the eastern boundary of the VOA.⁶²</p>	<p>In light of the concerns highlighted by responses to the City Plan consultation, the proposed boundary changes to the VOA have been reviewed and they will be set back to align with those set out by the current City Plan 2016. See “Schedule of changes to Westminster’s spatial designations” and “Submission Policies Map”.</p>
<p>534 individuals⁶³ and local organisations in the Victoria area considered that the extent of the Victoria Opportunity Area should be significantly reduced at several sites. This was set out in a petition received by the council called “Petition to: not extend the Victoria Opportunity Area beyond the boundary adopted in the London Plan” which ran until 5 September 2019 (note 150 signatures were collected prior to the close of Regulation 19 consultation on the City Plan).</p>	<p>The council believes that Policy 4. ‘Spatial Development Priorities: Victoria Opportunity Area’ (VOA) is sound. The City Plan sets ambitious targets to build 22,000 new homes and create space for at least 63,000 new office-based jobs across the city over the life of the Plan.</p> <p>The City Plan is very clear that it balances growth against heritage, conservation and amenity considerations. It also City Plan identifies areas where these jobs will be provided and homes will be built, including the VOA. The London Plan identifies Victoria as an Opportunity Area (as defined by the boundary adopted in Westminster’s Core Strategy in 2011). The London Plan also sets an indicative target for the VOA to provide least 4,000 additional jobs and 1,000 new homes over the period 2016-2041.</p> <p>There is therefore a compelling reason to maintain the boundary of the VOA (as defined by the boundary adopted in Westminster’s Core Strategy in 2011) so as to enable the area to deliver the new homes and jobs required by both the City Plan and London Plan.</p>
<p>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.⁶⁴</p>	<p>More prominence to the strategic relevance of the opportunity at Victoria Station has been given through amendments to the policy’s supporting text.</p>

	A flexible approach to height at the station and interchange boundary would be welcome. ⁶⁵	Policies in the design chapter set out guiding criteria for building height which allow for flexibility.
	Reference to the positive contribution hotels development can make to the OAs is supported. ⁶⁶	Support noted.
	Support for practical changes and measures at Victoria to promote and reallocate space to walking, cycling and public transport. ⁶⁷	Support noted.
	Policy point on enhanced sustainable travel mode is welcome. ⁶⁸	Support noted.
	The issues posed by the Inner Ring Road must be addressed. ⁶⁹	This is sufficiently addressed by existing wording referencing the dominance of roads in the area.
	The challenges of coach traffic in Victoria should be recognised. ⁷⁰	Reference to the challenges connected with the coach station operations are referred to in the supporting text of Policy 4 and Policy 27 (public transport and infrastructure).
	The Plan should set out ambitions and support for improvements to Parliament Square through enhanced pedestrian priority and reduced traffic domination. ⁷¹	While Parliament Square does not sit within the VOA boundary, the policy sets out ambitions to improve public space and connectivity by strengthening the links with neighbouring sites and visitor attractions.
	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. ⁷²	While this policy sets out specific ambitions for the VOA, the City Plan as a whole supports improved sustainable transport throughout Westminster.
	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. ⁷³	Noted.
	New public realm improvements should accommodate access for deliveries and servicing activity. ⁷⁴	Through Policy 30 (freight and servicing) and Policy 44 (public realm) the City Plan seeks to balance freight and servicing needs with the use of the public realm, which sufficiently addresses the concern.
	Additional wording should be provided to encourage active frontages at ground floor level in retail developments. ⁷⁵	Current wording is considered sufficient. Being Victoria largely covered by a town centre designation, this is also addressed by Policy 15 (town centres, high

		streets and the CAZ). Policies on design also support and encourage active frontages.
	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. ⁷⁶	The current level of reference in this policy is considered sufficient. A more detailed policy point on the protection of the WWHS is covered by Policy 40 (Westminster's heritage).
	The policy should reflect that development in the VOA could affect the setting of the Pimlico Conservation Area (which is outside the VOA). ⁷⁷	Amended supporting text to recognise Conservation Areas.
	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. ⁷⁸	Given the limited space available for new development, most growth is to be achieved through smaller schemes including redevelopment and extension to existing buildings. This policy is designed to be read in conjunction with the other policies in the City Plan, which protect existing open space and heritage assets.
	The station, its tracks, approaches and airspace are all effectively public assets and should remain in the public realm. ⁷⁹	Noted.
Policy 5 North West Economic Development Area	General support for the principles of the policy ⁸⁰	Inclusion of the Royal Oak KDS in the NWEDA does not preclude a broad range of commercial development.
	Policy should include hotels as an accepted use close to transport hubs ⁸¹	Policy 5 encourages provision of affordable workspace.
	Request that the Royal Oak Key Development Site is explicitly mentioned in the supporting text and is added to the Paddington Opportunity Area ⁸² .	Noted.
	Request for more affordable office or work space ⁸³ .	Noted. Other City Plan policies on public realm and green infrastructure cover these issues.
	Request to allow more flexibility on loss of SME space ⁸⁴ .	Noted.
	Request to alter policy to encourage the creation of more green spaces ⁸⁵ .	Noted. This policy does not preclude further documents being produced, either through the Site Allocations DPD or through planning briefs.
	Request reference to be made to the Kensal Canalside Opportunity ⁸⁶ .	Noted. Issue addressed through retail policies.

	<p>Requests creation of a planning framework covering all developments in the Woodfield Road area⁸⁷.</p> <p>Requests to extend the Harrow Road District Centre designation⁸⁸.</p> <p>Concern that the policy may prejudice major new developments⁸⁹.</p> <p>Opposition to underpasses in the NWEDA⁹⁰</p>	<p>This policy does not preclude major new development.</p> <p>Noted. Pedestrian connectivity will be given due consideration to safety.</p> <p>Noted. The policy does not preclude hotel development, but these are to be directed to the CAZ and District Centres (see policy 16).</p> <p>Inclusion of the Royal Oak KDS in the NWEDA does not preclude a broad range of commercial development.</p>
Policy 6 Church Street/Edgware Road and Ebury Bridge Road Estate Housing Renewal Areas	General support for the principles of the policy ⁹¹ .	Support noted.
	lack of consultation in the development of the Church Street Masterplan ⁹² .	Support noted.
	Concerns over the risk of losing affordable housing when existing estates are demolished and rebuilt for regeneration purposes ⁹³ .	This consultation covers the City Plan, not the Church St master plan
	Concerns that the policy does not address wider improvements to the Edgware Road Housing Renewal Area ⁹⁴ .	Noted
	Potential of development and investment due to regeneration area's proximity to CAZ and transport hubs should be maximized ⁹⁵ .	Road crossings addressed in other policies
Policy 7 Managing development for Westminster's people	Policy ambition is supported. ⁹⁶	Support noted.
	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. ⁹⁷	The reference will be removed for clarity that all policies have equal weight.
	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. ⁹⁸	Policy wording has been amended for clarity. The supporting text sets out that a balanced approach will be taken when assessing proposals.
	The policy should be applied flexibly given that the requirements to protect and enhance might not always be possible in a dense urban environment. ⁹⁹	Policy wording has been amended for clarity. The supporting text sets out that a balanced approach will be taken when assessing proposals.

	<p>Daylight and sunlight standards should be treated flexibly.¹⁰⁰</p>	Policy wording has been amended for clarity. The supporting text recognises that standards cannot always be met but points to BRE Guidelines as a starting point to assess proposals.
	<p>The reference to sense of enclosure to be deleted as notional and subjective.¹⁰¹</p>	The reference to sense of enclosure is a longstanding policy for Westminster and is a necessary material consideration to ensure developments are appropriately designed when assessing impacts on people's health and wellbeing.
	<p>Uncertainty around the wording of this policy will lead to inconsistency in decision making given the flexibility of the interpretation.¹⁰²</p>	Policy wording has been amended for clarity.
	<p>Concerns about the absence of the requirement to minimise construction impacts as a function to delivering neighbourly development.¹⁰³</p>	This point is covered by 7B in the policy wording, which requires protecting and where appropriate enhancing local environmental quality. The supporting text to the policy further specifies that this also covers construction impacts. Policy 34 sets out detailed requirement on the protection from local environmental impacts.
	<p>The policy would benefit from an additional clause ensuring the health and wellbeing impacts of development proposals are addressed.¹⁰⁴</p>	Additional supporting text provided to highlight the link between managing development and protecting residents' health and wellbeing.
	<p>Concerned that the policy has been watered down by the addition of "where appropriate" with regards to enhancing amenity.¹⁰⁵</p>	The policy recognises that it may not always be possible to enhance amenity. The policy wording allows for a reasonable degree of flexibility to ensure the protection of residents from negative impacts while encouraging good quality developments contributing to the City Plan objectives to come forward.
	<p>Inclusion of Agent of Change principle welcomed, however it is not clear how the policy will be enforced in the long term.¹⁰⁶</p>	The council considers it is sufficiently clear.

3.3 Housing Policies

Policy	Summary of responses	Council response
Policy 8 Stepping up housing delivery	Concerns over 200sq m limit on new homes ¹⁰⁷ .	This point will be covered and justified within the Housing Capacity Topic Paper.
	Concerns over delivery of targets and how commercial and residential targets will interact, alongside building height and amenity policies ¹⁰⁸	Noted. Unit thresholds within Appendix 1 are a guide and are note rigid.
	Concerns over redevelopment of existing affordable housing – that like-for-like replacement will not happen ¹⁰⁹	Further additions to supporting text to be applied.
	Objection to restriction of short term letting of student accommodation ¹¹⁰	The Housing Capacity Topic Paper will provide a detailed explanation outlining the negative impact that short-letting of student accommodation outside term-time contribute to.
Policy 9 Affordable housing	Concerns over lack of 50% strategic affordable housing target ¹¹¹ .	Changes to policy and supporting text clarifying the status of the 35% target, in addition to cross referencing London Plan policy required. Requirement for 50% strategic target in Westminster not supported.
	Concerns over lack of reference to Mayor's 50% target on public land and threshold approach ¹¹² .	Changes to policy and supporting text clarifying the status of the 35% target and cross referencing to London Plan policy required. Requirement for 50% strategic target in Westminster not supported.
	Concerns over lack of clarity on how contributions are calculated - units/floorspace and gross/net ¹¹³ .	Further clarification that calculation is on units through changes to the supporting text required. Portfolio approach could be explored through Site Allocations DPD and through SPD if considered acceptable.
	Concerns over lack of flexibility on viability ¹¹⁴ . Concerns over lack of Payment in Lieu figures on which to base viability calculations ¹¹⁵ .	This will be dealt with through the publication of the Annual Affordable Housing Statement.
	Questioning evidence underlying tenure split ¹¹⁶ .	This needs to be changed to reflect London Plan policy and cross reference to this.

		The tenure split will not change; however, topic paper needs to draw together the evidence to explain these policy choices.
	Object to the ban on tenure change from affordable to private. ¹¹⁷	The Housing Capacity Topic paper seeks to address the issue of not permitting changes of tenure of existing stock by private landowners.
	Concerns over lack of clarity on affordable housing credits and land swaps ¹¹⁸ .	Noted. The proposed modification would be a weakening of the council's policy position and is not considered appropriate. The council is not pursuing a system of affordable housing credits.
Policy 10 Affordable housing contributions in the CAZ	Concerns over practicality of on-site delivery of affordable housing ¹¹⁹ .	Further evidence on the practicality of on-site requirement needed.
	Concerns over how this policy interacts with commercial growth policies and the London Plan ¹²⁰	Further evidence of practicality of on-site delivery required. May need to include analysis of how this policy interacts with London Plan and our own commercial growth policies.
	Concerns over a lack of clarity over whether this applies to changes of use ¹²¹	Clarification that policy applies to changes of use needed.
	Uncertainty on the area of measurement to which the floorspace increase applies (NIA, GIA or GEA). ¹²²	Potential clarification that this will be measured in GIA.
	Concerns over lack of Payment in Lieu figures on which to base viability calculations ¹²³ .	This will be dealt with through the publication of the Annual Affordable Housing Statement.
	Concerns over lack of clarity on affordable housing credits and land swaps ¹²⁴ .	This should be addressed through revised viability testing.
	Concerns over ambiguity as to whether the international centres are excluded from the requirement to provide affordable housing on site.	Noted. The stepped approach has been designed to avoid cliff edges.
	Questioning the 1,000 sq.m. threshold at which the policy applies and the stepped approach to contributions.	Noted. The proposed modification would undermine the council's policy position and is not considered appropriate.
Policy 11	Object to specialist housing being allowed to convert to affordable housing only and lack of clarity over Clause D3 ¹²⁵	Consider amendment to para 11.13.

Housing for specific groups	Concerns over lack of clarity over 25% family housing target and whether it is strategic, or required on a site-by-site basis ¹²⁶ .	Although 25% is a strategic target, modification may be necessary to highlight this, in addition to the housing mix, which will be determined on a site-by-site basis.
	Concerns over lack of evidence to identify sufficient capacity to meet the need for Gypsies and Travellers accommodation over the plan period ¹²⁷ .	Bespoke GTAA required.
	Concerns that the council are only planning to meet local rather than strategic need for student accommodation ¹²⁸ .	Needs work to counter argument that we should plan for strategic need as well as local. Through topic paper.
	Concerns that approach to affordable student accommodation is not in line with the Mayor's ¹²⁹ .	Noted.
Policy 12 Innovative housing delivery	General support ¹³⁰ .	Support noted.
	The policy should include the type of products that the council considers to be innovative models of housing ¹³¹	It is not considered that the types of product need to be in the main policy wording as they are set out in paragraph 12.1.
	Large-scale purpose-built units should be protected by strict legal agreements from converting to other housing types ¹³² .	Paragraph 12.9 already explains that the council may use legal agreements to prevent large-scale purpose-built units from converting to other housing types.
	The council should consider a separate and more detailed policy focussed on Build to Rent ¹³³	It is not considered that Build-to-rent needs a standalone policy. The London Plan policy on Build-to-rent provides further details.
	The policy should not seek to regulate rental levels ¹³⁴ .	The policy is not trying to specifically regulate rental levels as tenure requirements are either determined by other policies in this plan or by London Plan policies. The reasoned justification has been clarified to explain that policies in the draft London Plan and in the forthcoming Planning Obligations and Affordable Housing SPD should be followed in relation to affordability.
	12(B) may give a 'blank cheque' to developers because it is not caveated ¹³⁵ .	It is not considered that the policy needs to be amended. All other policies in the draft City Plan, the draft London Plan and Building Regulations also apply.

	The council should consider how Modern Methods of Construction will be applied in practice for heritage assets ¹³⁶ .	The policy mainly applies to "new homes built". It is not considered that the policy needs to be amended as policies in the Design chapter will ensure that the use on Modern Methods of Construction is applied appropriately in heritage assets.
Policy 13 Housing quality	General support for the policy principles ¹³⁷ .	Support noted.
	The council should consider that it may not be possible for heritage assets to meet the Nationally Described Minimum Space Standards ¹³⁸	The reasoned justification has been clarified, so it is clear that the council acknowledges that it is not always possible to meet the Nationally Described Minimum Space Standards within heritage assets (conversions) and when extending properties.
	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. ¹³⁹	The reasoned justification has been clarified, so it is clear that the council supports tenure integration and tenure-blindness.

3.4 Economy & Employment Policies

Policy	Summary of responses	Council response
Policy 14 Supporting economic growth	Plan should be explicit that there should be no net loss of office floorspace from the CAZ. ¹⁴⁰	Minor modification proposed to reflect.
	While aspirations of commercial growth are supported, other policy requirements such as approach to height, and affordable housing are likely to compromise growth opportunities. ¹⁴¹	The plan has been subject to a viability test which concludes that policy requirements will not undermine the overall viability of development in Westminster.
	Commercial growth targets are not ambitious enough and fail to recognise the role of non-office employment. ¹⁴²	Commercial growth needs to be deliverable to conform with the NPPF. Targets therefore take into account likely forms of development, and development constraints, as set out in the commercial growth topic paper. Alternative ambitious projections have not been subject to any assessment of development capacity in the city and the impact of growth on townscape and heritage.
	Existing West End office market is functioning well, so policy does not need to be so protective.	A total jobs target is not required under the NPPF or London Plan. The absence of such a target does not rule out jobs growth through other forms of commercial development that are supported through the plan - such as in the retail and leisure industries.
	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 hierarchy ¹⁴³ ; small scale reformatting of mixed-use buildings; e.g. some loss of upper floors to extra retail/ residential etc ¹⁴⁴ ; the loss of offices to residential or hotels ¹⁴⁵ ; and the conversion of offices to educational use without marketing requirements where part of a university strategy. ¹⁴⁶	Past levels of loss of office floorspace justifies a protective policy stance to ensure central London's role as a global office centre is not compromised. Minor modification proposed to reflect scope for ground floor conversion of office stock to retail or complementary town centre uses within the town centre hierarchy - to support such centres vitality and viability. Further requested exceptions could lead to a continued substantial loss of office stock from the CAZ contrary to policy objectives.

	18-month marketing/ vacancy of offices as required under Clause D3 excessive. ¹⁴⁷	Marketing period is intended to deter the continued loss of office stock in recognition of the threat this poses central London's role as a global office centre. It seeks to ensure any future loss of stock is justified by there clearly being no demand for continued office use.
	Some consultees state the plan should protect SMEs in areas beyond the NWEDA; e.g. Soho and Fitzrovia ¹⁴⁸ whilst others support the proposed approach. ¹⁴⁹	Noted. Policy supports co-working space across the city – which in a central London context can help meet the needs of SMEs.
	Provision should be made for land swaps. ¹⁵⁰	Land use swaps are addressed through implementation section of the plan.
Policy 15 Town centres, high streets and the CAZ	Narrative of retail diversification supported. ¹⁵¹	Support noted.
	Some detailed comments on town centre health check findings and suggestions for boundary alterations. ¹⁵²	Minor modifications to the plan proposed to reflect, alongside some updates to the Town Centre Health Check.
	Charlotte St/ Fitzrovia CAZ retail cluster drawn too wide and covers an area with little retail character. ¹⁵³	Minor modification proposed to reflect.
	18-month marketing period is excessive, will lead to vacancies, and is contrary to the narrative about diversification of the sector. ¹⁵⁴	Marketing period allows for loss of retail where there is no genuine need. Marketing is not required in those parts of the WERLSPA that are not also designated as an International Centre or a CAZ retail cluster, or for proposals for subsidiary uses, in order to support diversification. Furthermore, scope is provided for temporary uses, which can avoid long term vacancies. The Town Centre Health Check that supports the plan identifies largely healthy town centres in Westminster.
	Marketing of vacant units under clause D should be at rates used before the unit became empty. ¹⁵⁵	Landowners of vacant premises are entitled to seek market rents for such properties.
	Should be clearer recognition that some loss of A1 units may be necessary – both from upper floors and in ground floors. ¹⁵⁶	Minor modification proposed to reflect.
	It is unclear how A1 uses can be protected against permitted development rights. ¹⁵⁷	An existing Article 4 Direction is in place requiring planning permission for change of use from A1 uses to A2.

	<p>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 elsewhere¹⁵⁸, though also opposing views supporting the approach¹⁵⁹.</p>	<p>Policy aims to balance a retained strong retail function in the town centre hierarchy, whilst offering scope for some complementary uses to enable such centres to diversify in response to the challenges they face. A more protective stance in the International Centres reflects their position at the top of London's town centre hierarchy, and their role as a prime location for comparison shopping. Policy only applies to key town centre frontages – greater flexibility of uses applies in the WERLSPA area which covers a large part of the West End.</p>
	<p>All references to shisha are too negative and unsubstantiated.</p>	<p>Shisha smoking has significant public health risks, and premises supporting such activity can also have negative impacts on residential amenity and town centre vitality and viability, as documented in the plan.</p>
	<p>Some support for the approach of no residential in International Centres¹⁶⁰, whilst others suggest there should be greater recognition of the role of town centres as places to live.¹⁶¹</p>	<p>Support noted. Commercial activity is the priority in town centres, in accordance with the NPPF and London Plan. Policy recognises scope for use of upper floors in some town centres for residential purposes, and policy 7 (managing development for Westminster's people) seeks to ensure future growth respects residential amenity.</p>
	<p>It is unclear how retail growth will be accommodated.¹⁶²</p>	<p>Retail growth will be accommodated through the intensification of town centres and provision at some key development sites listed in Appendix 1. The commercial growth topic paper provides scenario testing of how matters such as additional building height in key commercial areas can accommodate retail growth.</p>
	<p>Some comments on the council's approach to Oxford Street Place Plan or any forthcoming West End SPD.¹⁶³</p>	<p>Noted. Such documents are subject to separate consultation arrangements to the City Plan.</p>
	<p>Temporary uses will need to be carefully managed.¹⁶⁴</p>	<p>Noted. Clause F notes that such proposals will need to be carefully managed, whilst paragraph 15.5 refers</p>

		to the need for management plans for some complementary town centre uses.
	Support for town centre uses throughout the CAZ should not include parts that are mainly residential in character. ¹⁶⁵	Clause H notes that town centre uses throughout the CAZ should not cause significant harm to local character or residential amenity. Paragraph 15.27 also acknowledges that the CAZ includes some areas that are wholly residential in character.
	Community uses should be supported alongside retail in Queensway.	Noted. Paragraph 15.22 refers to support for new community facilities within this centre.
	Workspaces should be supported, and ground floor residential resisted, in local centres. ¹⁶⁶	Noted. Where workspaces meet the requirements of clause C they can be supported in local centres. Requirements under this policy for development to provide an active frontage preclude ground floor residential.
	Some references to opening hours and events. ¹⁶⁷	Such matters are addressed through licensing and therefore fall beyond the remit of the City Plan.
	Policy does not appear to address the issue of proliferation of bureaux de change through unit sub-divisions. ¹⁶⁸	Under existing Article 4 Direction, change of use from A1 to A2 uses require planning permission, and will therefore be judged against policy criteria requiring that proposals enhance the centres within which they are proposed.
Policy 16 Visitor economy	Expressed support to the approach to the visitor economy ¹⁶⁹ .	Support noted.
	Believe the Lord's Cricket Ground is not given the required protection and attention. ¹⁷⁰	Sufficient protection is awarded to Lord's Cricket Ground awarded through both Policy 1 as a use of international or national importance, and through Policy 16 as a cultural use.
	Should encourage innovation in the delivery of new space for cultural and leisure uses ¹⁷¹ .	Innovation in the sector is supported. The council seeks to balance the needs of visitors, businesses and communities, as set out in Policy 16.
	Opposition to the justification linking the need to deliver extensions alongside 'upgrades'. ¹⁷²	Both support and objection was received to clause H of Policy 16. Upgrades are defined broadly, providing sufficient scope for a flexible approach. The aim of this policy is to seek to enhance existing facilities where possible.

	To highlight the concentration of theatres, music venues and LGBTQ+ venues, as indicated on the Mayor's Cultural Infrastructure Map ¹⁷³ .	Noted. Modifications are proposed to the supporting text to highlight the importance of these venues for London's cultural offer.
	Produce a supplementary planning document to protect theatres ¹⁷⁴ that play an important role in civil society ¹⁷⁵ and integrate the existing plan with other initiatives and plans ¹⁷⁶ .	Suggestion noted. Following the publication of our Cultural Strategy, the council will continue to work with partners to establish the best way to manage change and growth in the sector.
	Should recognize the cross-boundary nature of the Knightsbridge International Centre and work with RBKC to protect the area ¹⁷⁷ , and include reference to Imperial College facilities in the Knightsbridge Strategic Cultural Area ¹⁷⁸ .	The council will continue to work with RBKC and other partners on initiatives in the area. It is not necessary to include every partnership arrangement in the plan.
	Concerned that the policy may allow events on playing fields/pitches ¹⁷⁹ , and that the policy should be strengthened to prevent a wider range of impacts caused by events on historic places ¹⁸⁰ .	The policy on events works in conjunction with other policies in the plan, who already address the impacts of events on playing fields/pitches and their impact on the historic environment. It is not necessary to duplicate these policies.
	Different views on if hotels should be supported outside the areas identified in the policy ¹⁸¹ , or further restricted to within the town centre boundaries ¹⁸² , further preventing development of new hotels in residential streets ¹⁸³ , addressing their negative impact ¹⁸⁴ .	The approach to the location of hotels is justified and responds to comments raised in previous consultations. The policy should also be read in conjunction with other policies in the plan regarding town centres, which addresses concerns raised.
	Conflict between the approach to affordable housing in the CAZ and restricting the siting of hotels in residential streets ¹⁸⁵ .	The approach to restricting hotels from residential areas is justified in addressing the different characters of streets and managing impacts.
	Against restriction of loss of office space to hotels in the CAZ ¹⁸⁶ .	In response to representations made to previous consultations, the change of use of hotels to office space is no longer addressed by this policy. Other policies in the plan allow the change of use from office to hotel use in certain circumstances.
Policy 17 Food, drink and entertainment	Expressed support for the approach to food, drink and entertainment ¹⁸⁷ .	Support noted.
	Guidance needed on requirements for applications to demonstrate benefits for community ¹⁸⁸ , and it may not always be appropriate ¹⁸⁹ .	Noted. We will monitor the policy and consider if further guidance will be required.

	Insufficient consultation with those offering shisha smoking in Westminster, the approach is discriminatory, and overly restrictive ¹⁹⁰ .	The approach towards shisha smoking in the City Plan is aimed at mitigating the negative impacts of shisha smoking is not overly restricting the use. The approach is proportionate and justified and has also been subject to several rounds of consultation. The equalities impacts have been considered as part of the Integrated Impact Assessment process.
	The policy should refer to detrimental impacts on public health of alcohol consumption ¹⁹¹ .	A modification is proposed to highlight the negative impacts of alcohol consumption in the context of public houses.
	Consider if the policy should further align with the draft new London Plan approach to the projection of pubs ¹⁹²	There is no need to duplicate London Plan policy as this is part of the development plan.
	Should remove 18-month clause for risk of long vacancy of public houses ¹⁹³ . Others suggest marketing should be at the previous rent ¹⁹⁴ .	In the context of Westminster, an 18 month marketing period for public houses is found to be appropriate. Marketing should be at market conform levels.
	More needs to be done to protect traditional pubs in Westminster ¹⁹⁵ ; the policy may have the unintended consequence of causing more public houses to be lost ¹⁹⁶ .	The policy places strong protection to public houses and, in conjunction with the London Plan, provides a strong basis for protection.
	The policy approach to takeaways is unsound and fails to provide an evidence-based way of achieving the policy's objective. ¹⁹⁷	The approach to takeaways is a local interpretation of the draft new London Plan policy and is justified.
	Suggest adding a set distance from residential properties to regulate and restrict shisha smoking ¹⁹⁸ , and consider the impact of shisha smoking on commercial premises ¹⁹⁹ .	A set distance from properties is not appropriate as this overly restricts the use and such distance would be arbitrary. The priority is to manage the impacts of shisha smoking on residential properties, which the policy seeks to address.
	The management plan required by the policy should be submit later at a pre-occupation stage ²⁰⁰ .	It is important to have a management plan in place at planning application stage, so this can be considered as part of the application.
	Further clarity needed on measures to prevent over concentration of food, drink, entertainment uses ²⁰¹ to manage the impacts on residential amenity.	Noted. We will continue to monitor the policy and consider if further guidance will be needed.

	The policy is not sufficient in limiting shisha smoking ²⁰² .	Noted. Planning policy is limited in what it can do to address shisha impacts. The approach to shisha is proportionate and robust.
Policy 18 Community infrastructure and facilities	General support for the principles of the policy ²⁰³	Support noted.
	Consider the plan contradicts the NPPF ²⁰⁴	The Plan aligns with the NPPF and supported by the PPS and BFS.
	Requests to view and comment on the Infrastructure Delivery Plan ²⁰⁵	Noted.
	Request clarification to confirm that policy does not apply to MoD facilities ²⁰⁶	The policy clearly refers to community facilities and built infrastructure rather than public space which is covered by green infrastructure policies
	Questions evidence base for indoor and outdoor sports facilities that identifies need and sets out a strategy to address this ²⁰⁷	Noted.
	Policy should distinguish between public and private uses ²⁰⁸	This policy makes provision for community facilities which are open to the public as well as exclusive to members.
	Not clear if gyms would be protected ²⁰⁹	The provision of different types of leisure facilities will be kept under review to ensure needs are met.
	Suggestion to add separate policy on health infrastructure, health and wellbeing ²¹⁰	The policy provides for land use planning for health facilities in the supporting text. To be cross-referenced with IDP
	Suggestion policy should allow for loss of sports facilities if they have been identified as surplus in the emerging PPS or BFS ²¹¹	Noted
	Suggests separating sport facilities from other community facilities ²¹²	The policy makes provision for all community facilities. Consultation for specific elements of community facilities is covered by the IDP work which is in parallel to this.
	Suggestion that the policy is inconsistent with London Plan Policy S1 ²¹³	See Policy 18B and supporting text
	Lack of demand should be evidenced ²¹⁴	Noted.
Policy 19	Suggestion that strategies for provision of infrastructure should be publicly consulted upon ²¹⁵	Carried out for IDP work.
	Policy should insist on community use of facilities in new education provision. ²¹⁶	Insisting on community use of new education facilities is considered unduly onerous, and could

Education and skills	<p>Further support for Imperial College expansion should be provided, and education uses should not need to make financial contributions towards employment and skills.²¹⁷</p> <p>Provision should be made for developers to meet employment and skills requirements themselves without requiring a financial contribution.²¹⁸</p>	<p>compromise the operational requirements of education providers.</p> <p>Policy as worded provides sufficient support for the future expansion of Imperial College. Minor modification proposed to clarify which types of development will be required to make a financial contribution towards employment and skills.</p> <p>Policy wording does not specify that financial contributions are always required. Instead it notes that these are one means of improving employment prospects for local residents. Scope therefore exists for developers to also meet employment and skills requirements through other means.</p>
Policy 20 Digital infrastructure, information and communications technology	<p>Suggestion of supporting changes on national level, with regards to the marketing means that affect the public realm²¹⁹</p> <p>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.</p>	<p>Noted.</p> <p>Noted.</p>
Policy 21 Soho Special Policy Area	<p>Disagreement about the blanket approach for the large hotels²²⁰.</p>	<p>There is no blanket ban on large hotels in the CAZ. The applications will be dealt with on an individual basis in line with the policies of any SPAs for which they are proposed.</p>
	<p>Questions on how the policy measures the mix and character of the uses in Soho²²¹.</p>	<p>The effectiveness of the policy will be monitored via Town Centre Health checks.</p>
	<p>Request clarity on prevention of overconcentration of food, drink, entertainment uses²²².</p>	<p>The policy stipulates applicants to justify such change of use in their Planning Statement</p>
	<p>Comments on licenced premises that may be degrading the street environment²²³.</p>	<p>Noted.</p>
	<p>Comments regarding developments and amalgamation of units behind retained facades²²⁴.</p>	<p>Noted.</p>
	<p>Concerns over clarity regarding the small-scale hotels definition²²⁵.</p>	<p>The policy makes provision for hotels with foot-plates of a size in accordance with Soho's existing uniquely diverse and finer urban grain.</p>

Policy 22 Mayfair & St James's Special Policy Area	Policy should support flexibility of uses between art galleries and antiques traders, and support land use swaps. ²²⁶	Minor modification proposed to reflect.
	Some further flexibility within the SPA required. ²²⁷	The special character of the area and the positive contribution specific uses within it make, merits protection as set out in the Special Policy Areas topic paper.
	Policy should only seek to protect base level of specialist floorspace upon adoption of plan. ²²⁸	Policy seeks to protect and enhance the character of the area, including supporting a growth in specialist floorspace over the plan period.
Policy 23 Harley Street Special Policy Area	Policy broadly supported, though provision should be made for land use swaps. ²²⁹	Land use swaps are addressed through implementation section of the plan.
Policy 24 Savile Row Special Policy Area	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. ²³⁰	The special character of the area merits the protection of existing tailoring space, and encouragement of further clustering, as set out in the Special Policy Areas topic paper.

3.5 Connections Policies

Policy	Summary of responses	Council response
Policy 25 Sustainable transport	<p>General support for the policy principles²³¹.</p> <p>A Transport Strategy should accompany the plan²³².</p>	<p>Support noted.</p> <p>Noted, the council does not consider not have a new Transport Strategy in production at this time to affect the soundness of the Plan or the implementation of its policies.</p>
	<p>Policy could be more ambitious to prioritise active travel over cars, reduce car use and require contributions (other than CIL) to reduce poor air quality²³³</p>	<p>Connections chapter is explicit in its prioritisation of sustainable transport measures, that the purpose is to reduce car use, notwithstanding this the council considers that improving air quality will not just be influenced by car use and air quality is covered sufficiently by Policy 33.</p>
	<p>Policy is too high level and needs examples²³⁴ - 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 streets²³⁵.</p>	<p>This is sufficiently covered in the London Plan and it is not considered necessary to repeat it in the City Plan.</p>
	<p>This Policy contradicts policy 32 regarding new river crossings²³⁶.</p>	<p>The council disagrees – the policy promotes sustainable transport modes, but in order to balance competing needs, demands and impacts the council seeks a compelling case for new crossings to be presented before they are supported.</p>
	<p>Financial contributions should apply to all transport modes²³⁷.</p> <p>Negative impacts of disused telephone boxes are not addressed by the policy²³⁸.</p>	<p>Minor modification proposed to address point</p> <p>De-cluttering is a key principle of Policies 20 and 44</p>
	<p>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 Plan²³⁹.</p>	<p>Freight and servicing are addressed in Policy 30. Policy 31 supports technological innovation in transport. A Lorries Services Plan is not considered necessary as Westminster follows regional guidance with regards to the London Lorry Control Scheme.</p>

	Impact of re-allocating road space needs to be balanced with the needs of essential commercial vehicles such as freight deliveries and servicing ²⁴⁰	The council considers the policy provides an appropriate balance to support commercial growth while promoting the City Plan's priority for walking and cycling above other transport modes.
Policy 26 Walking and cycling	<p>General support for the principles of the policy²⁴¹.</p> <p>Policy could go further to be more effective by referring to Thames Path, seeking to reduce car use and make walking routes accessible 24/7²⁴².</p>	<p>Support noted.</p> <p>Minor modifications proposed to insert reference to Thames Path, however requiring new public space to be accessible 24/7 may not be appropriate in every case, particularly where space is publicly accessible but privately owned and there are security implications.</p>
	Disagreement that short stay parking may not be appropriate in some cases - consultees want to see more short stay cycle parking ²⁴³ .	The council maintains that trips to the CAZ tend not to be made by bicycle and is mindful of the need to balance provision of short stay cycle parking alongside other public realm improvements that improve the walking experience. However, a minor modification is proposed to clarify that the council considers that short stay cycle parking <i>may</i> not be appropriate (instead of <i>will</i> not).
	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) ²⁴⁴ .	Promotion of cycling improvements is advocated in the Plan, but needs to be balanced approach against other objectives. It is not appropriate for the plan to specify the designation of new cycles routes as this is covered by other council strategies.
	Policy should reference the Mayor's 'Healthy Streets' approach ²⁴⁵ .	The council does not consider it necessary to repeat in detail the Mayor's Healthy Streets approach as this is sufficiently covered in the London Plan and the references in the City Plan are sufficient.
	Policy should go further to reduce traffic ²⁴⁶ .	A central principle of this chapter of the plan is traffic reduction – the council considers this is sufficiently clear and the policies work together to be effective in this respect.
	Policy should consider safety and encourage better links between walking, cycling & public transport ²⁴⁷ .	Safety of sustainable transport improvements stated explicitly in policies 25, 26, 28, 29, 30, 31 and 32

	Cycle space requirements for residential development are excessive ²⁴⁸ .	The City Plan adopts the new London Plan standards for cycle space provision in residential units, which aligns with objectives to promote sustainable transport measures.
Policy 27 Public transport and infrastructure	General support for the principles of the policy ²⁴⁹ . Funding for public transport should only be through CIL and should also include contributions to rail infrastructure (Part 1 C) ²⁵⁰ .	Support noted. Minor modifications proposed to clarify that contributions are not limited to improvements to bus infrastructure, but all sustainable transport modes.
	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 End ²⁵¹ .	Minor modifications proposed to include reference to river buses. The council do not consider it appropriate in the spirit of promoting sustainable transport to promote car-drop off in the West End.
	New electric vehicle charging points should be for taxis, not private cars ²⁵² .	The council considers that in order to effectively contribute to improve air quality across the city, provision of electric vehicle charging infrastructure for both private and public vehicles is necessary.
	Streamlining of bus services should be subject to maintaining due connectivity ²⁵³ .	Minor modification proposed to ensure public transport is streamlined to improve passenger experiences and contribute to a modal shift away from the private car.
	Policy should reference the Piccadilly line upgrades and mention the entrance to Knightsbridge underground station ²⁵⁴ .	The council does not consider it necessary or appropriate to list every upgrade project taking place in the city.
	Coach and bus standing facilities should be relocated to non-residential areas (including the relocation of Victoria Coach Station) ²⁵⁵ .	Although the council acknowledges the conflicts between coach and bus facilities and residential uses, given the dense, fine grain nature of Westminster's built environment and scarcity of sites, the council does not consider it appropriate to require the re-location of such facilities as an overarching principle – each case should be considered on its merits and the policies in the connections chapter which seek improved connectivity across the city would support the re-location of such facilities in better connected locations. Policy 7 protects residential amenity from unacceptable impacts of new development.

		The re-location of Victoria Coach Station is already supported in policies 4 & 27.
Policy 28 Parking	<p>General support for the principles of the policy (including adoption of cycle parking standards in line with the draft London Plan)²⁵⁶.</p> <p>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. These 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 uptake²⁵⁷.</p>	Support noted.
	<p>On street parking spaces should be prioritised for more sustainable modes of transport such as footway widening / public realm improvement schemes²⁵⁸</p>	The council considers the City Plan strikes a balance between the merits of the private car and the transition to sustainable modes of transport and that this is an appropriate evidence-based departure from the new London Plan's approach to parking, as justified in the policy. The council have agreed a statement of common ground with the Mayor and TfL on this objection and will continue dialogue to reach a resolution.
	Major development should provide cycle parking ²⁵⁹ .	The City Plan cannot force the change of use of existing parking spaces, however, the policies in the Connections chapter set out the priority for walking and cycling and therefore this will be a consideration for any scheme involving the change of use of car parking spaces.
	Residents of new development should be restricted from having a parking permit ²⁶⁰ .	The London Plan cycle parking standards apply, as set out in Appendix 2
	New car parks should be let only to residents ²⁶¹ .	The issuing of parking permits is not a matter for the City Plan
	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) ²⁶² .	Car parking provided as part of residential developments will only be for resident use – the council considers the policy is clear in this respect.
	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	This policy is primarily concerned with private residential parking. Servicing needs are sufficiently covered by policy 30.

	<p>requirements are (Part E) - does it apply to the whole city? If not, it should²⁶³.</p> <p>Objection to re-provision of car parking on housing estates²⁶⁴.</p>	<p>rolling out the implementation of electric vehicle charging infrastructure across the city, which will increase the access residents have to a charging point. Part E is considered to be clear that it applies to the whole city given that it doesn't specify any other spatial location.</p> <p>The council considers it appropriate to allow the re-provision of some parking on housing estates that are subject to renewal not least because occupants of housing renewal estates are often less in control of their housing situation and will likely retain their cars following renewal – not re-providing the spaces will lead to more on-street stress. A reduction in car parking on housing renewal estates is expected by the policy overall.</p>
Policy 29 Highway Access and management	General support for the principles of the policy ²⁶⁵ .	Support noted.
	Part A (and paragraph 29.2) need clarification on the intention ²⁶⁶	Minor modification proposed to clarify that the council only seeks (i.e. does not require) the designation of land from set-back frontages as highway.
	Coach and taxi parking should not adversely affect residential amenity ²⁶⁷ .	Residential amenity is protected under Policy 7.
	Strategic Road Network (SRN) map (Figure 25) needs correcting: Oxford Street is not part of the SRN and Great Western Road and Chepstow Place are ²⁶⁸ ..	Oxford Street is part of Westminster's Strategic Road Network.
Policy 30 Freight and servicing	General support for the principles of the policy, but it should encourage more sustainable solutions ²⁶⁹ .	Support noted.
	Include reference to River Thames in relation to freight ²⁷⁰ .	Minor modification proposed to policy 32 reference freight movements on the Thames.
	Policy is too prescriptive (particularly on measures that could improve air quality & the requirements for the Freight Operator Recognition Scheme) ²⁷¹ .	The council considers the policy contains a sufficient level of detail and requirements to manage freight and servicing within a tight grain, busy urban environment.
	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	The policy already supports re-timing of deliveries. If consolidated delivery chains can be developed that result in less space required for servicing functions,

	(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. ²⁷²	the policy would support this. However, the principle remains that if servicing and freight space for a development are required for a particular development then this should be accommodated on site rather than in the public realm/ on the highway. Requiring car parks to convert to consolidation centres is considered by the council to specific a policy requirement, the policy sufficiently supports the West End Partnership's Freight and Servicing Strategy which seeks to address the issue of consolidation.
	Footway should be prioritised for pedestrians and servicing restricted where there is conflict with pedestrians ²⁷³ .	The needs of pedestrians and businesses must be appropriately balanced to ensure both can operate alongside each other. Policies 25 and 44 should be read alongside this policy to ensure the design of new servicing facilities take into account the needs of other road users, impact on the public realm and the priority in the City Plan to encourage more walking and cycling.
	Transport assessments, delivery and servicing plans and construction logistics plans should be better monitored ²⁷⁴ .	The council do not consider it necessary to specify this within the policy – it will be addressed in the conditions of individual planning applications where appropriate.
	Development in WERLSPA should be required to provide a transport strategy and Policy 7 should refer to the need for a construction logistics plan ²⁷⁵ .	The council do not consider it necessary to repeat policies throughout the Plan as all policies should be read together. The requirement for delivery and servicing plans is considered sufficient to address development in the WERLSPA.
	Commuted sums should be paid if servicing is not provided ²⁷⁶ .	The council do not consider this an appropriate requirement upon development, considers it may lead to developers making a payment instead of designing in servicing solutions which could cumulatively have a negative impact on the public realm and does not have a process in place to

		administer funds to offset the cost of servicing not being provided.
Policy 31 Technological innovation in transport	General support for the principles of the policy ²⁷⁷ . Concerns about additional street clutter from Electric Vehicle charging infrastructure - walking and cycling should be prioritised over EVs ²⁷⁸ .	Support noted. This policy seeks to respond to changing technologies over the plan period and when read alongside Policy 26 (Walking and Cycling) and 44 (Public Realm) the council considers and appropriate balance is struck between supporting the shift to non-polluting vehicles and other sustainable transport modes.
	New/replacement refuelling facilities should be on the strategic road network ²⁷⁹ .	The council does not consider it appropriate to limit the location of new facilities and all applications should be considered on their merits taking into account the other policies in the Plan.
	References to refuelling stations should include provision of electric vehicle infrastructure (including for commercial vehicles) ²⁸⁰ .	This is sufficiently referenced in Part B of the policy.
	On street electric vehicle infrastructure should be available for both residential and commercial users ²⁸¹ .	This is sufficiently covered by Part C of the policy and supporting text.
Policy 32 Waterways and waterbodies	General support for the principles of the policy ²⁸² . Better connectivity should be recognised as a strategic benefit of new river crossings ²⁸³ .	Support noted. The principle of this policy aligns with plan objectives to protect and enhance the public realm, urban fabric and the openness of the waterways etc. The benefits of connectivity that will be realised from new crossings must be balanced against these other objectives.
	Port of London Authority's Thames Vision document should be referenced ²⁸⁴	Minor modification to insert this reference made.
	Access to rivers and wharves should be protected and inclusive step-free, walking and cycling access should be ensured ²⁸⁵ .	The council considers improving walking and cycling connectivity is sufficiently covered across the whole Connections chapter, specifically Policies 25 and 26.

3.6 Environment Policies

Policy	Summary of responses	Council response
Policy 33 Air quality	Expressed support to the air quality approach ²⁸⁶	Support noted.
	Should consider impact of aviation- and ground-generated emission ²⁸⁷	Aviation is largely outside of the remit of the City Plan.
	Ensure policy reflects updated Policy SI1 of New London Plan ²⁸⁸	The examination of the London Plan will be followed
	The approach to parking could impede the objectives of this policy ²⁸⁹	The approach to parking has significantly changed through the City Plan process, informed by consultation. There are several factors that impact on air quality, and the policy is expected to be effective in improving air quality.
	The Air Quality Assessment threshold should be changed to 1,000 sqm or more of new build space ²⁹⁰ , and extend to include 'all areas of poor air quality' ²⁹¹	The AQA requirement for major developments is in line with the London Plan. It will not be appropriate to extend the requirements to include all areas of poor air quality. The plan already goes beyond the London Plan in requiring AQAs for residential development in Air Quality Focus Areas, concerning the areas with poorest air quality.
	More clarity on the standards needed for assessing change in air quality is needed ²⁹²	The Mayor will publish further guidance on Air Quality Neutral and Air Quality Positive approaches. The council will prepare a supplementary planning document to provide further guidance on the application of the environment policies in the City Plan.
	The approach to air quality should be more ambitious ²⁹³ , including by encouraging developers to achieve zero emissions ²⁹⁴	Noted. The approach to air quality is already ambitious and needs to be deliverable.
	Make explicit that achieving Air Quality Positive status is required of all major developments in Air Quality Focus Areas ²⁹⁵	Air Quality Positive status applies to large regeneration areas, in line with the London Plan. However, the policy requires an AQA in Air Quality Focus Areas which aims at improving air quality for the development.

	Clarity needed on Air Quality Focus Area (AQFA) boundaries ²⁹⁶	Air Quality Focus Areas are defined by the major and their designation is monitored. The latest boundaries can therefore be found on the GLA datastore website. This is sufficiently made clear in the supporting text.
	Council should re-consider approach to outdoor seating in areas of poor air quality ²⁹⁷	It will be overly restrictive to prevent outdoor seating in areas of poor air quality in principle.
Policy 34 Local environmental impacts	Expressed support for the approach to managing local environmental effects ²⁹⁸	Support noted.
	Wording changes to ensure amenity of occupiers of new developments is also protected should be made ²⁹⁹	Modifications are proposed to make it clearer that the policy applies to both existing and future occupiers.
	Council should explore lighting technologies ³⁰⁰	Noted. Further guidance on lighting may be provided in a supplementary planning document.
	Should include measures for noise from aviation and ground-based development ^{301 302}	Aviation is largely outside of the remit of the City Plan.
	Council should support review of the London Lorry Control Scheme (LLCS) ³⁰³	Noted. The council is supportive of initiatives that reduce negative local environmental impacts.
Policy 35 Green infrastructure	Expressed support to the green infrastructure approach ³⁰⁴	Support noted.
	Additional references to the Draft London Plan's Urban Greening Factor policy and to sustainable water use needed ³⁰⁵	The council will consider its approach to urban greening following the adoption of the new London Plan and in light of the preparation of the council's green infrastructure strategy.
	Tree planting in new developments requires strategic support elsewhere in the Plan regarding Public Realm ³⁰⁶	Noted. The plan should be read as a whole so duplication will be unnecessary. The public realm policy support high quality soft landscaping, which includes tree planting.
	Provision of space for children's active play should be considered on a site-specific basis ³⁰⁷	Noted. An ambitious policy approach is needed to address the levels of play space deficiency.
	Small loss of space should be acceptable for ancillary uses (such as toilet or café) ³⁰⁸	Noted. This will be supported if it is necessary for the enjoyment of the open space.
	A policy specific to the Royal Parks should be included ³⁰⁹	A policy clause on the Royal Parks is already included. In conjunction with the other policies in the plan, this forms a robust policy approach for the Royal Parks.
	Policy should also address quality of green infrastructure ³¹⁰	The policy is aimed at providing a multifunctional network of green space. It is thereby seeking to

		enhance the functionality, or quality of green infrastructure.
	Trees and open space should not impede access to loading bays/ entrances ³¹¹ .	Noted. Policy 30 considers freight and servicing arrangements and does not need to be duplicated.
	City Plan not linked to protected open spaces in previous Open Space Strategy ³¹² .	An updated audit of open spaces has taken place and informed the policy approach.
	Approach to trees should be refined ³¹³ .	Further guidance is available in the Trees in the Public Realm SPD which will be incorporated and updated into a further SPD to support the application of the environment policies.
	Suggested policy for closing streets for play streets and community events should be included ³¹⁴ .	Noted. Other policies in the plan already address events in the public realm and reconfigurations to streets.
Policy 36 Flood risk	Expressed support for the approach to flood risk management ^{315 316 317 318} .	Support noted.
	Impractical to target greenfield run-off rates ³¹⁹ .	Greenfield run-off rates are already good practice and in line with the London Plan.
	Updates to the Strategic Flood Risk Assessments will be required ³²⁰ .	The council will work with the Environment Agency to make necessary changes to the SFRA.
	Amendments to the criteria for site-specific Flood Risk Assessments are suggested ³²¹ .	The approach to site-specific FRAs is in line with national policy, and therefore does not need further changes.
	Approach to SuDS is too limiting, other drainage measures should also be considered ³²² .	Sustainable Drainage Systems (SuDS) cover a range of drainage measures, both hard and soft. The policy is therefore flexible enough to accommodate a range of measures to provide drainage solutions.
	Policy should be strengthened to not limit the future raising of flood defences.	Modifications are proposed to ensure future raising of flood defences are not limited.
Policy 37 Energy	Expressed support for the approach to Energy ³²³ .	Support noted.
	Policy should be more ambitious ³²⁴ and further align with industry guidance ³²⁵ .	The approach to energy is in line with the new London Plan. The council is preparing a carbon reduction strategy which may set out more ambitious carbon reduction targets.

	<p>Policy should permit an estate-wide approach to carbon reduction³²⁶.</p> <p>Consider development targets' energy demand on infrastructure³²⁷.</p> <p>Details for calculating financial contributions needed³²⁸.</p> <p>Plan should not encourage one-size fits all approach to building retrofits³²⁹.</p> <p>Allowing carbon offset payment for failure to meet emission targets should not be appropriate.</p> <p>Expand policy to clearly promote building retrofitting³³⁰.</p>	<p>The approach to off-site measures and contributions is sufficiently flexible to allow estate-wide compensation where appropriate.</p> <p>The Infrastructure Delivery has considered the impact of development on energy infrastructure.</p> <p>Further guidance on the calculation of financial contributions will be prepared.</p> <p>Building retrofits do not always need planning permission. The supporting text makes clear that the impact on historic buildings must be considered.</p> <p>The presumption will be for the measures to be taken on-site. However, it may not always be practicable to do so. To not prevent sustainable development, carbon offset payments may be considered in such circumstances. Further guidance on carbon offsetting will be prepared.</p> <p>The retrofitting of buildings often does not require planning permission and is therefore not controlled by planning policy.</p>
Policy 38 Waste management	Expressed support to the waste management approach ³³¹ .	Support noted.
	Plan does not conform to London Plan strategic waste planning approach, and the evidence is insufficient ³³² .	Evidence has been published and updated. A topic paper that sets out the approach to managing the London Plan waste apportionment has been prepared.
	Should explicitly commit towards circular economy ³³³ .	The supporting text already acknowledges the transition towards a circular economy.
	More detail and guidance on waste management will be welcomed, seeking to minimise negative effects ³³⁴ .	Noted. Separate guidance is already available for developers.
	Suggested provision that major developments should be required to participate in wider scheme ³³⁵ .	Noted. It is acknowledged that area specific waste management solutions may be required. Further guidance may be prepared.

3.7 Design & Heritage Policies

Policy	Summary of responses	Council response
Policy 39 Design principles	General support for the principles of the policy. ³³⁶	Support noted.
	Policy does not adequately address the need to conserve or enhance the historic environment. ³³⁷	Minor wording modification made to address this. Policy should also be read in conjunction with specific heritage policy requirements.
	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 (AEBC, Water Standards). ³³⁸	Minor modification made to policy to reference water efficiency and align with the London Plan approach.
	Higher BREEAM standards should be required and recognition that BREEAM standards can be met without water efficiency measures. ³³⁹	The BREEAM standards set out in policy are considered appropriate and deliverable. Reference to water efficiency added (see above).
	Requirements for extensions to buildings to trigger a requirement for the whole building to meet BREEAM standards is considered unreasonable and greater flexibility and amendments to the 500sqm threshold are therefore suggested. Sustainable design standards should be more flexible for listed buildings. ³⁴⁰	The BREEAM standards set out in policy are considered appropriate and deliverable.
	Need to balance employment and housing targets and opportunities to diversify the character of areas. Opportunities for change, diversification and intensification should be realised. ³⁴¹	The council considers the policy strikes an appropriate balance. Change, diversification and intensification can be achieved using a design-led approach which adheres to recognised principles of good design, including respecting local context. Minor modification made to supporting text to clarify.
	Provision of an operational management plan should be a material consideration ³⁴² .	The design principles policy seeks to ensure that any negative impacts of proposals on amenity are mitigated through good design. The provision of an operational management plan would be material consideration but this is not a design issue and does not need to be referenced in the policy.
	Clarity is needed for collaborative and participatory design approaches ³⁴³ and suggestion that the council improve engagement and considers use of Design Review Panels which include residents. ³⁴⁴	Noted. The council encourages good practice in ensuring early community engagement on design of schemes. Detail of process for implementation and ways to further promote collaborative and participatory

		approaches to both design and planning more widely are being considered as part of a separate review of our development management processes.
	Policy should balance the need for heritage conservation against ambitions for improved sustainability ³⁴⁵ Double glazing should be considered in conservation areas and listed buildings. ³⁴⁶	The council considers policy strikes an appropriate balance and that heritage conservation/reuse of historic buildings and sustainability are mutually supporting objectives. Supporting text to the Heritage (policy 40) at paragraph 40.3 supports sensitive environmental performance of heritage assets but notes the need for a bespoke approach. Double glazing is considered in conservation areas but within listed buildings acceptability will depend on the significance and character of the particular building. Detailed issues such as this will be set out in supplementary guidance and are not appropriate within the plan itself.
Policy 40 Heritage	General support for the principles of the policy ³⁴⁷ . 'Setting' should feature more prominently in the policy and maximum weight be given to the consideration of Westminster World Heritage Site ³⁴⁸ .	Support noted. Minor modification to World Heritage Site policy criteria, with further reference to setting.
	Policy is too detailed and conservative and may conflict with the wider growth aspirations of the plan. Suggestion proposals should be considered case by case and on their own merits ³⁴⁹ Policy needs to be applied in a balanced way and fully engage with harm and benefit ³⁵⁰ Request for specific policy reference to Heritage and Good Growth ³⁵¹	The council considers the policy strikes an appropriate balance between heritage and growth, having regard to statutory duties placed upon us in relation to heritage assets and taking into account the extent and exceptional significance of heritage assets within Westminster. Policy includes references to harm and benefits both within supporting text and in certain parts of the policy itself. However, it does not seek to duplicate NPPF wording and must also reflect statutory duties in relation to heritage assets – this approach is further justified in the Heritage evidence topic paper. Policy includes reference to Good Growth which seeks to emphasise that heritage contributes significantly to growth and good growth therefore creatively incorporates the conservation of heritage

		assets. All proposals are considered on their own merits.
	Concern that policy offers only an element of general protection to unlisted buildings of merit in conservation areas, which alone will not be sufficient and unlisted buildings of merit should be a recognised part of place shaping ³⁵² On the other hand, suggestion re-development of unlisted buildings should be case by case and suggested need for rewording of part L to identify need to classify and assess the contribution of the building, and then weigh this against the desirability and wider benefits a development may bring forward ³⁵³	Policy has been strengthened from previous versions and is now considered to provide a sufficiently comprehensive and proportionate approach to the protection of unlisted buildings and conservation areas, in line with national policy.
	Policy should be clearer that significance of historic buildings is not limited to front façade, facadism is discouraged and demolition behind retained facades to merge buildings should be resisted. Where there are non-designated heritage assets these should be kept/ restored as much as possible. ³⁵⁴	Minor modification made to supporting text recognise that not only front façade may be of importance. However, demolition to merge buildings behind retained facades may not require permission and policy also seeks to recognise that, in some locations, demolition/remodelling behind retained facades may be appropriate and provide a sensitive approach, which can assist in achievement of growth targets.
	Westminster World Heritage Site - The policy should include a commitment to require an updated management plan and reference cumulative harm, it should clarify that Heritage Impact Assessment is not a heritage statement; the council should consider producing a Westminster World Heritage Site SPD. ³⁵⁵	Minor amendment to include references to the WHS Management Plan, cumulative harm and clarification HIA is not a heritage statement. Minor modification to Design Policy which references forthcoming Heritage as well as Design SPD.
	Support for policy on parks and gardens but this should be strengthened.	Minor modification made to include reference to special interest of parks.
	Aspirations for Parliament Square should be mentioned. ³⁵⁶	World Heritage Site Policy includes general reference to improvements to public realm around the World Heritage Site, and Victoria Opportunity Area policy also sets out ambitions to improve public space and connectivity by strengthening the links with neighbouring sites and visitor attractions. Further reference not considered necessary. More detail on aspirations for Parliament Square specifically will be

		provided in the World Heritage Site Management Plan and Victoria Place Plan.
	Applicants should demonstrate improvements to environmental performance. ³⁵⁷	Requirements for applicants in relation to environmental standards apply to all buildings and are included within the Design Principles policy. This is not a specific matter for the heritage policy but supporting text recognises the need for a bespoke approach in relation to heritage and references sources of further advice.
	Suggested that there should be a presumption in favour of keeping non-designated heritage assets. ³⁵⁸ It was also suggested Clause R is unsound given that non-designated assets have no statutory protection. ³⁵⁹	The policy wording aligns with the NPPF which requires a balanced approach when considering development affecting non-designated heritage assets. Further justification for the approach is included within the heritage evidence paper.
	Concern about relying on a future Heritage SPD to properly apply the policy. ³⁶⁰	The policy has been strengthened from previous versions and is considered sufficiently comprehensive and does not rely on the forthcoming Heritage SPD. The Heritage SPD will, however, expand on matters which are too detailed for the plan.
Policy 41 Townscape and architecture	General support for the principles of the policy, particular support expressed for reference to local views. ³⁶¹	Support noted.
	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 buildings ³⁶² .	Noted. While it is generally most appropriate for new extensions to be subordinate to the host building, this is not explicitly stated as a requirement within policy criteria and each case is considered on its merits. Given our statutory duties in relation to listed buildings, it would be inappropriate if a more flexible approach were applied to listed buildings and the key consideration will be the impact on their special interest (significance) as set out in heritage policy.
	Policy should resist development of garden amenity spaces to the rear of buildings ³⁶³ .	Policy has been amended to clarify and include a reference to 'spaces' adjoining buildings.
	Policy should promote rear extensions in modern materials and support two storey glass infills, this should apply to listed as well as unlisted buildings. ³⁶⁴	This is too specific for policy. While modern or glass extensions are appropriate in some locations, this would need to be assessed on site by site basis. In

		line with national advice and good practice, the policy supports high quality, contextual design but does not specify a particular architectural response. For listed buildings, the key consideration is impact on special interest of the listed building and suggested changes would fail to comply with statutory duties.
	Policy should more positively encourage high quality architecture and alterations and extensions that provide residential and commercial growth ³⁶⁵	Policy already stresses the importance of alterations and extensions to residential and commercial growth.
	Extensive development should be identified, suggested all key development sites are extensive development and the Plan should support the potential for extensive development ³⁶⁶	Policy recognises there are relatively few locations appropriate for 'extensive development' in Westminster but supports the appropriate layout and design of extensive development sites where these do exist. Key development sites are identified but not all of these will constitute extensive development, as defined in supporting text of the policy. Policy notes that any extensive development sites are likely to be subject to planning briefs or similar which would be subject to full consultation and further detail within the plan is not considered necessary or appropriate.
	Support for removal of references to mansard within policy but not clear why residential roof extensions should only be appropriate for one storey but commercial for more storeys. ³⁶⁷	Policy does not restrict roof extensions to one storey but supporting text recognises that in certain areas, particularly residential areas, townscape and amenity considerations mean that more than one storey may be inappropriate. Policy amended to clarify approach and while seeking to support extensions creating new residential floorspace, amended to make clear that criteria do not only apply to residential areas.

	<p>Concern over geographical locations identified for commercial extensions and that policy is too restrictive. 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.³⁶⁸ The policy is not clear where commercial upwards extensions are allowed³⁶⁹</p>	<p>Minor modifications made to clarify approach and make clear appropriate commercial extensions may be permitted in any location in the city. To support commercial growth targets, policy takes a positive approach and identifies certain locations with more mixed and commercial character where townscape means that larger extensions may be appropriate and less restrictive criteria will apply. This does not, however, preclude roof extensions in other areas and commercial extensions may be acceptable anywhere in the city, subject to meeting the relevant criteria.</p>
	<p>Policy on extensions within key commercial areas is constraining, by particularly restricting extensions to unlisted buildings only.³⁷⁰</p>	<p>Policy does not seek to prevent appropriate extensions on listed buildings which will maintain their special interest/significance. Policy has therefore been amended to remove specific reference to unlisted buildings.</p>
	<p>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 land³⁷¹</p>	<p>Policy notes that uniformity is characteristic of certain areas in Westminster and seeks to protect this only in locations where this contributes to character/ heritage assets. One or more storeys does not set a limit and seeks to recognise that we will consider more than one storey.</p>
Policy 42 Building height	<p>Expressed support for the principles of the building height approach³⁷²</p>	<p>Support noted.</p>
	<p>Further guidance on the prevailing building heights and general approach will be appreciated³⁷³</p>	<p>Further guidance in a supplementary planning document may be prepared.</p>
	<p>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.³⁷⁴</p>	<p>The 30m reference in the policy has been misinterpreted as a limit. Proposed modifications to the definition of a tall building make the approach to building height clearer.</p>
	<p>Questions the setting of prevailing height at 6 residential storeys in Victoria Opportunity Area³⁷⁵ and the approach to Paddington Opportunity Area.³⁷⁶</p>	<p>The Building Height Study uses an established methodology to identify the prevailing context heights of Paddington and Victoria Opportunity Areas, and is therefore robust.</p>

	<p>Building heights should be considered according to metres and volume rather than storeys.³⁷⁷</p> <p>Concerned about potential harm to the historic environment, the evidence base and urban design approach to tall buildings.³⁷⁸</p>	The policy sets out heights in both storeys as metres.
	<p>Approach to tall buildings is contrary to City Plan and sustainable growth and constrain development³⁷⁹.</p>	The evidence has considered the impact on the historic environment. Design principles in the policy give further consideration to the historic environment, addressing concerns. The policy sets out a positive strategy for tall buildings to facilitate placemaking and deliver growth. This is based on an established method, which has been tested at examinations.
	<p>Review wording to create more flexibility for taller buildings across the borough³⁸⁰.</p>	Disagree that the approach to tall buildings is restrictive. The policy sets out a positive strategy for tall buildings to facilitate placemaking and deliver growth.
	<p>Requested Edgware Road Junction / Marylebone Flyover Opportunity Area is expanded³⁸¹.</p>	Minor modifications are proposed to clarify the approach to tall buildings outside of the specific locations identified in the policy.
	<p>Unclear how tall buildings will help frame Victoria Station and Victoria Street³⁸².</p>	The area aligns with the recommendations of the Building Height Study. Tall buildings outside of this area may not be appropriate.
	<p>Criteria-based policy more appropriate and expected need for helipad³⁸³.</p>	The design principles align with the recommendations of the building height study.
	<p>Does not reference Royal Oak as suitable for tall building³⁸⁴.</p>	The policy stills contains a criteria-based elements, but it is appropriate to set out a positive strategy for tall buildings to facilitate placemaking and deliver growth.
	<p>References to maximum heights at and around Victoria station should be deleted and sites should be marked as suitable for tall buildings³⁸⁵.</p>	The Building Height Study concludes that the area is not suitable in principle for tall buildings. However, the policy is sufficiently flexible to support tall buildings outside of the areas identified where appropriate.
	<p>POA and VOA should consider accommodating District Landmarks at least³⁸⁶.</p>	The policy aligns with the findings of the Building Height Study. The policy is sufficiently flexible.
		<p>Paddington and Victoria Opportunity Areas already have buildings of a district landmark nature. Additional buildings of such scale will not be appropriate.</p>

	<p>Include railway stations, underground stations and bus garages as suitable locations for tall buildings³⁸⁷.</p> <p>Strengthen policy by requiring proposals to clearly demonstrate neighbourly development³⁸⁸.</p>	<p>It is not appropriate to include all suggested locations as suitable for tall buildings.</p> <p>The plan needs to be read as a whole and it is therefore not necessary to repeat policy 7.</p>
Policy 43 Building height in the housing renewal areas	<p>Wording compromises Policy 42 and assigns lower standard of amenity and shading protection for people living in housing renewal areas³⁸⁹.</p> <p>Concerns about the lawfulness of having a different policy approach to height for housing renewal areas compared to other areas.³⁹⁰</p>	<p>The council is justified to set out a different approach or estate regeneration areas given the unique challenges with those developments.</p> <p>The council is justified to set out a different approach or estate regeneration areas given the unique challenges with those developments.</p>
	<p>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 account³⁹¹.</p>	<p>The policy approach aligns with the findings of the Building Height Study, which has considered impacts on surrounding areas.</p>
	<p>General support for the principles of the policy³⁹².</p> <p>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 End³⁹³.</p>	<p>Support noted.</p> <p>Minor modification proposed to require high quality and durable seating.</p> <p>The council considers the policy as drafted balances the different functions and demands on the public realm in a local context and it is not necessary to specify the size of memorials. Guidance on events and signage can be effectively addressed through a Supplementary Planning Document.</p>
Policy 44 Public realm	<p>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 pedestrians³⁹⁴.</p>	<p>De-cluttering is a key principle of the policy. Licensing of tables and chairs on the highway is not within scope of the City Plan. This policy should be read alongside Policies 25 and 29 regarding allocation of highway/footway for public pedestrian use.</p>
	<p>Policy should enhance management of public realm³⁹⁵ including enhanced routes and connections to Parliament Square³⁹⁶.</p>	<p>The policy is considered to provide an effective framework for managing the public realm. Policies in the connections chapter address improve connectivity across the city and further references to Parliament Square not considered necessary. More detail on aspirations will be provided in the World Heritage Site Management Plan and Victoria Place Plan.</p>

	Negative wording around high level adverts should be removed ³⁹⁷ and temporary advertisement permissions should be extended to encourage higher quality installations; temporary signage should be supported where it encourages retail growth ³⁹⁸ .	The policy is considered to be acknowledge the positive contribution advertising can make to the public realm and the policy will be effective in balancing the competing demands on the public realm. The policy doesn't preclude longer-term permissions for adverts.
Policy 45 Security measures in the public realm	General support for the principles of the policy ³⁹⁹	Support noted.
	The policy should refer to the setting of heritage assets alongside historic townscape ⁴⁰⁰ .	It is considered that changes are not needed as the reasoned justification already explains that all applications and measures will need to consider its "visual effects" and "Westminster's historic townscape". Moreover, all policies in the draft City Plan should also be considered when proposing any new measures.
	The policy should refer to archaeology ⁴⁰¹ .	It is considered that changes are not needed as the reasoned justification already explains that all applications and measures will need to consider "Westminster's historic townscape". Moreover, all policies in the draft City Plan should also be considered when proposing any new measures.
	The council should go further in developing a hostile vehicle mitigation strategy for the Central Activities Zone ⁴⁰² .	Suggestions are welcomed. However, it falls out of the remit of the City Plan.
Policy 46 Basement development	Clarification is needed on whether (parts of the) policy applies to commercial developments ⁴⁰³ .	The principles of the policy also apply to commercial developments.
	All sleeping accommodation must be at or above modelled tidal breach flood level. ⁴⁰⁴	Modifications to policy 46 Flood Risk are proposed to reference the EA guidance.
	Supports policy approach to basement development ⁴⁰⁵ .	Support noted.
	Clarification is requested on if the policy applies to Class D1 medical buildings in SPAs.	The principles of the policy also apply to commercial and other types of development.
	Request a more comprehensive basement policy similar to Kensington and Chelsea restricting basements under listed buildings ⁴⁰⁶ .	The policy already limits the number of floors of basements and considers impacts on listed buildings.

	<p>Policy should give additional flexibility, request insertion to original wording of exception to 1.8m encroachment limit if possible to demonstrate no impact on services⁴⁰⁷.</p> <p>Detailed policy more appropriate for SPD⁴⁰⁸.</p>	<p>It is not necessary to build in additional flexibility in the policy.</p> <p>Given the pressures for basement development in Westminster, this policy provides the right level of detail to manage such development.</p>
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3.8 Implementation & Monitoring

KPI / Section	Summary of responses	Council response
KPI 2	The timescale for affordable housing review is too long ⁴⁰⁹	Comment noted, the council agree that the trigger for review should be reconsidered. This will be amended in minor modifications.
KPI 5 & KPI 7	The proposed trigger for review of no net reduction in office or hotel floorspace is unsound. Within the CAZ and the Opportunity Areas the trigger should mirror that for the delivery of new homes namely 10% below an annualised floorspace target for three consecutive years. ⁴¹⁰	The plan does not have an annualised floorspace target for office or hotel development therefore it is not possible to assess a 10% drop against a target.
	KPIs for commercial floorspace have no timeframe set ²⁸⁵ .	Minor modification to assess a trend in office floorspace reduction which will be reviewed annually through the council's Authority Monitoring Report.
	Question whether net reduction in floorspace is best review mechanism for office floorspace ⁴¹¹ .	Minor modification to assess a trend in office floorspace reduction.
KPI 15	Need KPI to track noise levels against a threshold rather than just the number of complaints received ⁴¹²	It would be unreasonable to expect the council to proactively monitor noise across the city in this way and there aren't the resources to do this. Complaints are a good measure of where noise levels have become a problem. We will also soon be publishing the noise standards technical paper.
KPI 33	Suggested rewording of KPI33 in relation to NOx, CO2 and particulate matter ⁴¹³	This KPI is being amended in minor modifications.
Land use swaps	Welcome the recognition of land use swaps within Savile Row SPA and recommend that it should also apply to Mayfair SPA ⁴¹⁴	The paragraph on Land Use Swaps will be amended in minor modifications.
SPDs / DPD	Welcome early engagement from WCC about content of DPD document in relation to Hyde Park Barracks ⁴¹⁵	Support noted.
Neighbourhood planning	Support for neighbourhood planning guidance ⁴¹⁶	Support noted.
General comments	The plan needs additional environmental KPIs ⁴¹⁷	Comment noted. The council consider that the current KPIs are sufficient.
	It is not clear that all technical notes, planning obligations and SPDS are published yet ⁴¹⁸	Supplementary Planning Documents are due to follow the Plan. An exact timescale is to be confirmed.

	<p>Concern whether the viability section recognises the high land values in Westminster⁴¹⁹</p> <p>Suggestion that WCC should have KPIs that link to health outcomes⁴²⁰</p>	<p>The council are happy with the viability section as the policies have been independently tested.</p> <p>Comment noted however the council is satisfied with the existing KPIs.</p>
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3.9 Appendix 1: Key Development Sites

Section	Summary of responses	Council response
Key Development Sites	Housing numbers shouldn't be specified in the plan and are not justified - they do not reflect optimisation of sites (especially for site's 14 & 19); Site 18 should not be listed as low scale residential ⁴²¹ .	Figures listed are indicative not a minimum or maximum. This has been made clearer through a minor modification to the introductory paragraph in Appendix 1.
	HIA is needed for site allocations and concern about how heritage impacts have been considered in modelling of sites (specific concerns about uplift in expected residential numbers on Site 1 (St Mary's Hospital) and Site 26 (Hyde Park Barracks), as well as no specification for Site 25 (Queen Alexander Military Hospital) to retain existing buildings; concerns about development at Victoria and how that will affect the outstanding universal value of the Westminster World Heritage Site ⁴²² .	How heritage has been considered when arriving at indicative figures for the KDS is set out (along with an explanation of the methodology used to estimate housing numbers) in the Housing Topic Paper that accompanies the submission documents. The council does not consider it necessary to produce a Heritage Impact Assessment for each site as the purpose of the KDS is not to fully design-up the schemes in detail, but to give an indication of the expected scale of housing delivery. With regards to the requirement to retain buildings at Site 25, the City Plan attempts to set a middle ground between retention of high-quality buildings and redevelopment potential, hence why retention is supported but not required.
	The specified number of units for Sites 1 & 15 may not give sufficient flexibility for the optimisation of the site ⁴²³ .	Figures listed are indicative not a minimum or maximum. This has been made clearer through a minor modification to the introductory paragraph in Appendix 1.
	Planning brief referenced for sites 3 is out of date and should be afforded low weight ⁴²⁴ .	Minor modification proposed to change emphasis on the planning brief.
	Site 3 should be considered suitable for tall buildings ⁴²⁵ .	Minor modification proposed in the 'Notes' for this site to better explain how the council expects development on this site to respond to its local context.
	Suggestions for acceptable uses identified for sites: Site 26 (Hyde Park Barracks) should include retention of some military	Noted – expected mix of land uses have been updated for sites 26 and 20 through minor modifications. The expected land use mixes for site

	<p>uses⁴²⁶, Site 13 should have more flexibility for the mix of uses and Site 20 should allow for mixed use over the station⁴²⁷.</p> <p>Site 13 (Royal Oak) should be included in the Paddington Opportunity Area⁴²⁸.</p> <p>Site 14 (Westbourne Bus Garage) – an improved bus facility must be required⁴²⁹.</p> <p>Rail tracks between Ecclestone and Ebury Bridges should be listed as a key development site.⁴³⁰</p>	<p>13 are already broad and varied – offering sufficient flexibility for the site</p> <p>The council does not consider it appropriate to extend the Paddington Opportunity Area boundary given the implications for building height of doing so and the sensitivities with adjacent conservation areas and townscape (as identified in Westminster's Building Height Study) of a building of the height likely necessary to make development viable.</p> <p>This will be addressed through the forthcoming Site Allocations DPD</p> <p>The site was not identified as having potential to contribute to the strategic objectives of the Plan or to deliver more than 50 residential units</p>
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3.10 Appendix 3: Schedule of Strategic Policies

Section	Summary of responses	Council response
Strategic / Non-strategic assessment	No justification for how strategic policies have been identified ⁴³¹ .	National guidance was followed to assess whether policies were strategic in nature.
	Strategic nature of the plan makes it difficult to assess its effectiveness ⁴³² .	The policies will be assessed against the KPIs identified in the Monitoring chapter of the plan and on an annual basis through the Authority's Monitoring Report.

3.11 General comments on the City Plan

Section	Summary of responses	Council response
Overarching comments	<p>Sections/Policies considered missing from the Plan:</p> <ul style="list-style-type: none"> i. reference to collaboration with Camden to improve Charlotte Street⁴³³ ii. tackling homelessness⁴³⁴ iii. dedicated Royal Parks policy⁴³⁵ iv. strategic housing allocation for Knightsbridge Neighbourhood Area⁴³⁶ v. policy on misuse of telephone boxes⁴³⁷ vi. Assets of Community Value⁴³⁸ vii. publication of SPDs alongside the plan⁴³⁹ 	<ul style="list-style-type: none"> i. Collaboration with LB Camden is set out in the Duty to Co-operate Statement. ii. Not a City Plan matter iii. Royal Parks are sufficiently covered by policy 35 Green Infrastructure. iv. Given the small-scale nature of neighbourhood areas in Westminster it is not considered possible to allocate housing targets to any area with any accuracy. v. Not a City Plan matter vi. Not a City Plan matter vii. SPDs to support the policies in the City Plan 2019-40 will follow post-adoption – they cannot be produced in advance of adoption as their content is dependent on knowing final wording of the Plan.

3.12 Comments on meeting the legal duties of producing a Local Plan

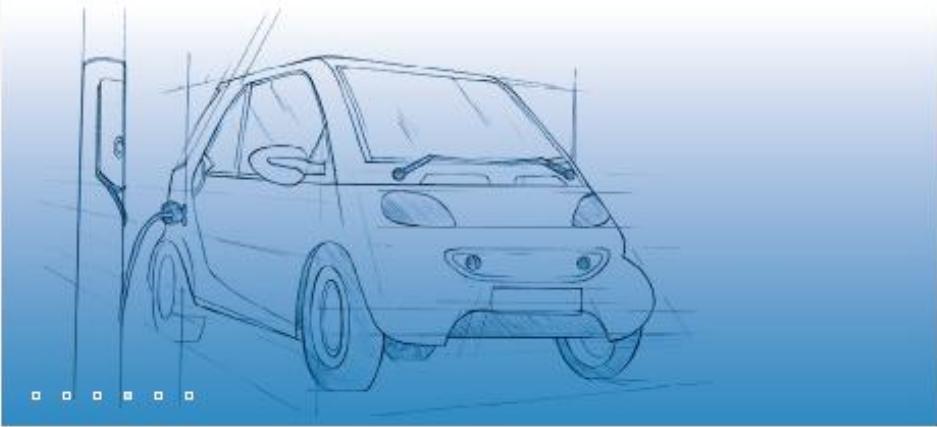
	Summary of responses	Council response
Legal	19 consultees ⁴⁴⁰ responded 'yes' to the question 'Do you consider Westminster's City Plan to be legally compliant?'	Noted.
Not Legal	<p>Three consultees⁴⁴¹ explicitly responded 'no' to the question 'Do you consider Westminster's City Plan to be legal'. Issues raised in relation to the legal duty included:</p> <p>The six week consultation period was too short⁴⁴²</p> <p>Some of the evidence base was not available for the full six week consultation period⁴⁴³.</p>	The Town and Country Planning Regulations require consultation for a minimum of six weeks – the council has therefore complied with Regulations.
	There is an overly simplistic approach to viability assessment ⁴⁴⁴ .	The council does not consider the delay prejudiced consultees from responding in full to the consultation given that those who made the comments still submitted detailed responses to the consultation after the evidence paper had been published indicating those consultees were able to take it into account in their representation.
	The declaration of a national and regional climate emergency after publication of the Regulation 19 plan necessitates a review of the draft policies to enable the plan to effectively address the emergency ⁴⁴⁵ .	The City Plan viability report was carried out by the leading expert in local plan viability assessments and the council is confident in the methodology used and its findings.
		The City Plan is ambitious in terms of mitigating climate change – healthier and greener being a key theme running throughout all policies. The Plan is not premature as it does not preclude innovative and emerging technologies and solutions being utilised to address climate change. In any case, the plan will be subject to a review five years post-adoption.

3.13 Comments on meeting the duty to co-operate in producing a Local Plan

	Summary of responses	Council response
Met the Duty	21 consultees ⁴⁴⁶ responded 'yes' to the question 'Do you consider Westminster's City Plan complies with the Duty to Cooperate?' Comments include: Acknowledgement that the consultation process provided an opportunity for an integrated approach to issues ⁴⁴⁷ . Westminster has engaged constructively and actively with stakeholders ⁴⁴⁸ .	Noted.
	There is proof that the council has considered comments from the community ⁴⁴⁹ .	Noted.
Have not met the Duty	Four consultees ⁴⁵⁰ responded 'no' to the question 'Do you consider Westminster's City Plan complies with the Duty to Cooperate?' Issues raised in relation to the duty to co-operate included: The Plan does not address noise related to waste collection and from businesses ⁴⁵¹ . Lack of co-operation with the Mayor specifically on the proposals for Oxford Street ⁴⁵² .	Comment unrelated to the duty to co-operate.
	The policies in the plan are too draconian ⁴⁵³ .	The council is co-operating with the Mayor on Oxford Street and other strategic issues, as demonstrated through our Duty to Co-operate Statement and Statement of Common Ground.
	The Plan is too hasty in light of the declaration of a climate emergency ⁴⁵⁴ .	Comment unrelated to the duty to co-operate.

Appendix 1 Consultation website (Reg 19 consultation, 2019)

Home > Planning policy



City Plan 2019 – 2040

Westminster is a vibrant city which offers a wealth of opportunities for its residents, its businesses and more than 28.5 million tourists who visit each year.

City Plan 2019 – 2040 is a plan for all these people. It sets out an ambitious strategy to make Westminster one of the best places to live, work and play.

A city that will inspire the world.

Our City Plan is based on 3 key themes, linked to our City for All aims

Homes and communities
A healthier and greener city
Opportunities for growth

Formal consultation now open

The formal consultation, known as the Regulation 19 stage, is now open and we are seeking feedback on the updated version of our new City Plan 2019 - 2040 and the accompanying Integrated Impact Assessment.

- [Full Regulation 19 publication draft City Plan 2019 - 2040 \(PDF, 12MB\)](#)
- [Comment](#)
- [Integrated Impact Assessment \(PDF, 3.2MB\)](#)

To comment email planningpolicy@westminster.gov.uk.

 The formal consultation opened on 19 June 2019, and will close at 5pm on Wednesday 31 July 2019.

Find out more

[View our evidence papers](#)

[Summary - our approach \(PDF, 444KB\)](#)

[Policies map - June 2019 \(PDF, 6.4MB\)](#)

[Statement of representations procedure - June 2019 \(PDF, 495KB\)](#)

['Duty to co-operate' statement - June 2019 \(PDF, 600KB\)](#)

[Habitats regulation assessment - June 2019 \(PDF, 375KB\)](#)

[Consultation statement June 2019 \(PDF, 3MB\)](#)

[Explore the interactive policies map](#)

[Visit the story map](#)



Appendix 2 Planning policy website (Reg 19 consultation, 2019)

Home > Planning policy

Revision to Westminster's City Plan

The council is currently working on a complete review of its City Plan. Consultation on the publication 'draft City Plan 2019 - 2040' under Regulation 19 is now open until 5pm on 31 July 2019.

[Read the draft City Plan and Integrated Impact Assessment, and find further information on the consultation process](#)

[Complete our online form](#) to add your details to our consultation database, and we'll notify you of future updates and consultations.

Once this revision has been made, it will be the 'local plan' for Westminster, and will replace all current policies in the adopted Westminster's City Plan, and saved policies in the Unitary Development Plan. Detailed information about the programme and proposed contents of this revision is set out in Westminster's [Local Development Scheme](#) (published on 18 June 2019 to replace the June 2017 timetable).

Evidence and topic papers

- [Commercial growth evidence topic paper - June 2019 \(PDF, 400KB\)](#)
- [Waste evidence - June 2019 \(PDF, 1.6MB\)](#)
- [Audit of open spaces - 2016 \(PDF, 1.7MB\)](#)
- [City Plan viability report - 2019 \(PDF, 676KB\)](#)
- [Housing needs analysis - June 2019 \(PDF, 533KB\)](#)
- [Housing needs analysis technical appendix - June 2019 \(PDF, 657KB\)](#)
- [Housing Capacity topic paper - June 2019 \(PDF, 526KB\)](#)
- [Heritage evidence topic paper - June 2019 \(PDF, 971KB\)](#)
- [Views background paper - June 2019 \(PDF, 846KB\)](#)
- [Convenience retail evidence topic paper - June 2019 \(PDF, 2MB\)](#)
- [Parking evidence paper - June 2019 \(PDF, 1.4MB\)](#)
- [Building height study \(PDF, 13.3MB\)](#)
- [Building height study, appendices \(PDF, 5.8MB\)](#)
- [Special Policy Areas Topic Paper June 2019 \(PDF, 2.1MB\)](#)
- Town Centre Health Checks Report 2018/19:
 - [Main Report \(PDF, 44MB\)](#)
 - [Appendix 1: Town Centre Health Checks by year of survey \(PDF, 545KB\)](#)
 - [Appendix 2: Individual Town Centre Health Check Reports \(PDF, 50MB\)](#)
 - [Appendix 3: Recommended changes to designation boundaries \(PDF, 4.1MB\)](#)
 - [Appendix 4: Evidence for the reclassification of existing 'Other Shopping Centres within the CAZ' \(PDF, 770KB\)](#)

Additional papers to follow:

Technical noise standards

**Appendix 3 Statement of Representations Procedure (Reg
19 consultation, 2019)**

**CITY
PLAN
2019 – 2040**

**STATEMENT OF
REPRESENTATION
PROCEDURE**

JUNE 2019

Statement of Representation Procedure
Town and Country Planning (Local Planning) (England) Regulations 2012 –
Regulation 19

Title of document

Westminster City Plan: 2019 – 2040
Regulation 19 Publication Draft for Consultation (June 2019).

Supporting documents to the Westminster City Plan include:

- Integrated Impact Assessment (June 2019)
- Policies Map (June 2019)
- Consultation Statement (June 2019)
- Duty to Co-operate Statement (June 2019)
- Habitat's Regulation Assessment (June 2019)

Subject matter and area covered

Westminster City Council has prepared the full revision to its City Plan for submission to the Secretary of State. The City Plan sets out a vision, the spatial strategy, planning framework and development management policies to guide development in Westminster up to 2040. The City Plan will be used to make decisions on future planning applications.

Period of publication for representations

Representations are invited on the City Plan Publication Draft (or its supporting documents) for a period of six weeks from 19th June until 31st July 2019. This statement provides details on how to make representations.

How to view the documents

The Publication Draft of the Westminster City Plan 2019 – 2040 will be available to view and download online at: www.westminster.gov.uk/cityplan2040. During the six-week consultation period it will also be possible to inspect a hard copy of the City Plan, Integrated Impact Assessment and Policies Map at the council's offices at 64 Victoria Street, London, SW1E 6QP and at all public libraries within Westminster. Details of the location and opening hours of the libraries can be viewed at: www.westminster.gov.uk/libraries

Representations

Representations on the plan can be made throughout the representations period. Representations must be made in writing before 5pm on 31st July 2019. Please note that late representations cannot be accepted. It is recommended that representations are made by completing the consultation form which can be viewed at: www.westminster.gov.uk/cityplan2040.

Paper copies are available at all public libraries in Westminster.

Completed representation forms should be emailed to planningpolicy@westminster.gov.uk or posted to:

City Plan Consultation
Policy and Strategy,
Westminster City Council,
64 Victoria Street,
London,
SW1E 6QP

All responses will be made public, although private email and postal addresses and other contact details, and any signatures will be redacted. If you would like your details to be added to our consultation database to be notified of future planning policy and neighbourhood planning consultations please indicate so in your response. We will not use your contact details for other purposes. To read about Westminster City Council's approach to data protection, please go to www.westminster.gov.uk/data-protection

We will submit all representations received to the Inspector appointed to examine Westminster's City Plan 2019 - 2040. The purpose of the public examination referred to above is to consider whether the revisions comply with legal requirements, has regard to national policies, is in general conformity with the London Plan and is sound. 'Soundness' is assessed using the criteria set out in detail in paragraph 35 of the National Planning Policy Framework. Representations at this stage should therefore only be made on the legal and procedural compliance of the Westminster City Plan 2019 - 2040, the soundness of the plan and whether the plan is in conformity with the Duty to Cooperate.

Receiving notification of the progress of the Westminster City Plan 2019 - 2040

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- that the full revision to the City Plan has been submitted to the Secretary of State for independent examination under section 20 of the above Act;
- the publication of the recommendations of any person appointed to carry out an independent examination of the full revision to the City Plan, and
- the adoption of the new City Plan.

For further information please email planningpolicy@westminster.gov.uk.

CITY PLAN 2019 – 2040

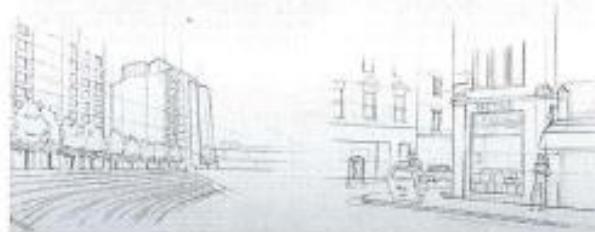


City of Westminster

Appendix 4 Notice email (Reg 19 consultation, 2019)



CITY PLAN 2019 – 2040



Following an initial consultation last year, we are writing to inform you that the formal consultation, known as the Regulation 19 stage, is now open. We are seeking feedback on the updated version of our new City Plan 2019-2040 and the accompanying Integrated Impact Assessment.

We feel that this plan sets out a sound strategic direction for growth in the city over the next 20 years. From transforming our high streets to creating more affordable housing, it addresses every aspect of the built environment, whilst preparing our city for the future.

The publication draft of the Westminster City Plan 2019 – 2040, along with the Integrated Impact Assessment is now available to view and download online at: www.westminster.gov.uk/cityplan2040 where you will also find details on how to respond.

We appreciate the input and time that you have given to help us shape the City Plan. We now look forward to hearing your views on a plan that we believe will deliver on our ambitious strategy to make Westminster one of the best places to live, work and play. Not just in London or the UK, but globally.



A handwritten signature in black ink that reads "Richard Beddoe".

Cllr Richard Beddoe
Cabinet Member for Place Shaping and Planning

The formal consultation closing date is 5pm on Wednesday 31 July 2019.

@CityWestminster

Appendix 5 Second email (Reg 19 consultation, 2019)



There is still time to review and respond to the updated version of our new City Plan 2019-2040 and the accompanying Integrated Impact Assessment.

Thank you to those that have responded. If you have yet to provide us with your feedback, this formal consultation, known as the Regulation 19 stage will close at 5pm on 31 July 2019.

We feel that this plan sets out a sound strategic direction for growth in the city over the next 20 years. From transforming our high streets to creating more affordable housing, it addresses every aspect of the built environment, whilst preparing our city for the future.

The publication draft of the Westminster City Plan 2019 – 2040, along with the Integrated Impact Assessment is now available to view and download online at: www.westminster.gov.uk/cityplan2040 where you will also find details on how to respond.

We appreciate the input and time that you have given to help us shape this plan. We now look forward to hearing your feedback on our plan, that we believe will deliver on our ambitious strategy to make Westminster one of the best places to live, work and play. Not just in London or the UK, but globally.



Cllr Richard Beddoe
Cabinet Member for Place Shaping and Planning

The formal consultation closing date is 5pm on Wednesday 31 July 2019.

@CityWestminster

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planningpolicy@westminster.gov.uk
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You can update your preferences or unsubscribe from this list.

Appendix 6 Articles in newspapers (Reg 19 consultation, 2019)

Business

Westminster council plans skyscraper ban - but property developers say the only way is up

JOANNA BOURKE | Wednesday 3 July 2019 13:22 | [1 comment](#)

Click to follow
The Evening Standard



Westminster City Council wants to restrict skyscrapers in the West End (Oli Scarff/Getty Images)

Westminster is a booming area at the capital's core, but a battle looms ahead between the council and developers as the borough consults over its plans for the next 20 years.

It is home to approximately 55,000 businesses, including the Ritz, Fortnum & Mason and Tate Britain, which produce £53.6 billion in annual output — higher than any other local authority. At more than eight square miles, it is also one of Greater London's largest central boroughs, and its most densely populated. It has 114 people per hectare, almost double the capital's average, and forecasts suggest its population will swell by more than 10% to 276,150 by 2040.

All this calls for a major housebuilding and office expansion programme to protect the area's economic pre-eminence. But this is where council leaders are on a collision course with the property developers who want to deliver the buildings. Westminster City Council's latest City Plan doesn't want skyscrapers, but the industry reckons that the only way is up.

Architects, developers and planning firms are this month examining the council's new blueprint (all 208 pages of it), ahead of a consultation closing on July 31.

Westminster wants to create 1495 homes every year for 10 years, plus 1850 affordable homes by 2023. On top of that, it wants to create the space for 63,000 new jobs. It reckons some 4.8 million sq ft of offices — around five Shard towers — either in new or existing buildings, are needed.

Richard Beddoe, the council's cabinet member for planning, says: "Our plan is unapologetically ambitious."

But under its proposals, the council wants to rule out high-rises — with Paddington and Victoria the possible

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PROMOTED STORIES



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But under its proposals, the council wants to rule out high-rises – with Paddington and Victoria the possible exceptions as their skyline is already taller. It reckons there are plenty of other ways to create new space. The plan suggests adding one or two storeys to existing buildings, refurbishing outdated properties and bringing forward land for new developments. Property firms can also submit new ideas for building.

Beddoe believes it is “realistic” that Westminster can be “one of the best places to live, work and visit. Not just in London or the UK, but globally”. But Andrew Southern, chairman of London developer Southern Grove, thinks the borough’s ambitions may be difficult to meet.

He says: “Tall modern buildings – when designed to a high standard – can enhance London’s skyline while providing a high density of homes.” Southern warns that height restrictions could keep some builders away.

And Pete Ladham, managing director of Assael Architecture, says being anti-skyscrapers sends the wrong message. He adds: “The Government has set ambitious targets, but given the lack of developable land in urban areas, intensification of land use is really one of the only options available to ramp up the number of homes being built, alongside new and innovative forms of housing. Tall buildings are an inevitability in this respect.”

Meanwhile, affordable housing targets may not be easy to meet, says Antony Stark, director at builder Linea Homes. He points out that high land values in Westminster mean the economics of introducing affordable housing on some sites can be unfeasible. Stark says: “This in turn could be detrimental to delivering the private homes target as developers will be reluctant to purchase sites if they are going to get refused [planning permission] for not providing enough affordable housing.”

Westminster’s plans for offices have been given a similarly lukewarm reception. Property agent BNP Paribas Real Estate’s planning director David Phillips says there is scope to create workspace within upcoming redevelopments in the council’s “opportunity areas” such as Victoria and near Tottenham Court Road. Despite that, Phillips says: “I suspect the emerging plan is overly ambitious given the scarcity of land.”

Phillips thinks the plan may be good for protecting the historic character of the West End, but ponders: “Is it going to be progressive enough to deliver the quantum of development being sought?”

The council may need to think higher – literally – to convince sceptical developers that its growth targets can be achieved.

OTHER PARTS OF THE WESTMINSTER WISH-LIST

Savile Row: The council wants to keep Savile Row in Mayfair as the heart of menswear. The City Plan says planners will “resist” losing dedicated tailoring floorspace. It also wants to restrict the size of shops to 3229 sq ft, to keep the character of the area and make sure no stores look too big.

Sean Dixon, managing director of Savile Row tailor Richard James, welcomes the efforts. But he says more help is needed to keep businesses thriving. “Every five years rent increases by close to 100%; the prices for tailoring do not.”



[READ MORE](#)

Westminster council looks to stop big stores swamping Soho



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Mipim 2019: Brexit uncertainty puts deals in the shade

Soho: From next year new planning rules will restrict the size of shops in Soho to protect independent businesses and encourage smaller-scale, boutique hotels.

It is hoped that the move will make room for more non-chain retailers and start-ups to open.

Philip Thompson, director at landlord Soho Estates, calls the plans "well balanced".

■

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ANNA WHITE | Tuesday 18 June 2019 15:38 BST | 0 comments


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First look at Westminster's urban plan


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Westminster has poor social housing and high crime rates. Many of its streets need a complete makeover while once-quirky Soho has become corporate and sanitised.

But now the local council is pledging to change all this with a new urban plan, published today and previewed exclusively by *Homes & Property*.

Proposed reforms include a curb on new skyscrapers and a ban on mega-basement super-mansions so beloved of often-absent foreign investors. The aim is to return Westminster to middle-income families and small businesses.

Westminster City Council pledges to build 1,495 new homes per year for the next decade; prioritise housing for the "squeezed middle" and reject planning applications to combine properties that create huge single homes which are then rarely used.

The "City for All" blueprint, which will take effect from January next year, proposes to turn away big chain retailers and hotels from Soho, preserving it for small and creative businesses.

Building for families

The West End heart of Westminster is beset with problems. There are 114 people per hectare in the borough – double the London average.

Average Westminster salaries of £52,199 fall way short of what is needed to fund a mortgage for the average house there, which is currently priced £1,054,400.

"We have some of the most affluent residential areas in the country but also some of the most deprived," says Richard Beddoe, council cabinet member for place shaping and planning.

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-  Couple take on 'modernist rockstar' lighthouse in latest Grand Designs
-  One of the most notorious Primrose Hill Set party pads is up for sale

1. Stamp Duty

2. Free floori

3. Part Exchange yo

4. Or move with just 5%

"Housing shortages have been exacerbated by the increasing disconnect between what people earn and the cost of property."

Nimbyism and dysfunctional planning hinder Mayor's grand housing plan

The borough caters for the both the rich and the lowest earners: 25 per cent of all homes are social housing.

But this leaves middle-income households earning £30,000 to £90,000 a year finding they have nowhere to live. Beddoe promises to build 4,000 new homes for this group.

But Westminster must not forget its vulnerable residents, one property analyst warns: "Central London boroughs are very transitory. Couples soon realise they cannot afford to bring up a family in an area that cannot even cope with its social housing, let alone its provision for senior living."

No more mega mansions

The Conservative council plans to block planning permission for more "private palaces" with a 200sq m limit on new homes.

"The size limits will ensure we make the best use of space," says Beddoe. "And we know we have to provide homes for nurses, teachers, police and other workers."

He adds: "No more Russian oligarchs buying up Nash-designed terrace townhouses overlooking Regent's Park."

Bringing the creative heart back to Soho

Westminster makes more money than any other London borough, generating £53.6 billion a year, or 3.2 per cent of the country's gross national product.

Soho is an important part of the borough's tourism, retail and creative economy. However, a quarter of small shops have shut down in the area since 2007. Pubs, clubs and live music venues continue to close.



Richard Beddoe: Westminster council cabinet member for place shaping and planning
(Westminster Council/ Leo Cincicolo)

From next January, new planning rules will restrict the size of shops in Soho to protect independent businesses while hotels must have fewer than 40 rooms.

The council has also pledged to create 10,000 new jobs in fashion, art, media and film through apprenticeship programmes.

"Soho has become sanitised by too many large chains and businesses," says Beddoe. "We will now refuse permission for large commercial developments."

Making streets safe

Westminster has the highest crime rate of any borough according to comparison website finder.com.

With the 2017 Westminster Bridge terror attack in mind, the City plan puts pressure on developers to design security measures into their schemes and seek Metropolitan Police advice at the planning phase.

Petty crime and antisocial behaviour are rife on the North Bank but not addressed in the plan.

To attract families and young professionals, the council must create safe streets as well as build homes at the right price.

Reining in high rises

Planners will cap the height of towers in line with existing structures and not overshadow the 11,000 listed buildings, 56 conservation areas and 85 traditional London squares.

There will be clusters of tall buildings in [Victoria](#) and [Paddington](#) – the commercial hubs of Westminster – with West End Gate, a 30-storey residential tower, approved for Edgware Road and a school and Dudley House, a 22-floor apartment block, approved in Paddington.

Elsewhere the borough will remain “low rise”. The plan sets out heights that are appropriate across different pockets without harming the townscape and views.

READ MORE

- [Collapse in London's property market shows tentative signs of slowdown](#)

- [Londoners willing to pay £43k premium for homes close to Tube stations](#)

- [The best spots to live along the Thames and London's hidden waterways](#)

New homes bringing down house prices

The city plan stretches from 2020 to 2040. At the moment it is hard to find homes in the heart of Westminster for less than £800,000.

The conversion of the red-brick Grade II-listed [Westminster Fire Station](#) is under way with 17 flats and a new 5,000sq ft restaurant, Mathura, from Michelin-star chef Atul Kochhar, on the ground floor.

The scheme launches next year with homes priced from £850,000. Call CBRE on 020 7420 3050.



From £850,000: flats in Westminster Fire Station

[Ebury Place](#), by Taylor Wimpey in Victoria, has 47 one-, two- and three-bedroom luxury flats. The boutique scheme has 24-hour concierge and views of the Houses of Parliament.

Two-bedroom flats are priced from £1.27 million. Visit [eburyplace.com](#) or call 020 8003 6719.

New development [Noma](#) is in Kilburn High Street, the last real pocket of regeneration in the City of Westminster.

The apartments, with one to four bedrooms, are set in landscaped grounds with green walls and roofs, solar panels and low carbon emissions. It fits with Westminster City Council's pledge to remove air pollution.

There's a residents' gym and the cheapest flat available is a two-bedroom, two-bathroom home priced at £756,000. Visit [live@noma-westminster.com](#) or call JLL on 020 7205 2496.

Also in Kilburn High Street, in a gated mews, are 45 new one-, two and three-bedroom apartments at [Park Place](#).

Appendix 7 Letters received in relation to the “Petition to: not extend the Victoria Opportunity Area beyond the boundary adopted in the London Plan”

**THE QUEEN ANNE'S GATE RESIDENTS' ASSOCIATION
16 DARTMOUTH STREET
LONDON SW1H 9BL**

17 October 2019

Members of the Cabinet
Westminster City Council
64 Victoria Street
London SW1E 6QP

Dear Councillors

CABINET MEETING ON 21 OCTOBER 2019: AGENDA ITEM 4 PETITION TO NOT EXTEND THE VICTORIA OPPORTUNITY AREA BOUNDARY

I am writing on behalf of The Queen Anne's Gate Residents' Association to express the Association's concerns with the Report supporting the above agenda item. The Association comprises residents and businesses in Queen Anne's Gate, Old Queen Street, Dartmouth Street, Lewisham Street and Carteret Street in St James's Ward.

The Cabinet Report was discussed at a general meeting of the Association last night. It was noted that many members of the Association had signed the petition.

The consensus of the meeting was that the Association:

- 1) Supports the recommendation in paragraph 4.11 of the Report to remove the three changes set out in the draft City Plan 2019-2040.
- 2) Is disappointed that the Report does not address the main point of the petition, ie that the VOA boundary in the draft City Plan should not extend beyond the boundary adopted in the London Plan.
- 3) Asserts that the area beyond the boundary adopted in the London Plan does not meet the definitions of (a) an Opportunity Area (as set out in paragraph 4.5 of the Report) and (b) the Victoria Opportunity Area (as set out in paragraph 4.6).

Members of WCC Cabinet

17 October 2019

Page 2

- 4) Asserts that, in general, the buildings outside the boundary adopted in the London Plan are (a) not considerably smaller than their context and would not benefit from upwards extensions, (b) not outdated to the point that they cannot be redeveloped by refitting rather than demolition and rebuilding, and (c) do not limit the opportunities to improve the public realm and local environmental quality, legibility and enhanced social and community facilities.
- 5) Does not object in principle to the Council's objectives of growth and intensification, but believes that these objectives can be achieved in ways that are more sustainable and less damaging to the environment and to the amenity of the City's residents.
- 6) Urges the Cabinet therefore to align the VOA boundary in the draft city Plan with that adopted in the London Plan.

Yours sincerely

Graeme Cottam

Chair, The Queen Anne's Gate Residents' Association

cc: Councillor Louise Hyams, St James's Ward

Councillor Mark Shearer, St James's Ward

CATHEDRAL AREA RESIDENTS GROUP
43 Ashley Gardens
London SW1P 1QF

Cabinet Members
Westminster City Council
Westminster City Hall
London SW1E 6QP

please respond to peter@harley1.net

18 October 2019

Dear Cabinet Members

Cabinet Meeting: 21 October 2019: Item 4

Report: Petition not to extend the Victoria Opportunity Area boundary

I am writing on behalf of the Cathedral Residents Area Group which is the designated Amenity Society focussing on the Westminster Cathedral conservation area. References are to the Cabinet Report for Item 4.

We welcome the conclusion in section 4.11 of the report that "there is not a compelling case to justify the proposed changes to the VOA boundary". The changes which had been proposed are detailed in section 4.8 and shown in Appendix D as follows:

- 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;
- 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;
- 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.

However, the petition required that the boundary of the VOA should be revised to that which is consistent with the definition in the London Plan. That definition is quoted in section 4.6 of the report as "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".

CATHEDRAL AREA RESIDENTS GROUP
43 Ashley Gardens
London SW1P 1QF

Cabinet Members
Westminster City Council
Westminster City Hall
London SW1E 6QP

please respond to peter@harley1.net

20 October 2019

Dear Cabinet Members

Cabinet Meeting: 21 October 2019: Item 5

Report: Westminster City Plan - Regulation 19 consultation and next steps

I am writing on behalf of the Cathedral Area Residents Group which is the designated Amenity Society focussing on the Westminster Cathedral conservation area. References are to the Cabinet Report for Item 5 unless otherwise stated. In the light of our letter of 18 October CARG requests that some statements in that report be corrected.

Responses to the Regulation 19 consultation

These are not correctly presented in Section 4.5. CARG with other amenity societies and resident associations did not receive adequate justification for the proposed boundaries of the Victoria Opportunity Area in spite of several approaches to the City Plan Team. So the petition considered by Cabinet under Item 4 was launched on the WCC website and we were assured that signatures would be taken as responses to the Regulation 19 consultation. By closure of the petition it had received 534 signatures. Those signatories should be added to the 23 individual respondents recorded in the table shown in Section 4.5.

Soundness of the draft City Plan

In view of the petition Vincent Square Ward Councillors made representations which resulted in the City Plan Team ceding three proposed sites from the VOA as described in the Report for Item 4. CARG and others emphasised to the Cabinet Member for Place Shaping and Planning and to the City Plan Team that these changes are welcome but that they do not fully respond to the petition. We were told that no further changes to the VOA were envisaged.

Accordingly our letter of 18 October details the further sites (described in sub-paragraphs A, B and C of that letter) which the petition required to be omitted from the VOA in the City Plan 2040. **The second sentence of Section 4.6 should read "598 consultees raised issues which they considered to be related to the soundness of the Plan. Most of these issues are considered by the council not to**

give rise to concerns about the 'soundness' of the revision. However, at least 540 consultees (all local to the Victoria area and including three amenity societies, several residents associations and 534 individuals) considered that the extent of the Victoria Opportunity Area should be significantly reduced at several sites."

Also **Section 4.8** should read "The majority of comments on the Plan related to soundness, mostly requiring reductions in the extent of the Victoria Opportunity Area. The council has conceded only about 25% of the site area which the petition required to be removed from the VOA. Some other comments pointed out where we can improve the clarity, understanding and application of our policies. The latter will be addressed through a series of minor modifications to the plan. A schedule of the policies where modifications will be made is set out in Appendix 2."

In Appendix 1, for consistency, the text of the **third bullet point of Policy 4: Victoria Opportunity Area should be replaced by:** "Several sites should be removed from the proposed Victoria Opportunity Area (VOA)".

This letter is copied to the councillors for the three wards which extend into the VOA. In addition to members and associates of CARG, it is also copied to representatives of The Thorney Island Society, The Belgravia Society, the Queen Anne's Gate Residents Association, the Buckingham Gate Association and many local individuals, all of whom share and support the views set out above.

Sincerely

Peter Roberts
Chair, Cathedral Area Residents Association
please respond to peter@harley1.net

cc: Cllrs David Harvey, Danny Chalkley, Selina Short
Cllrs Tim Mitchell, Louise Hyams, Mark Shearer
Cllrs Nickie Aiken, Jacqui Wilkinson, Christabel Flight
CARG members and associates
The Thorney Island Society
The Belgravia Society
Queen Anne's Gate Resident Association
Buckingham Gate Association

Cabinet Members

Westminster City Council

Cabinet Meeting: 21 October 2019 -- **Item 4: Petition not to extend the Victoria Opportunity Area Boundary**

20th October 2019

Dear Cabinet Members,

Protect Our Pimlico has been following developments relating to the proposed extension of the VOA in the consultation for Westminster's City Plan 2040 and the petition begun by residents requesting that the VOA remain within the boundaries outlined in the London Plan which was stated to be "the station, the airspace above its tracks and approaches and nearby sites". These areas were deemed to have potential for intensive development.

We welcome your report's, 4.11, conclusion that "There is not a compelling case to justify the proposed changes to the VOA boundary at the locations identified in Section 4.8 but believe that **this alone does not meet the requests of the residents who signed the petition against the VOA expansion.**

The petition signatories intended that "the station, the airspace above its tracks and approaches and nearby sites" was to determine the VOA boundary. Thus, we would wish to see 1) all areas north of Victoria Street between Palace Street and Storey Gate; 2) all areas south of Victoria Street between Vauxhall Bridge Road and Strutton Ground 3) areas west of Buckingham Palace Road between Belgravia Police Station and Grosvenor Gardens removed from the proposed City Plan 2040 as well as the other areas already recognised as worthy of removal in the report.

Residents do not wish to see either their residential areas or the heritage sites within Westminster's responsibility compromised by the intensive development that these proposed VOA boundaries would encourage. The encroachment of the VOA into any of these areas would seriously compromise the character and amenity of nearby residential neighbourhoods, conservation areas and irreplaceable London, World Heritage sites within Westminster's auspices to protect with its planning policies.

We urge the Cabinet to remove these additional areas from the VOA as it will be designated in the City Plan 2040 and to maintain a VOA which is tightly focused as was, we believe, its original intention around Victoria Station.

With regards,
Martha Gott-Sankey
Protect Our Pimlico

CATHEDRAL AREA RESIDENTS GROUP
43 Ashley Gardens
London SW1P 1QF

Cllr Richard Beddoe
Westminster City Council
Westminster City Hall
London SW1E 6QP

please respond to peter@harley1.net

22 October 2019

Cllr Richard Beddoe

**Cabinet Meeting: 21 October 2019: Item 4
Report: Petition on the Victoria Opportunity Area**

The handful of Victoria residents who observed the Cabinet meeting on 21 October were disappointed on two main counts with the very circumspect wording of the statement which you delivered.

- First, your statement gave the impression that Victoria Opportunity Area has been revised in the City Plan 2040 to comply fully with the requirements of the petition. The Cabinet seemed content to accept that impression. In fact, as has been clear from our earlier exchanges, the three sites which had been removed from the proposed VOA accounted for only a small proportion of the sites which residents had petitioned to be excluded.
- Second, since you did not address any of the sites which residents have argued should be removed from the VOA, after months of 'consultation' we still have not been given any justification for those areas being retained in the VOA.

It cannot be in the interest of the transparency and accountability which are essential for good governance that processes of public consultation and Cabinet oversight are undermined by omissions and evasions as has been the case for the VOA in the proposed City Plan. We were not permitted to contribute or comment on this during the Cabinet meeting.

On behalf of the Cathedral Area Residents Group and the other amenity societies and resident associations to whom this letter is copied I again request that we be given justification for the City Plan Team refusing to remove the following sites from the Victoria Opportunity Area as was required by the petition.

- A. all sites north of Victoria Street between Palace Street and Storey's Gate;

- B. all sites south of Victoria Street between Vauxhall Bridge Road and Strutton Ground;
- C. sites west of Buckingham Palace Road between Belgravia Police Station and Grosvenor Gardens.

This letter is copied to the councillors for the three wards which extend into the VOA. In addition it is copied to members and associates of CARG, as well as to representatives of The Thorney Island Society, The Belgravia Society, The Queen Anne's Gate Residents Association, the Buckingham Gate Association and local individuals, all of whom share and support concerns over the extent of the Victoria Opportunity Area in City Plan 2040.

Sincerely

Peter Roberts
Chair, Cathedral Area Residents Association
please respond to peter@harley1.net

cc: Leader of the Council
Members of Westminster City Council Cabinet
Cllrs David Harvey, Danny Chalkley, Selina Short
Cllrs Tim Mitchell, Louise Hyams, Mark Shearer
Cllrs Nickie Aiken, Jacqui Wilkinson, Christabel Flight
CARG members and associates
The Thorney Island Society
The Belgravia Society
The Queen Anne's Gate Residents Association
Buckingham Gate Association

Appendix 8 Consultation form (Reg 19 consultation, 2019)

CITY PLAN 2019 – 2040

PROPOSED SUBMISSION REPRESENTATION FORM



City of Westminster

1. WELCOME

Westminster is a vibrant city which offers a wealth of opportunities for its residents, its businesses and more than 28.5 million tourists who visit each year. City Plan 2019–2040 is a plan for all these people. It sets out an ambitious strategy to make Westminster one of the best places to live, work and play.

This is your chance to have a say on whether the City Plan's policies are legally compliant, sound and whether the plan has been prepared in accordance with the Duty to Cooperate.

This online form allows you to save a draft response and revisit it to complete it another time. Please note, however, your response will not reach us until you hit SUBMIT at the end of the form. You will receive an email confirming your response has been successfully submitted along with a copy of your representation. If you do not receive a response within 24 hours of submitting it, please email planningpolicy@westminster.gov.uk

For more information on the consultation process please visit:
westminster.gov.uk/revision-westminsters-city-plan

This consultation will close on Wednesday 31 July 2019.

Thank you for taking part.



2. PERSONAL AND CONTACT DETAILS

2a. Full name*

2b. Email address*

2c. Address*

2d. Organisation (if applicable)*

3. ABOUT YOU

3a. Are you completing this questionnaire as a/on behalf of a...? Please tick as many as apply*

- | | |
|---|--|
| <input type="checkbox"/> Developers, landowners and real estate companies | <input type="checkbox"/> Consultancy firms and professional networks |
| <input type="checkbox"/> Individual | <input type="checkbox"/> BIDs |
| <input type="checkbox"/> Business and trade associations | <input type="checkbox"/> Other public sector institutions and bodies |
| <input type="checkbox"/> Neighbourhood forums and amenity societies | <input type="checkbox"/> Healthcare institutions and providers |
| <input type="checkbox"/> Statutory consultees | <input type="checkbox"/> Cultural and education institutions |
| <input type="checkbox"/> Charities, campaigns groups and other clubs/associates | <input type="checkbox"/> Neighbouring boroughs |
| | <input type="checkbox"/> Members and political parties |

3b. If you are a consultant completing this form on behalf of someone else,
please state the name of the organisation or individual you are representing.

4. DUTY TO COOPERATE

Under the Localism Act 2011, local planning authorities have a legal Duty to Cooperate with other local planning authorities and organisations to seek to address strategic planning matters likely to have an impact beyond their immediate Local Plan area. The Duty to Cooperate is the mechanism for ensuring the right issues are addressed, in the right way, and with the right partners to maximise the effectiveness of policy and plan-making.

More information on the duty can be found here at legislation.gov.uk/ukpga/2011/20/section/110/enacted.

4a. Do you think that Westminster City Council's City Plan complies with the Duty to Co-operate?*

- Yes
- Don't know
- No

4b. Please provide details on why you consider Westminster City Council's City Plan does NOT comply with the Duty to Cooperate.

4c. Please provide details on why you consider Westminster's City Plan complies with the Duty to Cooperate.

5. LEGAL AND PROCEDURAL REQUIREMENTS

A plan is considered legal when it complies with the legal requirements under section 20(5) (a) of the Planning and Compulsory Purchase Act 2004 at legislation.gov.uk/ukpga/2004/5/pdfs/ukpga_20040005_en.pdf

5a. Do you consider Westminster City Council's City Plan to be legally compliant?*

- Yes
- Don't know
- No

5b. Please clearly state which sections or policies of the plan you consider NOT legally compliant.
Please refer to policy and paragraph numbers in your response.

5c. Please provide evidence of why you consider these sections of the plan or policies are NOT legally compliant.

5d. Please set out what modification(s) you consider necessary to make the selected sections or policies of Westminster City Council's City Plan legally compliant.



Please attach any necessary evidence to support the above proposed modification(s).

5e. Please provide details on why you consider Westminster's City Plan legally compliant.



6. SOUNDNESS

Local plans are required to meet the tests of soundness as set out in the National Planning Policy Framework. (tinyurl.com/y6amohoq) This means they should be positively prepared, justified, effective and consistent with national policy.

6a. Do you consider Westminster City Council's City Plan to be sound?*

- Yes
- Don't know
- No

**6b. Please clearly state which sections or policies of the plan you consider NOT legally compliant.
Please refer to policy and paragraph numbers in your response.**

6c. Please provide evidence of why you consider these sections of the plan or policies are NOT sound.

6d. Please set out what modification(s) you consider necessary to make the selected sections or policies of Westminster City Council's City Plan sound.



Please attach any necessary evidence to support the above proposed modification(s).

6e. Please provide details on why you consider Westminster City Council's City Plan sound.



7. ORAL EXAMINATION

Westminster City Council is required to submit the City Plan to the Secretary of State for an independent examination. This process involves an independent inspector, appointed by the Secretary of State, who will need to assess whether the City Plan:

- has been prepared in accordance with the Duty to Cooperate;
- meets the relevant legal and procedural requirements;
- is considered 'sound'.

7a. Would you like to participate at the oral part of the examination? (Please note that written and oral comments carry the same weight and will be given equal consideration by the Inspector)

- Yes, I wish to participate at the oral examination
 No, I do not wish to participate at the oral examination

7b. Please use the box below to provide any further comments on Westminster City Council's City Plan.

Thank you for completing the questionnaire. If you would like to find out more please visit westminster.gov.uk/planning-policy, email planningpolicy@westminster.gov.uk or write to City Plan 2019–2040 Consultation, Westminster City Council, 64 Victoria Street, SW1E 6QP.

Privacy Note

Please note: Due to the process of having an independent examination, representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email and postal address) online, however the original representations will be available for public viewing at our council office by prior appointment, as soon as reasonably practicable after the City Plan and supporting documents have been submitted to the Secretary of State.

Receiving notification of the progress of Westminster's City Plan 2019–2040

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- that the full revision to the City Plan has been submitted to the Secretary of State for independent examination under section 20 of the above Act;
- the publication of the recommendations of any person appointed to carry out an independent examination of the full revision to the City Plan; and
- the adoption of the new City Plan.

Would you like to be notified of the next steps of the City Plan process detailed above?

- Yes
 No

Do you wish to be consulted on planning issues in the future?

- Yes
 No

GDPR Notice

When ticking yes please note that Westminster City Council will store your personal details to ensure that you are consulted on planning issues across Westminster in the future. Your details will be kept by Westminster City Council and will only be used for the purpose set out above. Your personal details will remain with us until you wish to no longer be consulted. To remove your personal details from the consultation list, please email planningpolicy@westminster.gov.uk.

Westminster City Council respects your privacy and is committed to ensuring that personal data is adequately recorded and processed lawfully. Further details of our Fair Processing Notice following the introduction of the General Data Protection Regulation can be found on our website at westminster.gov.uk/fair-processing-notice.

CITY PLAN 2019 – 2040



City of Westminster

Appendix 9 Respondents (Reg 19 consultation, 2019)

The respondents highlighted in red submitted their representations after the deadline (5pm 31st July 2019). The council has however considered them.

ID	Channel	Name	Type of respondent
1	Email	Marine Management Organisation	Statutory consultees
2	Form	Delfont Mackintosh Theatres	Cultural and Education institutions
3	Form	Linda Freeman	Individuals
4	Form	Daniel Nassbrook	Individuals
5	Form	Dalicja Markiewicz	Individuals
6	Form	Paddington Development Trust	Charities, campaign groups and other clubs/associations
7	Form	Kevin Lee	Individuals
8	Form	Najy Nasser	Individuals
9	Email	Port of London Authority	Other public sector institutions and bodies
10	Email	National Grid	Business and trade associations
11	Email	London Cycling Campaign	Charities, campaign groups and other clubs/associations
12	Email	Longmartin Properties	Developers, landowners and real estate companies
13	Form	Mary-Ann Smillie	Individuals
14	Form	Planning & Conservation Working Group (London Parks & Gardens Trust)	Statutory consultees
15	Form	Marylebone Cricket Club / Lord's Cricket Ground	Cultural and Education institutions
16	Email	Westminster Cycling Campaign	Charities, campaign groups and other clubs/associations
17	Form	Anita Westbrook	Individuals
18	Form	Michael Romberg	Individuals
19	Form	Simon Osborne-Smith	Neighbourhood Forums, Amenity Societies and Residents' Associations
20	Form	Thane Freehold	Neighbourhood Forums, Amenity Societies and Residents' Associations
21	Email	Natural England	Statutory consultees
22	Email	Beaumont Hotel Properties Limited	Business and trade associations
23	Email	McDonalds	Business and trade associations
24	Email	Exhibition Road Cultural Group	Charities, campaign groups and other clubs/associations
25	Email	Cathedral Area Residents Group	Neighbourhood Forums, Amenity Societies and Residents' Associations
26	Email	Imperial College Healthcare NHS Trust	Healthcare institutions and providers
27	Email	Miles Barber	Individuals

28	Email	NHS Property Services and the Department of Health and Social Care	Developers, landowners and real estate companies
29	Email	Defence Infrastructure Organisation	Other public sector institutions and bodies
30	Email	Amypro Limited trading as Sara Café, Mr Ali Faraj, Mr Ahmad Al-Husseini and Shaymaa Faraj	Business and trade associations
31	Email	Shaw Corporation	Consultancy firms and professional networks
32	Email	South East Bayswater Residents Association	Neighbourhood Forums, Amenity Societies and Residents' Associations
33	Email	City of London Corporation	Neighbouring boroughs
34	Email	Donise Limited trading as Al Balad Restaurant and (1) Mr Hussein Hakim, (2) Mr Ali Hakim, (3) MrKhodor Hakim, and Donise Limited	Business and trade associations
35	Email	Mayor of London	Statutory consultees
36	Email	Transport for London	Statutory consultees
37	Form	The Canal and River Trust	Statutory consultees
38	Email & Form	St John's Wood Society	Neighbourhood Forums, Amenity Societies and Residents' Associations
39	Form	Knightsbridge Association	Neighbourhood Forums, Amenity Societies and Residents' Associations
40	Form	Amy Rogers	Individuals
41	Form	Diana C C Colvin	Individuals
42	Form	Eric Edward Robinson	Individuals
43	Form	Dr Judith McCall	Individuals
44	Form	Martin Scott	Individuals
45	Form	Soho Housing Association	Developers, landowners and real estate companies
46	Form	Ramon Prasad	Individuals
47	Form	Stanway Little Associates	Consultancy firms and professional networks
48	Email	Fitzrovia West Neighbourhood Forum	Neighbourhood Forums, Amenity Societies and Residents' Associations
49	Email	The Royal Parks	Charities, campaign groups and other clubs/associations
50	Email	Transport for London Commercial Development	Statutory consultees
51	Email	Knightsbridge Neighbourhood Forum	Neighbourhood Forums, Amenity Societies and Residents' Associations
52	Email	Whitbread	Business and trade associations

53	Email	Knightsbridge Association	Neighbourhood Forums, Amenity Societies and Residents' Associations
54	Email	St Marylebone Society	Neighbourhood Forums, Amenity Societies and Residents' Associations
55	Email & Form	Trophaeum Asset Management	Developers, landowners and real estate companies
56	Email	4C Hotel Group	Business and trade associations
57	Email	Thorney Island Society	Neighbourhood Forums, Amenity Societies and Residents' Associations
58	Email	The Pollen Estate	Developers, landowners and real estate companies
59	Email	Kildare Gardens and Kildare Terrace Residents Association	Neighbourhood Forums, Amenity Societies and Residents' Associations
60	Email & Form	The Howard de Walden Estate	Developers, landowners and real estate companies
61	Email	Café N1 trading at 1 Church Street and Mr Hakim Gholam and family	Business and trade associations
62	Email	Pimlico Neighbourhood Forum	Neighbourhood Forums, Amenity Societies and Residents' Associations
63	Email	Marylebone Association	Neighbourhood Forums, Amenity Societies and Residents' Associations
64	Email	Graeme Cottam	Individuals
65	Email & Form	Westbury Hotel Ltd	Business and trade associations
66	Email	Church Commissioners for England	Developers, landowners and real estate companies
67	Email	Sport England	Statutory consultees
68	Email	Blow Up Media Ltd	Business and trade associations
69	Email	John Lewis Partnership	Business and trade associations
70	Email & Form	AYR Projects Limited	Developers, landowners and real estate companies
71	Email	Church Street Ward Neighbourhood Forum	Neighbourhood Forums, Amenity Societies and Residents' Associations
72	Email	Soho Society	Neighbourhood Forums, Amenity Societies and Residents' Associations
73	Email & Form	Soho Data Holdings Ltd	Developers, landowners and real estate companies
74	Email & Form	Meard & Dean Street RA	Neighbourhood Forums, Amenity Societies and Residents' Associations
75	Email	Berkeley Group	Developers, landowners and real estate companies

76	Email	NatWest Trustee & Depositary Services Limited as trustee of Hermes Property Unit Trust	Developers, landowners and real estate companies
77	Email	Taylor Wimpey Central	Developers, landowners and real estate companies
78	Email	Marble Arch BID	BIDs
79	Email	London First	Charities, campaign groups and other clubs/associations
80	Email	Network Rail	Statutory consultees
81	Email	Thames Water	Statutory consultees
82	Email	Hanover House Ltd	Developers, landowners and real estate companies
83	Email	Viridian Property Ltd	Developers, landowners and real estate companies
84	Email	Momentum Transport Consultancy	Consultancy firms and professional networks
85	Email & Form	Planning Resolution	Consultancy firms and professional networks
86	Email	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)	BIDs
87	Email	Historic England	Statutory consultees
88	Email	Criterion Capital	Developers, landowners and real estate companies
89	Email	The Crown Estate	Developers, landowners and real estate companies
90	Email & Form	Victoria BID and Victoria Westminster BID	BIDs
91	Email	Berners Allsopp Estate	Developers, landowners and real estate companies
92	Email	EEH Ventures	Developers, landowners and real estate companies
93	Email & Form	RIU Hotels	Business and trade associations
94	Email	Landsec	Developers, landowners and real estate companies
95	Email	Baker Street Quarter Partnership	BIDs
96	Email	The Northbank BID	BIDs
97	Email	C&C1 Ltd	Business and trade associations
98	Email	Royal Borough of Kensington and Chelsea	Neighbouring boroughs
99	Email	Maida Hill Neighbourhood Forum	Neighbourhood Forums, Amenity Societies and Residents' Associations
100	Email	Shaftesbury Plc	Developers, landowners and real estate companies

101	Email	GIA Chartered Surveyors	Consultancy firms and professional networks
102	Email	North London Waste Plan (boroughs working on)	Neighbouring boroughs
103	Email	Royal London Asset Management	Developers, landowners and real estate companies
104	Email & Form	Marks and Spencer PLC	Business and trade associations
105	Email & Form	Achim von Malotki	Individuals
106	Email	British Land	Developers, landowners and real estate companies
107	Email & Form	BMO Real Estate Partners and SCP Estate Ltd.	Developers, landowners and real estate companies
108	Email	Campaign for Real Ale Limited (CAMRA) West London branch	Charities, campaign groups and other clubs/associations
109	Email	Lazari Investments Ltd	Developers, landowners and real estate companies
110	Email & Form	Victoria Gardens Development Limited / Stockley House	Developers, landowners and real estate companies
111	Email	Wildstone Planning	Consultancy firms and professional networks
112	Email	Society of London Theatre	Cultural and Education institutions
113	Email	Marylebone Forum	Neighbourhood Forums, Amenity Societies and Residents' Associations
114	Email & Form	Shiva Hotels	Business and trade associations
115	Email	Unite Students	Business and trade associations
116	Email & Form	Thomas&Thomas and partners LLP	Consultancy firms and professional networks
117	Email & Form	Margaret Lister	Individuals
118	Email	Capco Capital & Counties	Developers, landowners and real estate companies
119	Email	Legal & General Property (L&G)	Developers, landowners and real estate companies
120	Email	Grosvenor Britain & Ireland (Graig McWilliam CEO)	Developers, landowners and real estate companies
121	Email	Audley Property	Developers, landowners and real estate companies
122	Email	Imperial College London	Cultural and Education institutions
123	Email	Westminster Property Association	Developers, landowners and real estate companies
124	Email	Montagu Evans LLP	Consultancy firms and professional networks
125	Email	West End Partnership	BIDs
126	Email	Notting Hill East Neighbourhood Forum	Neighbourhood Forums, Amenity Societies and Residents' Associations

127	Email	The Freight Transport Association (FTA)	Business and trade associations
128	Email	Clivedale	Developers, landowners and real estate companies
129	Email	NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups	Healthcare institutions and providers
130	Email	New West End Company	BIDs
131	Email	Susie Dye	Individuals
132	Email	Wandsworth Borough Council	Neighbouring boroughs
133	Email	Great Portland Estates plc	Developers, landowners and real estate companies
134	Email	The Portman Estate	Developers, landowners and real estate companies
135	Email	Environment Agency	Statutory consultees
136	Email	The Belgravia Society	Neighbourhood Forums, Amenity Societies and Residents' Associations
137	Email	London School of Economics	Cultural and Education institutions
138	Email	The Collective	Developers, landowners and real estate companies
139	Email	Westminster Labour Party	Members and political parties
140	Email	Heart of London Business Alliance	BIDs
141	Form	Victoria Wegg-Prosser	Individuals
142	Form	UK Hospitality	Business and trade associations
143	Form	Firethorn Trust	Developers, landowners and real estate companies
144	Form	Eden Dwek	Business and trade associations
145	Form	The Board of Trustees of the Tate Britain Gallery	Cultural and Education institutions
146	Form	Motcomb Estates	Developers, landowners and real estate companies
147	Form	Travis Perkins	Business and trade associations
148	Form	Islington & Hackney Swifts Group	Charities, campaign groups and other clubs/associations
149	Form	London Wildlife Trust	Charities, campaign groups and other clubs/associations
150	Form	Ferleigh Properties Limited	Developers, landowners and real estate companies
151	Form	Bentall Greenoak	Developers, landowners and real estate companies
152	Form	James Edward Hewitt	Individuals
153	Form	Dolphin Living	Developers, landowners and real estate companies
154	Form	Equinox Fitness Holdings UK	Business and trade associations
155	Form	Citizen M	Business and trade associations
156	Form	Carter Jonas	Consultancy firms and professional networks
157	Form	Andy Beverley	Individuals

158	Email	Covent Garden Community Association	Neighbourhood Forums, Amenity Societies and Residents' Associations
159	Email	Palace of Westminster Restoration and Renewal Programme (Anna Sinnotta)	Other public sector institutions and bodies

Endnotes

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- 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.
 - ¹³ City of London
 - ¹⁴ Graeme Cottam
 - ¹⁵ NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups
 - ¹⁶ Historic England
 - ¹⁷ The Belgravia Society, Heart of London Business Alliance, The Board of Trustees of the Tate Britain Gallery, Dolphin Living
 - ¹⁸ 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)
 - ¹⁹ Cathedral Area Residents Group, Grosvenor Britain & Ireland (Graig McWilliam CEO)
 - ²⁰ Cathedral Area Residents Group, Fitzrovia West Neighbourhood Forum
 - ²¹ Shaw Corporation Limited, Marble Arch BID, Cathedral Area Residents Group, Knightsbridge Neighbourhood Forum, Church Commissioners for England
 - ²² TfL Commercial Development
 - ²³ 4C Hotel Group
 - ²⁴ The Belgravia Society
 - ²⁵ Shaw Corporation Limited, Cathedral Area Residents Group, TfL Commercial Development
 - ²⁶ Cathedral Area Residents Group
 - ²⁷ Grosvenor Britain & Ireland (Graig McWilliam CEO)
 - ²⁸ Cathedral Area Residents Group, West End Partnership
 - ²⁹ Historic England
 - ³⁰ Historic England
 - ³¹ Church Commissioners for England
 - ³² Beaumont Hotel Properties Limited (BHP), 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)
 - ³³ Shaftesbury Plc, Longmartin Properties
 - ³⁴ Transport for London
 - ³⁵ Westminster Cycling Campaign
 - ³⁶ Marylebone Association
 - ³⁷ New West End Company
 - ³⁸ Shaw Corporation Limited
 - ³⁹ TfL Commercial Development

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- ⁴⁰ The Portman Estate
⁴¹ TfL Commercial Development
⁴² Historic England
⁴³ The Northbank BID
⁴⁴ The Portman Estate, Grosvenor Britain & Ireland (Graig McWilliam CEO)
⁴⁵ Royal London Asset Management, Lazari Investments Ltd
⁴⁶ West End Partnership
⁴⁷ Landsec, British Land, Westminster Property Association (WPA)
⁴⁸ Paddington Development Trust (PDT)
⁴⁹ TfL Commercial Development
⁵⁰ Marble Arch BID
⁵¹ Westminster Cycling Campaign
⁵² Canal and River Trust
⁵³ 4C Hotel Group
⁵⁴ British Land, Westminster Property Association (WPA)
⁵⁵ British Land
⁵⁶ NHS London Healthy Urban Development Unit / Central London and West London CCG
⁵⁷ Travis Perkins
⁵⁸ TfL Commercial Development, Landsec, RIU Hotels, Grosvenor
⁵⁹ Victoria Gardens Development Ltd/Stockley House, TfL Commercial Development
⁶⁰ Thane Freehold, Cathedral Area Residents Group (CARG), Diana C C Colvin (individual), Thorney Island Society, Graeme Cottam, Belgravia Society
⁶¹ Belgravia Society
⁶² Grosvenor
⁶³ The list of signatories to the petition can be viewed on Westminster City Council's website here: <http://petitions.westminster.gov.uk/Victoria-protect/>
⁶⁴ Network Rail, Victoria BID and Victoria Westminster BID, Victoria Gardens Development Ltd/Stockley House, Landsec, Grosvenor, Westminster Property Association (WPA)
⁶⁵ Network Rail
⁶⁶ 4C Hotel Group
⁶⁷ TfL
⁶⁸ Westminster Cycling Campaign
⁶⁹ Westminster Cycling Campaign, Victoria BID and Victoria Westminster BID, Grosvenor
⁷⁰ Victoria BID and Victoria Westminster BID
⁷¹ Victoria BID and Victoria Westminster BID
⁷² Wandsworth Borough Council
⁷³ TfL Commercial Development
⁷⁴ Freight Transport Association (FTA)
⁷⁵ Bentall Greenoak
⁷⁶ Historic England
⁷⁷ Pimlico Neighbourhood Forum
⁷⁸ Graeme Cottam
⁷⁹ Graeme Cottam
⁸⁰ The Canal and River Trust, AYR Projects Limited, TfL Commercial Development
⁸¹ Wildstone Planning
⁸² TfL Commercial Development
⁸³ Maida Hill Neighbourhood Forum
⁸⁴ AYR Projects Limited
⁸⁵ Maida Hill Neighbourhood Forum
⁸⁶ RBKC
⁸⁷ Maida Hill Neighbourhood Forum
⁸⁸ Maida Hill Neighbourhood Forum
⁸⁹ Notting Hill East Neighbourhood Forum
⁹⁰ Maida Hill Neighbourhood Forum

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- ⁹¹ 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
- ⁹² Church Street Ward Neighbourhood Forum and Achim Von Malotki
- ⁹³ Westminster Labour Group
- ⁹⁴ Church Commissioners for England
- ⁹⁵ Church Street Ward Neighbourhood Forum and Achim von Malotki
- ⁹⁶ Fitzrovia West Neighbourhood Forum, Knightsbridge Neighbourhood Forum, Howard De Walden Estate, Church Commissioners, Wandsworth Borough Council, Westminster Labour Group, Ferleigh Properties Limited
- ⁹⁷ Soho Data Holdings, RIU Hotels, Shaftesbury, Victoria Gardens Development Limited/ Stockley House, Grosvenor, Westminster Property Association (WPA), Clivedale, Motcomb Estates, Ferleigh Properties Limited
- ⁹⁸ 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
- ⁹⁹ Imperial College Healthcare NHS Trust, Tropheum Asset Management, Church Commissioners
- ¹⁰⁰ Land Securities, 4C Hotel Group, GIA Chartered Surveyors, Marks & Spencer PLC, Capco Capital & Counties, Westminster Property Association (WPA), Clivedale, Portman Estate
- ¹⁰¹ 4C Hotel Group
- ¹⁰² Whitbread, John Lewis Partnership
- ¹⁰³ Knightsbridge Neighbourhood Forum, Soho Society
- ¹⁰⁴ NHS London Healthy Urban Development Unit/ Central London and West London Clinical Commissioning Groups
- ¹⁰⁵ Covent Garden Community Association, West End Partnership (WEP)
- ¹⁰⁶ Freight Transport Association (FTA)
- ¹⁰⁷ Church Commissioners for England, Taylor Wimpey Central, Berkeley Group, Defence Infrastructure Organisation, Clivedale, Marylebone Association
- ¹⁰⁸ TfL Commercial Development, Victoria Gardens Development Limited / Stockley House
- ¹⁰⁹ Maida Hill Neighbourhood Forum
- ¹¹⁰ Unite Students
- ¹¹¹ Mayor of London, Maida Hill Neighbourhood Forum
- ¹¹² Mayor of London, Westminster Property Association (WPA)
- ¹¹³ 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)
- ¹¹⁴ Clivedale, Shaw Corporation Limited, Criterion Capital
- ¹¹⁵ Berkeley Group, Clivedale, Fitzrovia West Neighbourhood Forum, Marks and Spencer PLC, Shaw Corporation Limited
- ¹¹⁶ Achim von Malotki, Maida Hill Neighbourhood Forum, Mayor of London, Westminster Labour Group
- ¹¹⁷ Grosvenor Britain & Ireland (Graig McWilliam CEO)
- ¹¹⁸ Landsec
- ¹¹⁹ 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.
- ¹²⁰ Lazari Investments Ltd, Capco Capital & Counties, Westminster Property Association (WPA), West End Partnership, The Portman Estate

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- ¹²¹ Imperial College Healthcare NHS Trust, Imperial College London, Westminster Property Association (WPA)
- ¹²² Shaftesbury Plc
- ¹²³ Berkeley Group, Clivedale, Fitzrovia West Neighbourhood Forum, Marks and Spencer PLC, Shaw Corporation Limited
- ¹²⁴ Landsec
- ¹²⁵ Grosvenor Britain & Ireland, Shaw Corporation Limited
- ¹²⁶ BMO Real Estate Partners and SCP Estate Ltd., Defence Infrastructure Organisation, Shaftesbury Plc, Shaw Corporation Limited, TfL Commercial Development, Wildstone Planning
- ¹²⁷ Mayor of London
- ¹²⁸ Mayor of London, Unite Students
- ¹²⁹ Unite Students, Imperial College London
- ¹³⁰ Fitzrovia West Neighbourhood Forum, Berkeley Group
- ¹³¹ Transport for London Development
- ¹³² Church Street Neighbourhood Forum, Achim von Malotki
- ¹³³ Transport for London Development
- ¹³⁴ Unite Students
- ¹³⁵ Knightsbridge Neighbourhood Forum
- ¹³⁶ Church Commissioners for England
- ¹³⁷ 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
- ¹³⁸ Church Commissioners for England
- ¹³⁹ Church Street Neighbourhood Forum, Achim Von Malotki
- ¹⁴⁰ Mayor of London
- ¹⁴¹ Shaw Corporation Limited, TfL Commercial Development, Westminster Property Association (WPA), The Portman Estate, Bentall Greenoak
- ¹⁴² Westminster Property Association (WPA), West End Partnership, Bentall Greenoak, London First
- ¹⁴³ British Land, Westminster Property Association (WPA)
- ¹⁴⁴ Shaftesbury Plc
- ¹⁴⁵ Shaftesbury Plc
- ¹⁴⁶ London School of Economics and Political Science (LSE)
- ¹⁴⁷ Berners Allsopp Estate, Shaftesbury Plc, Victoria BID and Victoria Westminster BID, The Northbank BID, Criterion Capital
- ¹⁴⁸ Fitzrovia West Neighbourhood Forum, Marylebone Association
- ¹⁴⁹ The Crown Estate, Westminster Property Association (WPA)
- ¹⁵⁰ The Howard de Walden Estate, Westminster Property Association (WPA), Motcomb Estates
- ¹⁵¹ 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)
- ¹⁵² Longmartin Properties, Knightsbridge Neighbourhood Forum, Marble Arch BID, Shaftesbury Plc, Baker Street Quarter Partnership, Berners Allsopp Estate
- ¹⁵³ Shaftesbury Plc, Berners Allsopp Estate
- ¹⁵⁴ Church Commissioners for England, Capco Capital & Counties, Landsec, New West End Company, Bentall Greenoak
- ¹⁵⁵ Maida Hill Neighbourhood Forum
- ¹⁵⁶ New West End Company, Westminster Property Association (WPA)
- ¹⁵⁷ Landsec, Marble Arch BID
- ¹⁵⁸ Church Commissioners for England, Royal London Asset Management, BMO Real Estate Partners and SCP Estate Ltd., New West End Company
- ¹⁵⁹ Knightsbridge Neighbourhood Forum

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- 160 New West End Company, Maida Hill Neighbourhood Forum, The Crown Estate
161 Shaw Corporation Limited, Carter Jonas
162 Mayor of London
163 Margaret Lister, New West End Company, Mayor of London
164 Capco Capital & Counties
165 Knightsbridge Neighbourhood Forum
166 Maida Hill Neighbourhood Forum
167 Grosvenor Britain & Ireland, Capco Capital & Counties
168 Marble Arch BID
169 Beaumont Hotel Properties (BHP), 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.
170 Marylebone Cricket Club / Lord's Cricket Ground.
171 Beaumont Hotel Properties (BHP).
172 Westbury Hotel.
173 Mayor of London.
174 Society of London Theatre.
175 Society of London Theatre.
176 Society of London Theatre.
177 Exhibition Road Cultural Group.
178 Imperial College London.
179 Sport England.
180 Historic England.
181 Wildstone Planning, 4C Hotel Group.
182 Maida Hill Neighbourhood Forum
183 Pimlico Neighbourhood Forum.
184 Graeme Cottam.
185 Whitbread Plc.
186 Whitbread Plc.
187 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.
188 British Land.
189 Westminster Property Association (WPA).
190 Amypro Limited trading as Sara Café, Mir Ali Faraj, Mr Ahmad Al-Husseini and Shaymaa Faraj submit 19 comments on this matter, together with Denise Limited trading as Al Balad Restaurant and (1) Mr Hussein Harim, (2) Mr Ali Hakim, (3) Mr Khodor Hakim, and Denise 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.
191 NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups.
192 Mayor of London, Historic England.
193 Church Commissioners for England.
194 Maida Hill Neighbourhood Forum.
195 Campaign for Real Ale Limited (CAMRA) West London branch.
196 BMO Real Estate Partners and SCP Estate Ltd and Shaftesbury Plc.
197 McDonalds.

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- 198 Marylebone Association.
199 Marble Arch BID
200 BMO Real Estate Partners and SCP Estate Ltd and Shaftesbury Plc.
201 Soho Society.
202 Marylebone Association.
203 Knightsbridge Neighbourhood Forum, NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups
204 Sport England
205 Port of London Authority
206 Defence Infrastructure Organisation
207 Sport England
208 Westminster Property Association (WPA)
209 Westminster Property Association (WPA)
210 NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups
211 Sport England
212 Sport England
213 NHS Property Services (NHSPS) and the Department of Health and Social Care (DHSC)
214 Maida Hill Neighbourhood Forum
215 Soho Society
216 Sport England
217 Imperial College London
218 London School of Economics and Political Science (LSE)
219 Victoria BID and Victoria Westminster BID
220 UK Hospitality
221 Shaftesbury Plc, Meard & Dean Street RA
222 Church Commissioners for England
223 Meard & Dean Street RA
224 Marylebone Association, Soho Society
225 Soho Society, Shiva Hotels
226 The Pollen Estate
227 Tropaeum Asset Management
228 The Pollen Estate
229 The Howard de Walden Estate
230 The Pollen Estate
231 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
232 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)
233 Church Commissioners for England, Transport for London, Westminster Cycling Campaign
234 Transport for London
235 Marble Arch BID, Knightsbridge Neighbourhood Forum, NHS Healthy Urban Development Unit/Central London and West London Clinical Commissioning Groups, Transport for London
236 Wandsworth Borough Council
237 Transport for London
238 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)

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- ²³⁹ Freight Transport Association, Transport for London
- ²⁴⁰ Freight Transport Association
- ²⁴¹ 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
- ²⁴² Port of London Authority, London Cycling Campaign, Transport for London, Westminster Cycling Campaign
- ²⁴³ Mayor of London, Transport for London
- ²⁴⁴ St Marylebone Society, The Belgravia Society, Andy Beverley, Transport for London
- ²⁴⁵ Transport for London
- ²⁴⁶ Westminster Cycling Campaign
- ²⁴⁷ Transport for London, Freight Transport Association
- ²⁴⁸ Unite Students
- ²⁴⁹ Church Commissioners for England, Momentum Transport Consultancy, The Northbank BID, West End Partnership, Freight Transport Association, New West End Company, Wandsworth Borough Council
- ²⁵⁰ Church Commissioners for England, Transport for London
- ²⁵¹ Port of London Authority, Heart of London Business Alliance
- ²⁵² Transport for London
- ²⁵³ Royal Borough of Kensington & Chelsea
- ²⁵⁴ Transport for London, Knightsbridge Neighbourhood Forum
- ²⁵⁵ Heart of London Business Alliance, Graeme Cotton
- ²⁵⁶ Maida Hill Neighbourhood Forum, Westminster Cycling Campaign, Marylebone Association, Heart of London Business Alliance
- ²⁵⁷ 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
- ²⁵⁸ New West End Company, Transport for London
- ²⁵⁹ Berkeley Group
- ²⁶⁰ Westminster Cycling Campaign, Westminster Labour Group
- ²⁶¹ Westminster Cycling Campaign
- ²⁶² Freight Transport Association, Covent Garden Community Association, Soho Society,
- ²⁶³ Knightsbridge Neighbourhood Forum, Marble Arch BID, Transport for London
- ²⁶⁴ Transport for London
- ²⁶⁵ Freight Transport Association, Northbank BID
- ²⁶⁶ Transport for London, Church Commissioners for England
- ²⁶⁷ Church Commissioners for England
- ²⁶⁸ Notting Hill East Neighbourhood Forum, New West End Company
- ²⁶⁹ City of London Corporation, Westminster Cycling Campaign, the Northbank BID, West End Partnership, Freight Transport Association, Soho Society, Grosvenor Britain and Ireland
- ²⁷⁰ Port of London Authority
- ²⁷¹ John Lewis Partnership, Freight Transport Association
- ²⁷² 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
- ²⁷³ LandSec, Westminster Property Association
- ²⁷⁴ West End Partnership, Freight Transport Association

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- 275 Covent Garden Community Association, Transport for London
276 Amy Rogers, Marylebone Association
277 Soho Data Holdings, Freight Transport Association, Marylebone Association, Northbank BID
278 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)
279 Soho Data Holdings, Environment Agency
280 Soho Data Holdings,
281 Freight Transport Association
282 Port of London Authority, City of London Corporation, Transport for London, Sport England, The Northbank BID
283 Wandsworth Borough Council
284 Port of London Authority
285 Transport for London, Freight Transport Association
286 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
287 South East Bayswater Residents Association
288 Knightsbridge Neighbourhood Forum
289 Church Commissioners for England
290 Church Commissioners for England
291 Knightsbridge Neighbourhood Forum
292 Westminster Property Association, Grosvenor Britain & Ireland (Graig McWilliam CEO)
293 Notting Hill East Neighbourhood Forum
294 Knightsbridge Neighbourhood Forum
295 Baker Street Quarter Partnership, Marylebone Forum
296 Shaftesbury Plc
297 Marylebone Forum
298 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
299 Thames Water
300 Notting Hill East Neighbourhood Forum
301 South East Bayswater Residents Association (SEBRA)
302 Kildare Gardens and Kildare Terrace Residents Association
303 Freight Transport Association (FTA)
304 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
305 City of London Corporation
306 Landsec
307 Church Commissioners for England
308 Baker Street Quarter Partnership, Marble Arch BID
309 The Royal Parks
310 Grosvenor Britain and Ireland (Graig McWilliam CEO)
311 Freight Transport Association (FTA)
312 Martin Scott
313 The Portman Estate, Knightsbridge Neighbourhood Forum, Notting Hill East Neighbourhood Forum
314 Notting Hill East Neighbourhood Forum

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- 315 Knightsbridge Neighbourhood Forum
 - 316 The Northbank BID
 - 317 Royal Borough of Kensington and Chelsea (RBKC)
 - 318 Notting Hill East Neighbourhood Forum
 - 319 Westminster Property Association (WPA)
 - 320 Environment Agency, Royal Borough of Kensington and Chelsea
 - 321 Knightsbridge Neighbourhood Forum
 - 322 Knightsbridge Neighbourhood Forum
 - 323 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
 - 324 West End Partnership, Knightsbridge Neighbourhood Forum
 - 325 Landsec
 - 326 The Howard de Walden Estate, The Crown Estate, Grosvenor Britain & Ireland (GRraig McWilliam CEO), Westminster Property Association (WPA)
 - 327 Baker Street Quarter Partnership
 - 328 John Lewis Partnership, Royal London Asset Management
 - 329 Historic England
 - 330 Soho Society
 - 331 Mayor of London, West End Partnership, Knightsbridge Neighbourhood Forum, The Northbank BID, West End Partnership, New West End Company, Heart of London Business Alliance
 - 332 Mayo of London, North London Waste Authority
 - 333 West End Partnership
 - 334 New West End Company, Simon Osborne Smith, the North Bank BID
 - 335 Heart of London Business Alliance
 - 336 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, London Borough of Wandsworth, Berkeley Group
 - 337 Historic England
 - 338 Environment Agency
 - 339 Knightsbridge Neighbourhood Forum, Environment Agency
 - 340 Church Commissioners for England, Berners Allsopp Estate, Howard de Walden estate, Shaftesbury Plc, BMO Real Estate Partners, SCP Estate Ltd
 - 341 Westminster Property Association
 - 342 The Northbank BID
 - 343 John Lewis Partnership
 - 344 Marylebone Association, Maida Hill Neighbourhood Forum
 - 345 Westminster Labour Group
 - 346 Marylebone Forum
 - 347 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)
 - 348 Historic England, Marylebone Association
 - 349 Church Commissioners for England, LandSec
 - 350 Westminster Property Association, Church Commissioners for England, Portman Estate, London School of Economics and Political Science
 - 351 Westminster Property Association
 - 352 Marylebone Association, St Marylebone Society
 - 353 Shaw Corporation Ltd, Royal London Asset Management
 - 354 Historic England, Marylebone Association, Fitzrovia West Neighbourhood Forum

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- 355 Historic England
 356 Victoria BID, Victoria Westminster BID
 357 Knightsbridge Neighbourhood Forum
 358 Fitzrovia Neighbourhood Forum, Marylebone Association
 359 Church Commissioners for England
 360 Shaftesbury Plc
 361 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.
 362 Portman Estate, Soho Housing Association, Howard de Walden Estate
 363 Marylebone Association
 364 Notting Hill East Neighbourhood Forum
 365 Shaw Corporation Ltd, Westminster Property Association
 366 Wildstone Planning, Shaw Corporation Ltd
 367 Shaw corporation ltd, Howard de Walden Estate, London First, Shaftesbury Plc
 368 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
 369 Capco Capital & Counties
 370 Howard de Walden
 371 Westminster Property Association
 372 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,
 373 Victoria BID and Westminster BID, Planning & Conservation Working Group (London Parks & Gardens Trust), The Belgravia Society, Berkeley Group
 374 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 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
 375 Victoria BID and Victoria Westminster BID, Bentall Greenoak
 376 Travis Perkins, Historic England
 377 The Belgravia Society
 378 Historic England
 379 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
 380 Westminster BIDs (Baker Street Quarter Partnership, Heart of Lonodn Business Alliance, Marble Arch Partnership, New West End Company, The Northbank BID, Paddington Now, Victoria BID, Victoria Westminster BID), British Land

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- ³⁸¹ 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
- ³⁸² Graeme Cottam
- ³⁸³ Imperial College Healthcare NHS Trust
- ³⁸⁴ TfL Commercial Development
- ³⁸⁵ Network Rail LUKAS
- ³⁸⁶ TfL Commercial Development
- ³⁸⁷ TfL Commercial Development
- ³⁸⁸ Knightsbridge Neighbourhood Forum
- ³⁸⁹ Church Street Ward Neighbourhood Forum, Achim von Malotki
- ³⁹⁰ Achim von Malotki
- ³⁹¹ Pimlico Neighbourhood Forum
- ³⁹² Knightsbridge Neighbourhood Forum, Baker Street Quarter Partnership, Northbank BID, Royal London Asset Management, Heart of London Business Alliance, Blow Up Media Ltd
- ³⁹³ Graeme Cotton, Northbank BID, Notting Hill East Neighbourhood Forum, Heart of London Business Alliance
- ³⁹⁴ Knightsbridge Neighbourhood Forum, Heart of London Business Alliance, Soho Society, Meard & Dean Street Residents Association
- ³⁹⁵ Baker Street Quarter Partnership
- ³⁹⁶ Victoria BID and Victoria Westminster BID
- ³⁹⁷ Blow Up Media Ltd
- ³⁹⁸ The Northbank BID, LandSec
- ³⁹⁹ Historic England, Baker Street Quarter Partnership, Marble Arch BID, The Northbank BID
- ⁴⁰⁰ Historic England
- ⁴⁰¹ Historic England
- ⁴⁰² Baker Street Quarter Partnership, Marble Arch BID
- ⁴⁰³ Trophaeum Asset Management, Westbury Hotel, Westminster Property Association (WPA)
- ⁴⁰⁴ Environment Agency
- ⁴⁰⁵ Mayor of London
- ⁴⁰⁶ Marylebone Association
- ⁴⁰⁷ Church Commissioners for England
- ⁴⁰⁸ London First, Montagu Evans
- ⁴⁰⁹ London First
- ⁴¹⁰ John Lewis Partnership
- ⁴¹¹ Landsec
- ⁴¹² Kildare Gardens and Kildare Terrace Residents Association
- ⁴¹³ Knightsbridge Neighbourhood Forum
- ⁴¹⁴ The Pollen Estate
- ⁴¹⁵ Knightsbridge Neighbourhood Forum
- ⁴¹⁶ Church Street Ward Neighbourhood Forum
- ⁴¹⁷ South East Bayswater Residents Association, Kildare Gardens and Kildare Terrace Residents Association
- ⁴¹⁸ Berkley Group
- ⁴¹⁹ Westminster Property Association (WPA)
- ⁴²⁰ NHS London Healthy Urban Development Unit / Central London and West London Clinical Commissioning Groups
- ⁴²¹ AYR Projects Limited, Transport for London, TfL Commercial Development
- ⁴²² Historic England
- ⁴²³ Imperial College Healthcare NHS Trust, NHS Property Services/DHSC
- ⁴²⁴ Travis Perkins
- ⁴²⁵ Travis Perkins
- ⁴²⁶ Defence Infrastructure Organisation

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- 427 TfL Commercial Development
 - 428 TfL Commercial Development
 - 429 Transport for London
 - 430 Cathedral Area Residents Group
 - 431 Knightsbridge Neighbourhood Forum
 - 432 London First, Viridian Property Ltd, Montagu Evans
 - 433 Michael Romberg
 - 434 William Differ
 - 435 Royal Parks
 - 436 Knightsbridge Neighbourhood Forum
 - 437 Church Street Neighbourhood Forum, Achim von Malotki
 - 438 Maida Hill Neighbourhood Forum
 - 439 Lazari Investments Ltd, Victoria Gardens Development Limited, Stockley House, Howard de Walden Estate
 - 440 William Differ, Dalicja Markiewicz, Neil Johnson, Najy Nasser, Amypro Limited, Denise Limited, Canal and River Trust, Knightsbridge Association, Diana C C Colvin, Ramon Prasad, Howard de Walden Estate, Café N1, Planning Resolution, RIU Hotels, BMO Real Estate Partners and SCP Estate Ltd, Victoria Wegg-Prosser, Eden Dwek, Board of Trustees of the Tate Britain Gallery , Motcomb Estates
 - 441 Whitbread Plc, James Edward Hewitt, Trophaeum Asset Management
 - 442 Whitbread Plc, Lazari Investments Ltd, Victoria Gardens Development Limited, Stockley House, Shiva Hotels
 - 443 Whitbread Plc, Victoria Gardens Development Limited, Shiva Hotels, Taylor Wimpey Central, Montagu Evans
 - 444 London First
 - 445 James Edward Hewitt
 - 446 William Differ, Linda Freeman, Dalicja Markiewicz, Neil Johnson, Najy Nasser, Thane Freehold, Canal and River Trust, Knightsbridge Association, Howard de Walden Estate, Planning Resolution, RIU Hotels, Achim von Malotki, BMO Real Estate Partners and SCP Estate Ltd, Victoria Gardens Development Limited, Shiva Hotels, Victoria Wegg-Prosser, Eden Dwek, Board of Trustees of the Tate Gallery, Motcomb Estates, Dolphin Living, Citizen M
 - 447 Neil Johnson
 - 448 Howard de Walden Estate
 - 449 Howard de Walden Estate
 - 450 Simon Osborne-Smith, Ramon Prasad, Trophaeum Asset Management, James Edward Hewitt
 - 451 Simon Osborne-Smith
 - 452 Ramon Prasad
 - 453 Trophaeum Asset Management
 - 454 James Edward Hewitt

CITY PLAN 2019 – 2040



City of Westminster