

# CITY PLAN 2019 - 2040

## Consultation Statement

Regulation 19 version

March 2024

# Contents

---

<b>1 Introduction .....</b>	<b>3</b>
<b>1.1 Introduction.....</b>	<b>4</b>
<b>2 Regulation 18 Consultation (2022)...</b>	<b>5</b>
<b>2.1 Regulation 18 Consultation (2022)..</b>	<b>6</b>
Emails .....	6
Website .....	6
Meetings and Events.....	6
Responses.....	7
Summary table of responses and how these will be taken into account	8
<b>3 Informal Engagement .....</b>	<b>16</b>
<b>3.1 Informal Engagement.....</b>	<b>17</b>
3.1.1 Workshops .....	17
3.1.2 Website.....	20
3.1.3 Engagement with Statutory Stakeholders.....	22
3.1.4 Engagement with other stakeholders and landowners	26
3.1.5 Summary table of comments and how these have been taken into account	26
<b>4 Appendices .....</b>	<b>29</b>
<b>4.1 Appendix 1: Regulation 18 Email ..</b>	<b>30</b>
<b>4.2 Appendix 2: Regulation 18 Statement</b>	<b>32</b>
<b>4.3 Appendix 3: Regulation 18 screenshots</b>	<b>34</b>
4.3.1 Screenshot of website advertising the Regulation 18 Consultation	34
4.3.2 Screenshot of website advertising the Informal Engagement and associated flyer	35
<b>4.4 Appendix 4: Regulation 18 respondents</b>	<b>36</b>

# 1 Introduction

---

# 1.1 Introduction

---

This document provides the details of the consultation undertaken to date as part of the Partial Review of Westminster’s City Plan 2019- 2040 (adopted April 2021), and how feedback received has informed the Regulation 19 version of the plan. It gives information on how the partial revision has been carried out in accordance with the council’s statutory duties including legal requirements set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Furthermore, this document also identifies how the principles contained within the Fairer Westminster strategy have been achieved throughout the partial review. After the completion of Regulation 19 consultation, a new consultation statement will be published which will only report on the consultation undergone as part of the Regulation 19. Both statements will be submitted to the Planning Inspectorate alongside the Partial City Plan Review and its accompanying evidence base.

A partial review of the City Plan is being carried out to align it with Westminster’s new strategy: Fairer Westminster. The new and revised policies will help make Westminster a fairer and more inclusive city. The scope of the review, as set out during Regulation 18 consultation, includes three parts:

- 1) Strengthening Policy 9 to help secure more affordable housing, particularly for those in need of social housing.
- 2) Introducing a new policy to prioritise retrofit and refurbishment of existing buildings where appropriate.
- 3) Introduction of Site Allocations to help guide and unlock the development of key underutilised sites to deliver significant levels of growth, infrastructure, and provide other benefits.

This consultation statement documents the level of consultation carried out on the Partial City Plan Review up to Regulation 19 stage. It describes who was consulted, when, for how long and how they were invited to make their representation. It also pulls together the key issues raised and how these have informed the Regulation 19 version of the Plan.

All consultations were carried out in line with the council’s new [Statement of Community Involvement](#) (SCI) (2023). We delivered on the principles in the new SCI ahead of its formal adoption as we were developing it concurrently with the revised City Plan. The new SCI has 5 principles of engagement:

- Article I. Early engagement
- Article II. Inclusive engagement
- Article III. Use of appropriate consultation methods
- Article IV. Clear information and simple communications
- Article V. Transparent records and feedback

We started to engage early with consultees; we used their input to inform our perspective prior to formulating our policies. We’ve used a range of consultation methods including emails, website, social media channels, and meetings. These are detailed below. Our communication was designed to be simple and clear irrespective of the method used. Examples of this can be seen in the appendices. We have kept a record of our engagement, the feedback we have received and our response to it.

We were inclusive in our engagement as we reached out to over 1,500 consultees on our database that represent a very broad spectrum of stakeholders from statutory bodies, amenity societies and special interest groups such as ethnic and religious groups.

# 2 Regulation 18 Consultation (2022)

---

## 2.1 Regulation 18 Consultation (2022)

---

Formal notification of the Partial Review of the City Plan under Regulation 18 was carried for a period of 6 weeks between Thursday 6<sup>th</sup> October to Thursday 17<sup>th</sup> November 2022.

### Emails

Notification of the consultation was made by email to approximately 1,500 consultees on the council's Planning Consultation Database. This included statutory consultees such as all neighbouring boroughs (Lambeth, RBKC, Wandsworth, Camden, City of London and Brent), the Greater London Authority, Transport for London, Thames Water and Historic England. The database also includes general consultation bodies such as voluntary bodies and those representing different racial, ethnic or national groups, those representing different religious groups, disabled people and the interests of those carrying out business in Westminster. The database also includes businesses, residents' groups and members of the public who have expressed an interest in the development of Westminster's planning policy.

Consultees were informed of the council's intention to partially review the City Plan and were asked to share their thoughts on the new content of the policies. Their comments were recorded and are summarised below with our response.

### Website

The council website advertised the Regulation 18 consultation on a dedicated page that included a link to the Regulation 18 statement. A screenshot of the website is attached in Appendix 3.

### Meetings and Events

The partial review was discussed in a number of meetings with key stakeholders.

On 31<sup>st</sup> October 2022 officers met representatives from the Greater London Authority. Key points from this initial discussion which have influenced the policy wording included:

- Suggestion to consider setting BREEAM targets for the retrofit policy.
- Consulting the GLA's Whole Life Carbon Guidance.

Officers engaged with Neighbourhood Forums and Amenity Societies in a workshop on 1<sup>st</sup> November 2022 to share information on the consultation and gather initial feedback. Key issues raised included:

- Concerns about the viability of delivering a new affordable housing split which prioritises social over intermediate housing.
- When affordable housing is not built on site it means there is no benefit to the neighbourhood.
- A suggestion to consider using the Affordable Housing Fund to support other developers in providing affordable housing.

Historic England was consulted on 3<sup>rd</sup> November 2022. Key issues included:

- Retrofit policy could have a hierarchy to define types of demolition. A façade retention or the even the removal of a staircase could potentially be very significant.
- Retrofit policy should be about embodied carbon not the age or aesthetic of the building. Poorly performing and ugly buildings shouldn't be forced to refurbish.
- Retrofit policy should have a hierarchy of justifications and, this would be a better approach than creating an exemption list.
- There could be a hierarchy of retrofitting options, so it's not cost prohibitive. Retrofitting does not need to be expensive.

- There is a risk of mal adaption in retrofitting that could damage historic buildings, be less carbon efficient in the long term or introduce poor health outcomes such as mould.
- Site allocations should follow GLA’s design led approach.

Westminster Property Association was consulted on 14<sup>th</sup> November 2022. Key issues included:

- Would flipping the affordable housing split deliver more social housing in the long term?
- Proportionate evidence is required to justify affordable housing from small sites.
- Delivering on site affordable housing for small sites is not feasible especially in high value areas where there could be management issues.
- The cascade approach to delivering affordable housing should be changed to provide upfront flexibility.
- There are certain characteristics which indicate the building is suitable for a retrofit; it has good floor to ceiling height, floor plates size and structural integrity.
- The volume of evidence required for Whole Life Carbon assessments needs to be realistic.
- Planning should be involved very early to prevent issues downstream.
- Retrofit policy should set very clear criteria and circumstances where retrofit is appropriate.
- Retrofit policy should not lead to under optimisation of sites. The wellness of the occupier needs to be considered as well.
- Exceptions need to be provided for heritage buildings where a façade retention is the best option but carbon costly.

## Responses

The council received 47 formal responses to Regulation 18 consultation – a similar level to that received at the same stage of the adopted City Plan.

As shown in Figure 1 below, responses were received from the broad spectrum of consultee types. A full list is provided in Appendix 4.

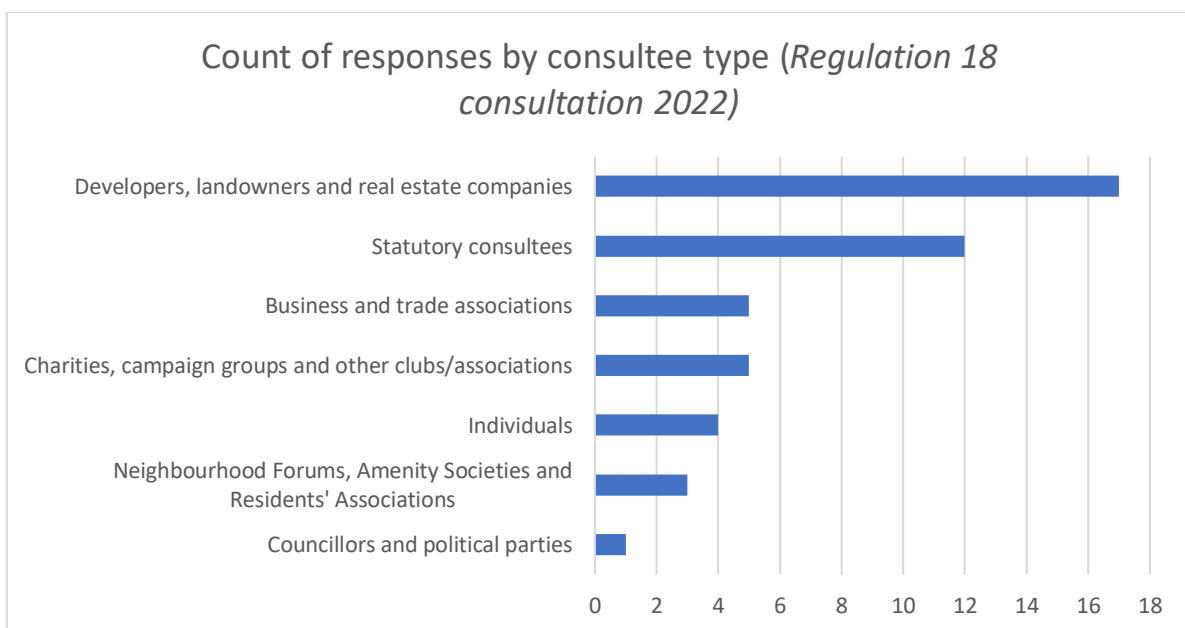


Figure 1 - Count of responses by consultee type (Regulation 18 consultation 2022)

## Summary table of responses and how these will be taken into account

The 47 responses received covered the three topics consulted on. These responses raised a number of issues, and the table below sets out a summary of each topic and the council's response.

Support for increasing the supply of social housing compared to intermediate housing varies depending on the respondent. In general, developers were cautious about the viability of being able to make such a contribution, whereas other types of stakeholders clearly supported the policy change.

There has been consistent support for a retrofit-first policy with repeated emphasis to have a cascade / sequential test to ensure a retrofit *first* and not a retrofit *only* approach. Respondents would like to see a clear, unambiguous, and consistent approach developed that has the flexibility to take into account the nature of each application.

There were submissions from stakeholders who had previously submitted sites through the Call for Sites in Winter 2022 reiterating their hope their sites would be allocated, along with some additional evidence submitted. Some new sites were also submitted for allocation.



Issue	Summary of Issue	Council Response
<b>Affordable Housing</b>		
<b>Viability</b>	Concerns about scheme viability arising from affordable housing requirements in the face of sustained increased costs to the development industry. Viability evidence needs to be undertaken to inform policy and published.	Revised policies will be supported by a viability assessment that is published on the council's website as part of the evidence base at Regulation 19 consultation.
<b>Small sites</b>	Concerns that seeking affordable housing from small sites will deter investment, may not be practical (e.g. registered providers may not be willing to manage), and is not in accordance with NPPF paragraph 64.	High levels of housing need and the nature of development in Westminster justifies seeking to maximise all opportunities for affordable housing provision, including from small sites, as per policies in other Central London boroughs. Future policy will be informed by viability evidence and policy wording will take into account barriers to on-site delivery, including for small sites.
	Any new threshold for seeking affordable housing from small sites should be clearly defined, along with detail on delivery mechanisms.	Noted – policy wording will make clear when affordable housing is required from small sites, and how it should be delivered.
	Affordable housing contributions from small sites should not be required on-site and should be focused on other methods of delivery such as off-site delivery or payments-in-lieu. Meeting affordable housing requirements off-site but within the 'neighbourhood area' would be acceptable for small sites.	Noted – new policy approach will consider both merits and obstacles to securing on-site delivery on small sites, including implications in terms of development viability. Different mechanisms of affordable housing delivery, such as off-site delivery and payments-in-lieu, will also be considered. The use of neighbourhood areas as a means of securing affordable housing provision within the 'vicinity' of the host development will be explored for all types of sites.
<b>London Plan conformity</b>	Revised policy should: <ul style="list-style-type: none"> <li>• Be clear that the goal is to deliver 50% of all new homes as affordable housing</li> <li>• Reference and enable the Mayor's approach to delivery on public land, his portfolio approach, and the 'fast track route' approach to viability</li> </ul>	Revised affordable housing policy will be prepared to be in general conformity with the London Plan, while considering local evidence on housing needs.

- Not set out alternative tenure approaches for public and private land

<b>Definitions</b>	Greater flexibility should be provided in the definitions of affordable rent, intermediate rent and other tenure terms.	Definitions will be reviewed to ensure that they are in line with the NPPF and the London Plan, and housing needs evidence.  Definition to be corrected to clarify London Living Rent is an intermediate housing product, and not a social housing one.
	Would support a broader definition of Key Workers.	Noted – whilst this is not a matter to be addressed via this City Plan Partial Review, changes to how intermediate housing is allocated are being considered by the council.
<b>Delivery</b>	S106 agreements should ensure affordable housing is delivered as soon as possible.	Detailed content of S106 agreements is beyond the scope of the City Plan, but improving the pace of delivery is important and the revised policy will therefore prioritise on-site provision.
	Existing cascade approach to affordable housing delivery is supported.	Support noted.
	The council should actively look to bring more land forward to meet development needs and identify possible sites and look to facilitate land assembly, supported where necessary by compulsory purchase powers.	Noted - site allocations will consider key development opportunities. Use of compulsory purchase powers is beyond the remit of the City Plan.
	Existing delivery rates have been very poor. New policy should be informed by evidence of what has been secured in recent years (numbers, tenures, and amount of financial contributions and what this translates into in terms of new affordable homes).	The council acknowledges that affordable housing delivery has been poor, with this being a key driver for the need to review Policy 9 of the City Plan.  Details of affordable housing delivery are documented in the council’s Authority Monitoring Reports, which are available on the website.  New viability evidence will be prepared to explore if payments-in-lieu methodology and rates are adequate.
	Council should be flexible in terms of height/tall buildings (if other policies are met) to ensure affordable housing is delivered – this should be taken into	Whilst increasing affordable housing delivery is a priority, all proposals will still need to properly respond to local context in term of building heights, in line with Development Plan policies

	account through any proposed Site Allocations	and site-specific principles set out in any proposed Site Allocations.
<b>Tenure</b>	Support for prioritisation of social housing over intermediate.	Support welcomed.
	Important to continue to provide intermediate housing for key workers and help enable businesses recruit local staff and help overcome ongoing labour shortages that may not be met by social housing tenants.	Value of intermediate housing to provide for key workers acknowledged – the revised policy will ensure a proportion of affordable homes delivered are intermediate, whilst ensuring housing supply responds to local housing needs.
		Other planning policies and council initiatives, such as the work of the Westminster Employment Service, also seek to support local residents, including those in social housing, into local employment opportunities.
	Policy should provide flexibility for tenure requirements to reflect site-specific circumstances.	Policy will set out the council's preferred tenure mix for all new developments, based on evidence of need. In line with the London Plan and the City Plan, any deviation from the policy will require suitable justification from the applicant.
	Guidelines on how tenure blind developments can be achieved should be provided.	London Plan policy applies – paragraph 3.6.7 makes clear that tenure integration should be maximised, and affordable housing should have the same external appearance as private housing. Matters of housing quality and design are outside the scope of the current review.
	Council should explore options so Build to Rent schemes provide a proportion of homes at social rents.	Noted – Policy 11 Innovative Housing is outside the scope of the current review.
	Paragraph 9.8 of City Plan should be deleted as not in line with housing needs evidence.	Agree that Paragraph 9.8 should be deleted.
	Suggestion that social housing requires larger housing typologies, whilst intermediate tends to favour smaller typologies, and that policy should account for habitable rooms and/or floorspace rather than only considering unit numbers.	Noted – policy to consider how affordable housing requirements should be calculated.

## Retrofit

<b>Support</b>	Overarching support for a policy that promotes retrofitting over redevelopment and achieves zero carbon, whilst some consultees note that the issue is better addressed at London or national level.	Support noted. The climate emergency justifies the council seeking to address this issue in the absence of sufficient policy coverage at a London or national level.
<b>Retrofit first, not retrofit only</b>	<p>Demolition (or deconstruction) may be justified in cases where:</p> <ul style="list-style-type: none"> <li>• the existing building is of poor quality;</li> <li>• it does not and cannot meet occupiers requirements;</li> <li>• it is very energy inefficient;</li> <li>• there are structural problems and physical constraints;</li> <li>• the building has a poor impact on health and wellbeing;</li> <li>• it is financially unviable to retrofit;</li> <li>• larger carbon savings can be made in the long term;</li> <li>• there are competing policy objectives, such as the need to optimise sites to provide sustainable development and meet growth targets, or deliver wider economic, social, and public benefits.</li> </ul>	Noted – policy will seek to prioritise retrofit whilst also identifying considerations of where demolition and rebuild may be justified.
	Policy should make explicit that upward and outward extension of existing buildings is sustainable.	Existing City Plan policies provide support for the extension of existing buildings subject to impact on surroundings.
<b>Policy definitions and benchmarks</b>	The policy should follow a sequential approach: retrofitting should be considered first, and any redevelopment proposal should require a detailed assessment against set criteria.	Noted - the intent of the policy is to follow a sequential approach as suggested.
	The policy should set out clear definitions, benchmarks and tests.	Noted. The draft policy includes clear definition, benchmarks and tests.
	Need to review if net zero standards should be set out for minor	Noted. Applicability of net zero standards to retrofit and refurbishment that does not meet ‘major

	developments, as refurbishments are not always major developments.	development' definitions, due to limited increases in new floorspace, to be considered, informed by evidence on viability implications.
<b>Process</b>	It is important to provide clarity at the earliest stage of the development process, generally at the site acquisition stage, and a proportionate and streamlined pre-application process should be developed accordingly. Any expectations should be realistic for the applicant.	Noted – any new policy will provide clarity of the council's expectations, which developers should have regard to when acquiring sites. Pre-application processes are an implementation matter that fall beyond the remit of policy wording. We will continue to engage closely with the development industry as the policy is developed to test the expectations.
	Greater guidance and advice on what carbon reducing technologies can be used is needed, and on economic savings.	The policy together with an update of the Environment SPD and further guidance will provide appropriate guidance for applicants on carbon reduction possibilities.
	Incentives are needed to promote retrofitting, such as rates relief.	We will consider ways to promote retrofitting, but the scope of this consultation is limited to planning policy.
	Policy presents an opportunity to collect data and create a new monitoring indicator.	Any new policy will be subject to future monitoring indicators to judge its effectiveness.
<b>Embodied carbon</b>	Policy should be aligned with the London Plan on the Circular Economy and Whole Life Cycle Carbon.	Noted - policy will be drafted in conformity with the London Plan.
	Embodied carbon should be considered alongside end-use or operational carbon, and resource efficiency should be optimised throughout the construction process.	Noted - Recognition of the amount of embodied carbon associated with construction activity is a key driver for a new policy that better prioritises retrofit and refurbishment over demolition and redevelopment. Policy will seek to ensure this is considered alongside operational energy use.
<b>Heritage and townscape</b>	The policy should work for both historic and more modern developments and should not have a negative impact on townscape and heritage settings.	Noted - the policy will be developed to work for a range of building types and situations, recognising the differing

		levels of intervention may be appropriate for heritage assets.
	Retrofitting should focus on architectural significance, and particularly focus on unlisted buildings of merit. A test for if a building merits retention may be if it causes harm to a heritage asset.	Noted - policy will consider its impacts on townscape alongside climate change impacts.
	Flexibility should be built in to allow historic buildings to be as energy efficient as possible.	Noted – policy will seek to promote better energy efficiency in historic buildings, whilst fulfilling the statutory duty to protect heritage assets.
<b>Wider issues and opportunities around retrofitting</b>	The policy needs to consider that retrofitting can have a significant impact on biodiversity.	While retrofitting does offer less opportunity for improving biodiversity, it does not have a harmful impact – and this is off-set by reduced mineral and resource use. Development will still be required to demonstrate a biodiversity net-gain regardless of whether they are retrofitting or redeveloping.
	Retrofitting should not only focus on upper floors, but also on ground floors across the West End by requiring openable doors for retail frontages and banning outside gas fired heaters.	Concerns around ground floors and gas fired heaters are noted. We will consider how we can promote energy efficiency further within the scope of the policy, alongside other tools such as updates to the Environment SPD.
	Rebalancing towards refurbishment presents an opportunity to limit carbon impacts of existing buildings, and improve their performance in relation to water use, air quality, waste, private vehicle use and urban greening.	Noted – Where refurbishment works can be used to provide a range of benefits, this will be highlighted through supporting text and additional guidance in the Environment SPD.
	The sequential test for flood risk should be applied to make sure any use is appropriate, and flood resilience and resistance should be designed into refurbishment plans, including Sustainable Drainage Systems (SuDS).	Any new policy will be applied alongside other existing policies, such as those specifically about flood risk.

### Site Allocations

<b>Function of the CAZ</b>	Existing office/commercial buildings in the West End should not be converted	City Plan policy 13 and the council’s Article 4 Direction for the CAZ already
----------------------------	--	---

	to residential. Allocations should consider how to boost footfall, to support full recovery from the pandemic.	protect from the loss of office floorspace from the CAZ. Site allocations will carefully consider potential uses for each site, bearing in mind evolving need and demand for different land uses.
<b>Social infrastructure</b>	Lack of childcare provision in Central London is a major factor impacting on the recruitment and retention of staff. City Plan should prioritise the delivery of social infrastructure alongside affordable housing.	The council's Infrastructure Delivery Plan will inform infrastructure requirements for specific sites, including in relation to social infrastructure.
<b>Health infrastructure</b>	Site Allocations may offer an opportunity for co-location of new health facilities with other council or public services.	The council's Infrastructure Delivery Plan will inform infrastructure requirements for specific sites.
<b>Protecting open spaces</b>	Allocations must consider the impact of taller buildings on views in and out of open spaces and availability of natural light.	Where allocations identify the potential for taller buildings, the impacts on views from open spaces and availability of natural light will be considered.
<b>Retaining existing buildings</b>	Existing buildings should only be removed in exceptional circumstances.	We will consider each site's specific circumstances to define policies that can help ensure we optimise the site to achieve the council's strategic goals. Therefore, while the City Plan revision will look at embedding a retrofit-first approach, careful consideration should be made for each potential allocation to determine elements that can be retained and adapted, and others that may require demolition and rebuild.

# 3 Informal Engagement

---



# 3.1 Informal Engagement

A series of informal engagement activities were undertaken by the council from October 2023 through to January 2024. These engagement activities are not statutory in nature but have been conducted in accordance with the new Statement of Community Involvement and with Fairer Westminster’s commitment to improve transparency and involve the community throughout policy development.

## 3.1.1 Workshops

### Councillor Workshops

In December 2023, workshops were held with ward Councillors that either have a Site Allocation proposed in their ward or in close proximity to their ward. The purpose of these workshops was to update Councillors on how the Site Allocations have progressed and to seek initial feedback on the proposed principles for them on behalf of the communities they represent. A further briefing note was issued to Councillors summarising the information presented in the workshops alongside an invitation to submit any comments.

The first workshop was held on 14<sup>th</sup> December 2023 and focussed on the proposed Site Allocations at Westbourne Park Bus Garage and land adjacent to Royal Oak station. Councillors from the Bayswater, Harrow Road, Hyde Park, and Westbourne wards were invited to attend the workshop. Councillors expressed general support for officers to continue working towards developing a draft policy that is to be publicly exhibited.

The second workshop was held on 19<sup>th</sup> December 2023 and focussed on the proposed Site Allocations at Grosvenor Sidings and St Mary’s Hospital. Councillors from the Church Street Hyde Park, Knightsbridge & Belgravia, Little Venice, Marylebone, Pimlico North and Pimlico South wards were invited to attend the workshop. Councillors again expressed general support for officers to continue working towards developing a draft policy that is to be publicly exhibited.

### Design Review Panel

In December 2023, each Site Allocation was referred to the Westminster Design Review Panel. This process sought to ensure expert oversight of the high-level design parameters that were to be incorporated into the Site Allocation policies. This process entailed a site visit to each Site Allocation sites followed by a panel discussion during which the panel reviewed the opportunities and constraints identified by council officers for each site and evidence gathered to date and provided independent, expert feedback.

The outcomes of the Design Review Panel are provided in reports which have been published alongside the Regulation 19 City Plan, a high-level summary of the comments is given in the tables below.

#### Grosvenor Sidings

- The panel agreed that the site has the potential to provide a mix of homes and new public realm to support local need.
- The council’s wider and overarching vision and aspirations for the site and how it responds to wider Victoria / city ambitions should be made clearer.
- The site has two distinct characters and could be broken up to enable the council’s aspirations

for the eastern and western sides to be better defined.

- The panel discussed that varying building heights would work best on the site but that it may be appropriate for taller buildings to be located north and south of the eastern side, and along the western side occupied by British Transport Police.
- The panel also discussed the importance of improving connectivity, and permeability around the site and links to the wider area.
- The panel recommended that the heritage assets were enhanced and re-purposed and could influence the character of future development proposals, particularly along the eastern side, where a more contextual street-based approach would be more appropriate.
- The panel also recommended considering the socioeconomic needs of the area to define the appropriate housing mix.

### **Land adjacent to Royal Oak station**

- Policy should include an overall vision for the site linked to identification of key public benefits that any development here should deliver and set out place-shaping and connectivity aspirations for a larger area.
- The policy itself should be 'light touch' with more limited focus on improving permeability and safe access and creating high quality public realm which also addresses the change in levels.
- A diagram accompanying the policy could focus on connectivity and show a larger area, which includes the stations, and ensures access and connections are tied into the site. Incorporating a route through the centre of the site should be considered, if feasible.
- This is a uniquely challenging site and housing in this location appears problematic and may be inappropriate. If housing were to be considered, innovative high quality bespoke solutions would be needed to achieve residential quality and to address the significant challenges posed by this constrained site.
- Policy should stress the importance of greening and climate resilience, noting the importance of the railway as an ecological corridor.

### **Westbourne Park Bus Garage**

- The site has the potential to provide a significant number of new homes and other activities, including commercial, leisure, and community uses.
- The council's overarching vision and aspirations for the site should be made clearer.
- There is scope for the scheme to deliver meaningful biodiversity net gain.
- The panel discussed the importance of considering the massing of tall building(s) against established development nearby.
- The impact on wider views needs to be considered when planning the location of tall buildings on the site, including not undermining the townscape status of Trellick Tower.
- The panel highlighted the importance of improving the public realm, connectivity, and permeability around and through the site.
- The panel recommended being more specific about the footprint of the tall building and testing it against the views if the policy is to have criteria around building height.
- The panel recommended considering the socioeconomic needs of the area to define the appropriate mix of uses for the site.

### **St Mary's Hospital**

- Policy should start with a stronger and more ambitious vision for the site, stressing the aim to deliver a world class health estate, which is set within world class townscape, and integrating references to key issues such as public realm, well-being, and sustainability. A better diagram should illustrate key principles.

- Policy should include a requirement that any redevelopment proposals coming forward are accompanied by a comprehensive masterplan and set out the key parameters for that masterplan and the work needed to underpin it.
- The focus of policy should be on elements we want to see enhanced at ground plane - considering activating ground floor frontages, improving legibility, connectivity sustainable travel and highlighting key importance of public realm, rather than overly focusing on heights;
- Sustainability should be more prominent within considerations, included within the vision and key principles. Potential level of demolition is of concern and circular economy principles and potential to retrofit should be integrated into policy.
- Breadth of proposed uses could be refined, also having regard to what uses will contribute to this as a place and to the public realm.
- A strategy which involves clear scope for phased development across the area should be considered.

### Key Community Representatives

In January 2024, workshops were held with key community representatives. These included residents that live in the area and Business Improvement Districts that operate in close proximity to the proposed site allocations. Key community representatives were drawn from:

- Neighbourhood Forums;
- Resident Associations;
- Amenity Societies;
- Business Improvement Districts (BIDs); and
- Other relevant community groups.

The purpose of these workshops was for the council to share information regarding the process for developing the proposed Site Allocation policies and the guiding principles which the council seeks to incorporate in any future policy wording. The workshops also sought to gather early feedback on the proposed Site Allocation principles before the policies were published as part of Regulation 19 consultation.

The first workshop for the proposed Site Allocation at Grosvenor Sidings took place on 9<sup>th</sup> January 2024. A total of 19 key community representatives were invited to attend the workshop, either in person or virtually. Of these invitations, 8 stakeholders attended the workshop.

The second workshop for the proposed Site Allocations in the north of the city; land adjacent to Royal Oak station, Westbourne Park Bus Garage and St Mary's Hospital, took place on 15<sup>th</sup> January 2024. A total of 39 key community representatives were invited to attend the workshop, either in person or virtually. Of these invitations, 11 stakeholders attended the workshop.

A summary of the key issues raised in relation to each site is provided in the table below.

#### Grosvenor Sidings

- Lack of clarity on the relationship between the proposed Site Allocation and the previously exhibited Future Victoria Masterplan.
- Significant retail provision on the site may further impact on the viability of the Lupus Street high street retail offering.
- Whether the Site Allocation would override the Tall Buildings Policy.

- Whether the site can have any role in facilitating the relocation of the Victoria Coach Station.
- How redevelopment of the site can both mitigate and respond to flooding in the area.
- How through-site access, open space and buffer zones are to be utilised across the site.
- How the site can respond to the amenity impacts from the adjacent railway lines and whether over-rail development has been considered.
- What potential community or cultural uses can be incorporated on the site.
- Assurance that the site can be sufficiently serviced by means of wastewater, sewerage, gas and electricity.

#### **Land adjacent to Royal Oak station**

- Whether the existing levels of biodiversity can be re-provided should the site be redeveloped.
- How the ageing infrastructure surrounding the site can cope with intensification on the site and whether there is any scope to facilitate upgrades as part of the site's redevelopment.
- Whether there is sufficient demand for additional office space in the area.
- Potential traffic and amenity impacts if the site were to be used for light industrial (freight and logistics) purposes.
- Support for open space and permeability improvements, but desire that this be managed in a coordinated approach.

#### **Westbourne Park Bus Garage**

- The potential role of the site in facilitating an additional crossing along the Grand Union Canal.
- Potential traffic and amenity impacts if residential land uses were to be incorporated onto the site.
- Whether commercial floorspace that is complementary to Great Western Studios can be incorporated in the site's future redevelopment.
- Desire that any future development be sufficiently set back from the towpath so as to enhance the public domain.
- Request that the site's heritage be accurately documented (e.g. Brunel heritage discovery).
- Policy should be very strong on biodiversity net gain.

#### **St Mary's Hospital**

- A prioritisation of sturdy and resilient step-free access is needed both for people accessing the site and within the site itself.
- The provision of community facilities needs to be carefully considered.
- The site should support night-time food and beverage outlets to cater for shift workers.
- Improved permeability and accessibility is critical and efforts should be made to improve access to and from the Paddington Basin.

### **3.1.2 Website**

From 9<sup>th</sup> January 2024 to 26<sup>th</sup> January 2024, the council published a website on the 'Commonplace' platform which complimented the workshops held for the proposed Site Allocations. The website link was circulated with all of the key community representatives outlined above and ward Councillors (including wards that both include the proposed Site Allocation and wards that are proximate to the proposed Site Allocation). In addition, the council circulated a link with other stakeholders near the proposed Site Allocations and both digital and hard-copy flyers with links and QR codes to the website, were placed in the Victoria, Pimlico, Maida Hill, Church Street and Paddington libraries.

The website was structured to include a map of the proposed Site Allocations and their location within the city, a timeline of the work that has been undertaken and is to be undertaken as part of the Partial Review and a profile of each Site Allocation (which included an overview of the site, an account of site

constraints and opportunities and proposed policy principles). The website also included a survey in which respondents could share their views on each individual Site Allocation.

Extracts of the website and flyer are provided in Appendix 3 of this report.

The website attracted 528 views and a total of 63 responses to the survey were made. This included:

- 13 for Grosvenor Sidings
- 28 for the land adjacent to Royal Oak station
- 12 for Westbourne Park Bus Garage
- 10 for St Mary's Hospital

A summary of survey results is provided below:

### **Grosvenor Sidings**

The sentiment towards the proposed Site Allocation principles was generally positive, with the most significant positive element being the provision of open space on the site and permeability improvements. Many of the comments highlighted the desire that, if redeveloped, the built form should be complimentary to the surrounding neighbourhood character and that affordable housing be maximised.

Some respondents did not support the Site Allocation in full or would not until several matters are resolved such as assurances that Network Rail has found a replacement sidings or that it is confirmed that sufficient infrastructure planning has occurred to facilitate the development.

As a result of the feedback received, the allocation has been strengthened to respect existing heritage and townscape on-site and within the area. The allocation also includes provision of open spaces, an increased focus on permeability and protection of existing residential amenity.

### **Land adjacent to Royal Oak station**

The sentiment towards the proposed Site Allocation principles was mixed. Opponents of the scheme argued that both residential and commercial uses would place a strain on existing infrastructure and in particular, residential uses are inappropriate due to amenity impacts. Other respondents advocated for maintaining the site's existing use, noting the existing vegetation on the site.

Supporters of the scheme welcomed the proposed permeability improvements, re-provision of biodiversity and potential provision of community facilities. As a result of the feedback received, the allocation has been strengthened to ensure that biodiversity is improved on the site, and an increased focus on permeability to try and secure public access to the site.

### **Westbourne Park Bus Garage**

The sentiment towards the proposed Site Allocation principles was generally positive, with the most significant positive element being the activation along the Grand Union Canal, the provision of open space on the site and other permeability improvements. There was also support for the provision of social housing, public realm improvements and partnering with community organisations to provide unique spaces within the development.

Some respondents opposed the Site Allocation and required greater assurance that the bus garage will remain operational, and the development will not negatively impact already strained infrastructure. The feedback has been considered and the policy requires public realm, permeability and open space improvements. The policy supports a redevelopment of the bus garage that meets current and projected future transport needs.

## St Mary's Hospital

The sentiment towards the proposed Site Allocation principles was positive, with many expressing support for a renewed St Mary's Hospital and improved permeability, both within the site and alongside Paddington Basin. Support was also raised for the promotion of food & beverage outlets and the inclusion of affordable housing – particularly for key workers who may work at the hospital. Some comments also called for there to be a greater emphasis on design principles for the site as a whole to ensure that development is cohesive and brings about the best possible outcomes.

This feedback was considered, and the policy was updated to strengthen its emphasis on ensuring a positive relationship between new development and the Paddington Basin, along with ensuring that uses such as food and beverage and affordable housing were referenced within the site allocation wording.

All of the comments received through the Commonplace consultation platform have helped to refine the policy wording.

### 3.1.3 Engagement with Statutory Stakeholders

#### Greater London Authority

Duty to Cooperate (DtC) meetings were held between the council and the Greater London Authority (GLA) on 31<sup>st</sup> October 2023, 19<sup>th</sup> December 2023 and 13<sup>th</sup> February 2024.

The first meeting focussed on the revised affordable housing policy in which high-level policy directions were discussed. These are discussed thematically below:

- Housing Needs Assessment: The emerging findings of the housing needs assessment were shared which included findings that demonstrate a significant need for affordable housing. The GLA acknowledged that this is a London-wide problem.
- Targets and thresholds: The GLA cautioned against a deviation from London Plan policies that could lead more schemes to follow the Viability Tested Route. However, no objection was raised in relation to a change in the tenure split that considered the 30/30/40 split requirement set out in the London Plan.
- Portfolio approach: The GLA cautioned against changes to the portfolio approach and that any policy wording that discourages this approach be kept flexible and at a high level.
- Small sites: The GLA raised no objections to seeking affordable housing contributions from small sites and referenced work completed by the Royal Borough of Kensington and Chelsea and Merton Council as being relevant.

The second meeting with the GLA focussed predominantly on the proposed Site Allocations. The outcomes of this meeting are summarised below:

- The council should explore whether additional Site Allocations can be developed.
- Clarification to be provided how the Site Allocation policies interact with other tall buildings policies.
- Greater consideration to be given to industrial land uses on sites that have non-designated industrial uses.
- GLA advised a Statement of Common Ground with Historic England will alleviate any heritage concerns and should be sought.

The third meeting focussed on the retrofit-first policy. The outcomes of this meeting are summarised below:

- GLA advised that going beyond the embodied carbon benchmarks within the London Plan Guidance is accepted, noting that approaches to assessing embodied carbon have moved on since the guidance was published.
- GLA advised that the retrofit first policy should not create any barriers to the delivery of affordable housing and delivery of estate regeneration schemes.
- Consideration should be given to how the policy is monitored over time and how reviews to benchmarks may occur.

In addition to the above workshops, the draft policy wording for affordable housing was shared with the GLA on 22<sup>nd</sup> January and for the Site Allocations on 9<sup>th</sup> December 2023. Following this, the policies were shared again on 12<sup>th</sup> February 2024.

### Historic England

A meeting was held with Historic England on 30<sup>th</sup> November 2023 in which the emerging principles for the Site Allocations were shared and comments were invited. Broadly, Historic England supported the sites identified and the need to unlock development through emerging policy however, outcomes and finalisation of the council's commissioned heritage impact assessments were needed for more detailed comments. They also suggested that the policies be kept to high level principles rather than setting detailed design parameters. The comments for each site from Historic England were as follows:

- **Grosvenor Sidings:** No in-principle objections were made but Historic England required the commitment that the heritage impact assessment recommendations are transposed into the policy wording.
- **Land adjacent to Royal Oak station:** Support that the site should complement the adjacent Opportunity Area and not be extended. Further support that heights should be stepped down if tower elements are proposed.
- **Westbourne Park Bus Garage:** Historic England agreed that due to changing contexts, the heritage impacts on this site are lesser compared to the other sites. Policy wording should incorporate heritage impact assessment recommendations.
- **St Mary's Hospital:** Historic England raised concerns over the potential scale of the redevelopment but are awaiting final recommendations of the heritage impact assessment. They support keeping Site Allocation wording high-level, but with greater emphasis on justifying heritage impacts during planning application stage.

### Transport for London

The draft policy wording was shared with the TfL Spatial Planning on 23<sup>rd</sup> November 2023. In response they made the following comments:

- **Grosvenor sidings:**
  - Development proposals would need to include high quality and accessible active travel routes to link the site to public transport connections and amenities.
  - Deliver public realm improvements and improve permeability and access to Victoria Station, including via riverfront routes.
  - Constraints of building adjacent to the railway line will need to be mitigated.
- **St Mary's Hospital:**



- Support for public realm improvements and opportunities that improve access to the Paddington Basin.
- There are operational transport constraints that would need to be taken into account, including access to the side of Paddington station adjacent to the site and the infrastructure protection requirements to build over the Bakerloo, Hammersmith & City and Circle London Underground lines.
- **Royal Oak:**
  - TfL Strategic transport infrastructure will need to be carefully considered within development proposals (including permeability, level differences, high quality active travel routes, mitigating the impacts on and proximity to existing surrounding transport infrastructure (as per London Plan Policy D13 and requirements for building adjacent and above the operational railway).
  - Need to enhance access.
  - Need to address the perception of safety at all times of day and night through design including lighting and passive surveillance.
- **Westbourne Park Bus Garage:**
  - This is the only bus garage in Westminster and its importance in providing successful and efficient bus services in this part of London should not be underestimated.
  - Any redevelopment of the site will need to protect the continuity of bus garage operations, in construction and end state, ensuring the final design is future proofed for growth and electrification of the bus fleet.
  - Constraints should be more explicit in including reference to the retention of the bus garage on site.
  - Need to ensure the type/use class of development is an appropriate neighbour for an operational bus garage and that the design mitigates the impacts of this established activity – as per London Plan Policy D13.
  - Subject to the above, TfL Spatial Planning agreed that development provides opportunities to activate the site and provide a better public realm and active travel connections.
  - Infrastructure and asset protection would be required for any development adjacent to the railway and Westway structures.

## Neighbouring Boroughs

A series of meetings were held with neighbouring boroughs in August/September 2023 to update them on the contents and work being undertaken as part of the City Plan Partial Review. These meetings provided an opportunity to share knowledge and learn from authorities that have taken a similar approach to emerging policies and to help inform the council’s approach to the relevant policy strand. The council’s proposed site allocations relevant to the neighbouring authority were also discussed to ensure the impact on any proposed site allocation are understood and potential concerns of proposals raised.

A summary of the schedule of meetings with neighbouring authorities, including when they took place and what was discussed are shown in the table below. The council’s Duty to Co-operate Statement sets out in more detail the content of these discussions and how they informed the policies.

Date	Consultee	Strategic issues discussed
29.08.23	LB Brent	<ul style="list-style-type: none"> <li>● Affordable housing</li> <li>● Affordable housing delivery from small-scale residential developments</li> <li>● Mayor’s portfolio approach</li> </ul>



		<ul style="list-style-type: none"> <li>• Student housing</li> <li>• Retrofitting</li> <li>• Site allocations – St Mary’s Hospital</li> <li>• Brent’s design code for Staples Corner</li> <li>• Brent Cross West</li> <li>• Brent’s Article 4 Directions</li> <li>• Government consultation on planning reform</li> </ul>
<b>05.09.23</b>	LB Wandsworth	<ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Retrofitting</li> <li>• Site allocations – Grosvenor Sidings</li> <li>• Wandsworth Local Plan Partial Review</li> <li>• Clapham Junction Masterplan</li> <li>• Government consultation on planning reform</li> </ul>
<b>11.09.23</b>	LB Camden	<ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Mayor’s portfolio approach</li> <li>• Student Housing</li> <li>• Gypsy and Traveller Sites Assessment</li> <li>• Retrofitting</li> <li>• Site allocation – St Mary’s Hospital</li> <li>• Camden Local Plan Review</li> <li>• Euston Area Action Plan</li> <li>• Government consultation on planning reform</li> <li>• Neighbourhood planning</li> </ul>
<b>12.09.23</b>	LB Southwark	<ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Affordable housing delivery from small-scale residential developments</li> <li>• Retrofitting</li> <li>• Site allocation</li> <li>• Southwark SPD preparation</li> <li>• Government consultation on planning reform</li> </ul>
<b>14.09.23</b>	LB Lambeth	<ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Student housing</li> <li>• Retrofitting</li> <li>• Site allocations – Grosvenor Sidings</li> <li>• Lambeth Site Allocations DPD</li> <li>• Government consultation on planning reform</li> </ul>
<b>19.09.23</b>	City of London	<ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Retrofitting</li> <li>• CoL Sustainability SPD and Carbon Options guidance document</li> <li>• Site allocations</li> <li>• Neighbourhood planning</li> <li>• Government consultation on planning reform</li> </ul>

<p><b>20.09.23</b></p>	<p>Royal Borough of Kensington and Chelsea</p>	<ul style="list-style-type: none"> <li>● Affordable housing</li> <li>● Affordable housing delivery from small-scale residential developments First homes</li> <li>● Retrofitting</li> <li>● Site allocations – St Mary’s Hospital, Westbourne Park Bus Garage and Grosvenor Sidings</li> <li>● Government consultation on planning reform</li> <li>● Neighbourhood planning</li> <li>● Westminster’s Planning Obligation and Affordable Housing SPD</li> </ul>
------------------------	--	--

**3.1.4 Engagement with other stakeholders and landowners**

**Landowners**

Throughout the process of developing the draft site allocations, officers established and maintained a collaborative working relationship with affected landowners to understand their aspirations for the sites and inform policy wording. Engagement took place in the forms of multiple meetings as well as written communication, i.e. emails on the likely content of draft allocations in the lead up to Regulation 19 consultation.

**Westminster Property Association**

The Westminster Property Association (WPA) is a non-profit advocacy group for the development industry in Westminster, representing over 240 different members. Draft versions of the retrofit-first policy were shared with the WPA to gather their views on the council’s emerging position. In November 2023, planning policy officers attended a meeting of the WPA’s Planning Sustainability Group to discuss suggestions on the initial draft of the policy shared and to gather additional feedback.

Members of the WPA were then invited to an in-person industry workshop hosted by the council on the 24<sup>th</sup> November 2023. This workshop included representatives from architecture practices, engineering firms, construction contractors, developers, sustainability professions, planning firms and landowners. Following this in-person workshop, an additional online webinar was held for members of the WPA on the 12<sup>th</sup> December 2023. Both the in-person workshop and subsequent webinar presented on the wider context around the introduction of a retrofit-first policy, current policy requirements and ambitions of the council.

The WPA was then invited to submit written feedback and they issued a collated public response in December 2023.

**3.1.5 Summary table of comments and how these have been taken into account**

The informal engagement conducted from October 2023 to January 2024 has been used to inform the drafting of the Affordable Housing, Retrofit and Site Allocation policies in the lead up to Regulation 19.

The table below summarises matters that have been clarified or amended as a result of informal engagement.

Policy	Revisions
<b>Affordable Housing</b>	<ul style="list-style-type: none"> <li>• Greater emphasis on the need to maximise affordable housing delivery.</li> <li>• Changes to policy so it is clear how the Mayor’s ‘Threshold approach to applications’ will be applied in Westminster.</li> <li>• In line with evidence findings and the London Plan, changes to the tenure split to require 70% social housing and 30% intermediate housing.</li> <li>• The inclusion of a proposal for small-scale residential developments to contribute to affordable housing, with flexibility over the delivery mechanism provided.</li> </ul>
<b>New Retrofit First Policy</b>	<ul style="list-style-type: none"> <li>• Amendments to the language around when demolition could be justified.</li> <li>• Expanded explanation on what can be considered a ‘public benefit’ when justifying demolition.</li> <li>• Clarification of which LETI document the benchmarks are derived from, so that any updated benchmarks are not automatically required by the policy.</li> <li>• Changes to the definitions to be included in the glossary.</li> <li>• Introduced a new clause to enable “exceptional” circumstances where site specific constraints make meeting the benchmarks impossible.</li> <li>• Changes to the threshold, so that single storey buildings are excluded.</li> </ul>
<b>New Site Allocations</b>	
<b>Grosvenor Sidings</b>	<ul style="list-style-type: none"> <li>• Changes to structure of the policy wording, to instead focus on a vision statement with supporting core principles.</li> <li>• Changes to the site boundary to include two separate parcels east and west of the railway tracks to reflect two distinct character areas.</li> <li>• Greater emphasis on the importance of improving connectivity and permeability around the site and how this links to the wider area.</li> <li>• Reference to re-purposing of the Grade II listed 123A Grosvenor Road building and the potential to retain and repurpose the existing depot structures within the Grosvenor Sidings to celebrate the industrial heritage of the area.</li> <li>• Greater emphasis of proposals accommodating green and blue infrastructure.</li> </ul>
<b>St Mary’s Hospital</b>	<ul style="list-style-type: none"> <li>• Changes to structure of the policy wording, to instead focus on a vision statement with supporting core principles.</li> <li>• Greater emphasis on sustainability and the need to deliver biodiversity net gain.</li> <li>• Articulation of the need to promote the Paddington Basin as an important local asset.</li> </ul>

	<ul style="list-style-type: none"> <li>• Reference to the canal shelter for potential reinstatement to provide useful links to tangible local heritage.</li> <li>• Specified an area in the site allocation which could be more acceptable for tall buildings, given the sites location in an Opportunity Area and in the context of heritage constraints.</li> </ul>
<p><b>Westbourne Park Bus Garage</b></p>	<ul style="list-style-type: none"> <li>• Changes to structure of the policy wording, to instead focus on a vision statement with supporting core principles.</li> <li>• Greater emphasis on the need to consider present and future transport needs, when considering redevelopment options for the bus garage.</li> <li>• Greater emphasis on sustainability and the need to deliver biodiversity net gain.</li> <li>• Reference to heritage assets and the need to consider impacts of development on the canal.</li> <li>• Articulation of the need to provide permeability improvements, including a reference to a potential new pedestrian bridge.</li> <li>• Clear references to land uses that will support the area's economy.</li> </ul>
<p><b>Land adjacent to Royal Oak</b></p>	<ul style="list-style-type: none"> <li>• Changes to structure of the policy wording, to instead focus on a vision statement with supporting core principles.</li> <li>• Greater emphasis on a mixed land use for the site without stringently requiring a particular use class.</li> <li>• Greater emphasis on the need to optimise densities and respecting the integrity of the adjacent tall building cluster through a design-led approach rather than prescriptive requirements.</li> <li>• Greater emphasis on sustainability and the need to deliver biodiversity net gain, particularly given the extant biodiversity on the site.</li> <li>• Greater emphasis on the need to protect any residential land use from the negative externalities from surrounding land uses (i.e. noise, vibration, air pollution etc).</li> </ul>

# 4 Appendices

---

## 4.1 Appendix 1: Regulation 18 Email

---

Dear Stakeholder,

On Tuesday 4 October, our vision for Westminster was outlined at the launch of our Fairer Westminster strategy.

Our ambitions are to deliver more affordable housing (including a greater proportion of social tenure) and a greener city that includes cleaner streets, improving air quality and prioritising more energy efficient projects such as retrofitting to help us meet our net zero carbon goals.

To achieve this, a robust and up to date policy framework for future planning decisions for Westminster will be reviewed. Aspects of our City Plan will be rewritten pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The proposed Regulation 18 Notice can be found [here](#). In addition, please find attached a summary document titled 'City Plan: What you need to know' to help you to better understand our plans and why we propose this direction of travel.

The partial review of the adopted City Plan includes:

1. Updates to Policy 9 on affordable housing to maximise the provision of genuinely affordable housing for those most in housing need
2. A new policy prioritising retrofitting and refurbishment of existing buildings where appropriate
3. The inclusion of site allocations to guide the development of key sites that make a significant contribution to growth targets and other policy objectives.

Although these policy amendments will cause consequential changes to other parts of the City Plan, we are not intending to amend any other policies through this review. As set out in our new [Local Development Scheme](#), also published today, a full review of the City Plan is scheduled to take place in 2025.

Alongside the Regulation 18 Notice, we have also published a short [report](#) that sets out how we plan to assess the new policies' impacts on sustainability, equalities, health and safety through an Integrated Impact Assessment (IIA).

We invite you to respond to this consultation with your ideas about the policies subject to review, our approach to the IIA and to submit details of any sites you think should be allocated for development.

If you responded to the former administration's call for sites earlier this year and you wish to further include additional details regarding your site's suggestions, then please inform us at [planningpolicy@westminster.gov.uk](mailto:planningpolicy@westminster.gov.uk). Please note that we are not seeking to identify every potential site in the city, our focus will be on larger sites that can deliver significant amounts of development and/or infrastructure improvements where more detailed policies are needed to ensure that are implemented in the best possible way.

Consultation will run to 5pm on Thursday 17<sup>th</sup> November 2022.

Please get in touch with us at [planningpolicy@westminster.gov.uk](mailto:planningpolicy@westminster.gov.uk) to submit your response to the consultation or if you have any questions. Please title your email 'City Plan Partial Review – response to Regulation 18 consultation' and send it in an editable format (e.g. Word) to allow your response to be easily processed.

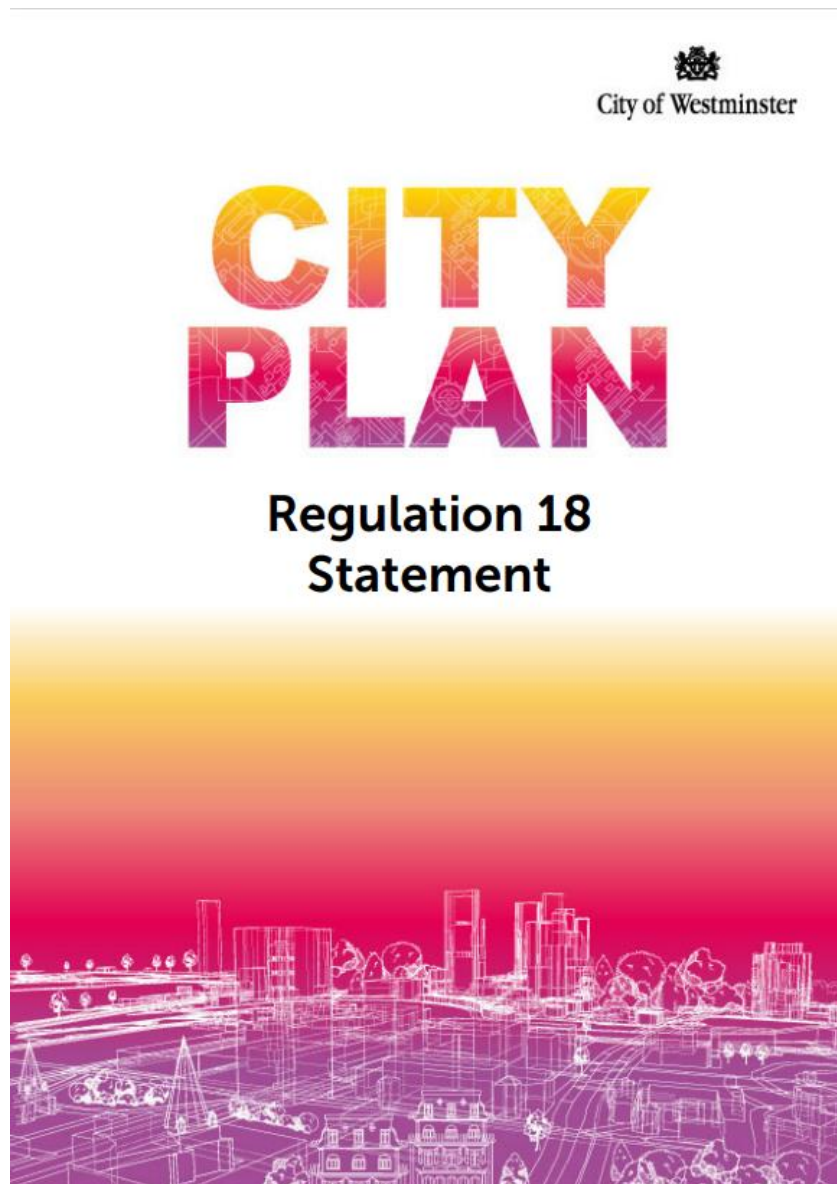
We look forward to hearing your ideas and any key sites you think should be allocated for specific types of development.

Kind regards

Cllr Geoff Barraclough  
Cabinet Member for Planning and Economic Development

## 4.2 Appendix 2: Regulation 18 Statement

---





**City of Westminster**  
**Planning and Compulsory Purchase Act 2004**  
**Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008**  
**Town and Country Planning (Local Planning) (England) Regulations 2012**  
**Notice of Partial Review of Westminster's City Plan Development Plan Document**

As set out in the council's revised [Local Development Scheme](#) (October 2022), Westminster City Council is proposing to carry out a Partial Review of the City Plan 2019- 2040 (Adopted April 2021). We would like to strengthen the policy on the delivery of affordable housing to address the significant waiting list for social housing and provide suitable homes for those who need it most. In recognition of the climate emergency that we face, the Council would also like to prioritise retrofit and refurbishment of existing buildings where appropriate, rather than demolition.

To this end, the Partial Review will include:

**1. Updates to Policy 9 on affordable housing to deliver more affordable housing**

Our policy currently seeks a greater proportion of intermediate (60%) compared to social (40%) housing, but we want to explore options to redress this balance with the objective of delivering a greater quantity of affordable housing as social, particularly on public land if it is shown to be viable.

In order to meet the high affordable housing challenge the city faces we also want to explore options and viability implications of requiring affordable housing from small sites below the current size thresholds set out in adopted Policy 9.

We welcome views from stakeholders on these ambitions, the best way to deliver them and the evidence that the council should gather to shape the policies.

**2. A new policy prioritising retrofit and refurbishment of existing buildings where appropriate**

We acknowledge that sometimes demolition is the only route and although there are higher embodied carbon costs associated with this route initially, it may derive larger carbon savings in the future, along with wider social and economic benefits. But we want to achieve a better balance between sustainability and growth and have a more effective tool to assess whether the social and economic benefits outweigh the environmental cost of demolition and subsequent contribution development makes to climate change. We therefore want to gather your ideas on what our planning policy on retrofit should say, how we could build a suitable framework to support the ambition to prioritise retrofitting and refurbishment, and the evidence to support it.

**3. The inclusion of Site Allocations to guide the development of key sites that make a significant contribution to growth targets and other policy objectives**

We welcome submission of new sites to be considered for allocation or new information on sites previously submitted as part of the council's call for sites undertaken earlier in 2022.

**4. Any other consequential changes necessary for consistency across the document.**

This notice is being made in accordance with Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012.

You are invited to let us know if you have any comments on what the above policies and site allocations should include.

Representations can be made by email to [planningpolicy@westminster.gov.uk](mailto:planningpolicy@westminster.gov.uk) or in writing to: City Planning Policy, Innovation and Change, Westminster City Council, 17th Floor, 64 Victoria Street, London, SW1E 6QP by **5pm on 18th November 2022**. They should be clearly labelled 'City Plan Partial Review – response to Regulation 18 consultation'. You can also find further information on our website at [www.westminster.gov.uk/city-plan](http://www.westminster.gov.uk/city-plan).

*Councillor Geoff Barraclough*  
*Cabinet Member for Planning and Economic Development*  
*7th October 2022*

Figure 2 - <https://www.westminster.gov.uk/media/document/regulation-18-statement>

# 4.3 Appendix 3: Regulation 18 screenshots

## 4.3.1 Screenshot of website advertising the Regulation 18 Consultation

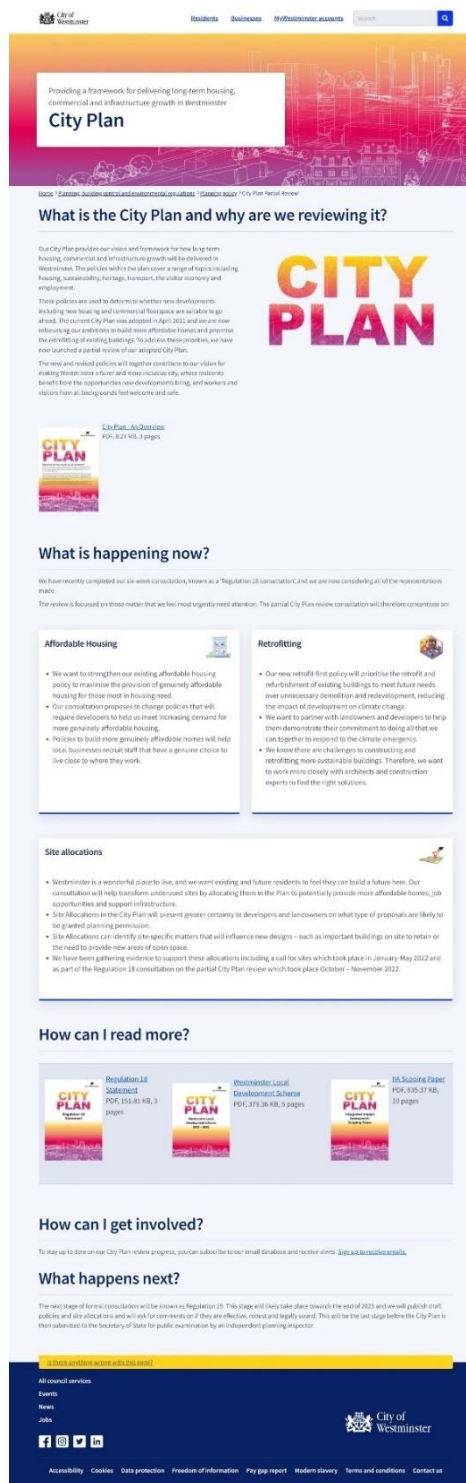


Figure 3 - <https://www.westminster.gov.uk/planning-building-control-and-environmental-regulations/planning-policy/city-plan-partial-review>

4.3.2

Screenshot of website advertising the Informal Engagement and associated flyer

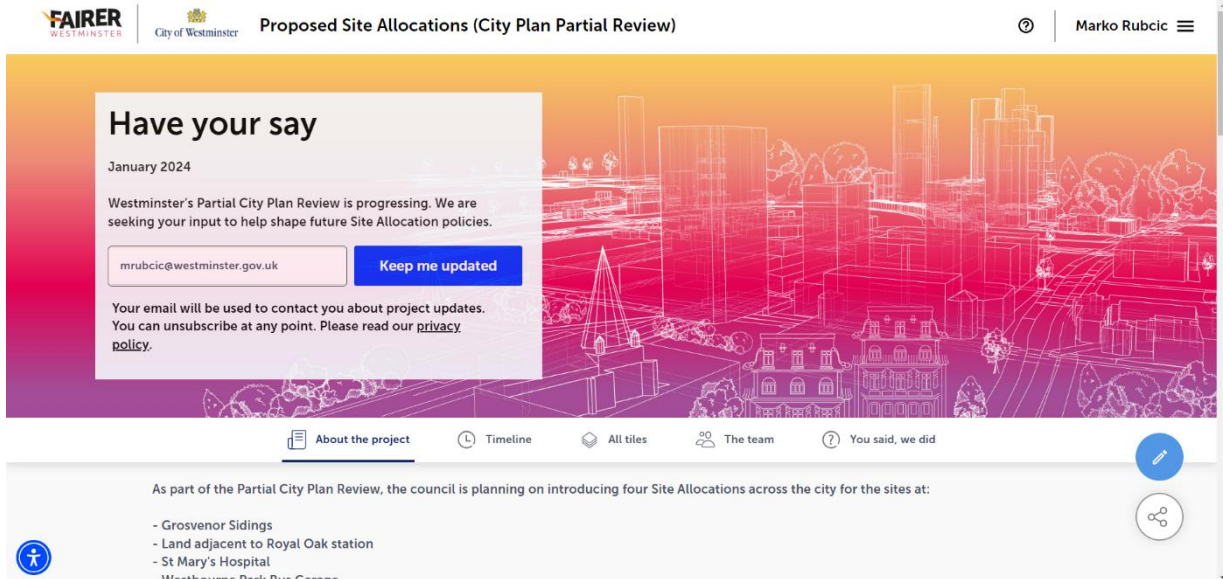


Figure 4 - <https://proposedsiteallocations.commonplace.is/>

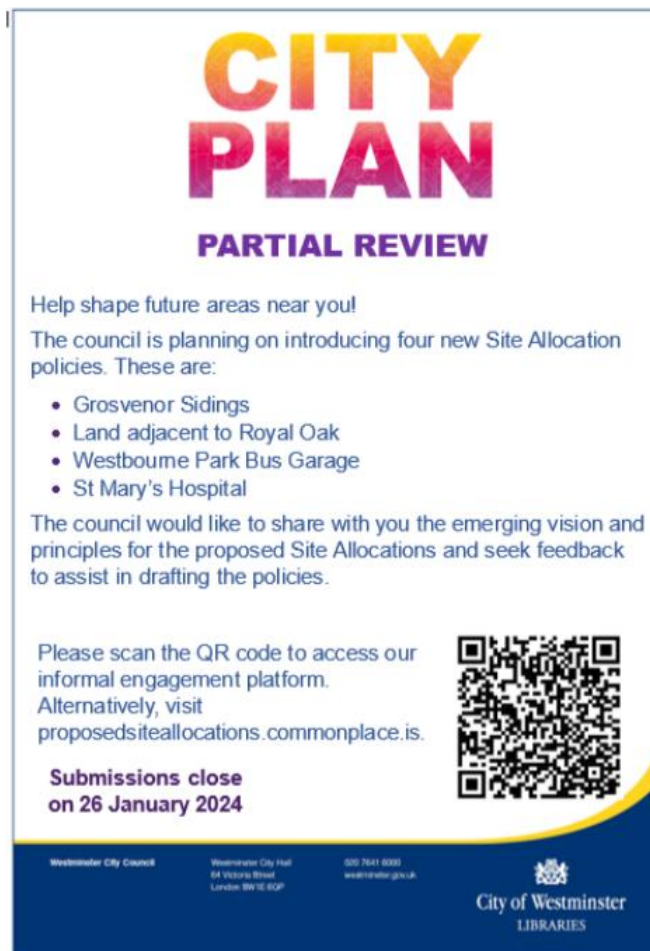


Figure 5 – Libraries flyer with QR code

## 4.4 Appendix 4: Regulation 18 respondents

---

ID	Name
CPR01	Vishvas Kanji (Individual)
CPR02	Guthrie McKie (Individual)
CPR03	The Coal Authority
CPR04	Vitcorp
CPR05	Natural England
CPR06	Achim Von Malotki (Individual)
CPR07	Soho Society
CPR08	City of London
CPR09	Thames Water
CPR10	Shaftesbury PLC
CPR11	Fitzrovia West
CPR12	Canal & River Trust
CPR13	Westminster's Conservative Party
CPR14	Knightsbridge Neighbourhood Forum
CPR15	Tayla Davies (Individual)
CPR16	BusinessLDN
CPR17	Greater London Authority
CPR18	Howard De Walden Estate
CPR19	Heleniums Limited
CPR20	Brent & Westminster Swifts group
CPR21	Heart of London Business Alliance
CPR22	Knightsbridge Partnership BID
CPR23	Port of London Authority (PLA)
CPR24	Theatres Trust
CPR25	BBC Pine Bidco LTD
CPR26	New West End Company
CPR27	Defence Infrastructure Organisation
CPR28	Royal London UK Real Estate Fund
CPR29	Imperial College London
CPR30	Church Commissioners
CPR31	British Land
CPR32	Lazari Investments Limited
CPR33	Westminster Property Association
CPR34	Rochester Row LTD & Meadow Victoria LTD
CPR35	London Historic Parks and Gardens Trust
CPR36	Universities Superannuation Scheme
CPR37	Landsec
CPR38	Marks & Spencer
CPR39	Capital & Counties
CPR40	Historic England
CPR41	Berkeley Homes
CPR42	Tate Gallery

<b>CPR43</b>	Hertfordshire and North London Sustainable Places
<b>CPR44</b>	Transport for London (TTL Properties Ltd – TfL's commercial arm)
<b>CPR45</b>	Future of Westminster Commission
<b>CPR46</b>	NHS HUDU
<b>CPR47</b>	Great Portland Estates

Planning Policy Team

Westminster City Council  
64 Victoria Street  
London, SW1E 6QP

[planningpolicy@westminster.gov.uk](mailto:planningpolicy@westminster.gov.uk)

March 2024