



City of Westminster

Committee Agenda

Title:

Planning & City Development Committee

Meeting Date:

Thursday 27th April, 2023

Time:

6.30 pm

Venue:

Rooms 18.01 & 18.03, 18th Floor, 64 Victoria Street, London

Members:

Councillors:

Ruth Bush (Chair)	Ryan Jude
Jason Williams (Vice-Chair)	Amanda Langford
Barbara Arzymanow	Ed Pitt Ford
Nafsika Butler-Thalassis	Sara Hassan
Md Shamsed Chowdhury	Robert Rigby
Paul Fisher	Cara Sanquest
Jim Glen	Mark Shearer



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

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



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

**Email: gwills@westminster.gov.uk; Tel: 07870 548 348
Corporate Website: www.westminster.gov.uk**

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

AGENDA

PART 1 (IN PUBLIC)

1. MEMBERSHIP

To report any changes to the membership.

2. DECLARATIONS OF INTERESTS

To receive and record declarations of interest.

3. MINUTES AND MATTERS ARISING FROM THE MINUTES

(Pages 3 - 18)

To sign the minutes of the last meeting as a correct record of proceedings.

Matters Arising from the Minutes.

4. WESTMINSTER DESIGN REVIEW PANEL

(Pages 19 - 22)

5. PLANNING POLICY UPDATE

(Pages 23 - 28)

6. ADDENDUM REPORT ON AMENDMENTS TO SUB-COMMITTEE LATE REPRESENTATIONS PROCEDURES

(Pages 29 - 38)

7. EARLY COMMUNITY ENGAGEMENT GUIDANCE UPDATE

(Pages 39 - 120)

8. NATIONAL PLANNING CONSULTATIONS UPDATE

(Pages 121 - 130)

**Stuart Love
Chief Executive
19 April 2023**



CITY OF WESTMINSTER

MINUTES

Planning & City Development Committee

MINUTES OF PROCEEDINGS

Minutes of a meeting of the **Planning & City Development Committee** held on **Wednesday 26th October, 2022**, Rooms 18:01 - 18:03 18th Floor, Westminster City Hall, 64 Victoria Street, London, SW1E 6QP.

Members Present: Councillors Ruth Bush (Chair), Jason Williams (Vice-Chair), Robert Rigby, Jim Glen, Mark Shearer, Barbara Arzymanow, Md Shamsed Chowdhury, Paul Fisher, Ed Pitt Ford, Ryan Jude, Amanda Langford and Cara Sanquest

Also Present: Councillors Geoff Barraclough and Matt Noble

Apologies for Absence: Councillor Nafsika Butler-Thalassis and Councillor Ellie Ormsby

1 MEMBERSHIP

1.1 That Councillor Sara Hassan had replaced Councillor Ellie Ormsby on the Planning and City Development Committee and Planning Application Sub-Committee (1).

1.2 There were no further changes to the Membership.

2 DECLARATIONS OF INTERESTS

2.1 There were no declarations of interests.

3 MINUTES AND MATTERS ARISING FROM THE MINUTES

3.1 Agreed that the minutes of the Planning & City Development Committee held on 27 July 2022 be agreed subject to the sentence in paragraph 4.4 in relation to the Annual update on planning applications and appeals performance - 2021/22 which reads '*Whilst there was a fluctuation in the yearly statistics, this is a result of appeals being determined by the Planning Inspectorate rather than the Council*' be amended and that the words '*rather than the Council*' is deleted.

3.2 Matters Arising from the Minutes

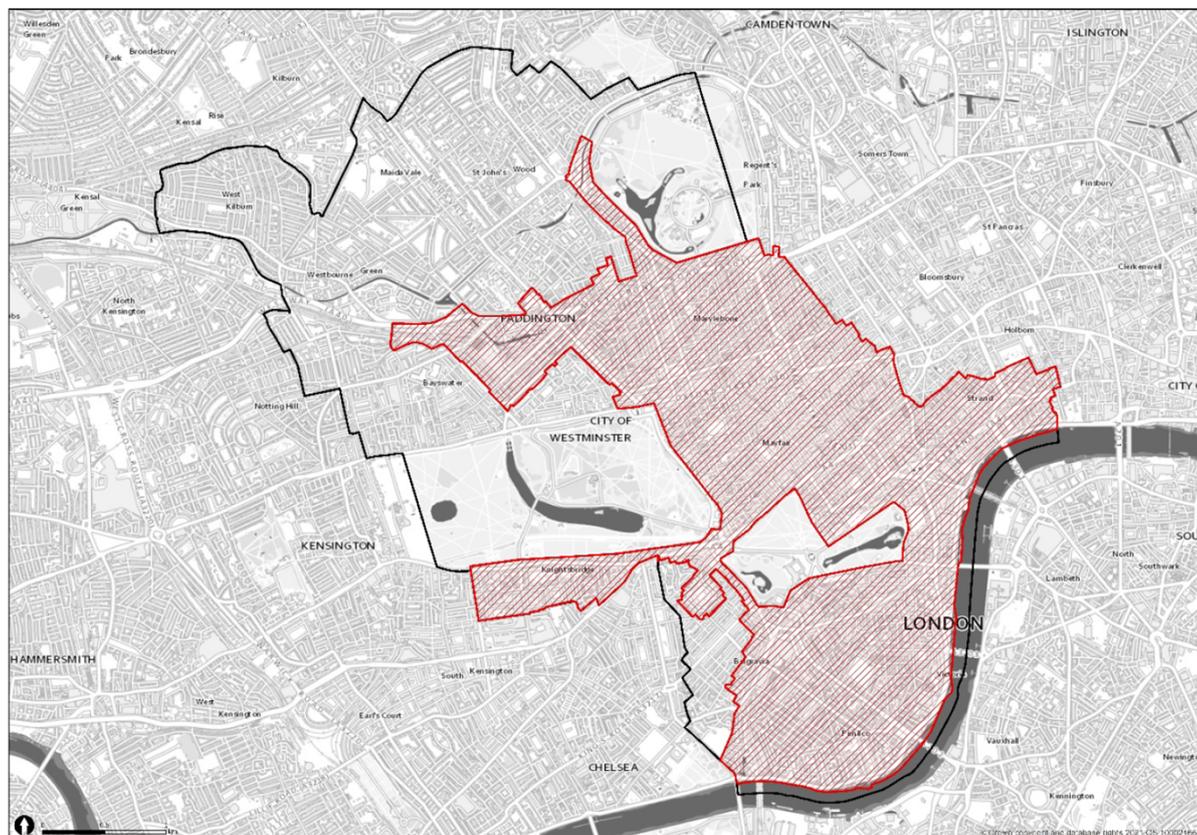
3.2.1 Minutes 3.2 – Minutes 3.2.2 Draft Early Community Engagement Guidance

Members were provided an update regarding the appointment of a Community Champion and informed that works were currently being undertaken to ensure that the newly created position was completely independent. Members were informed that officers had made initial informal enquiries with a number of potential service providers, but that one of these providers may not be in a position to formally bid to run the service. The Committee would be provided with an update on the Community Champion's role and how they would work with stakeholders at their next meeting. Members noted that the Community Champion scheme was initiated by the previous Administration and was supported by the current.

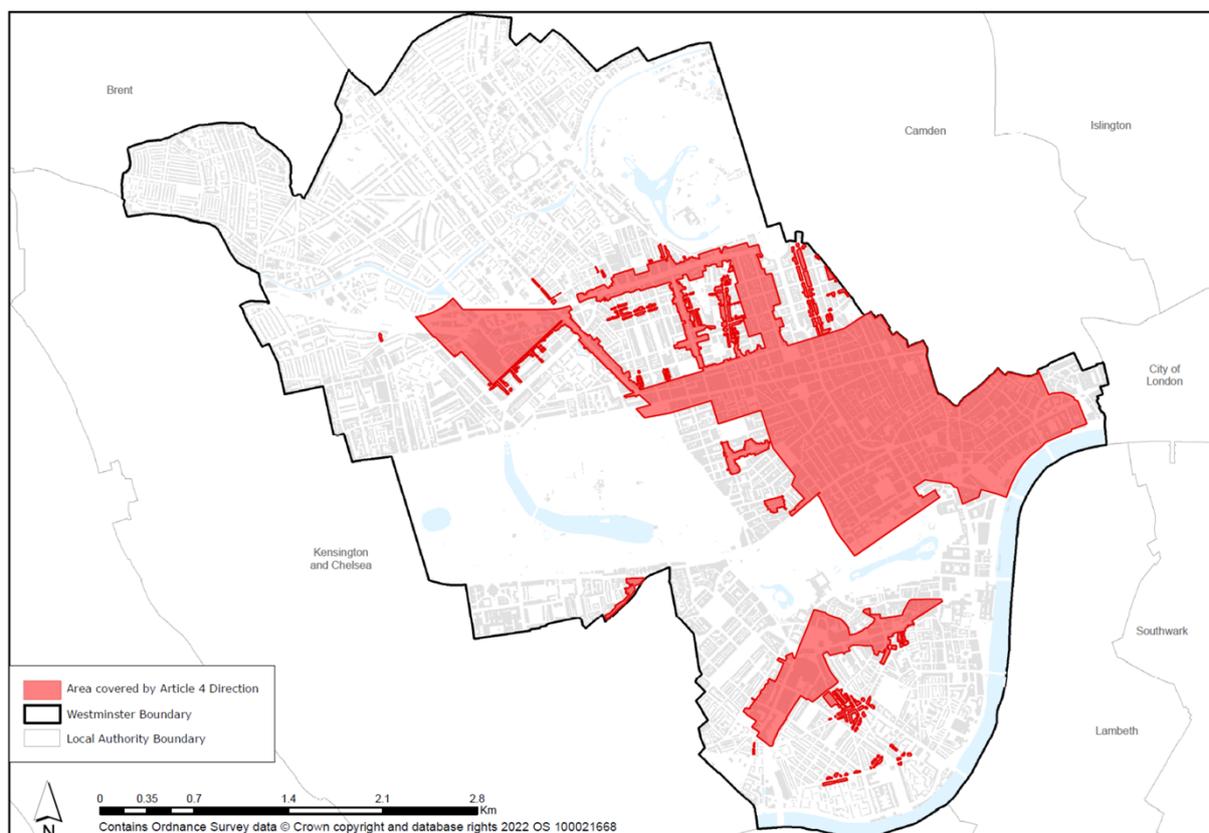
3.2.2 Minutes 3.2 – Minutes 3.2.4 National Policy & Planning Reform Update. 4.4 Article 4 Direction

Members noted that a large area of the Central Activity Zone (CAZ) which was originally proposed by the council, had been reduced by central government and requested that maps be provided to clarify what was originally proposed and what this was amended to. Members were informed that the updated map for the CAZ was available on the council's webpage but that this could be circulated with the minutes.

The area the council originally proposed, which comprises the CAZ minus Royal Parks and the River Thames, can be viewed below:



The revised boundary that the Article 4 Direction now applies to can be viewed below:



3.2.3 Minutes 3.2 Minutes 3.2 5 National Policy & Planning Reform Update.

Officers confirmed that there was no live list or any informal enquires received regarding the change of use under permitted development rights. Members noted that this may be due to there still be uncertainty regarding the new scheme.

3.2.4 Minutes 3.2 Minutes 3.2.6 National Policy & Planning Reform Update. 4.4 Affordable Housing and Planning Obligations SPD.

The Committee requested that officers provide a list of Supplementary Planning Documents (SPDs) that were currently being formulated or in the process of adoption. The Committee was reminded that the Local Development Scheme had been published alongside the consultation on the City Plan and this included a list of SPDs which were currently under review. The Local Development Scheme sets out that work is underway on the following new SPDs:

- Planning Obligations and Affordable Housing; and
- Public Realm

It also sets out that work is underway on updating the existing Environment SPD.

3.2.5 Minutes 3.2 – Minutes 3.2.8 5 VAT on New Build and Refurbishment Schemes. 5.3 Incentives for Retrofit rather than Redevelopment.

The Committee noted that they previously held discussions about lobbying Central Government regarding incentives for retrofits and were of the view that the current political climate was not the optimum time to undertake this. Members noted that a plan would be formulated for the above activity and the Committee would be advised and updated on its contents.

3.2.6 Minutes 3.2 Minutes 3.2.9 Planning Enforcement Team Performance and Local Enforcement Plan

Members were informed that consultation on the Local Enforcement Plan was being formalised and that the Communities Directorate was being liaised with to ensure that all stakeholders are consulted. The Committee were reminded that the Local Enforcement Plan focuses on planning enforcements activities and the consultation would seek views on what areas should be prioritised and how resources should be deployed.

3.2.7 Minute – 5 Discussions of the future format and Terms of Reference of the Planning & City Development Committee.

Members noted that their quorum was three and agreed that they should hold future discussions on whether this should remain. The Committee were reminded that their quorum was set out in the Constitution and that the latter was currently being reviewed.

3.2.8 Paddington Green Police Station

Members noted that Paddington Green Police Station Planning Application had been 'called in' by the Mayor of London and that it was anticipated that an amendments would be submitted to the Mayor. Members were informed that officers would submit comments regarding the revised application and would seek the view of the Planning Applications Sub-Committee before responding to the Mayor. The developer had undertaken consultations with stakeholders, and this included invitations to exhibitions. Members were advised that they should seek advice from the Director of Place Shaping and Town Planning regarding attending events organised by the Developer. This was to ensure that any actions by Members which could potentially be viewed or amount to pre-determination. This was to guard against.

3.2.9 Design Review Panel

Officers advised that preparatory work had started regarding the creation of a Design Review Panel and both officers and other stakeholders had been consulted. The Committee were informed that most London Local Planning Authorities had a Design Review Panel and that large developers and staff members such as design officers were familiar with the concept. It was noted that some officers were or had previously been members of DRPs in other boroughs. The Panel will not have any statutory functions and will only act in

an advisory capacity an provide expert advice on a range of design related issues. Members were advised that the Panel views would be sought in addition to the advice provided by Design, Conservation and Sustainability Officers, and the former should be viewed as a complementary additional resource which would help to boost the standard of design and quality of developments.

4 PLANNING APPLICATIONS AND APPEALS PERFORMANCE MID-YEAR UPDATE - 2022/23

- 4.1 The Committee received a report which provided a mid-year update on the performance of the Town Planning service in terms of the timeliness and quality of its planning application decision making and the success rate of planning appeals for the first two quarters of 2022/23. Performance against all measures exceeded the Department for Levelling Up Homes and Communities (DLUHC) and relevant internal performance indicators.
- 4.2 The Committee was advised and noted: -
- 4.2.1 That the volume of Applications for the first two quarters of the year was consistent and figures were like those of the previous year for the same period.
- 4.2.2 That the number of applications determined exceeded those which had been received in the first quarter and this was due to the Town Planning Service resolving an increased number of outstanding cases.
- 4.2.3 That the number of pre-application advice requests had increased, and this indicated that there was recovery following the increase of fees at the start of 2021.
- 4.2.4 The speed of decision making continues to surpass the DLUHC threshold for Major, Non-Major and Other applications. The Major applications rate is 93%, Non-Major Applications is 77% and other Applications is 78%.
- 4.2.5 There have been 306 Extensions of Time (EOTs) used during the first two quarters for Non-Major applications and this has resulted a mean of 40 additional days. The additional period covers the need to receive, assess and review revised documents. There were 192 EOTs used for Other applications and the mean additional days to review these applications was 28 days. This is reflective of there being a lesser need to reconsult and assess revised drawings for these types of applications.
- 4.2.6 That the quality of decision making at Westminster continued to be high and that only a very small proportion of Major and Non-Major planning applications were overturned at appeal. There had been an increase in the number of appeals dismissed or partly dismissed from 66% to 70% from the previous year.

- 4.2.7 There were two appeal decisions in the first quarter which may potentially assist the service with future interpretations of policies in the new City Plan. These were the sites at Leconfield House and 2-49 Cambridge Street).
- 4.3 Members held a discussion and noted the following: -
- 4.3.1 That the determined appeals provided guidance on how to consider certain material considerations during the decision-making process and were a good source of information.
- 4.3.2 That appeals decision assisted and aided the Service with interpreting future Policies.
- 4.3.3 That the use of the Pre-Application Advice Service had decreased in recent years, and this may be attributed to the current economic climate. Members were reminded that fees had been increased and the format of the service amended in January 2021 to improve the service and move towards cost recovery and this is likely to have also impacted on use. Numbers for 2022/23 do though show an increase in pre-application requests. There are currently fewer larger complex developments, and these types of developers are typically more heavy users of the pre-application advice service. The larger developers have indicated that the advice service should be extended and include components such as the 'fast tracking' of applications. The Committee were informed that wider economic impacts in the property industry had reduced margins for minor schemes and resulted in smaller developers not using the service so extensively.
- 4.3.4 Members were advised that use of the pre-application advice service had reduced during the Covid period by around 30% and that statistics indicated that there had been reductions in planning applications nationally and this was between 20% to 30%.
- 4.3.5 Members agreed that the pre-applications advice service should continue to be promoted and be extensively marketed. The Committee noted that part of the marketing strategy could include the benefits of using the service which include resolving significant issues with schemes prior to the formal planning application stage and being supported with early community engagement. The Committee also noted that usage of the service led to better decision making, improved planning outcomes and higher approval rates. Members noted that developers were already signposted to the pre-applications advice service.
- 4.3.6 Members were reminded that use of the pre-application advice service was voluntary and confidential. Residents are informed of proposed scheme when a formal planning application is made. The Committee was advised that works would continue to ensure that there are broader consultations with communities at pre-application stage and that stakeholders have an opportunity to have an input in prospective schemes during their early development stage.

- 4.3.7 The Committee was advised that over 90% of planning applications are submitted via the Planning Portal. There are a variety of methods which interested parties can use to communicate their views. These include direct emails to the service and liaising with the relevant amenity society. In addition to neighbour notification letters the service also places an advert in a local newspaper and erects a site notice to notify people of each application. Members were advised to forward their suggestions to the service on how to further improve communications and the process of receiving enquires regarding planning applications.
- 4.3.8 Members noted that the DLUHC did not specify performance targets regarding planning appeals. Local Planning Authorities (LPAs) typically set their own performance indicators for Planning Appeals. The Committee were reminded that appeals were lodged by applicants and that their dismissal meant they were refused. The non-determinations of planning applications can also be appealed, as can any conditions imposed on a planning permission.
- 4.3.9 Members were advised that it is 'common ground' among all LPAs that their primary purpose is to ensure their decisions deliver high quality development. The Committee was informed that performance indicators are not an influence in the outcome of a planning decision, but rather they are an indicator of the quality and professionalism of the service that has been provided. The Committee was informed that a recent appeal regarding costs lodged against the service had been dismissed and the officers report had been commended by the Planning Inspectorate. The Committee was informed that most planning applications considered by LPAs were approved.
- 4.3.10 Members noted that the performance indicator for appeals had been set at 60% for several periods and queried whether consideration should be made to increase the bar to 65%.
- 4.3.11 Members noted that most appeals lodged related to delegated decisions and requested that future reports include examples of these appeals.
- 4.3.12 Members were informed that the Town Planning Service would continue to improve and were reminded that London LPAs had different priorities and Westminster has its own unique features and challenges, such as a high number of listed buildings and other heritage assets.
- 4.3.13 Members noted that there had been an increase in the number of withdrawn applications and were advised that these figures were due to the Service identifying and closing old dormant applications. The Committee was informed that all planning applications needed to be accounted for and receive a decision. The reasons for applications becoming dormant vary and range from the applicant not wanting to pursue the application or concerns regarding proposals that prevent their determination.
- 4.4 Members thanked officers for their report and responding to enquiries raised by the Committee,

RESOLVED:

1. Members noted the contents of the report and the on-track performance of the Planning Service.
2. That the pre-applications advice service continue to be promoted and be extensively marketed and that the marketing strategy include the benefits of using the service.
3. That future reports on planning applications and appeals performance include examples of appeals which were lodged against delegated decisions.

5 AMENDMENTS TO SUB-COMMITTEE LATE REPRESENTATIONS PROCEDURES

- 5.1 The Committee received a report which provided an overview of the recommended changes to the current procedures for accepting late representations in advance of Planning Applications Sub-Committee meetings. The recommended procedure included the introduction of a deadline for submission of late representations in advance of the commencement of the committee meeting to allow Members and officers appropriate time to fully consider the planning merits of the issues being brought before the committee.
- 5.2 The operation and function of the Planning Applications Sub-Committees were governed by the Terms of Reference set out in the Constitution, the Statement of Community Involvement in Planning (2014) and the Committee Procedure Rules, which were last updated to allow for hybrid committee meetings in May 2021. Any amendments to the procedures for accepting late representations do not require any changes to the Constitution or the Statement of Community Involvement in Planning.
- 5.3 Members were reminded that representations received prior to the publication of the committee report were summarised and addressed in full in the report and full copies of the representations were provided in the background papers. Representations received after the publication of the committee report and prior to 2.00pm on the Thursday prior to committee were circulated to Members by the close of business on that day. For representations received after 2.00pm on the Thursday prior to committee there was currently no defined 'cut off' after which representations would not be accepted. Representations were accepted up until the start of the committee meeting and circulated at the meeting.
- 5.4 Members were advised that officers had reviewed the approaches taken by other comparable local planning authorities (LPAs) and assessed the practicality of introducing a deadline on a variety of days prior to the committee meeting. Of the ten other LPAs analysed, 5 had introduced a deadline for late representations prior to planning committee meetings and 5 accepted representations up until the start of the committee meeting. Of those with a deadline, 2 were set earlier on the day of the committee meeting.

5.5 Considering the approaches taken by comparable LPAs, and having regard to the processes that are required to be undertaken by Legal Services and the Committee and Councillor Liaison Team in advance of a Planning Applications Sub-Committee meeting, officers have considered three options for introducing a deadline for late representations:

- Option 1 – Deadline at 12.00 on the day of the committee meeting
- Option 2 – Deadline at 12.00 on the working day prior to the committee meeting
- Option 3 – Deadline at 12.00 two working days prior to the committee meeting (to align with current public speaking deadline).

5.6 The Committee discussed the various options regarding deadlines for submitting late representations to Planning Applications Sub-Committees and was advised by Officers that the preferred Option was 2. Officers commented that Option 2 allowed the Major and Minor Planning Sub-Committees to still consider the late representation and enabled parties who had either missed the deadline for registering to make a deputation at the Sub-Committees, or had not been granted a speaking slot, the opportunity to put forward a written submission. A mechanism was recommended to allow acceptance of representations after the deadline in exceptional circumstances to ensure that it does not prejudice the ability of the committee to consider representations that raise genuinely new material planning considerations. This would be achieved by giving the Chair discretion to accept late representations in exceptional circumstances. Where a representation was received after the deadline, the Presiding Officer and the Solicitor to the Council would advise the Chair whether the late representation raises new material planning considerations. The Presiding Officer would advise the commentator of the chair's decision. Officers advised that it was unusual for new material considerations to be presented immediately prior to a committee meeting. The Committee noted that the Chair's refusal to accept a late representation may be challenged. Members noted that the Chairs had discretion on whether interested parties could make verbal representations at the Sub-Committee if they apply after the online register to speak at the meeting has closed.

5.7 Members had an in-depth discussion and noted the following: -

5.7.1 The Committee was informed that there had been historic discussions on how late representations should be processed and whether a set deadline should be implemented.

5.7.2 That there had been an increase in the number of late representations being submitted and that written information contained in these documents were increasingly becoming bulkier. Members noted that their Sub-Committees were adjourned for these documents to be read and acknowledged that lengthy late written representations may be difficult to fully comprehend during adjournments.

5.7.3 Members noted that the Chair's introductory note advised that Members received and read all documents a week prior to their meeting and felt that

reading representations during the meeting gave rise to the perception that this would not be the case. The Legal Officer advised that all representations need to be considered and fully assessed as part of the decision-making process and failure to do this would leave the council open to legal challenge. The Committee noted that the Chair's introductory note would need to be updated to include a statement that the Chair had the discretion to accept any late representations that were received after the deadline for submitting written information. The Chair should also advise of the number of late representations received after the deadline and give reasons on why they are accepted or refused.

- 5.7.4 Members agreed that interested parties should not be deterred from submitting written representations to their Sub-Committees and commented that some in this cohort may not be fully aware or be engaged in the planning process. Officers reminded the meeting that the Chair would have discretion on whether late representations after the deadline should be accepted and highlighted that written information received was typically duplication of information which had previously been submitted by interested parties.
- 5.7.5 Members commented that the processes including the setting of deadlines for submitting late representations should continue to be primarily resident focused and noted that currently they were able to request for an adjournment to read late representations that were submitted. Members agreed that all representations were valid and should be fully evaluated regardless of when they are submitted during the application. The Committee noted that the proposed options put forward would largely be beneficial to Members and officers' time would not be reduced if any was adopted.
- 5.7.6 Members agreed that the Chair's script should be updated and include a segment which informed that the Chair had the discretion to accept any late representations that were received after the deadline for submitting written representations. The Chair should also advise of the number of late representations received and give reasons as to why they had been accepted or refused. The Sub-Committee would be adjourned to allow Members sufficient time to read any late written representations.
- 5.7.7 Members agreed that officers should conduct an analysis of late representations that were submitted to their Sub-Committees and noted that 5 of the 10 Local Planning Authorities which were benchmarked accepted written submissions on the same day as their planning committees.
- 5.7.8 Members agreed that adequate reading time to digest written representations should be factored in and noted that colleagues had employment commitments and noted that this can cause pressure on time for reading late documents. Members also commented that it was more difficult to consider lengthy representations that are tabled at the Sub-Committee. There was a view that implementing a deadline for late representations would ensure that the Sub-Committees' decision-making would be more robust, and the duty to ensure that all representations were given due attention would be easier to meet.

- 5.7.9 The Committee also acknowledged that colleagues may also be slow readers, and that a deadline submission for late written representation on the same day as the online register to make deputations at their Sub-Committees or the day before the meeting would help to alleviate the above concerns.
- 5.7.10 Members commented that interested parties should be permitted to submit written representations until 10:00hrs on the day of the Sub-Committee during Bank Holiday periods. Members were informed that during Bank Holiday periods the online register to make deputations at Planning Sub-Committees were brought a day forward.
- 5.7.11 Members noted that some interested parties such as developers and planning agents were better resourced and would be more familiar about the planning process in relation to late representations in comparison to residents. The Committee noted that a set deadline for all stakeholders would ensure there was equity amongst all groups in this matter and timeframes should be fully published and it be communicated that late representations may not be considered.
- 5.7.12 Members commented that stakeholders are not be able to address issues that are raised in late representations submitted by other parties that are tabled at the Sub-Committee. The Sub-Committee also noted that late representations tabled at the meeting may be given undue weight and that this would be avoided if all representations were considered at the same time prior to the meeting.
- 5.7.13 That both the statutory (21 day) and any new deadlines for submitting written representations should be made public. Members noted that the latter should be viewed as a concession in instances when interested parties fail to submit written submission before the statutory deadline. The Committee noted that not all interested parties would be aware of the pre-committee deadline and that some LPAs. It was noted that the Service was committed to setting out their consultation period under the Statement of Community Involvement in Planning.
- 5.7.14 Members commented that late representations could also serve as a refresher to colleagues on what are the main concerns or topics for a particular application. Members also noted that interested parties would be aware that there may be difficulties encountered by the Sub-Committee in fully comprehending lengthy written late submissions that are tabled at the meeting.
- 5.7.15 Members noted that their adopted Policies set out what should be considered as 'material considerations'. The Sub-Committee were informed that a definition and examples of 'material consideration' were available on the Service website and that the website also contains advice on how to comment on planning applications and get involved. The Community Planning Advisor and early community engagement guidance would ensure that the wider community involvement in planning, particularly in the earlier stages of the planning process. Members commented that interested residents would likely to be fully engaged in the initial stages of planning schemes.

- 5.7.16 The Committee noted that the current procedure for receiving late representations had successfully operated for a long period and that Members would have ensured that all representations received were fully understood before making a decision. These decisions therefore should not be viewed as being invalid.
- 5.7.17 Members agreed that any new procedure that may be adopted should be reviewed, and the outcomes reported to a future Committee. The review should include how the Chairs discretion was used and what representations were received and include those that were refused.
- 5.7.18 Members requested that officers provide an analysis of what is contained in late representations, and this should include trends such as their frequency, content, profile of those submitting representations and whether they were repetitious of previous information previously submitted. The Committee also requested that information be provided on how other LPAs support their members in reading late representations, in particular individuals that have reading needs or English as a second language.

RESOLVED:

1. Members noted the contents of the report.
2. That officers provide an analysis of what are contained in late submissions that are submitted to Planning Applications Sub-Committees and this should include trends such as their frequency, contents, and profile of those submitting representations and whether information submitted are repetitious be reported at their next meeting.
3. That officers provide information on how other Local Planning Authorities support their members in reading late representations and individuals who have reading needs such as dyslexia or English as a second language.
4. That Chairs of all Planning Sub-Committee make it explicitly known that sufficient time would be provided for Members to read all late representations.
5. That the procedure for receiving late representations that may be adopted is reviewed and the outcomes reported to a future Committee. The review should include how the Chairs discretion was used and what representations were received and include those that were refused.

6 UPDATE ON PARTIAL CITY PLAN REVIEW

- 6.1 The Committee received a report which provided an overview of the Partial Review to the City Plan which was launched on 7 October, running to 18 November 2022. It explained the scope of the review and role of the Planning and City Development Committee in the preparation of the Plan.

- 6.2 The current City Plan was adopted in April 2021 (work commenced in 2017), and sets our broad strategy for growth and includes over 40 thematic policies on a diverse range of issues. Alongside the London Plan and ‘made’ neighbourhood plans, it provides the starting point for determining all planning applications in Westminster. The Plan now needed some updating to better align with the priorities in the council’s new Fairer Westminster Strategy.
- 6.3 The Plan was only recently adopted, took a long time to produce, and is still considered largely fit for purpose. The Cabinet Member therefore agreed to limit any review to the key priorities of:
- Affordable housing – to help deliver more affordable housing, particularly social housing, and explore if small sites (i.e. those delivering less than 10 homes) can also start to contribute towards new affordable housing;
 - Climate change – to better prioritise retrofit and refurbishment of existing buildings over demolition and redevelopment;
 - Site allocations (previously intended to form a separate document) – to provide site specific guidance on key sites – including mix of uses, amount of new floorspace, and design criteria.
- 6.4 Regulation 18 consultation took place between 7 Oct 2022 – 18 Nov 2022 and this included dedicated website, emails to all stakeholders, internal engagement with other teams and meetings with key stakeholders including neighbourhood forums, WPA, the GLA, and Historic England.
- 6.5 There would be more informal engagement (workshops, meetings etc) through 2023 to attempt to build consensus on proposals before the next formal stage of consultation (Regulation 19).
- 6.6 Members held discussions and noted the following: -
- 6.6.1 That supportive comments had been received from individuals regarding the broad scope of proposals for the partial review of the City Plan, and that more substantial comments would come forward as more detail on the potential content of new policies and site allocations is published.
- 6.6.2 The partial review of the City Plan had been fully publicised, and all the council’s social media platforms were used to undertake this. There had also been events held with Neighbourhood Forums and these bodies can act as an outreach to local communities.
- 6.6.3 Officers advised that partially reviewing the City Plan and there being focus on certain areas helped to limit costs. Members agreed that this approach was sensible and noted that the three areas focused on were highlighted in the Majority Group’s Manifesto. It was also noted that to date all work on the partial review had been carried out by officers. Moving forward, any additional costs (such as commissioning of supporting evidence where external technical expertise is required, or the costs of the Planning Inspectorate

carrying out independent examination of the plan) will be met from existing budgets.

- 6.6.5 Members noted that it was envisaged that the outcomes of the partial review of the City Plan would be implemented before the next Council Election and that it was proposed that a full review of the City Plan then be undertaken in 2025, when more data is available on how the version of the City Plan adopted in April 2021 is performing.
- 6.6.6 Members noted that the Basement Policy has not been earmarked for further review as since the adoption of the April 2021 City Plan, and the new policy on basements within it, there had been a substantial reduction in the amount of basements being proposed or approved.
- 6.6.7 Members were reminded that SPDs could be used to influence policies and advised that the Planning Obligations and Affordable Housing SPD and an update to the Environmental SPD would be consulted on next year. There would also be national policies in 2024 regarding Biodiversity Net Gain (BNG) and these would need to be reflected in forthcoming SPDs.
- 6.6.8 Members noted that a Community Impact Assessment would be undertaken regarding Licensing and Planning, and there would be future discussion on any overlaps.

RESOLVED

1. That Officers report back to the next committee on the responses to Regulation 18 consultation and any substantial emerging evidence based findings if available.

7 ANY OTHER BUSINESS WHICH THE CHAIR CONSIDERS URGENT

- 7.1 The Chair requested that the Committee considered whether colleagues making representations at their Sub-Committee should be required to leave the meeting after their deputations and requested that this proposal be discussed at the next Meeting.
- 7.2 The Chair commented that discussions had been held with the Director of Town Planning and Building Control regarding providing the Committee with information on the outcomes of planning decision for residents and businesses in relation to S106 agreements. The Committee would receive reports on these agreements that had been made such as public art, new community space, greenery, or similar proposals. These S106 agreements would be reported periodically and be resident focused and be in a form of an e-newsletter and published on the Council's website. This new scheme was hoped to ensure that the wider community were enabled to be aware of planning outcomes.

- 7.3 Members were reminded to forward any training requirements to the Committee and Councillor Coordinator. The Chair advised that a further training session on sustainability will be facilitated by the Westminster Property Association and the Cabinet Member for Climate Action, Regeneration & Renters. The session would focus on Sustainable Cities and include a briefing.
- 7.4 Members requested for a training session which focuses on biodiversity.
- 7.5 The Chair thanked the Committee and Officers for their contribution.

DATE OF NEXT MEETING

- Wednesday 29 March 2023

The Meeting ended at 8.35 pm

CHAIRMAN: _____

DATE _____

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City of Westminster

Planning & City Development Committee

Date: 27 April 2023

Classification: General Release

Title: Westminster Design Review Panel

Report of: Director of Town Planning and Building Control

Financial Summary: The costs of the panel are to be met through fee income received by the authority. The DRP will be administered through existing staff resources in the Town Planning service.

Report Author and Contact Details: Jane Hamilton (jhamilton@westminster.gov.uk)

1. Executive Summary

1.1 This report provides an update on progress in establishing a Design Review Panel for Westminster.

2. Recommendation

2.1 Members are asked to note the content of this report.

3. Introduction

3.1 At the last meeting of Planning and City Development Committee, members were advised that officers had begun work to set-up a Design Review Panel for Westminster. This report provides more detail on the how the panel will operate and progress and timelines for its establishment.

3.2 Role and Operation of the Panel

3.3 As noted previously, the Westminster Design Review Panel (DRP) is being established to provide an expert, independent voice on design which will support internal decision makers to promote exemplary, sustainable design standards and negotiate design improvements. The establishment of a Design Review Panel was a manifesto commitment and responds to both the National Planning Policy Framework and London Plan policy, which require local planning authorities to have design review processes in place.

3.4 The Panel will follow established best practice and will provide independent, constructive review of major development proposals and projects from a design perspective. It is to be made up of a pool of external, independent, multidisciplinary built environment experts (including architects, place-making, sustainability and planning professionals). The purpose of the DRP is not to duplicate or replace

existing mechanisms for securing high quality design, but to provide additional expert advice to inform the planning process. By offering advice and review during the pre-application process and on planning applications, the DRP's role should support planning officers, the planning committee and the community in securing high quality development.

- 3.5 Officers have undertaken research into different models for delivery and best practice in design review. Visits were made to observe other panels in operation, a workshop was held with officers and presentation made to the local amenity societies and forums earlier this year. Following on from this, an operating model and Terms of Reference for the Westminster Design Review panel has been developed. This will adhere to the principles set out in the London Design Review Charter, which is published by the Mayor of London and supports the London Plan policy on Design Review.
- 3.6 The panel will initially provide a core service focused on independent review of major development proposals at pre-application stage. It will be administered by officers in-house and the Town Planning service will identify schemes that are most likely to benefit from independent design review - typically major strategic proposals and council-own development.
- 3.7 The Panel itself will be formed of a pool of around 20-30 members (including more than one Chair) with a broad range of design expertise and wide skill set, which will complement those of our in-house design specialists. Full panel meetings will typically involve a chair and four or five panel members taken from the wider pool of experts, selected according to the nature of the scheme being considered and types of expertise required.
- 3.8 Following panel meetings, the Panel's observations and recommendations will be signed off by the Chair and panel members and then provided to the applicant as impartial advice. These comments and recommendations will also be noted in any pre-application response and in the Planning Officer's report to the Planning Sub Committee should proposals become the subject of a planning application.
- 3.9 A draft Terms of Reference for the panel has been prepared and sets out detail of working arrangements, as well as a code of conduct for members and the process for managing conflicts of interest. This will be published with details of all panel members in the pool, following conclusion of the recruitment process.
- 3.10 Panel membership and Recruitment
- 3.11 A recruitment process for members of the design review panel was launched in February and closed on 13 March 2023. This was widely advertised including in architectural and professional press, and across a wide range of networks and forums.
- 3.12 Through this recruitment we have sought to attract a diverse and multidisciplinary group of built environment professionals to provide access to a wide skill set to inform the design process. While there will not be specific resident representatives on the panel, Westminster residents can also join the panel as long as they have relevant built environment expertise and demonstrate they meet the selection criteria.

- 3.13 All applicants were asked to fill in an online form and explain their experience and how they are able to contribute positively to the role and meet the selection criteria. The recruitment process has resulted in around 250 applications to join the panel, including 49 applicants for chair.
- 3.14 Interviews are to be held for the positions of Chair and officers are working through all applications using the selection criteria to create a shortlist and final panel membership will be agreed with appointed chairs. As noted above, we aim to recruit around 20-30 members to the pool for the panel, plus two to three chairs.
- 3.15 Next steps
- 3.16 Once final panel membership has been agreed, a training and induction event for panel members will be held to which all committee chairs will be invited. All panel members will be asked to sign and agree to the terms of reference and code of conduct, including rules in relation to confidentiality and conflicts of interest.
- 3.17 Given the significant interest in joining the panel, the selection process will take longer than originally anticipated. It is now proposed the first meeting of the panel can be held in early summer and the Design Review Panel will then be programmed to meet monthly, depending on demand.
- 3.18 Once established, the impact and success of the panel will be monitored and evolve in response to demand and feedback from internal and external stakeholders and any changes in priorities and policies. A review of effectiveness of process will be undertaken after six months and an annual report published which considers the impact of the panel.

5. Financial Implications

- 5.1 The design review panel will be a discretionary service and cost will be borne by applicants and the fee income received by the authority would cover costs to ensure the panel is cost neutral. Administering the panel at this stage is to be met through existing staff resources in the Town Planning service.

6. Legal Implications

- 6.1 Design Review is an independent and impartial evaluation process and carried out by expert practitioners with current experience in design and development. To ensure impartiality and confidence in the DRP, its work and members, consideration should be given in the terms of reference to securing the following:
- a) Independence – the review must be conducted by panel members who are unconnected with the scheme’s promoters and decision makers and mechanisms should be in place to ensure that conflicts of interest do not arise. Each panel member must be required to register and declare any interests and/or conflict of interest and the register should be maintained and kept up to date;
 - b) Expertise and suitably trained people who are experienced in design and know how to criticise constructively. Panel members must be required to provide evidence of expertise and membership of a recognised professional body;
 - c) Accountability – the DRP and its advice must be clearly seen to work for the benefit of the public. This should be ingrained within the terms of reference;
 - d) Transparency - the DPR’s remit, membership, governance processes and funding should always be in the public domain.

- e) Confidentiality – to encourage open engagement DRP members should be required to agree and enter into a confidentiality agreement. DRP discussions should be kept confidential before information is in the public domain.
- f) Recruitment should be based on agreed selection criteria, undertaken through an open transparent process with assessment of performance on an annual basis. The performance referenced refers to professional performance and expertise.
- g) The DRP members should be required to adhere to the Nolan Principles of Public Life. In other words, the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- h) Within reason, the DRP panel should include a range of knowledge and skills appropriate to the project under review. Consideration should be given as to whether some panels may find the attendance of the local ward members on behalf of amenity societies and residents as beneficial to the objective of the review.
- i) Equalities – DPR members should understand and be required to apply the Council's public sector equality duty when carrying out their advisory functions.

7. Conclusion

- 7.1 Members are asked to note the content of this report and provide any feedback they may have which will inform the final Terms of Reference document.

<p>If you have any questions about this report, or wish to inspect one of the background papers, please contact: Jane Hamilton (jhamilton@westminster.gov.uk)</p>

Background Papers

[London Design Review Charter](#)



City of Westminster

Planning & City Development Committee

Date: 27th April 2023

Classification: General Release

Title: Planning Policy Update

Report of: Director of Policy and Projects

Financial Summary: The resourcing of the Partial Review to the City Plan will be met from existing budgets. No direct financial impacts of the proposed changes to the NPPF have been identified.

Report Author and Contact Details: Sean Walsh (swalsh2@westminster.gov.uk)

1. Executive Summary

1.1 This report provides an update on the Partial Review to the City Plan and an overview of the council's response to governments recent consultation on changes to the NPPF.

2. Recommendation

2.1 Members are asked to note the content of this report.

3. Update on Partial Review of the City Plan

Introduction

3.1 At the last meeting of Planning and City Development Committee, Members were presented with an outline of the work that had commenced on a partial review of the City Plan. To recap, the scope of the review was outlined as being limited to:

- updates to the policy on affordable housing with a view to increasing the amount of social housing that is delivered and to better meet the high affordable housing challenges the city faces;
- a new policy prioritising retrofitting of existing buildings to ensure future development better responds to the climate emergency, and achieves a better balance between sustainability and growth; and
- the inclusion of 'site allocations' to provide site specific guidance on the development of key sites that make a significant contribution to growth targets and other policy objectives.

3.2 At the time of the last meeting, consultation on the scope of the review was ongoing. This closed in mid-November and this report now provides a summary of the key feedback received.

Consultation Results

- 3.3 In total 47 separate responses were received - a similar amount to that received at the same stage of consultation (Regulation 18) on the existing City Plan. It is likely that we will receive higher levels of responses at future stages when there is some draft policy wording or site allocations to comment on.
- 3.4 Responses came from a wide cross-section of organisations including individual residents, resident groups e.g. neighbourhood forums, statutory consultees, charities/campaign groups, developers/ landowners and businesses/BIDs. Whilst responses were largely supportive of the scope of the review and the council's broad intentions, the following key issues were also raised by a number of parties:

Affordable Housing

- any changes in policy such as change in tenure mix should not undermine development viability;
- any requirements for affordable housing from small sites (i.e. less than 10 units) needs justifying against national policy and in terms of how it would work in practice;
- that current delivery rates need to be improved;
- requests for flexibility to be built into policy to respond to site specific circumstances and;
- that the continued provision of intermediate housing for key workers and those supporting the Westminster economy will remain important.

Retrofit and Refurbishment

- any policy should be 'retrofit first' and not 'retrofit only', so it does not provide a barrier to the redevelopment of structurally poor buildings that cannot be made to meet operational requirements and have limitations on how energy efficient they can be made, or buildings that are underutilised for the location;
- any policy needs to work for both modern and historic developments, and not have negative impacts on Westminster's high-quality townscape and heritage value.

Site Allocations

- the relationship between site allocations and any retrofit first policy needs to be made clear;
- site allocations provide an opportunity to help protect the commercial functions of the CAZ, and support the provision of health and social infrastructure in new developments; and
- any site allocations will need to consider the impacts of any taller buildings they propose on views and open spaces.

Next steps

- 3.5 All of the feedback summarised above provide important points to consider as policy wording, site specific guidance, and supporting evidence base is drafted, which will be documented through a consultation statement that accompanies the Partial Review of the Plan. Further informal engagement with a range of stakeholders will be

carried out this year as policies and guidance are drafted, to attempt to build consensus on proposals in the plan in advance of the next formal stage of consultation on what we intend to submit to the Planning Inspectorate for independent examination (known Regulation 19 consultation).

4. Changes to national policy

Introduction

4.1 In December 2022 the government launched consultation on some specific changes to the wording in the NPPF that they are looking to introduce later this year, alongside some further broad ideas for a more extensive review that will then also be consulted on at a later date, after more detail has been worked up. Much of the more substantial areas of planning reform have therefore been deferred to a later date, with the imminent changes to the NPPF being more light touch and technical in nature. All consultation materials do however raise issues that the council has now formally responded to. A breakdown of key issues, and how we have responded, is therefore provided below.

4.2 Changes proposed in the immediate review of the NPPF

Design – while we welcome any increased emphasis of improving design quality, we have objected to immediate proposals to insert additional references in the NPPF to the development of ‘beautiful’ buildings and places. As this is a highly subjective term that has not been properly defined, it is ours (and many others in the industries) view that it cannot therefore be practically applied with any consistency in planning decisions. We have also suggested national policy could do more to better promote and support the retrofitting of heritage buildings to respond to the climate emergency.

Housing targets – Collectively some of the changes now proposed to the NPPF risk inhibiting growth in areas outside of London and have therefore been objected to. These include text that indicates the government’s own standard method of establishing housing need should only be used as a starting point, and that it is acceptable for plans to come forward that do not seek to meet these targets if doing so involves building at densities significantly out of character. There are concerns that this could result in many authorities in rural or suburban areas not seeking to deliver growth, further deepening the housing crisis and placing increased pressure on the densification of urban areas.

Local Plan examinations – While we support a more proportionate approach to local plan examination and evidence, we have objected to the proposed removal of the requirement for plans to be ‘justified.’ Removal of this test could result in poor plan making across the country that proposes limited growth, supported by little evidence, and results in lengthy and costly examinations.

4.3 Changes to be addressed through a later more extensive review of the NPPF

Affordable housing – while we welcome signals that the more substantive review of the NPPF will put higher priority on the future delivery of social rent housing as the main form of future affordable housing, we have sought that amendments go further in supporting all possible routes to the delivery of more affordable housing. This includes ensuring it does not rule out affordable contributions from small sites (i.e. those delivering less than 10 homes as it currently seeks to), and enabling contributions to also be sought from commercial developments, (given Planning

Inspectors rejected our proposals to do so at the last City Plan examination in the absence of anything in the NPPF to support it).

Decision making – We support the government’s recognition that local planning authorities have limited control on housing delivery once planning permission has been granted, and therefore support in principle their aims of assessing applicant’s past behaviour in the decision-making process, subject to the detail of how it would work in practice, which is not clear at this stage.

Plan making – We are broadly supportive of intentions to introduce new ‘National Development Management Policies’ to reduce unnecessary duplication of similar policies across the country, subject to the detail of what issues these cover, the precise wording proposed, and ensuring scope is still provided for locally distinct policies where justified. We have however strongly objected to proposals that a new plan making system would abolish Supplementary Planning Documents (SPDs), given the huge benefits these provide in providing helpful guidance to stakeholders that flesh out City Plan policies, without the need for costly and lengthy independent examinations prior to adoption.

Next steps

- 4.4 Officers will continue to respond to future consultations on planning reform in liaison with the Cabinet Member as they come forward – most notably including any future consultation on new ‘National Development Management Policies’. Members of PCD committee will be kept up to date on any substantial new changes to national policy as they come into force.

5. Financial Implications

- 5.1 The costs associated with the preparation of the City Plan Partial Review, including commissioning of evidence base and public examination are to be met from the existing Policy and Projects planning policy budget. Feedback to the Regulation 18 consultation has not resulted in any pressure to extend the scope of the Plan Review to include a greater number of policies, which would require commissioning of additional evidence base and a longer examination - leading to greater Planning Inspectorate costs.
- 5.2 No financial implications of the government’s proposals for planning reform have been identified beyond the officer time needed to respond to future consultations as further detail emerges.

6. Legal Implications

- 6.1 Legal services have considered the contents of this report and do not have any additional comments.

7. Conclusion

- 7.1 Members are asked to note the content of this report and provide any feedback they may have on the issues raised through the recent consultation on the City Plan Partial Review, which can be considered as policies are drafted. As consultation on changes to the NPPF and wider planning reform has already closed and the council has responded accordingly, any additional observations on these matters can only be considered in the context of informing responses to future consultations.

If you have any questions about this report, or wish to inspect one of the background papers, please contact: Sean Walsh
(swalsh2@westminster.gov.uk)

Background Papers

Consultation paper – [reforms to national planning policy](#)

Consultation paper – [draft changes to the NPPF](#)

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City of Westminster

Planning & City Development Committee

Date: 27 April 2023

Classification: General Release

Title: Amendments to Sub-Committee Late Representations Procedures – Additional Information

Report of: Director of Town Planning & Building Control

Financial Summary: None.

Report Author and Contact Details: Oliver Gibson (ogibson@westminster.gov.uk/07971026919)

1. Executive Summary

1.1 This report is an addendum report providing additional information on previous trends in late representations reported to the Planning Applications Sub-Committee's between January 2022 and March 2023. The purpose of this information is to inform the committee's consideration of whether the planning service should amend current procedures for accepting late representations in advance Sub-Committee meetings by introducing a deadline for their submission in advance of the start of the meeting. This report should be read in conjunction with the report to the previous Planning and City Development Committee on 26 October 2022, which is provided in the background papers.

2. Recommendation

2.1 In light of the additional background information provided on the source and content of recent late representations, the Committee is asked to consider whether they support the preferred option to introduce a deadline for acceptance of late representations at midday on the day prior to the committee meeting.

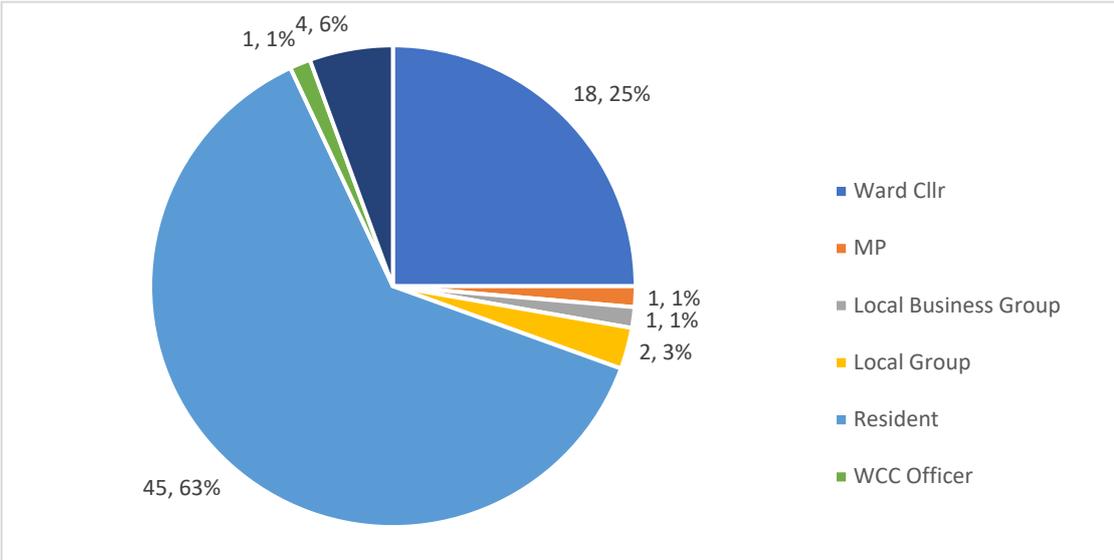
3. Late Representations Trends

3.1 Between January 2022 and March 2023 there were 28 Planning Applications Sub-Committee meetings. Of these, there were late representations tabled by the presenting officer at 27 of these meetings. This equates to an average of 10.5 late representations per committee over the monitored period. Note that this average is increased by particularly high volumes of representations submitted to particular items on the agendas for the Sub-Committee meetings on 8 March 2022 (Travis Perkins, 149 Harrow Road), 22 March 2022 (13-17 Montpelier Street), 28 June 2022 (13-17 Montpelier Street) and 30 December 2022 (Saxon Hall and 150-152 Hamilton Terrace).

3.2 The average length of a late representation is 2.7 pages and therefore Members are currently expected to read and digest an average of 28 pages of late representations in public during each Sub-Committee meeting.

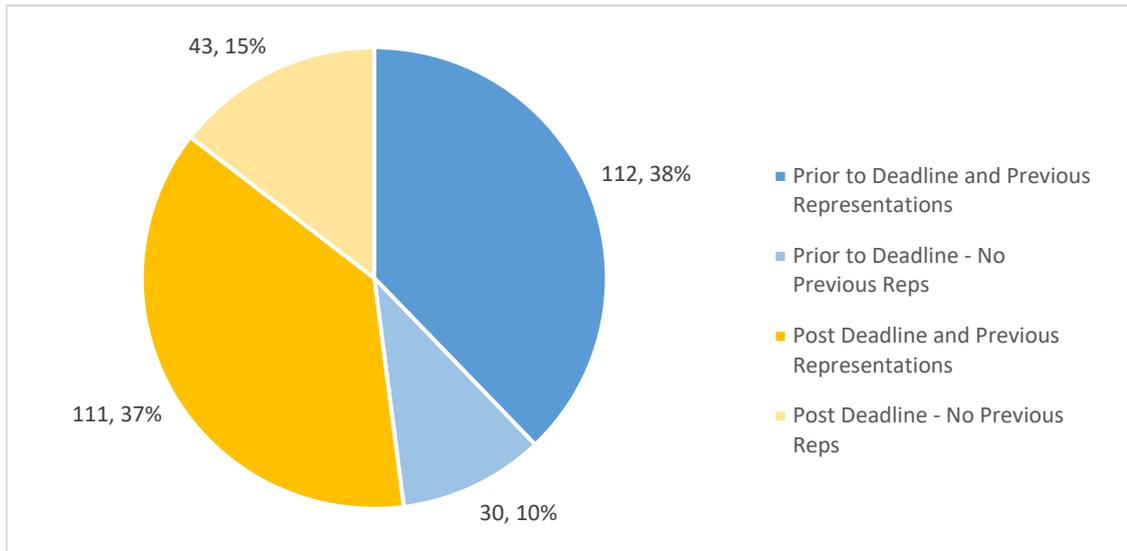
3.3 Of the late representations received, 75% had previously made comments on an application in response to the Council’s initial notification or were from the applicant or one of their professional representatives. Only 25% of late representations were from persons who had not previously corresponded with the Council in relation to an application. Figure 1 provides a breakdown of the respondent types for those who had not responded to consultation until the late representation stage. Of the 72 representations received from new respondents, 44 were received as part of the large influxes of late representations that were received in relation to the applications identified in paragraph 3.1.

Figure 1 – Source of late representations where correspondent has not previously responded to consultation during the application.



3.4 Analysis of the date on which the late representations were received shows that 48% of current late representations were submitted to the Council sufficiently early to be circulated to Members after midday on the day prior to the committee meeting (Option 2 in the October 2022 PCD report in the background papers). Only 43 of the 152 late representations received after midday on the day prior to the committee meeting (14.6% of the total number of late representations) were from interested parties that had not previously corresponded with the Council and of these none raised new material planning considerations that had not previously been considered in the committee report.

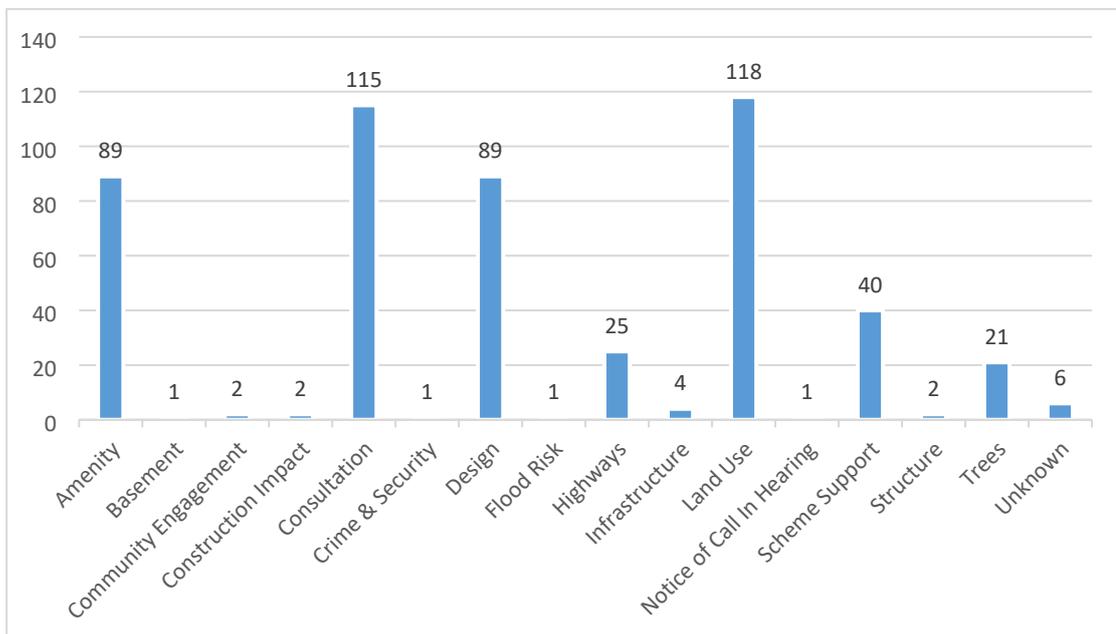
Figure 2 – Timing of late representations relative to proposed midday deadline on day prior to the committee meeting.



3.5 Only one late representation has been identified as introducing a new material consideration that was not known about prior to the correspondence being shared with the committee. This was correspondence from the GLA and applicant that was reported to the Planning Applications Sub-Committee on 20 September 2022 in relation to the scheme for redevelopment of 217-221 Harrow Road. The representations set out an amended affordable housing offer which had emerged following the publication of the committee report.

3.6 Whilst the identification of new material considerations in late representations is rare, it is recognised that the ability for interested parties to submit further comments, particularly where these comment on the content of the officer's report and recommended conditions, is important and a function of the current process that is valued by those making representations. The preferred option would retain this ability to hold the content of the committee report to account whilst avoiding the need for Members to read and scrutinise the representations for the first time during the committee meeting. Figure 3 below provides a summary of the topic areas that representations between January 2022 and March 2023 have focused on.

Figure 3 – Topic areas addressed by late representations (Jan 2022 – Mar 2023)



4. Recommended Late Representations Procedure

4.1 As set out in the report the Planning and City Development Committee in October 2022, officers have identified the following options for introducing a deadline for late representations:

Option 1 – Deadline at 12.00 on the day of the committee meeting

- Would continue to leave limited time for officers to assess and circulate late representations to Members.
- Members would continue to have limited time to read and consider representations prior to the committee meeting, particularly where Members have other commitments immediately prior to the committee meeting.

Option 2 – Deadline at 12.00 on the working day prior to the committee meeting

- Would allow time for assessment of late representations and circulation to members by email.
- Members would receive representations by email by close of business on the day prior to the committee meeting allowing Members the opportunity to read and consider all representations prior to the committee meeting.
- Those persons wishing to make verbal representations that may have missed the deadline for this or have not been allocated a speaking slot on the preceding working day still have the option to make final/additional representations in writing instead.

Option 3 – Deadline at 12.00 two working days prior to the committee meeting (to align with current public speaking deadline)

- Would allow for time for assessment of late representations and circulation to members by email and hard copy.
- Members would have representations by email prior to the weekend prior to the committee meeting allowing Members to read all representations together prior to the committee meeting.
- Those wishing to make verbal representations that may have missed the deadline or have not been allocated a speaking slot would no longer have the ‘fall back’ option to make final/additional representations in writing. This may lead to more requests for acceptance of late representations on an exceptional basis after the deadline.

4.3 It is recommended that Option 2 is pursued. This approach strikes an appropriate balance between enabling Members to read and consider late representations prior to the committee meeting and ensuring that the rights of interested parties to make representations and respond to the content of the committee report are not compromised. As identified through the analysis of late representations in Section 3, genuinely new material considerations that were not covered in the committee report rarely arise. In the very limited instances where new material considerations come to light immediately prior to the committee meeting the introduction of a deadline for late representations will not prevent these representations being brought to the Sub-Committee’s attention provided (a) the Chair has the power to accept late representations after the deadline where there are genuinely new material considerations (see paragraph 4.5 of the October 2022 PCD report) and (b) where the new deadline is clearly communicated in all planning committee related correspondence and on the relevant pages on the Council’s website.

4.4 Crucially, the preferred option also affords those persons who have missed the deadline to verbally address the Sub-Committee or where a person has not been

allocated a public speaking slot (i.e. where these limited slots are oversubscribed) the opportunity to make additional/final representations in writing.

- 4.5 It will be necessary to retain the ability for officers to table late changes to the original recommendation set out in the officer's report, either to respond to the content of additional representations or to correct discrepancies where these occasionally arise. However, alongside the recommended introduction of a deadline for late representations, officers will review the processes involved in finalising the officer recommendation to put in place measures that reduce the frequency of recommendation changes being tabled in future.

5. Financial Implications

- 5.1 None.

6. Legal Implications

- 6.1 Subject to the provisions set out in Section 4 of the October 2022 PCD report, to ensure those unable to make verbal representations have the option to make additional/final written representations and to enable the chair to exercise discretion in exceptional circumstances, the proposals would not prejudice those who wish to comment on planning applications that are reported to the Planning Applications Sub-Committees.
- 6.2 The introduction of the new deadline for late representations will be clearly identified in all relevant correspondence and on the Council's website to ensure all interested parties are aware of its introduction.

7. Conclusion

- 7.1 In light of the additional information set out in this report, it is recommended that Option 2, which would introduce a deadline for late representations at 12.00 the day prior to the Sub-Committee meeting is pursued. This would strike an appropriate balance between enabling the Sub-Committees to fully consider all representations received, whilst maintaining the opportunity for interested parties to make late representations in response to the committee report and other new material planning considerations that may occasionally arise following the publication of the committee report.

If you have any questions about this report, or wish to inspect one of the background papers, please contact: Oliver Gibson (ogibson@westminster.gov.uk / 07971026919)

Background Papers:

1. Planning and City Development Committee report titled 'Amendments to Sub-Committee Late Representations Procedures' dated 26 October 2022.

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City of Westminster

Planning & City Development Committee

Date: 26 October 2022

Classification: General Release

Title: Amendments to Sub-Committee Late Representations Procedures

Report of: Director of Town Planning & Building Control

Financial Summary: None.

**Report Author and Contact Details: Oliver Gibson (ogibson@westminster.gov.uk/
07971026919)**

1. Executive Summary

- 1.1 This report provides an overview of the recommended changes to the current procedures for accepting late representations in advance of Planning Applications Sub-Committee meetings. The recommended procedure includes the introduction of a deadline for submission of late representation in advance of the commencement of the committee meeting to allow Members and officers appropriate time to fully consider the planning merits of the issues being brought before the committee.

2. Recommendation

- 2.1 Members are asked to consider the contents of this report and make recommendations where they consider the recommended process for accepting late representations could be improved prior to implementation.

3. Current Late Representations Procedure

- 3.1 The current approach to receiving late representations is set out in the Committee Procedure Rules. The Committee Procedure Rules were last updated in May 2021 to reflect the hybrid committee meeting processes that were introduced at that time to maintain the option for interested parties to make remote verbal recommendations to the Sub-Committees, following the cessation of the temporary legislation that allowed fully remote public meetings during the pandemic.
- 3.2 The Terms of Reference for the Planning Applications Sub-Committees (set out in Part 23 of the Constitution) and the Council's current Statement of Community Involvement in Planning (2014) are both silent on the process by which the Council accepts representations in advance of a Sub-Committee meeting. Therefore, they do not require any update to accommodate the recommended amendments to the late representations procedure set out in this report.
- 3.3 At present representations received prior to the publication of the committee report are summarised and addressed in full in the report and full copies of the representations are provided in the background papers. The existing Committee Procedure Rules

include provision for representations received after the publication of the committee report and prior to 2.00pm on the Thursday prior to the committee meeting to be circulated to Members by the close of business on that day.

- 3.4 For representations received after 2.00pm on the Thursday prior to the committee meeting there is currently there is no defined 'cut off' after which representations will not be accepted. Consequently, representations are regularly accepted from interested parties up until late afternoon on the day of the Sub-Committee meeting, with occasional late representations received as late as immediately prior to the commencement of the meeting itself.
- 3.5 The current approach has been identified by Members and officers alike as being disadvantage to those participating in the decision-making process, as neither Members nor officers are able to appropriately consider the merits of representations that are made at such a late stage. This is particularly the case for Members who are currently required to read and digest representations during the Sub-Committee meeting, immediately prior to the officer presentation. The current arrangement also disadvantages those making representations as their representations do not receive the level of scrutiny that they would were they provided to the Sub-Committee Members in advance of the meeting.

4. Recommended Late Representations Procedure

- 4.1 Officers have reviewed the approaches taken by other comparable local planning authorities (LPAs) and assessed the practicality of introducing a deadline on a variety of days prior to the committee meeting. Of the ten other LPAs analysed, 5 had introduced a deadline for late representations prior to planning committee meetings and 5 accepted representations up until the start of the committee meeting. Of those with a deadline, 2 were set earlier on the day of the committee meeting, whilst 3 were set on the working day immediately preceding the committee meeting.
- 4.2 In light of the approaches taken by comparable LPAs, and having regard to the processes that are required to be undertaken by Legal Services and the Committee and Councillor Liaison Team in advance of a Planning Applications Sub-Committee meeting, officers have considered the following options for introducing a deadline for late representations:

Option 1 – Deadline at 12.00 on the day of the committee meeting

- Would continue to leave limited time for officers to assess and circulate late representations to Members.
- Members would continue to have limited time to read and consider representations prior to the committee meeting, particularly where Members have other commitments immediately prior to the committee meeting.

Option 2 – Deadline at 12.00 on the working day prior to the committee meeting

- Would allow time for assessment of late representations and circulation to members by email.
- Members would receive representations by email by close of business on the day prior to the committee meeting allowing Members to read and consider all representations prior to the committee meeting.
- Those wishing to make verbal representations that may have missed the deadline for this or have not been allocated a speaking slot on the preceding working day still have the option to make final/additional representations in writing.

Option 3 – Deadline at 12.00 two working days prior to the committee meeting (to align with current public speaking deadline)

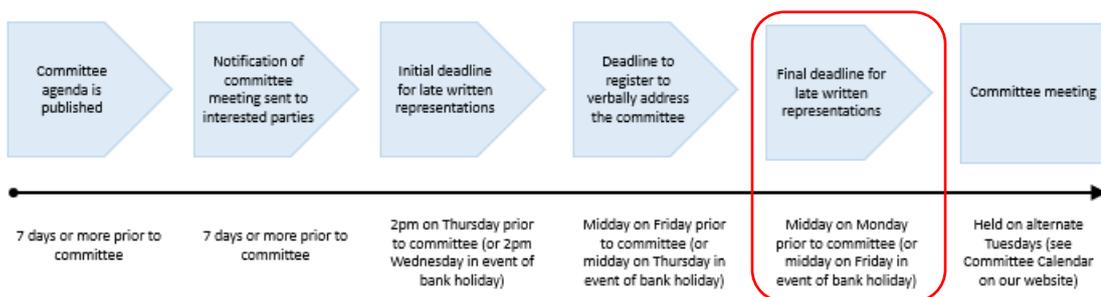
- Would allow for time for assessment of late representations and circulation to members by email and hard copy.
- Members would have representations by email prior to the weekend prior to the committee meeting allowing Members to read all representations together prior to the committee meeting.
- Those wishing to make verbal representations that may have missed the deadline or have not been allocated a speaking slot would no longer have the ‘fall back’ option to make final/additional representations in writing. This may lead to more requests for acceptance of late representations on an exceptional basis after the deadline.

4.3 Of the options set out above it is recommended that Option 2 is pursued. This approach strikes an appropriate balance between enabling Members to read and consider late representations prior to the committee meeting and ensuring that the rights of interested parties to make representations and respond to the content of the committee report are not compromised.

4.4 Crucially, the preferred option affords those persons who have missed the deadline to verbally address the Sub-Committee or where a person has not been allocated a public speaking slot (i.e. where these limited slots are oversubscribed) the opportunity to make additional/final representations in writing.

4.5 In addition to careful consideration of the timing of the deadline for late representation, as set out in paragraph 4.4, to ensure that a deadline does not prejudice the ability of the committee to consider representations that raise genuinely new material planning considerations that are not included in the committee report, it is recommended that the Committee Procedure Rules include a chair’s discretion to accept late representations after the deadline in exceptional circumstances. It is recommended that the discretion would be exercised in consultation with the Presiding Officer and the Solicitor to the Council who would be on hand to advise the Chair whether the late representation does or does not raise new material planning considerations. It will be the responsibility of the Presiding Officer to advise the commentator of the chair’s decision regarding whether to accept their representation.

Diagram 1 – Existing deadlines for committee meetings, including recommended deadline for late representations (outlined in red).



4.6 Existing arrangements for circulation of the committee agenda and report, the initial batch of late representations (faced with a blue cover sheet and known as ‘Additional Representations’) and the deadline for public speaking would remain unchanged. Diagram 1 above identifies the various existing deadlines and shows how and where the recommended late representations deadline would fit into the pre-Sub-Committee meeting period. Hard copies of the late representations, which will have been circulated to the Members of the Sub-Committee electronically the working day prior to the meeting under the proposed arrangements, will continue to be provided at the Sub-Committee meeting.

5. Financial Implications

5.1 None.

6. Legal Implications

- 6.1 Subject to the provisions set out in Section 4, to ensure those unable to make verbal representations have the option to make additional/final written representations and to enable the chair to exercise discretion in exceptional circumstances, the proposals would not prejudice those who wish to comment on planning applications that are reported to the Planning Applications Sub-Committees.
- 6.2 The introduction of the new deadline for late representations will be clearly identified on the Council's website to ensure all interested parties are aware of its introduction.

7. Conclusion

- 7.1 The recommended option for introducing a deadline for late representations is considered to strike an appropriate balance between enabling the Sub-Committee to fully consider all representations received, whilst maintaining the opportunity for interested parties to make late representations in response to the committee report and other new material planning considerations that may arise following the publication of the committee report. Members are invited to consider the preferred approach and make recommendations where they consider it could be enhanced. Subject to the resolution of the committee, it is expected that the updated procedure for late representations can be introduced by the end of 2022.

If you have any questions about this report, or wish to inspect one of the background papers, please contact: Oliver Gibson (ogibson@westminster.gov.uk / 07971026919)

Background Papers:

1. None.



City of Westminster

Planning & City Development Committee

Date: 27 April 2023

Classification: General Release

Title: Early Community Engagement Guidance Update

Report of: Deirdra Armsby, Director of Town Planning and Building Control

Financial Summary: None.

Report Author and Contact Details: Oliver Gibson, Strategic Planning Officer (ogibson@westminster.gov.uk/ 07971026919)

1 Executive Summary

- 1.1 The council launched its Early Community Engagement guidance in February 2022. The guidance was designed to address the concerns expressed by local communities in recent years that they are regularly consulted too late in the planning pre-application process by developers, or in some instances not consulted at all.
- 1.2 The guidance sets expectations for engagement carried out by applicants and developers and provides a framework to support them so that their pre-application engagement with communities occurs at an earlier stage, is more transparent, inclusive and accessible, and is more responsive to the expectations of local communities.
- 1.3 The guidance has now been in use for 12 months and this report provides a review of its use and effectiveness in that period and considers how the guidance and related practices can be updated and revised to make them more effective in driving improved applicant and developer behaviour when carrying out community engagement at pre-application stage.

2 Recommendation

- 2.1 Members are invited to discuss and comment on the contents of this report and consider the following recommendations for update of the current guidance and related practices. The recommendations are designed to address issues identified during the first 12 months of the use of the guidance which are identified in Section 4.

- (a) Work with the Communities Team to obtain feedback from community groups on their experience of developer engagement over the last 12 months to identify

whether there have been any changes or improvements in developer engagement activity that have not been reported to officers at pre-application stage.

- (b) Introduce a new pre-application advice service to provide applicants and developers with guidance on their early engagement strategy and identify a designated point of contact within the service to encourage developers to engage with the Council to develop their community engagement strategies ahead of paid pre-application advice with officers on the planning merits of their scheme.
- (c) Require pre-applicants for major development to provide details of their pre-application engagement as a mandatory part of the pre-application request submission form.
- (d) Amend the guidance to make the expected requirements at pre-application stage clearer, including provision of a template Early Engagement Strategy.
- (e) Review website to improve the online profile of Early Community Engagement guidance.
- (f) Write to the WPA, planning agents and other relevant bodies and organisations to relaunch the updated guidance and related practices.
- (g) Continue to work with applicants and developers to develop a set of enhanced case studies for future inclusion in the guidance, so that practical application of the principle of the guidance is more clearly articulated.

3 Background

Guidance Context

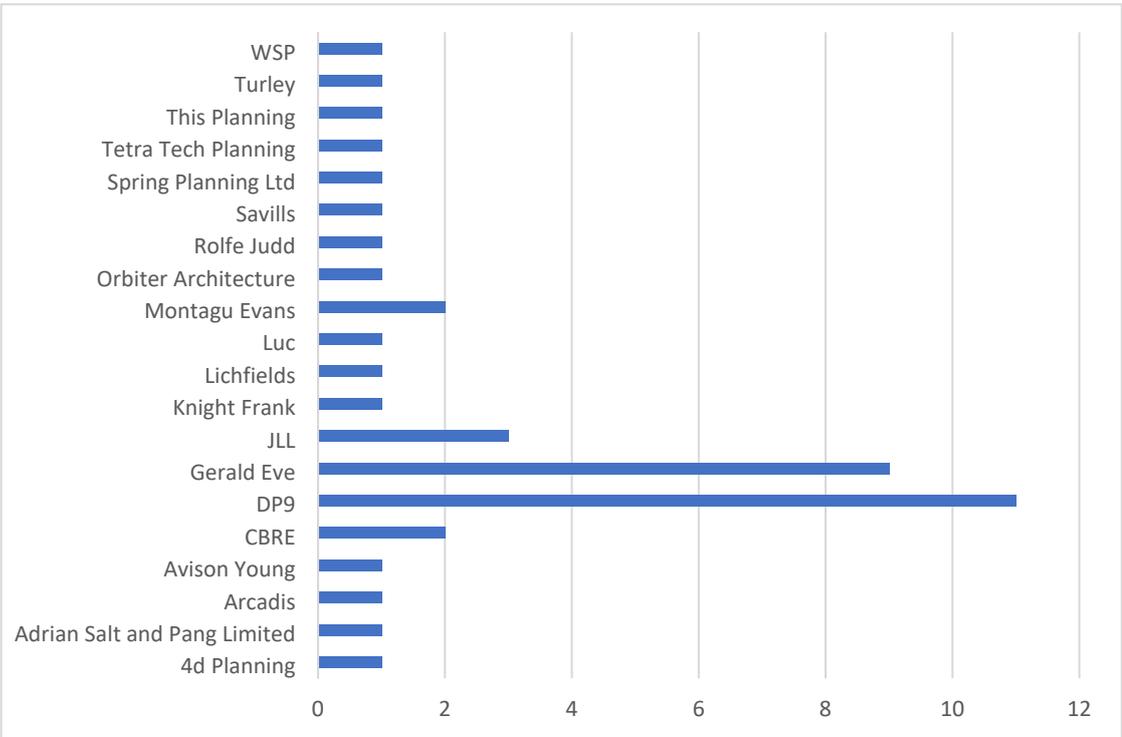
- 3.1 The adopted guidance has been developed within the current non-statutory framework that governs community engagement at pre-application stage. Whilst there is recognition of the importance of community engagement in planning in the National Planning Policy Framework (NPPF) (2021) and National Planning Practice Guidance (NPPG), applicants and developers are not compelled to engage and are not required to meet identified minimum standards when doing so. The NPPF and NPPG do not set out how or at which stage engagement, if undertaken, should occur. Whether an applicant has undertaken pre-application engagement, and the quality of that engagement, is not a ground on which a subsequent planning application can reasonably be determined.
- 3.2 The advice in the adopted guidance builds upon the expectations and requirements set out in Section 8 of the current Statement of Community Involvement (2014), which will be updated later in 2023. The updated version of the SCI will better promote the principles of early engagement across both developer and council engagement activities on planning matters and will enhance the profile and importance of the guidance by having greater alignment with the processes and expectations it contains.
- 3.3 The adopted guidance explains the Council's expectation that community engagement is undertaken by developers as early as possible during the planning pre-application phase using methods that maximise meaningful engagement with all parts of the local community. The guidance also puts in place a mechanism to provide officers with enhanced visibility of views of the local community at pre-application stage, allowing officer advice at this stage to take greater account of local views where these are consistent with the development plan.

4 Application of the Guidance Since February 2022

Guidance Use During 2022/23

- 4.1 All major pre-application advice requests made during the last 12 months have been analysed to develop a detailed picture of the approach applicants and developers have taken to pre-application engagement since the publication of the guidance.
- 4.2 There have been 42 new requests for pre-application advice (i.e. excluding follow up requests for advice on the same site) between February 2022 and the end of March 2023. The requests have been submitted by a significant number of different planning agents and architects, demonstrating a need for the principles of the guidance and how they are expected to be complied with in practice, to be understood by a wide range of planning and architecture professionals and their wider application teams.

Table 1 – Range of agents/architects submitting pre-application major requests.



- 4.3 The guidance encourages applicants to submit details of the early community engagement activities they have undertaken to date with their pre-application advice request (in a document referred to in the guidance as an Early Engagement Strategy). Disappointingly to date only one such document has been received. This was drafted by Concillio and submitted at pre-application stage in support of proposals to redevelop West End Central Police Station, 27 Savile Row, W1S 2EX.

Table 2 – New major pre-application requests accompanied by details of early community engagement undertaken by the developer.

Information provided	1
Information has not been provided	36
Total New Major Pre-App Requests	42

4.4 The Early Community Engagement guidance sets a threshold 50 units/10,000m2 of new floorspace above which applicants for these larger scale schemes are encouraged to invite officers to the early community engagement activities that are undertaken. Of the 42 new pre-application requests submitted, 6 emerging developments were above this threshold, but no requests for officer attendance at pre-application engagement events were received in relation to these schemes.

Table 3 – New major pre-application requests above or below the threshold for inviting officers to early community engagement activities.

Above Officer Invite Threshold	6
Below Officer Invite Threshold	36
Total New Major Pre-App Requests	42

4.5 Since May 2022 text explaining the expectations for applicants and developers to undertake early community engagement has been included in pre-application advice letters. Analysis of advice provided since June 2022 demonstrates that all officer responses where the undertaking of early community engagement is relevant have included specific advice that the pre-applicant should be undertaking early community engagement as soon as possible and that they should communicate the outcomes with the council, either as part of follow up pre-application discussions or in the Statement of Community Involvement submitted at application stage.

Examples of Schemes Following the Guidance

4.6 As identified in paragraph 4.3, an Early Engagement Strategy (ESS) was submitted with the pre-application request for redevelopment of West End Central Police Station, 27 Savile Row, W1S 2EX. The submitted ESS provides evidence of engagement undertaken to date, identifies issues raised and sets out a structure for future engagement (see Background Paper 1).

4.7 The approach taken, whilst short in format (2 pages) is welcome in that it takes a more factual approach to documenting pre-application engagement than can normally be found in Statements of Community Involvement submitted at application stage. In this regard the statement is consistent with the aim of the guidance to promote a more facts-based approach to analysis of engagement feedback.

4.8 The submitted statement diverges from the guidance in that whilst engagement had occurred prior to the submission of the pre-application advice request to officers, the engagement undertaken at this stage was limited to local groups and not with the wider public. Whilst a factual summary of feedback is provided in the statement, there is no provision of any written feedback captured from those consulted to corroborate the developer summary.

4.9 The statement concludes with a strategy for future community engagement and this aspect of the statement generally consistent with the aims of the guidance as it is able to set out a clear timetable for future engagement with other local groups and the wider community, including high level details of the format and approach to this forthcoming engagement. The approach to engagement with the wider community would though have been improved by provision of more than one exhibition event to maximise

attendance, although it is noted that an online event was also held to provide alternative access to the publicly exhibited information.

- 4.10 The statement offers to make a full summary of the feedback received to community engagement available to officers, but this was not provided prior to submission of the formal application in November 2022.
- 4.11 The formal application for redevelopment of West End Central Police Station (22/07647/FULL) is accompanied by a Statement of Community Involvement (SCI)¹. The SCI clearly takes on board the broad principles of the guidance and its content is more factual in tone and content than is often found in application SCIs for schemes of similar size and scale. The summary of the comments made by interested parties is balanced (albeit original comment documents are not provided as envisaged in the guidance) and the SCI provides a summary of how the scheme has been developed and enhanced in response to views expressed by consultees during the pre-application engagement (see pages 33-34 of the SCI in Background Paper 2).

5 Enhancing the Guidance

- 5.1 Whilst it is regrettable that following the positive launch of the guidance in February 2022, which received widespread support from the developer and planning agent community, there has not been wider industry 'buy in' into the principles set out in the guidance, it is clear that the issues are in part rooted in a lack of clarity around what is expected of applicants and developers at pre-application stage. This is in large part the product of the non-statutory environment that pre-application engagement operates within. Nevertheless, it is considered there is the opportunity to address these issues in future by amending and updating the guidance and the processes that support it. The following recommendations have been arrived at to make the guidance clearer and simpler for applicants and developers to comply with in practice.
- 5.2 It is also important that the opportunity value of this review is recognised as an opportunity to revisit how the Council promotes the guidance to drive greater compliance and raise the profile of the guidance among our developer community.

Recommendation (a) – Obtain Feedback from Communities

Officers will liaise with colleagues in the Communities Team to obtain feedback from a wide range of community groups to identify whether engagement undertaken in the first 12 months since the publication of the guidance has improved despite the failure of developers to share their engagement activity with officers at pre-application stage, as identified in Section 4. The outcome of this engagement with our communities will be shared with the Committee and may inform further recommendations for amendments to the guidance and the processes that support its implementation.

Recommendation (b) – Introduce an Early Engagement Pre-App & Point of Contact

The pre-application advice service will be amended to introduce a new free early engagement strategy pre-application request option. This will allow developers to seek advice from the Council on their proposals for carrying out early community engagement prior to seeking paid advice from officers on the planning merits of their proposed development at a later date. This will provide developers with a clearer and

¹ https://idoxpa.westminster.gov.uk/online-applications/files/055E1A56A4777B4325503E6DE2EB1E04/pdf/22_07647_FULL-STATEMENT_OF_COMMUNITY_INVOLVEMENT_AND_SUMMARY_OF_CHANGES-7560722.pdf

more formalised route to working with the Council at the earliest stage in their scheme development process and will better support them to maximise the reach of their engagement. Allied to this, a designated point of contact within the service will be identified. This will enable developers to more easily contact the planning service to raise specific ad-hoc questions related to the delivery early community engagement.

Recommendation (c) – Require Details of Engagement at Pre-Application Stage

Amend the pre-application advice request submission portal to prompt pre-applicants to provide details of community engagement that has been carried out and is planned in future using mandatory fields. This recommendation will help to raise the profile of the guidance expectation that community engagement should start at the earliest stage of scheme development, improve the sharing of engagement feedback with officers at pre-application stage and ensure more consistent collection of data demonstrating the effectiveness of the guidance.

Recommendation (d) – Simplify the Submission of Engagement Information

Develop a template for Early Engagement Strategies to make the process of submitting evidence of pre-application community engagement simpler for applicants and developers. Standardisation of the approach with a template, which can be included in the appendices of the guidance, would help to drive up compliance in terms of reporting on engagement at pre-application stage and ensure that the information submitted is more consistent with the requirements of the guidance.

Recommendation (e) – Raise Guidance Profile on Website

Officers will review the positioning of the guidance on the Council's website so that it is more prominently promoted to applicants and developers considering making a request for pre-application advice.

Recommendation (f) – Relaunch the Updated Guidance

The updates to of the originally published guidance and supporting processes will be used as an opportunity to relaunch the guidance, to boost its profile across the development industry, including industry bodies, the planning agent community, and other relevant planning related bodies and organisations.

Recommendation (g) – Work with Applicants to Develop Good Practice

Reduced activity in the development industry over the past 12 months has suppressed opportunities to work with key developers in Westminster to develop examples of good practice. As activity in the development industry increases, officers will refocus efforts to work with development sector partners to curate an improved set of case studies that can be included in a future updated version of the guidance. This will help to more clearly articulate how the principles of the guidance should be applied in practice.

6 Financial Implications

6.1 None. Any financial implications can be accommodated within existing budgets.

7 Legal Implications

7.1 None.

8 Conclusion

- 8.1 The evidence of uptake of the principles set out in the Early Community Engagement guidance is disappointing considering the strong development industry support at the time of launch. It is clear that the principles set out in the guidance need to be better supported by improved processes at pre-application stage that prompt and support applicants and developers to provide information on the engagement that has occurred.
- 8.2 It is evident that at a time of constant change in planning legislation, policy and guidance, the profile of the Early Community Engagement guidance has dropped, even among applicants and agents regularly working in Westminster. Therefore, it is important that we take steps to re-establish with them the importance the Council attaches to placing communities at the heart of the planning process. This can be achieved by relaunching the updated guidance and referring to the guidance more clearly and prominently on our website.
- 8.3 The Committee is asked to consider the contents of this review and its recommendations advise whether it considers the recommendations are appropriate to improve adherence with the principles of the guidance.

If you have any questions about this report, or wish to inspect one of the background papers, please contact: Oliver Gibson (ogibson@westminster.gov.uk / 07971026919)

Background Papers:

1. West End Central Police Station Early Engagement Strategy.
2. West End Central Police Station Statement of Community Involvement.

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Henigman - 27 Savile Row Community Engagement & Consultation

1. Early community engagement: Westminster's expectations

Westminster's Early Community Engagement guidance note, published in February 2022, sets out the expectation that 'community engagement should begin at the very earliest stage of scheme development' and that consultation should be a multi-phased 'conversation' with the local community and stakeholders.

This is in order to '[improve] trust and relationships between developers and local communities, building greater overall support for development and a greater appreciation of the positive benefits that can be delivered for existing local communities by well-designed development'.

For major developments, the guidance specifies that applicants undertake a range of activities to ensure the community have had the opportunity to comment on the proposals.

2. Consultation undertaken so far

In line with the above guidance, the Applicant has sought to engage local stakeholders at the earliest possible stage. In February 2022, the Applicant undertook tours of the site with key stakeholders:

- 16th February 2022: Su Thomas and Anda Rowland - Savile Row Bespoke Association
- 17th February 2022: Nigel Hughes - Mayfair Neighbourhood Forum
- 17th February 2022: Cllr Tim Barnes (Former West End Ward Councillor)
- 29th March 2022: Richard Cutt - Resident Society of Mayfair and St James

Opportunities raised at this stage included:

- Improving traffic flow around the site;
- Bringing increased footfall to the street;
- Providing a mid-level food/beverage offer in the area for activity all day;
- Providing a high-quality building that responds to the local context;
- Creating a low carbon modern building.

Limitations acknowledged included:

- The lack of street level access;
- The challenge posed by the existing low ceiling heights and the fact the building has been designed for a very specific purpose as a police station;
- Servicing and licensing;
- The Mayfair Neighbourhood Forum questioned if it would be practical to redevelop behind a retained façade, and multiple stakeholders asked about potential for residential use;
- The Savile Row Bespoke Association and Mayfair Neighbourhood Forum voiced support for the principle of redevelopment.

3. Consultation Plan

Following further development of the scheme we will shortly be undertaking consultation on more detailed plans to redevelop the site ahead of the summer. This will include further 1-2-1 meetings, the launch of a comprehensive consultation website, letter drop to the local community, a public exhibition event and a webinar event.

The planned dates for this activity are outlined below:

Date	Activity
w/c 27 th June	<p>Consultation Feedback Meetings with:</p> <ul style="list-style-type: none"> • West End Ward Councillors (Cllr Paul Fisher Confirmed) • Savile Row Bespoke Association (Su Thomas & Anda Rowland) • Mayfair Neighbourhood Forum (Planning Committee Meeting) • The Pollen Estate <p>Meetings to be confirmed</p> <ul style="list-style-type: none"> • New West End Company • Resident Society of Mayfair and St James • The Burlington Arms
Monday 4 th July	<p>Public Consultation Launch:</p> <ul style="list-style-type: none"> • Letter delivered to surrounding residents and business detailing consultation launch, and events • All stakeholder groups notified of consultation launch • Consultation website live
Tuesday 12 th July	<p>Public Exhibition:</p> <ul style="list-style-type: none"> • Public exhibition event (Local venue to Savile Row TBC) between 3:30pm - 7:30pm
Thursday 14 th July	<p>Public Webinar:</p> <ul style="list-style-type: none"> • Live Zoom Webinar event held between 6pm-7pm • Recording made available on website
22 nd July	<p>Consultation closes and comments analysed</p>

4. Further information

We are also hoping to hold a further event with retailers on Savile Row - led by the Savile Row Bespoke Association - to see whether there are aspects of the proposals that they may be able to assist with and influence.

Officers are invited to attend all consultation events and a full summary of feedback received will be made available following the consultation.



● CONCILIO

27 SAVILE
ROW

Former West End Central Police Station, 27 Savile Row

STATEMENT OF COMMUNITY INVOLVEMENT

October 2022

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Appendices

Appendix A	Consultation area
Appendix B	Letter to local residents
Appendix C	Door-knocking area
Appendix D	Instagram post advertising the consultation
Appendix E	Linkedin post advertising the consultation
Appendix F	Poster advertising the consultation
Appendix G	Consultation website
Appendix H	Exhibition boards
Appendix I	Survey available online and at our exhibition
Appendix J	Letter of support from the Savile Row Bespoke Association
Appendix K	Summary of Changes Document & Revised CGIs

1.0

Introduction

1.0

Introduction

1.1 Introduction

Savile Row 1 Limited ('the Applicant') is submitting an application on the site of the former West End Central Police Station, 27 Savile Row, W1S 2EX ('the Site').

The Applicant proposes: "Demolition of former police station building and its replacement with a new building comprising two basement levels, lower ground, ground plus seven storeys plus a roof plant level, delivering new office floorspace, new restaurant floorspace at partial ground and lower ground floor, new flexible workspace/training floorspace at basement 2, amenity terraces, public art, cycle parking, plant, landscaping and all associated works including enabling, highways and other ancillary works".

The project team has outlined that at the heart of the proposals is a commitment to adhering to the highest environmental standards so that the proposed redevelopment incorporates exemplary sustainability initiatives.

There is undoubtedly a need to breathe new life into this site and create a building with longevity. Supported by an experienced project team, the Applicant is seeking to create a lasting legacy by creating an accessible, modern and sustainable office building for the long term.

1.2 The Proposal

The Applicant understands the importance of heritage, whole life carbon, and sustainability when considering the redevelopment of the former West End Central Police Station. All opportunities for the retention of the existing building were explored but have been discounted due to the reasons set out in the Design and Access Statement and Planning Statement.

The Applicant, alongside the project team, developed five key principles that would underpin their ambitions for the Site. These themes were prevalent through all consultation material, and conveyed to local residents and stakeholders the vision for the site.

The established principles were:

- Make a positive contribution to the Savile Row Conservation Area, with a building of high architectural quality that is focused on particularly activating the northern end of Savile Row
- Have regard for the legacy and the importance of the period in which the existing building was designed and pay homage to that point in time
- Create an innovative, low carbon exemplar for how new buildings should be designed now and in the future, and set a benchmark in sustainable low carbon development and urban greening
- Create a future-proofed structure which will be flexible, adaptable, and accommodating for future uses and future generations
- Contribute to and significantly enhance the public realm at the northern end of Savile Row, balancing it with the lively and active environment that exists along its southern end.

The proposal acknowledges the importance of the 1930s-era architecture and seeks to pay homage to that heritage, and the redevelopment presents an opportunity to redefine the height and massing of the building, to more closely reflect recent proposed development at 18-20 Savile Row to ensure the new building sits comfortably within its surroundings.

1.3 Site Surrounds

The former West End Central Police Station sits within a prominent position and is well known within the local area. It is bound by Boyle Street to the north, Old Burlington Street to the west and New Burlington Street to the east.

The former West End Central Police Station was purpose-built as a bespoke police station and its design followed some very specific requirements set out by Scotland Yard at the time of its construction.

The police station front desk was vacated in 2017 and the building is currently unoccupied. There are significant challenges associated with trying to reuse the building for a new use which include:

- A raised ground floor preventing inclusive access and failing modern building standards
- A large portion of solid façades with few windows on the upper floors limiting daylight and views out of the building
- The internal spatial organisation was designed to meet bespoke police station specifications, and includes police holding cells and varying floor levels, which make the existing building's layout very complex
- Plant, services and circulation for the building were designed for its use as a dedicated police station and are inappropriate for office purposes
- Low floor-to-ceiling heights do not meet the expectations of modern day tenants
- Inflexible structures make space planning extremely challenging

Savile Row is an iconic street, with a rich history. It is the home of bespoke tailoring and a destination point for global and domestic visitors looking for the quintessentially British experience. The northern end of Savile Row, where the former West End Central Police Station is located lacks any vibrancy and experiences a lower footfall than the southern end of the street.

1.4 The Project Team

The Applicant appointed a team of consultants with extensive experience in sensitive redevelopments of high-profile schemes.

The communications and engagement team were responsible for ensuring transparent and informative communications with the local community.

The appointed consultants assisted in the creation of engagement material and were kept updated on the feedback given by stakeholders, to ensure any comments provided were taken on board as the scheme progressed towards submission.

The team working with the Applicant on the proposal at the former West End Central Police Station:

- **PLP Architecture**
 - *Architects*
- **DP9**
 - *Planning Consultants*
- **KMHeritage**
 - *Heritage Consultants*
- **Concilio**
 - *Community Engagement*
- **Hoare Lea**
 - *Mechanical and Electrical Engineers & Sustainability Consultant*
- **ARUP**
 - *Structural Engineers*
- **The Townscape Consultancy**
 - *Townscape Consultants*

1.5 Pre-applications undertaken

Westminster City Council

- Full pre-application 1 – Friday 26th November 2021

Westminster City Council

- Follow-up pre-application meeting – Friday 28th January 2022

Westminster City Council

- Full pre-application 2 – Friday 17th June 2022
- Follow-up meeting with senior officers – Friday 23rd September 2022

Historic England

- Pre-application 1 – Tuesday 12th July 2022
- Comments received Tuesday 26th July 2022
- Pre-application 2 – Tuesday 27th September 2022

Greater London Authority

- Pre-application 1 – Tuesday 19th July 2022
- Comments received Tuesday 16th August 2022

2.0

Executive Summary

2.0 Executive Summary

2.1 Introduction

This document provides a detailed record of the pre-application public and stakeholder engagement carried out in relation to the proposed redevelopment of the Site at 27 Savile Row, W1S 2EX, on behalf of the Applicant. The pre-application engagement has been undertaken by Concilio on behalf of the Applicant.

The application boundary is shown by the red line on Fig. 1 below.



The Proposed Development

The proposed development comprises the demolition and redevelopment of the former West End Central Police Station, 27 Savile Row ('the Site') to provide a sustainable new building on this iconic London street. The new development would provide:

- Modern, new office space (Class E)
- New flexible affordable workspace/training space (Class E/F1)
- A sensitive design that respects the heritage of Savile Row
- Exemplar sustainability credentials
- A new restaurant at ground and lower ground floor levels (Class A3)
- Public realm improvements on Boyle Street and Old Burlington Street
- Improved biodiversity
- End of journey facilities
- Provision of public art

The Applicant has a vision to create a high quality and sustainable new building that

fits seamlessly into its surroundings and helps to breathe new life into the northern end of the street.

A comprehensive description of the proposals can be found in the Design and Access Statement accompanying this submission.

2.2 The Consultation Process & Objectives

Concilio was appointed in November 2021 to perform a comprehensive community consultation and public affairs role to manage pre-application consultation with neighbouring residents and interested stakeholders concerning proposals for the redevelopment of the Site. The Applicant wanted to engage with the local community and other key stakeholders in order to gain valuable feedback on the emerging proposals for the Site in order that this could then be considered when developing the final proposals.

Consultation took place in two phases over a nine-month period between December 2021 and September 2022. The Applicant ensured that all consultation was flexible and as accessible as possible, and held both virtual and in-person meetings to suit each stakeholder. To facilitate this, a range of consultation activities were undertaken including:

- Tours of the building with key stakeholders at the start of the engagement to show the challenges of the Site;
- Meeting with West End ward councillors (where the Site is located) both before and after the local elections;
- Meetings with local business and community groups;
- The creation of a consultation website, containing information and updates on the progress of the scheme (www.27savilerow.co.uk);
- An interactive survey on the consultation website to gather feedback on the scheme;
- An in-person public exhibition with members of the project team on hand to answer questions;
- A virtual webinar hosted on Zoom, featuring a presentation from the project team and a moderated Q&A session; and
- Notification of the consultation through letter drop, social media adverts and a poster displayed prominently on the entrance door of the Site at 27 Savile Row, and door knocking to further bring awareness of the consultation to the local community.

The Applicant has sought to involve the local community and stakeholders extensively to help shape the final proposals.

This process is in addition to ongoing correspondence and communication with Westminster City Council officers as part of formal pre-application processes.

Key consultation statistics



1,748
website
views



14
stakeholder
meetings



1,627
addresses
notified



11
webinar
views



300
doors
knocked on



6
surveys
completed



1 webinar and
1 exhibition
hosted



3,000+ social media
impressions on
Instagram and LinkedIn

2.3 Summary of Key Themes

A number of key themes emerged from the consultation process. The feedback set out below comes from surveys received, verbal feedback given at the public exhibition, and feedback given during one-to-one meetings with immediate Site neighbours and stakeholders:

Sustainability

Those who engaged in the consultation welcomed the building's sustainability aspirations. The Applicant's ambitions to achieve the highest BREEAM target with a holistic low carbon approach and recycled building materials were embraced.

Stakeholders were very keen to understand the detail behind the decision to redevelop the building rather than refurbish. This was primarily in relation to the environmental impacts of that decision.

Heritage

Throughout the consultation, heritage was the key issue. Stakeholders were keen to understand how the design of the building would celebrate Savile Row's tailoring heritage or reflect the building's past use as a police station.

Design

The local community was keen to see a building of high-quality and thoughtful design. Most feedback indicated a dissatisfaction with the current building's contribution to the townscape. Concerns were raised about the proposed height of any new building and the quantity of glass.

Public Realm

There is limited good-quality public space to enjoy around the building which was recognised by those who we engaged with. Stakeholders were keen to address the poor transport conditions around the site and were supportive of measures that would improve the setting, greening and user experience of the space. Overall, stakeholders welcomed the planned improvements to the public realm.

Office Space

The provision of Grade A, high-quality office space was strongly welcomed. Some did question if other uses had been explored and if there was justification for additional office space in the West End, considering the impact of Covid-19 on working patterns.

Restaurant Space

Stakeholders welcomed the provision of new restaurant space at this location noting it would enliven the area by attracting new footfall. There were mixed responses to the design and potential future occupier with some stakeholders having strong feelings in how the space should operate.

Transport & Servicing

The pavement on Boyle Street is very narrow and a lot of servicing vehicles use the street. This was raised as an issue that would need to be addressed.

Construction

Local residents and stakeholders were interested in the timeline for the proposed redevelopment, as well as what measures were being considered to mitigate the disruption of demolition/construction and what the potential impact on highways would be during the redevelopment. It was also apparent that the local community expected a continual liaison throughout the construction process.

3.0

Background & Approach

3.0 Background & Approach

3.1 Policy Framework

Westminster City Council's Statement of Community Involvement in Planning (adopted in June 2014), makes clear that community involvement should ideally be sought in two stages:

- Firstly, views should be sought from interested groups on what may be appropriate for a site so that these comments can, wherever possible, be taken on board before the proposals are drawn up.
- Secondly, further views should be sought on the evolving proposals before a planning application is submitted, so that changes can be made in response before submission, and also so that people are already aware of the background to the proposals when Westminster City Council carries out its own consultations on the application.

The two stages have been addressed through the consultation programme that has been undertaken.

For large scale proposals where there is no legal requirement to consult, Westminster City Council agrees with the suggestion in the National Planning Policy Framework (NPPF) that it should strongly encourage developers to involve the local community from an early stage. They suggest that this should take a variety of forms such as local exhibitions, public meetings, circulation of leaflets or the creation of a well-publicised dedicated website, including a facility to make comments.

The consultation strategy devised and implemented by Concilio has been designed to meet the requirements for consultation as laid out in the NPPF and in Westminster City Council's Statement of Community Involvement.

The consultation strategy has also been shaped in accordance with Westminster City Council's Early Community Engagement Guidance, published in February 2022. The local community was notified using both digital and print materials; we conducted interactive digital engagement both in our briefings with local stakeholders and our public webinar; we held an in-person public exhibition and in-person meetings with ward councillors including an early engagement tour of the site.

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

3.2 Planning description of development

"Demolition of former police station building and its replacement with a new building comprising two basement levels, lower ground, ground plus seven storeys plus a roof plant level, delivering new office floorspace, new restaurant floorspace at partial ground and lower ground floor, new flexible workspace/training floorspace at basement 2, amenity terraces, public art, cycle parking, plant, landscaping and all associated works including enabling, highways and other ancillary works".

4.0 The Consultation Process

4.0

The Consultation Process

4.1 Aims of Consultation

The Applicant was keen to ensure the consultation strategy put in place delivered a series of key aims to assist with the evolution and development of the proposals:

- To raise awareness of the emerging proposals for the redevelopment of the former West End Central Police Station and discuss the public benefits
- To enable constructive dialogue between local stakeholders, the community, the project team, and the Applicant
- To ensure everyone who wanted to take part in the consultation was able to by being as accessible and inclusive as possible
- To ensure feedback could be incorporated into the final proposals
- To build a relationship with the local community

4.2 Consultation Process

The consultation strategy and process that Concilio has undertaken in relation to the proposed redevelopment of the former West End Central Police Station has been developed with both local policy and the above aims in mind. Specifically, the consultation process has:

- Conducted an engagement programme that is appropriate for the local community and key stakeholders
- Consisted of individual meetings with key stakeholders including elected representatives, a consultation website, interactive feedback surveys, a live webinar, freephone contact details, a printed poster on the Site entry door, and posted materials
- Ensured the consultation was well publicised
- Explained clearly what the scope of the consultation is
- Analysed the results from the consultation objectively
- Publicised collective responses with due regard to the Data Protection Act and GDPR requirements

4.3 Consultation Area

A consultation area was identified to reflect the scale of the proposed redevelopment proposals. The consultation area consisted of approximately 1,650 residential and business addresses around the site. Invitations to take part in the consultation were advertised to this area. A copy of the map can be seen in **Appendix A**.

4.4 Project Contact and Communications Channels

A freephone telephone number and e-mail address were available to ensure that communications could be managed from one place and there was a single point of contact for residents. A consultation website formed the 'consultation hub' containing information about the redevelopment proposals: www.27savilerow.co.uk. The consultation website sought the views of local residents and businesses on a range of subjects via an interactive survey to gather meaningful feedback from the local community.

4.5 Levels of Engagement

A summary of the activities undertaken are included on the following pages, along with key metrics and methods to raise awareness of the consultation.

Stakeholder Site Tours

Key stakeholders were invited on a tour of the existing building at The Site to introduce them to the emerging proposals.

Date	Stakeholder
16th February 2022	Savile Row Bespoke Association
17th February 2022	Mayfair Neighbourhood Forum
17th February 2022	Then West End Ward Councillor Tim Barnes
29th March 2022	Resident Society of Mayfair and St James

Stakeholder Meetings

As part of the consultation a number of meetings were arranged with key stakeholders. These have been detailed as follows:

Date	Stakeholder	Location
27th June 2022	Mayfair Neighbourhood Forum	Virtual (Teams)
27th June 2022	The Pollen Estate	Lansdowne House, Berkeley Square
27th June 2022	Savile Row Bespoke Association	Lansdowne House, Berkeley Square
30th June 2022	Resident Society of Mayfair and St James	Virtual (Teams)
4th July 2022	New West End Company	Virtual (Teams)

Date	Stakeholder	Location
6th July 2022	West End Ward Councillor Paul Fisher	Westminster City Hall, 64 Victoria Street
18th July 2022	Burlington Arms	21 Old Burlington Street
19th July 2022	Nkora Café , 14 Old Burlington Street	In-person meeting with Emile Mehmet held at Burlington Arms
21st July 2022	Savile Row Bespoke Association Tenants	In person presentation to tenants of Savile Row held at 5 Savile Row
1st August 2022	Derwent London	In person meeting held at 25 Savile Row
4th August 2022	Ensof Group (Owner of 23 and 28 Savile Row)	Telephone conversation
4th August 2022	Harris Williams & Co, Floor 4, 25 Savile Row	In person meeting with MD Dr Julian Feneley held at 27 Savile Row
9th September 2022	Cream Group/Miro Mayfair, 15 Old Burlington Street	In person meeting with Operations Director John Common
28th September 2022	Cabinet Member for Planning Geoff Barraclough	Westminster City Hall, 64 Victoria Street
2nd November 2022	The Pollen Estate	Nkora, Old Burlington Street
2nd November 2022	The Royal Academy of Arts	Royal Academy Building

The Applicant is continuing to reach out to: the owner of 23 Savile Row, Lazari; The Crown Estate, and Soho House Group, owners of Cecconi's Restaurant at 5A Burlington Gardens.

Following submission a notification e-mail and summary of scheme changes will be sent to a number of stakeholders including:

West End Ward Councillors, Mayfair Neighbourhood Forum, The Pollen Estate, Savile Row Bespoke Association, Resident Society of Mayfair and St James, New West End Company, Burlington Arms, Derwent London & Cllr Geoff Barraclough.

Raising Awareness

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

Method	Date	Additional Information
Letter	1st July 2022	1,627 letters distributed Included in Appendix B .
Door Knocking (Two Rounds)	12th July 2022	An area of 98 residential addresses between Savile Row, Burlington Gardens, New Bond Street, and Conduit Street was targeted for door knocking, indicated in Appendix C .
Social media adverts	First two weeks of July 2022	Instagram and LinkedIn posts which encouraged people to engage with the consultation. Appendices D and E.
Poster	18th July 2022	Posters affixed prominently to the Site which advertised the consultation. Included in Appendix F .

Consultation Website

The consultation website was live from 1st July 2022. In the three-week period after its launch, the website received 1,748 views.

The website contained information about the proposals, a film showing the existing building and the proposed development, a film illustrating the carbon impacts of alternative uses, and a survey to provide feedback.

The website is included in **Appendix G**.

5.0

Feedback

5.0 Feedback

5.1 Introduction

The consultation on the proposals for The Application took place between February and September 2022.

As outlined previously, this involved a range of meetings with key stakeholders, a consultation website, webinar, poster, and in-person exhibition.

The sections below outline the feedback received throughout the consultation.

5.2 Initial Stakeholder Meetings & Feedback

The importance of early engagement was a key priority for the Applicant. Ahead of the wider consultation events, four site tours took place with key political and community stakeholders identified in the previous section.

The following points summarise the questions and topics that were discussed during these tours:

Date	Stakeholder	Feedback
16th February 2022	Savile Row Bespoke Association	<ul style="list-style-type: none"> • Supportive of traffic calming and pedestrianisation • Food and beverage offer welcomed • Asked about the possibility of facade retention • Agreed with the challenge of floor to ceiling heights • Potential mix of uses • Interested in the architectural context • Generally supportive
17th February 2022	Mayfair Neighbourhood Forum	<ul style="list-style-type: none"> • Challenge of retention • Purpose designed building • No desire for residential use
17th February 2022	West End Ward Councillor Tim Barnes	<ul style="list-style-type: none"> • Asked about residential use • Queried basement excavation • Acknowledged the difficulty of the former police station layout • Advised that demolition is unpopular • Expressed importance of good design

In the lead up to the launch of the wider public consultation, the Applicant invited stakeholders to a second round of briefings, which took the format of a presentation by the project team followed by an open discussion.

The following points summarise the questions and topics that were discussed in these briefings:

Date	Stakeholder	Feedback
17th February 2022	West End Ward Councillor Tim Barnes	<ul style="list-style-type: none"> • Asked that the ground floor offer be activated all day • Supported the inclusion of public art • Welcomed the inclusion of a new building to draw footfall to Savile Row from Regent Street • Suggested ideas to improve the design so the ground floor restaurant and the entrance to the office’s lobby would appear more enticing, with more character • Had some concerns regarding the amount of glazing and canopy design elements of the building • Suggested more greenery
27th June 2022	Mayfair Neighbourhood Forum	<ul style="list-style-type: none"> • Supported the design and suggested that there should be references to the existing building in the new proposals • Asked for further detail on why the building is not suitable for refurbishment, which was provided • Recognised the current obsolescence of the building but questioned the redevelopment • Queried the height of the new building • Liked the public art proposal
27th June 2022	Savile Row Bespoke Association	<ul style="list-style-type: none"> • Questioned if the amount of glazing in the design could be reduced • Suggested ground floor restaurant would be more appealing without floor to ceiling glazing and to think about ‘hiding feet’ of diners • Asked that more character be considered for office entrance to attract greater footfall from Regent Street and a redesign of the canopy so less bulky • Suggested more greenery

Date	Stakeholder	Feedback
27th June 2022	The Pollen Estate	<ul style="list-style-type: none"> Public realm improvements were well received Supported the inclusion of public art Discussed the height of the new building, which was not considered an issue
30th June 2022	Resident Society of Mayfair and St James	<ul style="list-style-type: none"> Felt that the design of the building should lean into the tailoring heritage of the street Acknowledged that the existing building is not architecturally rich
4th July 2022	New West End Company	<ul style="list-style-type: none"> Understand why something needs to happen Liked the Art Deco style Noted congestion as an issue Saw it as an opportunity to take Savile Row forward Suggested the public art may need to be increased Acknowledged that there is little merit in the current building and supported demolition Shared concerns around potential congestion that might come
6th July 2022	West End Ward Councillor Paul Fisher	<ul style="list-style-type: none"> Expressed concerns about the significant amount of building work that would be involved in demolition Asked for timelines of the anticipated construction, which were shared Queried how the development could impact residents, particularly in relation to daylight and sunlight Stressed that heritage must be respected Discussed the sustainable ambition of the building and the end operational carbon levels
18th July 2022	Burlington Arms	<ul style="list-style-type: none"> Discussed the potential impacts of construction on neighbouring properties

Date	Stakeholder	Feedback
19th July 2022	Nkora Café	<ul style="list-style-type: none"> Discussed the potential impacts of construction
1st August 2022	Derwent London	<ul style="list-style-type: none"> Supported the curved design of the new building and the ambition to improve floor to ceiling heights Queried the levels of glass used in the proposed design that could result in overlooking Expressed concern that the shared street concept could lead to congestion, but also felt that it would create a pleasant environment
9th September 2022	Cream Group/Miro Mayfair	<ul style="list-style-type: none"> Discussed the potential impacts of construction
28th September 2022	Cabinet Member for Planning Geoff Barraclough	<ul style="list-style-type: none"> Discussion of alternative uses on the site, with reference made to hotel and residential options Welcomed the work done by the architect team around sustainability on the point of demolition Encouraged the inclusion of affordable workspace on site Discussed the proposed design

5.4 Webinar and In-Person Exhibition

To ensure the public had an opportunity to hear directly from the project team and ask questions, The Applicant held an in-person public exhibition and an interactive webinar.

Details of these events were publicised on the consultation letter (issued to 1,627 addresses), to key stakeholders, and on the consultation website. Two surveys were completed at the in-person exhibition. We later advertised the survey by affixing a poster prominently to the door of the site.

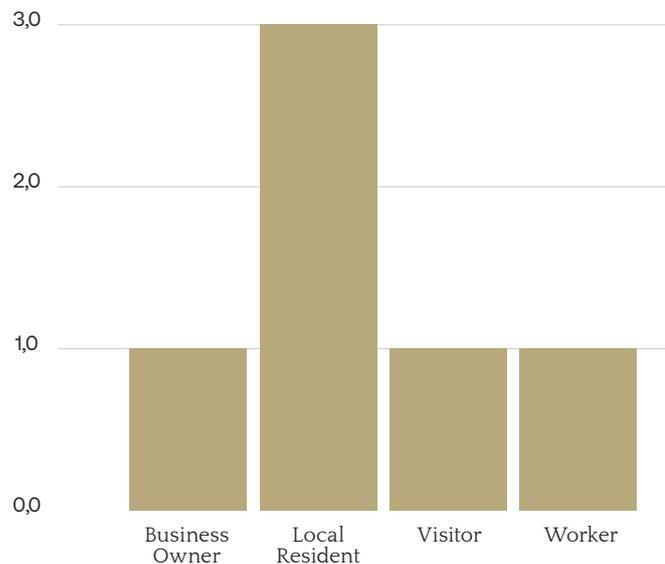
5.5 Survey Responses

On the consultation website and at the in-person exhibition, visitors were invited to complete a survey asking a range of questions related to the scheme.

Format	Responses
Digital	4
In-Person	2

A total of six surveys were completed. The responses can be seen below.

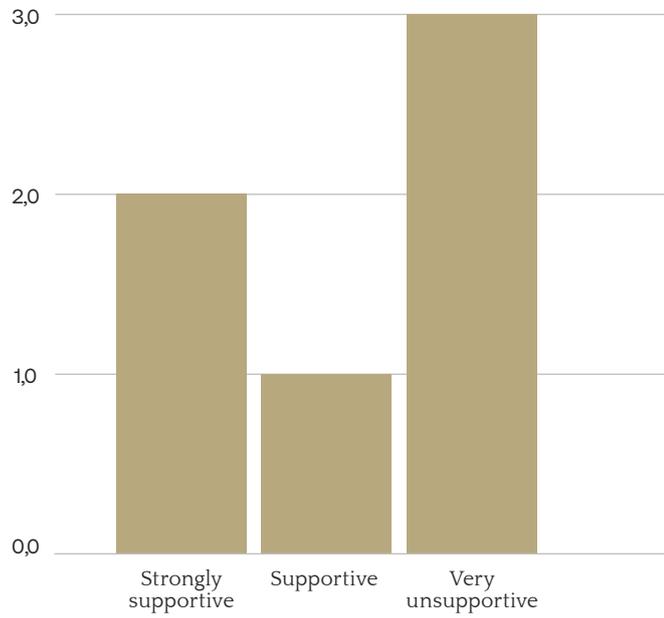
Question 1 - Firstly, what is your relationship to the area?



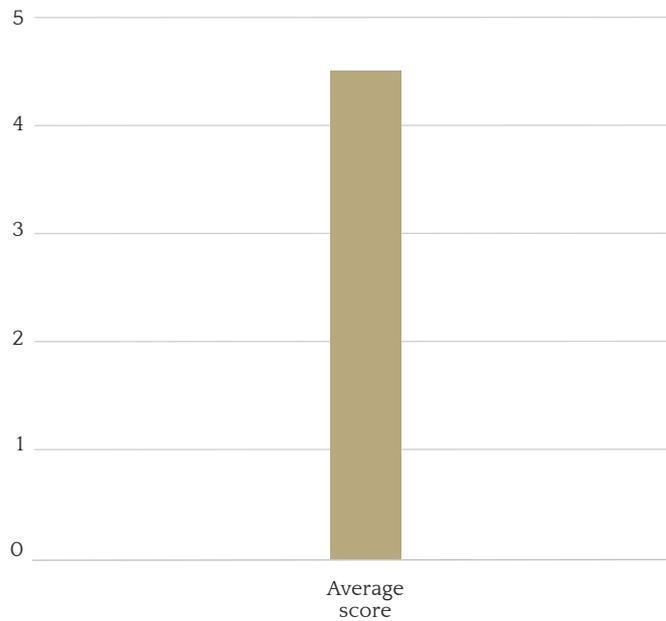
Question 2 - Overall, what do you think about our proposals to redevelop 27 Savile Row?

- I like how its good too environment and with great design
- Very good, I really appreciate it
- Its [sic] dull and not really respecting the vernacular of the Row lacks thought imagination - It was suggested that the style was a deco building this rendition is either residential (see the BBC series Poirot) or a workshop in the east end or rag trade - the current building is brutalist and that should reflect in the style of the replacement
- Sorry, this is the first time I have seen anything about this redevelopment so I have missed the ONE day exhibition and I haven't seen any information on the building above the proposed redevelopment
- I see no need to demolish the current structure. There has to be an effective retrofit design not being explored. Also, it would be better if the building footprint stepped back from the street including space for public use
- Not very good

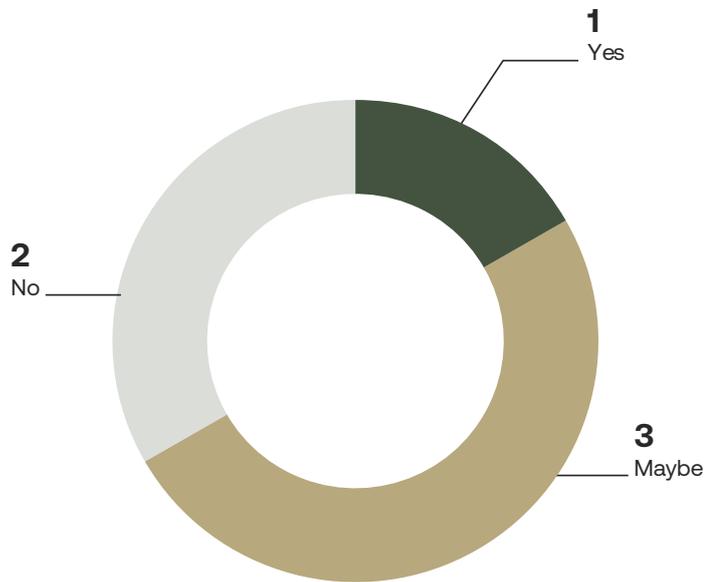
Question 3 - Do you support our ambition to create a more engaging and activated ground floor level?



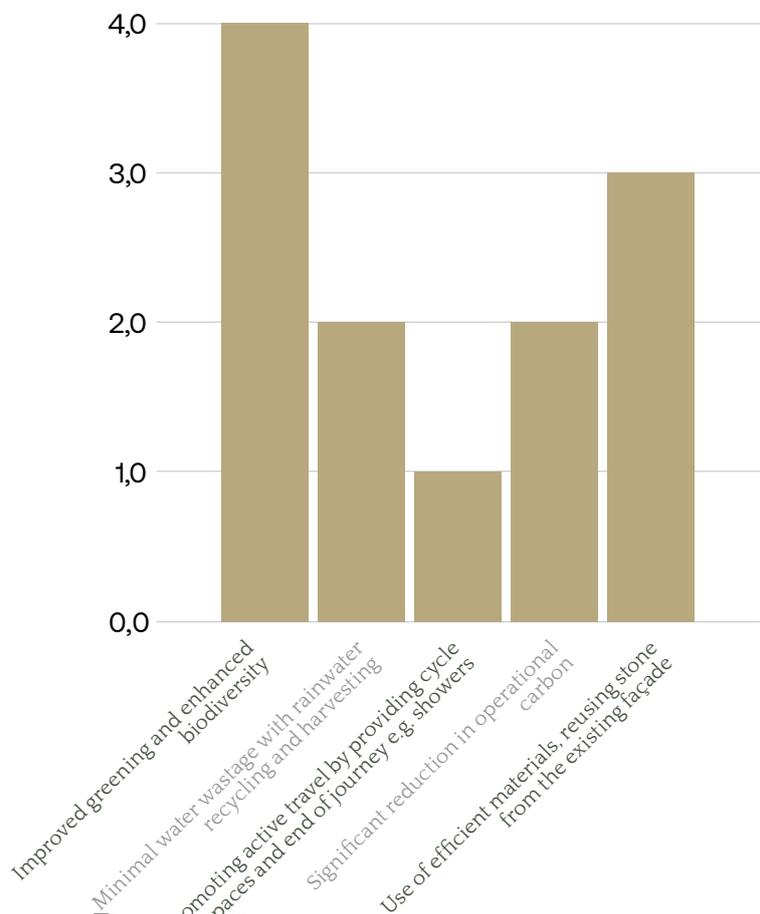
Question 4 - On a scale of 1-10, what do you think of our proposed mix of uses?



Question 5 - Do you think our proposals will help revitalise this part of Savile Row?



Question 6 - We are implementing a number of important sustainability initiatives as part of our proposals. Of these, which are most important to you?



Question 7 - When considering the public art, are there any themes the team should look to include, for example, the history of Savile Row?

- Should look for art figures related to business legends
- Lead don't follow – be original and forward thinking – take the lead don't follow – get a professional in
- History of the build and area how it went from a police station and the sold
- Why a British artist/designer?

Question 8 - Do you have any further thoughts regarding the proposals?

- Improve greening as much as possible
- Not sure any point in this survey as there is never any feedback given hopefully this time it will be different. Thank you
- Too much glass to be regarded as a low carbon sustainable office

5.6 Responding to Feedback

The comments

Theme 1 – Sustainability

Comments Raised

Stakeholders understood the need for change to happen to the building but there was initial scepticism to the principle of redevelopment due to the perceived negative environmental impact of demolition and rebuild. Stakeholders asked for an in-depth explanation of why the building could not be retained and refurbished.

Response

The former West End Central Police Station was built according to a set of very specific requirements required by Scotland Yard at the time. It cannot be repurposed for modern office use due to fundamental structural considerations such as a raised ground floor which prevents level access, poor window coverage resulting in low levels of natural light, immovable structures such as holding cells, and very low floor-to-ceiling heights.

The climate emergency is an extremely serious consideration for all of us. We are therefore proposing a low carbon design with operational carbon levels vastly lower than a retrofit could ever achieve, whose embodied carbon impact is almost equal to the kind of extensive retrofit which would be required for this building to stand a chance of attracting a modern occupier.

Theme 2 – Heritage

Comments Raised

Feedback indicated that stakeholders and residents would like to see the heritage of the building and Savile Row respected.

Response

We have designed an innovative building which reflects the time in which the former West End Central Police Station was constructed, along with several of its neighbours. Our design has been influenced by the 1930's Art Deco style, and will sit within the local context, aligning in height with the buildings to its west and east.

The use of Portland Stone in the proposed façade references the former West End Central Police Station and the curved features of the exterior are a nod to the building's Art Deco heritage. The façade has also been designed to reflect the tailoring heritage of Savile Row by taking inspiration from the 'warp' and 'weft' of woven fabric, to produce an interlaced design.

There is an opportunity to further acknowledge Savile Row's heritage through the use of public art to be incorporated on the building's façade. The opportunity to collaborate with an artist and local amenity societies to achieve this will provide an exciting opportunity.

With reference to the building's former use as a Police Station, we are considering retaining the style of the existing street signage on the West End Central Police Station subject to discussions with Westminster City Council's Highways team. Other opportunities may be available to provide subtle cues to its former use which include the retention of the '27 Savile Row' building lettering and through the proposed restaurant or within the office building, such as naming meeting rooms after notable Chief Constables.

Theme 3 – Design

Comments Raised

The local community was keen to see a building of high-quality and thoughtful design. Most feedback indicated a dissatisfaction with the current building's contribution to the townscape. Concerns were raised about the height of any new building at this location. The Savile Row Bespoke Association expressed specific desires for an enticing office entrance and for the windows of the ground-floor restaurant to be 'framed'.

Response

The Applicant has worked with PLP Architecture to deliver a building of high architectural merit and which makes a positive contribution to the local area. The building's curved corners and general Art Deco aesthetic are a homage to the 1930s provenance of the existing building, and its use of Portland Stone references the former West End Central Police Station.

In response to feedback received during the consultation, a revised design has been developed with a more symmetrical, and more solid-looking main elevation. In response to feedback from the Savile Row Bespoke Association, we have 'framed'

the restaurant windows, redesigned the office entrance, and incorporated planters at ground-floor level.

We are also looking to create a sense of vibrancy and activity, currently lacking along the northern end of Savile Row, with an active frontage comprising a busy restaurant with outdoor seating and framed glass windows.

In terms of building height, we are proposing a design with a modest increase in height. Our design is three metres taller, and should not result in additional overshadowing of neighbouring buildings.

Theme 4 – Public Realm

Comments Raised

The former police station is in poor condition and has a negative impact on the area's public realm. The area is in dire need of urban greening, particularly on the corner of Clifford Street. There is also a need for the building's public-facing aspects to be engaging, interesting and different.

Response

The proposed public art installation will be visible to anyone approaching the building from Regent Street. This will be a unique piece which celebrates Savile Row and its history. This will be alongside a building of the highest architectural quality, incorporating an engaging and active ground floor that will enliven the northern end of Savile Row.

We will provide a restaurant with retractable glass partitions at ground floor level, opening the former West End Central Police Station up to the public and providing opportunities for significant activation. Planting is proposed at ground floor level and on the roof terraces to contribute to the area's biodiversity and greening.

Theme 5 – Office Space

Comments Raised

It was questioned whether there is justification for additional office space in the West End, considering the impact of Covid-19 on working patterns – particularly the rise of working from home.

Response

The West End has a long history of responding to adversity, and we strongly believe that it will continue to be a hub of global commerce post Covid-19.

Our market research indicates that there is demand for high-quality office space in this area. This would be in line with Westminster City Council policy, as well as giving a boost to the economy of Savile Row.

Theme 6 – Restaurant Space

Comments Raised

Local stakeholders expressed that they would like to see a unique offer in terms

of the restaurant to help drive footfall to Savile Row from Regent Street, especially after 5pm. It was suggested that the ground floor unit could have an offer throughout the day, ranging from coffee to cocktails.

Response

We believe that a thriving new restaurant, catering for visitors throughout the day, will help reinvigorate this famous street. We agree it is crucial to have a restaurant offer which is accessible throughout the day.

We have not identified a specific operator yet, but we have received interest from at least one. This operator would fit in with the character of Savile Row and would provide a destination which we believe will become a cherished local institution.

Theme 7 – Transport and Servicing

Comments Raised

The pavement on Boyle Street is very narrow and a lot of lorries use the street, especially as it is the sole access point to the Westbury hotel. There are also congestion issues at the junction of New Burlington Street, Savile Row, and Clifford Street.

Response

We want to create a new shared pavement on Boyle Street and Old Burlington Street which will help create a more pleasant environment. We want to limit vehicle access via the installation of bollards to make the street more pedestrian friendly, as well as pushing back the building's facades relative to the current building to open up the pavement.

Theme 8 – Construction

Comments Raised

Local residents and stakeholders raised the timeline for the proposed redevelopment, and what the potential impact on highways would be during the redevelopment. It was also apparent that the local community expected a continual liaison throughout the construction process.

Response

We anticipate that the redevelopment process would take around two and a half years to complete, and do not anticipate any need for highway closures during this time. If the Application is successful, a full construction traffic management plan will be agreed with Westminster City Council.

The Applicant is committed to forming a longstanding positive relationship with the community and will be in constant contact throughout the redevelopment if the Application is successful. In doing so, we will build on the relationships formed throughout this pre-application consultation.

5.7 Changes to the Design

In light of the feedback received over the course of the consultation, a number of changes to the design were made, which are detailed below:

Feedback Comments	Design Response
Concerns were raised over the amount of glazing in the building's facade design.	<ul style="list-style-type: none"> We have increased the solidity of the facade by incorporating additional vertical columns on each facade on typical floors.
Consultees wanted the windows of the restaurant on the ground floor to be 'framed' to make the restaurant look more elegant and hide the feet of diners from passers-by.	<ul style="list-style-type: none"> We have incorporated greening to act as a screen, with fixed timber planters on all ground floor elevations.
Suggestions were made to revise the office entrance so it is more attractive when viewed from Regent Street down New Burlington Street, to entice footfall from Regent Street.	<ul style="list-style-type: none"> We have redesigned the entrance door and replaced glazed doors with a timber entrance door in line with these comments.
Local residents and stakeholders complained that Savile Row lacks any greenery, and that our proposals are an opportunity to resolve this.	<ul style="list-style-type: none"> Additional planters are proposed on ground floor and upper floors. A landscape architect has been appointed to design the upper floor terraces and maximise the longevity of planters. The proposed scheme is aiming to achieve the urban greening factor target of 0.3 set out by London Plan.
Concerns were expressed over the massing of the building.	<ul style="list-style-type: none"> Our revised proposals reduce the overall height by 2.41m. The footprint of roof plant has been reduced to minimise townscape impacts, and the upper floors are further set back to accommodate greenery.
We received negative feedback regarding the large awnings around ground floor.	<ul style="list-style-type: none"> We have reduced the size of these canopies from 1500mm to 600mm in width on Savile Row and Old Burlington Street elevations. Due to the width of the narrower pavement on Boyle Street, the canopy width has been reduced to 400mm on this elevation.
Sustainability was a key concern throughout the consultation, and stakeholders and residents wanted to see the most sustainable scheme possible.	<ul style="list-style-type: none"> Urban greening has been enhanced with planters. In addition, green roofing and brown roofing are integrated into the proposed scheme to enhance biodiversity. A blue roof has been also incorporated for rainwater attenuation. Material wise, the use of timber in the structure, window frames, planters and soffit of canopies is proposed to promote health and wellbeing and lower the embodied carbon. Reuse of existing building stone has been incorporated into the design, as well as using home grown materials to minimise the carbon footprint of the scheme.

<p>Consultees wanted reassurance that retrofit is not viable at this location.</p>	<ul style="list-style-type: none"> Retrofit options from non-invasive to extensive retrofit options have been explored and assessed carefully by the design team. These studies have led to the conclusion that the new build option is the only deliverable option for the site.
<p>Stakeholders encouraged the inclusion of affordable workspace on site.</p>	<ul style="list-style-type: none"> Affordable workspace with training opportunities is now proposed at basement level 2. This will be offered in perpetuity under rental terms to be agreed with Westminster City Council in due course.

6.0

Conclusion

6.0

Conclusion

6.1 Summary

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

The principle of changing the building's use was strongly welcomed and, once explained, most stakeholders agreed that redevelopment was the most suitable method to do this. Any improvement to the public realm and activation of the space was also largely welcomed.

There were mixed responses to the proposed design, with some comments being raised about the scale of glass being used and the style of the ground floor restaurant. Some also commented on the potential disruption that might be caused during the construction period.

Following this feedback a number of changes have been made to the scheme as detailed in Section 5.7. A summary document can also be found in Appendix K.

We are delighted that this approach to consultation and spirit of ongoing communication and trust has led to the Savile Row Bespoke Association submitting a letter of fulsome support, which is contained in Appendix J.

6.2 Continued Engagement

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

The Applicant will ensure that the submission of the Application does not mark the end of community engagement and will continue to discuss the proposals with the local community throughout the planning process.

7.0

Appendices

7.0

Appendices

Appendix A: Consultation area

Appendix B: Letter to local residents

Appendix C: Door-knocking area

Appendix D: Instagram post advertising the consultation

Appendix E: LinkedIn post advertising the consultation

Appendix F: Poster advertising the consultation

Appendix G: Consultation website

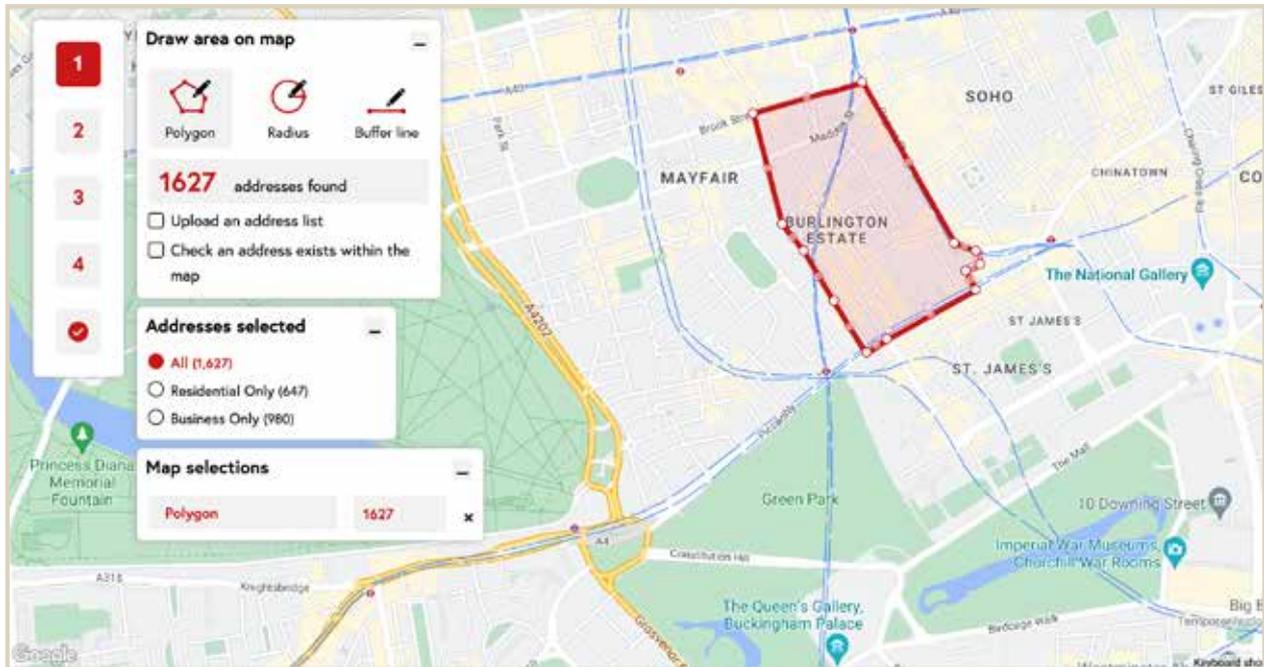
Appendix H: Exhibition boards

Appendix I: Survey available online and at our exhibition

Appendix J: Letter of support from the Savile Row Bespoke Association

Appendix K: Summary of Changes Document & Revised CGIs

Appendix A: Consultation area



27 SAVILE ROW

Dear Neighbour,

PUBLIC CONSULTATION LAUNCHES ON PROPOSALS TO REDEVELOP 27 SAVILE ROW

I am writing to you on behalf of Henigman Limited, which is launching a public consultation on their plans to create a sustainable, thriving new office building with a restaurant at ground floor and improved public realm at 27 Savile Row - giving a new lease of life to the northern end of this iconic street.

The existing building at 27 Savile Row sits within a prominent position and is well known within the local area. However, in its current state, the building has a complex internal organisation with varying floor levels, low ceiling heights, large sections of solid façade limiting daylight, and inadequate sustainability credentials.

Henigman's investment partner CPI Property Group recently purchased the former Savile Row Police Station and is looking to redevelop the current building. Celebrating the iconic Savile Row is at the heart of our proposals and we are looking to revitalise the street with a thriving new workspace with a new neighbourhood restaurant at the ground floor.

Our proposals include:

- A sensitive design that respects the heritage of Savile Row
- Modern, 21st-century office space
- A new restaurant bringing life and attracting footfall to this end of Savile Row
- Public realm improvements on Boyle Street and Old Burlington Street
- Exemplary sustainability credentials
- End-of-journey facilities

We always seek to adhere to the highest environmental standards and so the proposed redevelopment will follow exemplary sustainability initiatives.

Henigman is keen to establish themselves as good neighbours and long-term partners and is committed to engaging with the local community. With this in mind, we are launching a public consultation to hear the thoughts of residents and businesses ahead of submitting a Planning Application to Westminster City Council. You can view our proposals online at 27savilerow.co.uk and have your say on our vision for the site.

27 SAVILE ROW

We are also holding a public exhibition and webinar where you can learn more about our plans.

The public exhibition will be held on **Tuesday 12th July from 3.00pm – 7.00pm** at St James's Room, 1st Floor, **The Cavendish Hotel, 81 Jermyn Street, St. James's, SW1Y 6JF**. The webinar will be held virtually on **Thursday 14th July from 6.00pm – 7.00pm**, and you can sign up for this on our website – **27savilerow.co.uk**

In the meantime, if you have any queries, please do get in touch by emailing Concilio, who are managing the public consultation on our behalf by e-mailing **sgregory@conciliocomms.com** or calling our freephone number on **0800 994 9322**.

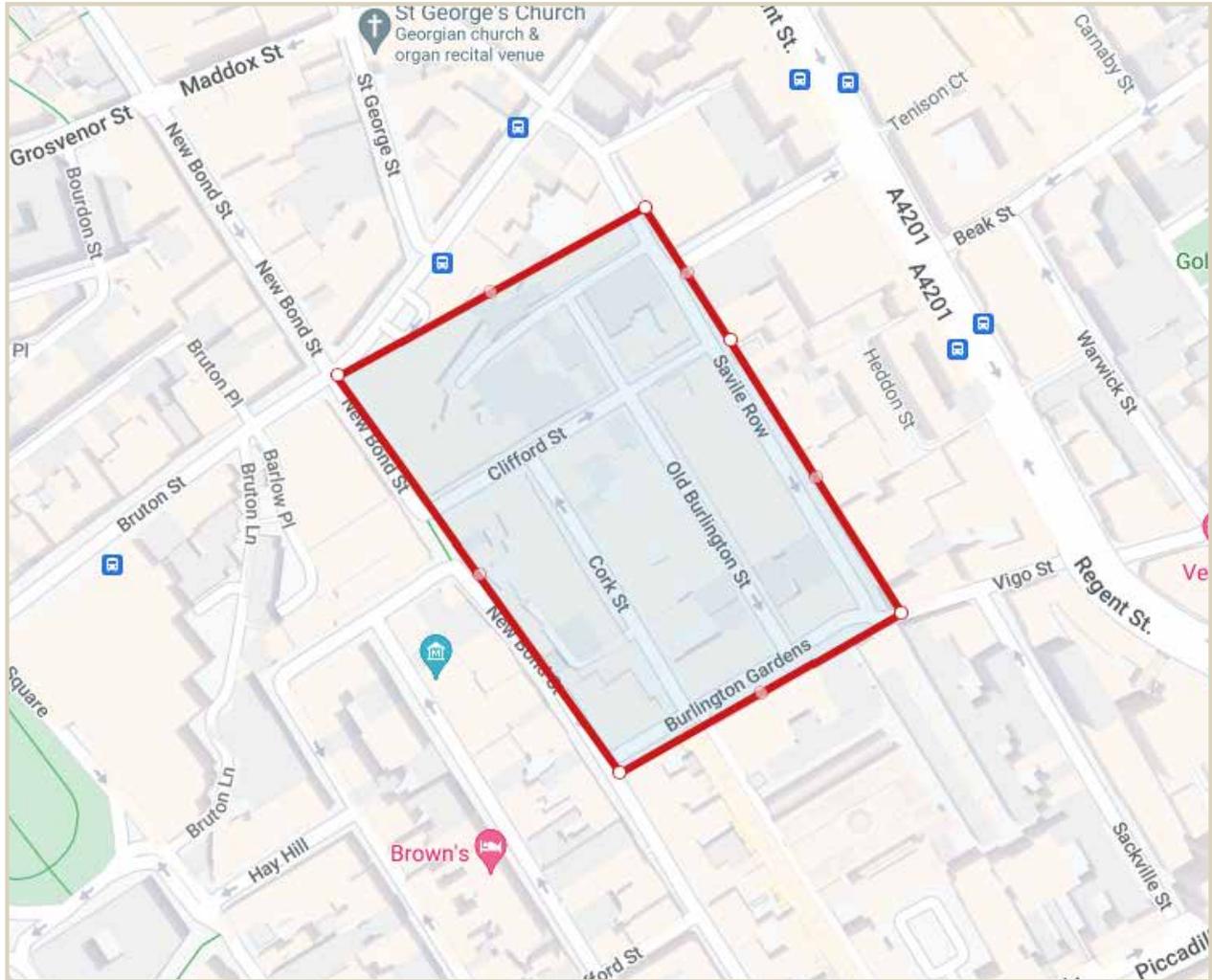
We look forward to your feedback.

Kind regards,

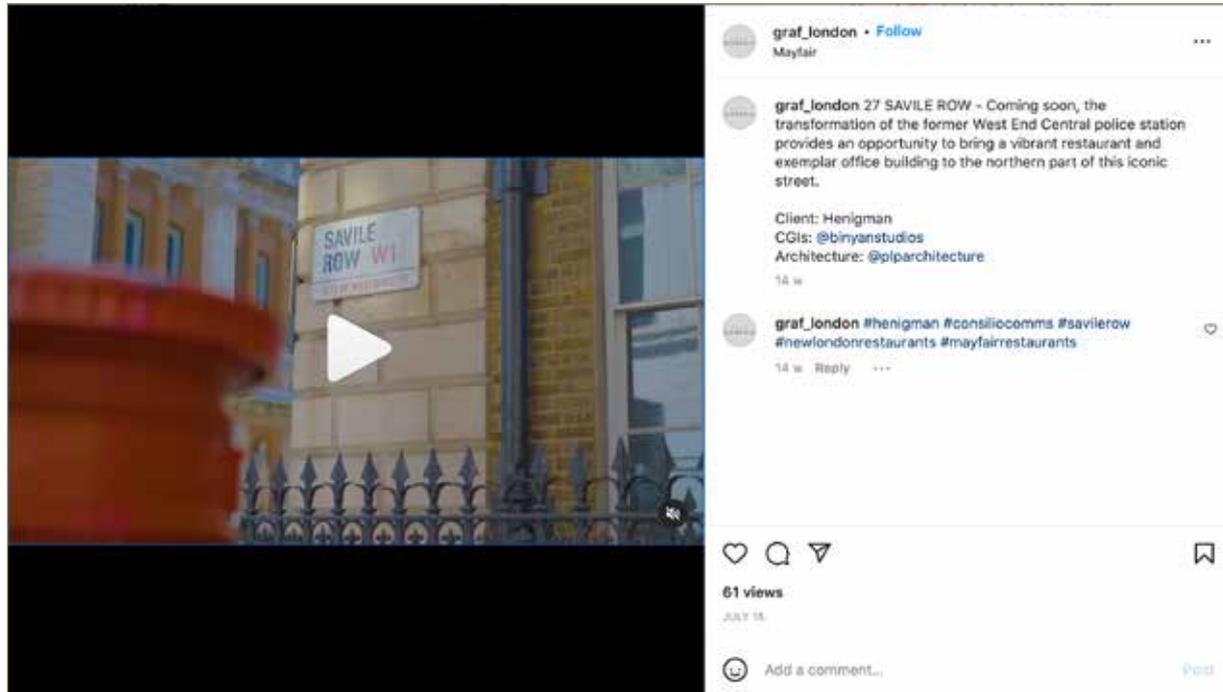


Stuart Goulds
Development Director
Henigman

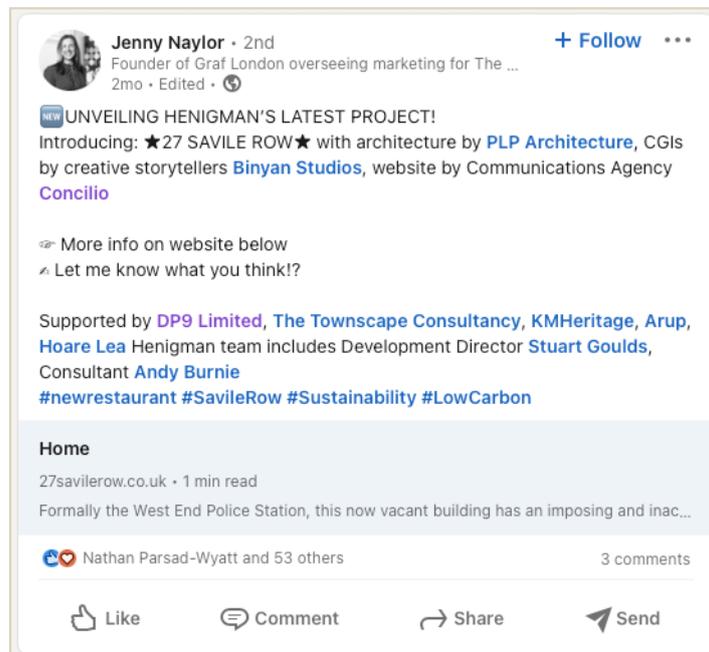
Appendix C: Door-knocking area



Appendix D: Instagram post advertising the consultation



Appendix E: LinkedIn post advertising the consultation



Jenny Naylor · 2nd
Founder of Graf London overseeing marketing for The ...
2mo · Edited ·

UNVEILING HENIGMAN'S LATEST PROJECT!
Introducing: ★27 SAVILE ROW★ with architecture by [PLP Architecture](#), CGIs by creative storytellers [Binyan Studios](#), website by Communications Agency [Concilio](#)

More info on website below
Let me know what you think!?

Supported by [DP9 Limited](#), [The Townscape Consultancy](#), [KMHeritage](#), [Arup](#), [Hoare Lea](#) Henigman team includes Development Director [Stuart Goulds](#), Consultant [Andy Burnie](#)
[#newrestaurant](#) [#SavileRow](#) [#Sustainability](#) [#LowCarbon](#)

Home
27savilerow.co.uk · 1 min read
Formally the West End Police Station, this now vacant building has an imposing and inac...

[Nathan Parsad-Wyatt](#) and 53 others · 3 comments

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☎ ☠ 🚚 🐕 🐾 🏠 24

**Transforming
27 Savile Row**

HAVE YOUR SAY

Contact us

☎ 0800 994 9022
✉ sgregory@cityofwestminster.com
🌐 27savilerow.co.uk

Scan the QR code to have your say on our website.

The development of 27 Savile Row is focused on creating a sustainable thriving new office building with a restaurant at ground floor and improved public realm, giving a new lease of life to the northern end of Savile Row.

Ahead of submitting a planning application to Westminster City Council, we want to hear your views on our plans.

27 SAVILE ROW

The redevelopment of 27 Savile Row is focused on creating a sustainable, exciting new office building with a restaurant at ground floor and improved public realm giving a new lease of life to the northern end of Savile Row.

This is our consultation website which explains what we are proposing and why. Ahead of submitting a planning application to Westminster City Council, we want to hear your views on our plans.

Have you had a chance to look through the website, please give us your thoughts by visiting about our events, or you can leave your say on the website.

[View our proposals](#) [Have your say](#)

The Opportunity

For the past two centuries, Savile Row has been globally synonymous with precision bespoke tailoring. The street corner itself is a widely recognised international brand, and the area is home to many of London's prized and iconic tailoring houses. It remains today the premier street in the world for bespoke and made-to-measure suits, adding to London's appeal.

However, it is currently a street of two halves. The southern end of Savile Row is a lively destination, with Coventry, the Royal Academy of Arts, exciting shops, terraces, and high quality public realm. The northern end of the street has to much quieter where street level activities are limited and where the lack of investment in the area's public realm is plainly evident. We believe there is an opportunity to change this and transform the northern end into one building for a number of Savile Row.

27 Savile Row is a purpose built public station which closed for public use in 2012. With its structural purpose long gone, it remains vacant and its imposing concrete facade do not contribute to the retail character of the area.

There is an opportunity to sustainably develop the site into a mixed use building consisting of a world class office space and a new restaurant, along with much needed public realm improvements, to bring life and commerce to the northern part of this important street.

OUR PROPOSALS AIM TO:

- Celebrate the heritage of Savile Row, preserving heritage, and bringing new visitors to the area - street
- Create Grade A office space and a vibrant new restaurant
- Bring life to the end of the building and contribute to improved public realm

The case for redevelopment

Formerly the West End Police Station, this 1920s/30s building has an intriguing and distinctive ground floor and seventh floors. The building has a complex planning arrangement that is derived from its former use. In its present form, the building would not be suitable as a residential, day-to-day office public station.

There is an opportunity to create a contemporary mixed use building, preserving Grade A listed ground floor office space and a Grade II listed ground floor that will make a significant contribution to the street's vitality and life.

Using a sensitive conservation approach, the embedded within the new build would be similar and be greater than a return.

We have shared extensive evidence on revitalising the existing building and propose a sensitive replacement that respects the building's rich heritage.

Celebrating Savile Row

Savile Row is an iconic street, with a rich history. It is the home of bespoke tailoring and a destination point for global and domestic visitors looking for the exceptionally British experience.

However, it is a space of two halves.

The southern end of the street is vibrant, with high footfall and visitors moving towards it through an ever-active environment.

The northern end of Savile Row is the opposite, an often unloved space for visitors to spend any time at the end of the street and its nearby establishments.

27 Savile Row has an iconic red brick facade and historic facade. The new 27m high 'Street' provides an avenue for visitors to take a break.

By creating high quality grade A office space, a dining environment and improved public realm, we can celebrate and regenerate this historic street.

Savile Row Bespoke Association

"We are working closely with the project team on 27 Savile Row to ensure the proposals for the building attract much-needed footfall into Savile Row and surrounding streets to redress the northern end of this iconic destination."

By Thomas - Savile Row Bespoke Association

Savile Row Bespoke
ASSOCIATION

Celebrating Savile Row in our design

The building's new facade will offer a unique opportunity to integrate a sculptural element with a purpose to further celebrate the history of Savile Row through the lens of a British urban re-design.

Highlighted in gold in the image to the left is the generous public art installation space. We would welcome your thoughts on what you would like to see here.

[Have your say](#)

27 SAVILE ROW
Bringing 27 Savile Row into the 21st Century

CONTACT US
0200 064 8322
enquiries@concoconema.com

Powered by Saville Online

The Challenge

The police station that formerly occupied the building at 27 Savile Row was purpose built and followed some very specific requirements set out by the initial brief at the time.

The police station from that time ceased to exist and the building is currently undergoing a phase of the challenge with the existing building are highlighted below.

A raised ground floor prevents inclusive access and fails modern building standards

A large percentage of solid facade with few windows on the upper floors limiting lighting and ventilation of the building

Complex internal spatial organisation which was designed to meet bespoke police station specifications, including holding police cells and varying floor levels

Plant, services and circulation for the building designed for its use as a dedicated police station that are inappropriate for office purposes

Low floor-to-ceiling height

27 Savile Row

The case for redevelopment

The climate emergency means we all need to be concerned about the environmental impact of buildings. We have assessed a number of options and propose a sustainable replacement that mitigates the carbon impact of buildings.

27 SAVILE ROW
Bringing 27 Savile Row into the 21st Century

Contact Us
0200 994 9222
gregory@scibocomma.com

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Key principles



Make a positive contribution to the built form
 Commissioned from world-class architects, the building will be designed to provide a high-quality, sustainable and resilient built form.



Have regard for the legacy
 The importance of the project is such that the existing building was designed and paid for to be a landmark building.



Create an improved low carbon, low energy building
 The building will be designed to be a low carbon building, with a low energy footprint, and to be a model for other developments and urban growth.



Good design to and significantly enhance the public realm
 The building will be designed to be a landmark building, with a high level of design and urban environment that will be a model for other developments.



Create a future-proofed structure which will be flexible, adaptable, and a contributing to future use and future generations.

Design Approach

The existing 27 Savile Row was built in the 1940s at a time when Art Deco and the Modernist style of architecture had a large influence on the style of buildings and approach to design. A number of buildings have remained from that period, and the engineering No. 27 Savile Row is an exceptional example that has stood the test of time.

The existing building is markedly more than the height seen on the west and east sides of Savile Row. The character and scale of development at the southern end of Savile Row are also more contemporary and larger than the current building at 27 Savile Row.

The image to the right is an example of the architectural style of the same period as 27 Savile Row which has helped inform our design approach.



New Proposal

Our proposal acknowledges the importance of the 1940s era architecture and seeks to respect the heritage. The design will reflect the historical high-bourgeois architecture to ensure the new building sits comfortably within its surroundings.

The redevelopment of this site presents an opportunity to redefine the meaning and height of the building, to create something that is more in keeping with the current developments at 30 and 23 Savile Row. The proposed building height aims to align with the taller buildings to the immediate west and east, creating more consistency along the street.



Sustainability



The Team

HENIGMAN

Henigman is a development and asset management focused on heritage, accessibility and functionality. The company collaborates with leading architectural practices to deliver complex and major projects in London. Henigman provides a seamless approach from its real estate development and management, continually seeking ways to improve commercial performance, quality and resilience. The company is led by its award-winning CEO Property Group which has made both RSC contributions to leading world-class real estate projects which are aligned to the Paris agreement and have a UN Global Compact approval to 2021.







PLP ARCHITECTURE

PLP Architecture is a London based studio of architects, designers and creatives who value the transformative role of ideas and the capacity for architecture to inspire. The practice has produced some of the world's greatest, most intelligent and ground breaking designs through a profound commitment to social, economic and environmental values. PLP's commitment to creating more sustainable (this can be seen in projects ranging from net zero rated, new development at London's Bankside South to its innovative hospital architecture at Singapore's Park View project).



Significantly beyond the GLA's environmental and sustainability targets, the attraction, brought by the building's lively ground floor use, will support local commerce and bring much needed public realm improvements to the northern end of South Lane.

Lee Robinson - President

WIDER TEAM

		
Community Engagement	Planning Consultant	Technical Engineer
		
Building Consultant	Mechanical and Electrical Engineers & Sustainability Consultant	Demographic Consultant

27 SAVILE ROW

Bringing 27 Savile Row into the 21st Century

Contact Us

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✉ enquiries@27savilerow.com

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The screenshot shows a website header with the logo '27 SAVILE ROW' and a hamburger menu icon. Below the header is a dark green banner with the word 'News' in white. The main content area features a news article with a photograph of a building facade. The article title is 'Consultation launches on proposals at 27 Savile Row'. The text below the title states: 'Herzog & de Meuron has launched a public consultation for their emerging proposals at 27 Savile Row. Herzog & de Meuron seeking to create a sustainable, thriving new office building'. Below the text is a 'READ MORE' link and a date 'July 1, 2022'. At the bottom of the page is a dark green footer with the logo '27 SAVILE ROW' and the tagline 'Bringing 27 Savile Row into the 21st Century'. To the right of the logo is a 'Contact Us' section with a phone icon and the number '0800 994 9322', and an email icon with the address 'sgregory@conciliocomms.com'.

27 SAVILE ROW

News



Consultation launches on proposals at 27 Savile Row

Herzog & de Meuron has launched a public consultation for their emerging proposals at 27 Savile Row. Herzog & de Meuron seeking to create a sustainable, thriving new office building

[READ MORE](#)

July 1, 2022 • No Comments

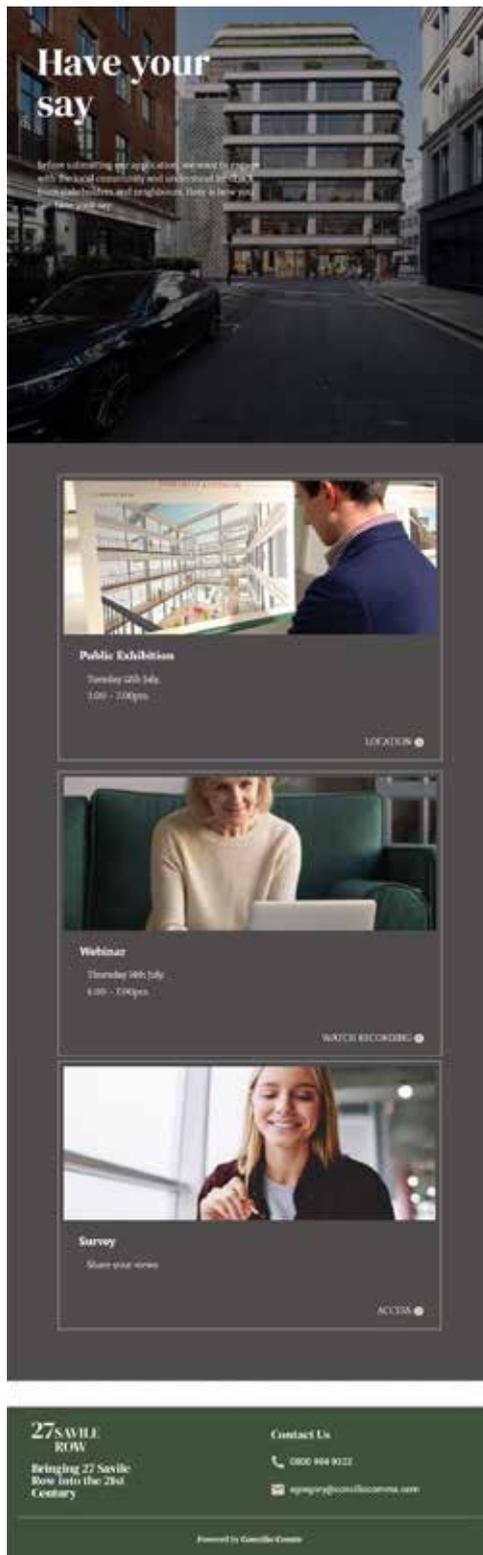
27 SAVILE ROW

Bringing 27 Savile Row into the 21st Century

Contact Us

0800 994 9322

sgregory@conciliocomms.com



Have your say

Before submitting an application, we want to engage with the local community and understand how the proposed 27 Savile Row and neighbours have a say in the future of the site.

Public Exhibition
Tuesday 25th July
1.00 - 2.00pm
[LOCATION](#)

Webinar
Thursday 26th July
8.00 - 8.00pm
[WATCH RECORDING](#)

Survey
Share your views
[ACCESS](#)

27 SAVILE ROW
Bringing 27 Savile Row into the 21st Century

Contact Us
0800 904 9022
enquiries@scilife.com

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The Team

HENIGMAN



Henigman is a development and investor company. Focused on heritage, investment and functionality, Henigman collaborates with leading architectural practices to deliver exemplar real estate projects in London.

Henigman promotes a sustainable approach towards real estate development and management, continually seeking ways to improve environmental performance, quality and resilience.

The company is backed by family-owned CPI Property Group which has made bold ESG commitments including environmental targets which are aligned to the Paris agreement and became a UN Global Compact signatory in 2021.

PLP/ARCHITECTURE



PLP Architecture is a London-based studio of architects, designers and researchers who value the transformative role of ideas and the capacity for architecture to inspire.

The practice has produced some of the world's greenest, most intelligent and ground-breaking designs through a profound commitment to social, economic and environmental values.

PLP's commitment to creating more sustainable cities can be seen in projects ranging from net-zero masterplans such as Bankside Yards in London, to biophilic luxury residences like Park Nova in Singapore.

The Wider Team



Planning Consultant



Community Engagement



Heritage Consultant



Mechanical and Electrical Engineers & Sustainability Consultant



Structural Engineers



Townscape Consultant

Site Context

27 Savile Row sits towards the northern end of Savile Row.

This iconic street is the home of bespoke tailoring and a destination for global and domestic visitors looking for the quintessentially British experience. The southern end of the street is vibrant, with high footfall, active shop frontages, Cecconi's and the Royal Academy of Arts.

The northern end of Savile Row is the opposite, as there are limited reasons for visitors to spend any time at this end of the street and it needs revitalisation.

27 Savile Row sits in a prominent central position, with the potential to attract footfall from Regent Street, New Bond Street, and Old Burlington Street.

By creating high-quality grade A office space, a thriving restaurant and improved public realm, we can celebrate and reinvigorate the northern part of this famous street.



The Building

The building currently standing at 27 Savile Row is a purpose-built police station, completed in 1940, to a set of very specific requirements for the Metropolitan Police. It was heavily modified in 1993, with the infill of the original internal lightwell with a new nine-storey steel-framed structure, adding an additional floor to the building. Its front desk closed in 2017 and it lies vacant. 27 Savile Row is not listed.

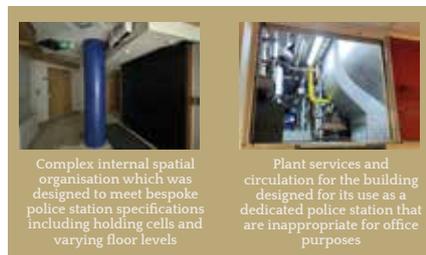
Its architecture is symbolic of its original purpose, now defunct, and the building detracts from the elegant character of Savile Row. The existing façade reflects the building's internal configuration, with solid surfaces marking the location of former holding cells, and some areas having no or minimal natural light.

The building has a complex internal spatial organisation that is derived from its former use. It has an inaccessible ground floor, poor-quality internal spaces, and low floor-to-ceiling heights, all of which present numerous challenges to any re-use of the existing structure - including as a modern-day police station.



A raised ground floor prevents inclusive access and fails modern building standards

A large portion of solid facades with few windows on the upper floors limit daylight and views out of the building



Complex internal spatial organisation which was designed to meet bespoke police station specifications including holding cells and varying floor levels

Plant services and circulation for the building designed for its use as a dedicated police station that are inappropriate for office purposes



Low floor-to-ceiling height

Bespoke internal configuration for a purpose-built police station

Timeline

- 1939-40 — West End Central Police Station was built
- 1940 — An aerial bomb caused 'significant internal damage' to the police station
- 1993 — Major refurbishment completed, with an additional floor added
- 2002 — Further external and internal alterations
- 2017 — Police station front desk closed
- 2021 — Police station vacated and the building sold

The Challenge

The current building at 27 Savile Row fails to comply with Government regulatory requirements, the London Plan, and health and safety expectations.

One of the key challenges facing 27 Savile Row, in addition to those listed on the right, is the lack of daylight caused by a large portion of solid façade along with poor internal configuration.



Office Entrance (9 Steps Up)
Fails to comply with national accessibility requirements for those with mobility issues



Office Lobby & Security Gate
Structurally integral columns compromise the entrance lobby, preventing open access into the building



Inadequate Lifts
Fails to comply with national accessibility requirements and the London Plan



Office Space
Internal floor-to-ceiling heights fail to comply with British Council for Offices guidance, making it impossible to provide high-quality office space



End-of-Trip facilities
Lack of level-access space for end-of-trip facilities for those looking to cycle to the building



Evacuation Difficult
Fails to comply with national health and safety requirements



Fire Fighting Difficult
Fails to comply with national fire safety requirements

Assessing the Options

We have assessed all options for how to re-purpose the police station building at 27 Savile Row, from non-invasive interventions through to wholesale redevelopment, according to the following considerations:



Legibility of heritage
How much would we need to change the building's c.1940 façade?



Embodied carbon
How much carbon is emitted as a result of producing materials for the construction of the building?



Fit for purpose
Is the building policy compliant and is it likely to attract a new occupier?



Public realm contributions
Does the building make a positive contribution to the local area?



Operational carbon
How much energy is used to keep the building warm, cool, ventilated, lighted and powered?



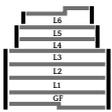
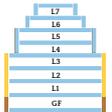
Longevity
How can the building be future-proofed to ensure it will last for a significant period of time?

Comparing the Options

When considering the future of 27 Savile Row, there is a clear trade-off between heritage and embodied carbon on the one hand, and operational carbon, public realm, longevity, and how fit for purpose the building is on the other.

In light of this, we believe that a wholesale redevelopment is justified, to provide a highly sustainable mixed-use office building with the greatest longevity and positive contributions to offer Savile Row.

In the long term, a wholesale redevelopment will be more sustainable because of the very low operational carbon levels this will allow us to achieve.

	 Approach 1 A non-invasive intervention, retaining the current building's façade and internal structures	 Approach 2 Retaining the façade from ground floor to fifth floor while completely rebuilding the building's internals	 Approach 3 Retaining façade from ground floor to third floor while completely rebuilding the building's internals	 Approach 4 Wholesale redevelopment of 27 Savile Row to provide a new building
Legibility of heritage	 Complete retention	 Significant loss	 Near total loss	 Complete loss
Embodied carbon	 Low	 High	 Very high	 Very high
Operational carbon	 Very high	 High	 Medium	 Very low
Fit for purpose	 Not at all	 Very low	 Low	 High
Public realm contribution	 None	 Minimal	 Minimal	 High
Longevity	 None	 Limited	 15-20 years	 100+ years

Embodied Carbon Comparison

We are proposing an ambitious and innovative low carbon building which will exceed the Greater London Authority's embodied carbon benchmark and which over the lifetime of the building produce less combined operational and embodied carbon than an approach which sees partial retention of the existing façade

Embodied Carbon
33% LESS
 than GLA Benchmark. Meeting
 GLA Aspirational Target 2030

Target of
BREEAM
 OUTSTANDING

Target of
WELL
 PLATINUM



What Our Proposals will Achieve



A sensitive design that respects the heritage of Savile Row



Exemplar sustainability credentials



Modern new office space



A new restaurant bringing life and attracting footfall to this end of Savile Row



Public realm improvements on Boyle Street and Old Burlington Street



Improved biodiversity



Encourage sustainable travel and provide end of journey facilities



Public art to celebrate the craftsmanship of the Savile Row tailors

High Quality Office Space

Our proposals will provide much-needed, high-quality office space, in line with the aspirations of the Westminster City Plan. We are looking to create a contemporary, high-quality commercial space whilst celebrating the unique heritage of Savile Row.

With confidence in the West End returning, our scheme will contribute to the thriving and vibrant character of the area. Henigman is seeking to future-proof this iconic site by making it an accessible, modern and sustainable office building.

The existing building does not meet modern day office requirements, as it has limited levels of natural daylight, inadequate floor to ceiling heights and is non-compliant with regards to accessibility, fire and health and safety.

Our proposals will provide the very best in 21st-century office space, with amenity space in the form of terraces on office floors to ensure the health and wellbeing of users, and end-of-journey facilities to allow for active travel.



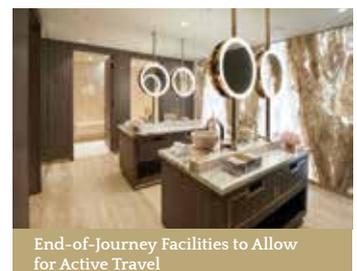
A Typical Office Floor



Visualisation of Proposed Office Floors



High Quality Office Space



End-of-Journey Facilities to Allow for Active Travel

Improving Public Realm

The existing building has a poor relationship with its surroundings and does not present a welcoming frontage. The building's façade is reminiscent of a fortress, contributing little to the area's public realm.

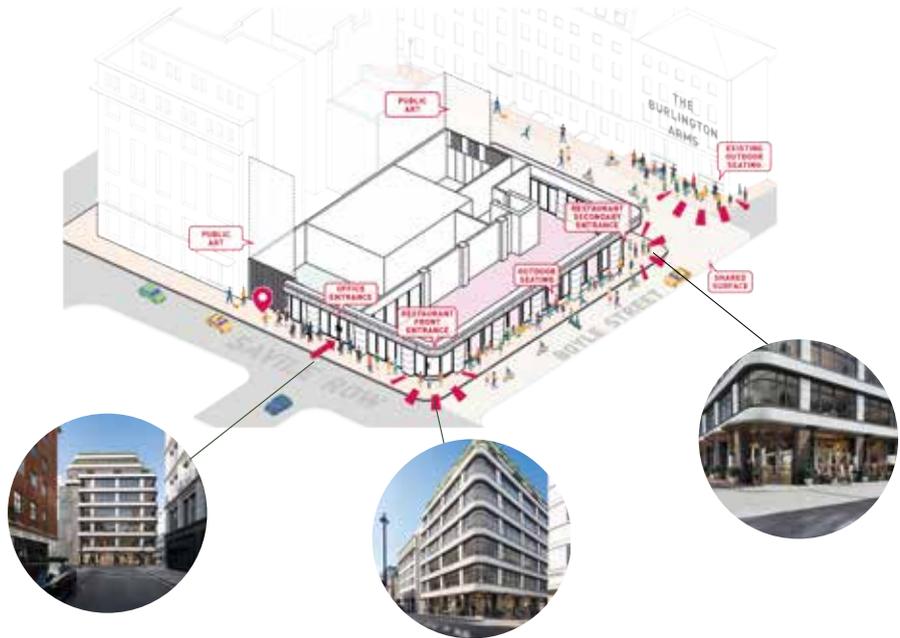
As part of our proposals, it is our ambition to create a lively and active ground floor that will make a significant contribution to the area's public realm. This will include:

A restaurant with outdoor seating at ground floor level, opening 27 Savile Row up to the public and providing interaction with pedestrians

Planting on green terraces to improve levels of biodiversity

Public art designed by a British artist on the bookends of the building's façades on both Savile Row and Old Burlington Street

A shared surface arrangement on Boyle Street and Old Burlington Street



Proposed Public Art

As part of our proposals, a portion of the façade fronting Savile Row and Old Burlington Street will be dedicated to a new public art installation.

Our vision is to have a British artist interpret and celebrate Savile Row's unique history on this blank canvas. With an engaging public art piece, 27 Savile Row will act as a focal point, drawing visitors from Mayfair and the wider West End.

We are keen to understand the public's view on what would be an appropriate artistic subject in this location.



The gold outline shows the portion of façade dedicated to new public art.

Sustainability

We are looking to create an innovative low carbon building which is exemplary of how we should build now and in the future, setting a benchmark in sustainable low carbon development and urban greening.



Lightweight construction
On the upper floors, we will use steel for primary columns/beams, while timber will be used for secondary beams and flooring.



Connectivity and transport
There will be substantial cycle spaces provided as part of the development. The site is well connected to a variety of transport links with a PTAL rating of 6b.



Minimising energy consumption
Inclusion of solar photovoltaics and air source heat pumps to minimise energy consumption.



Low carbon strategies
With our holistic low carbon and façade first approach, we can reduce both embodied carbon and operational carbon to achieve the highest BREEM outstanding target.



Circular economy strategy
We will undertake an audit of all strip-out materials and products for re-use.



Efficient materiality and design
We are looking at the use of timber, UK-sourced materials, and recycled stones on structure and façade elements to reduce carbon footprint.



Increasing biodiversity
The planted balconies and terraces will contain extensive planting to encourage biodiversity.



Water cycle
Equipment used throughout the building will be water efficient, with rainwater recycle and harvesting throughout. Storm water attenuation will also be included in the designs, to minimise water wastage.



Existing view from New Burlington Street looking west



Proposed view from New Burlington Street looking west

Appendix H: Exhibition Boards



Existing view from northern end of Savile Row looking south



Proposed view from northern end of Savile Row looking south

Have Your Say

Thank you for taking the time to review our proposal to transform 27 Savile Row. We would like to hear the thoughts of the community ahead of submitting a planning application to Westminster City Council later this year. We would be grateful if you could complete a feedback form.

Alternatively you can visit our website at 27savilerow.co.uk

If you would like to get in touch with the project team, please do so using the contact details below:

Email: sgregory@conciliocomms.com

Freephone: 0800 994 9322



Appendix H: Exhibition Boards



27 SAVILE ROW

Transforming 27 Savile Row

Thank you for reviewing our proposals for 27 Savile Row. Before submitting an application to Westminster City Council, we would like to receive your comments about our proposals. Please share your thoughts with us via our survey!

1. Firstly, what is your relationship to the area?

- Local Councillor Community Representative Business Owner
 Local Resident Visitor Worker Other

2. Overall, what do you think about our proposals to redevelop 27 Savile Row?

3. Do you support our ambition to create a more engaging and activated ground floor level? We are proposing a new restaurant at ground floor level with improved greening and public realm.

- Strongly supportive Supportive Neutral Unsupportive Very unsupportive

4. On a scale of 1-10, what do you think of our proposed mix of uses? We are seeking to provide high quality office space, restaurant at ground floor and new public realm spaces.

- 0 1 2 3 4 5 6 7 8 9 10
Strongly dislike Strongly like

5. Do you think our proposals will help revitalise this part of Savile Row?

- Yes Maybe No Unsure

27 Savile Row

27 SAVILE ROW

Transforming 27 Savile Row



6. We are implementing a number of important sustainability initiatives as part of our proposals. Of these, which are most important to you?

- Improved greening and enhanced biodiversity
- Significant reduction in operational carbon
- Use of efficient materials, reusing stone from the existing façade
- Minimal wastage with rainwater recycling and harvesting
- Promoting travel by providing cycle spaces and end of journey facilities e.g. showers

7. When considering the public art, are there any themes the team should look to include, for example, the history of Savile Row?

8. Do you have any further thoughts regarding the proposals?

9. Please leave your email address if you would like to be kept updated on our proposals for 27 Savile Row

Thank you for sharing your views with us on 27 Savile Row. If you require any further information please contact sgregory@conciliocomms.com. By providing your contact information you are consenting to being contacted. Your information will be stored by Concilio Communications Ltd, very securely, on UK servers only. If you do not wish to hear from us further, or change your mind after submitting your information, please email xselefkou@conciliocomms.com and let us know. Further details can be found at conciliocomms.com/privacy-policy

27 Savile Row

Appendix J Letter of support from the Savile Row Bespoke Association



15, Savile Row, London W1S 3PJ

Mr Mark Hollington
Westminster Planning North Area Team
Westminster City Hall
64 Victoria Street
London SW1

31st October 2022

Dear Mark

I am writing on behalf of the members of the Savile Row Bespoke Association (SRBA) to express our support for the transformation of the former West End Central Police Station, 27 Savile Row.

The Savile Row Bespoke Association is dedicated to protecting and promoting the practices and traditions that have made Savile Row the international home of bespoke tailoring. We are a key stakeholder with an interest in continued progress and improvement in the East Mayfair area ensuring Savile Row remains a global destination.

The proposed development of the West Central Police Station presents an opportunity to transform the northern end of Savile Row and bring it into step with the thriving southern part of the street.

We are also delighted that following extensive consultation, and in response to the feedback we gave, the developer has made changes to the scheme which include enhancing the ground floor appearance and introducing much needed affordable workspace for apprentice training and start-up opportunities.

The proposals brought forward will create a mixed used building consisting of world-class office space and a new restaurant, all of these changes will bring life, commerce, and footfall to the northern part of this iconic street.

We trust these comments will be afforded appropriate weight in the overall assessment of the application and hope that that the Council will reach a positive decision to support this development.

Yours faithfully

Su Thomas
Manager The Savile Row Bespoke Association

SAVILE ROW BESPOKE LTD REPRESENTS THE FOLLOWING COMPANIES:
ANDERSON & SHEPPARD · CAD & THE DANDY · CHITTLEBOROUGH & MORGAN · DAVIES & SON ·
DEGE & SKINNER · DUGDALE BROS & CO · EDWARD SEXTON · GIEVES & HAWKES · HUDDERSFIELD FINE
WORSTEDS · H HUNTSMAN · HENRY POOLE & CO · KATHRYN SARGENT · KILGOUR · MEYER &
MORTIMER · NORTON & SONS · RICHARD JAMES · RICHARD ANDERSON

Transforming former West End Central Police Station

The development of 27 Savile Row is focused on creating a sustainable, thriving new office building with a restaurant at ground floor and improved public realm, bringing new life to the northern end of Savile Row.

For the past two centuries, Savile Row has been globally synonymous with premium bespoke tailoring, being one of the many pillars of London's international cultural status. However, it is currently a street of two halves. The southern end of Savile Row is a lively destination, home to the Royal Academy of Arts, inviting shops and restaurants, and high-quality public realm.

The northern end of the street is in stark contrast where street-front activity is limited and where the lack of investment in the area's public realm is plainly evident.

27 Savile Row is a purpose-built police station which closed its front desk in 2017. It remains vacant and its imposing inactive façades do not contribute to the retail character of the area. There is an opportunity to sustainably develop the site into a mixed-use building consisting of a best-in-class office space and a new restaurant, along with much-needed public realm improvements, to bring life and commerce to the northern part of this important street.

Our proposals aim to

Celebrate Savile Row and bring new visitors to this iconic street



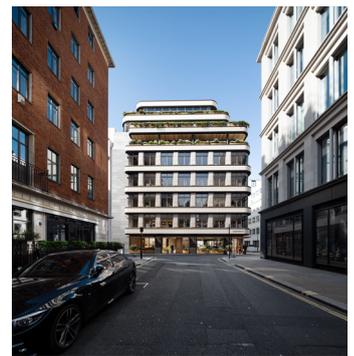
Create Grade A office space and a vibrant new restaurant



Bring life to the rear of the building and improve public realm



Deliver a sustainable and beautiful landmark building



Listening to feedback

For the past year, we have been working in partnership with the local community to deliver a building everyone can be proud of



We held 14 meetings with interested groups



We held a webinar presentation



3,000 letters delivered to the local community



We launched a consultation website



We held a public exhibition on the plans



300 doors knocked on

You said

We did

Here is how the scheme has evolved following feedback from the local community

The amount of glazing in the building's façade is too much	Increased solidity of the façade by incorporating additional vertical columns on every façade
The restaurant windows should be 'framed' so that diners' feet cannot be seen from the street	Introduced lumber planters on every ground floor elevation, with greening that will act as a screen
Make the office entrance more attractive to those coming from Regent Street	Redesigned the glass entrance doorway into a more attractive timber
Savile Row currently lacks any greenery	Introduced new planters at ground and upper floors, which will be designed by a landscape architect with longevity in mind
We are concerned about the building's massing	Reduced overall height by 2.4m, as well as minimising the bulk of rooftop plant and further setting back the upper floors
The scheme should be as sustainable as possible	Included new planters, biodiverse green and brown roofs, a blue roof to collect rainwater. We are also maximising use of timber in construction, and reusing existing building stone
We don't like the large ground floor awnings	Reduced the canopy size from 1500mm to 600mm on Savile Row and Old Burlington Street, and to 400mm on Boyle Street
Is retrofitting not viable at this location?	Assessed all retrofit options carefully, and retrofitting has been deemed as not deliverable for the site
Affordable workspace should be included on the site	Introduced affordable workspace with potential for training, apprentices, and start-ups at basement level 2

View from New Burlington Street looking west



Initial proposal



Revised proposal

View from northern end of Savile Row looking south



Initial proposal



Revised proposal

View from corner of Boyle Street and Old Burlington Street



Initial proposal



Revised proposal

View from corner of Savile Row and Boyle Street



Initial proposal



Revised proposal

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City of Westminster

Planning & City Development Committee

Date: 27 April 2023

Classification: General Release

Title: National Planning Consultations Update

Report of: Director of Town Planning and Building Control

Financial Summary: None.

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07971026919)**

1. Executive Summary

- 1.1 This report provides an update on recent and ongoing consultations by the Department for Levelling Up, Housing and Communities (DLUHC) on changes to planning fees and performance monitoring, permitted development rights, future changes to the current CIL and S106 regimes and the replacement of Environmental Impact Assessments with Environmental Outcome Reports.
- 1.2 The amendments proposed to planning fees and performance monitoring and permitted development rights are likely to have more immediate impacts on the planning service and decision making and the Committee is therefore invited to focus its consideration on these elements of the report. Proposals by government relating to the introduction of a new Infrastructure Levy and reform of the process for environmental assessments represent longer term aspirations and are reported for the Committee's information at this stage.

2. Recommendation

- 2.1 Members are asked to consider the contents of this report, including possible implications these may have for planning decision making in Westminster.

3. Increasing Planning Fees and Performance

- 3.1 The consultation was launched by the DLUHC on 28 February 2023¹. It seeks views on proposals to increase planning fees and improve the performance of local planning authorities. The principal changes proposed are:
 - to increase planning fees by 35% for major applications and 25% for all other applications;

¹ <https://www.gov.uk/government/consultations/increasing-planning-fees-and-performance-technical-consultation/technical-consultation-stronger-performance-of-local-planning-authorities-supported-through-an-increase-in-planning-fees>

- introduce additional fees for bespoke or 'fast track' services;
 - to make an annual inflation-related adjustment to planning fees;
 - ring-fencing of additional fees income;
 - double fees for retrospective applications;
 - removal of the 'free-go' for repeat applications;
 - introduction of a prior approval fee for the permitted development right allowing the Crown to develop sites within the perimeter of a closed defence site;
 - to build planning capacity and capability within local authorities, including addressing challenges in recruitment and retention, and how these can be addressed;
 - to reduce the Planning Guarantee period (after which planning fees are refunded on request) from 26 weeks to 16 weeks for non-major applications, and;
 - improve the quality of the local authority planning service by monitoring more performance measures.
- 3.2 The fee increase proposed would be the first increase in statutory planning fees since January 2018. Prior to that, statutory planning fees were increased in 2012. In the period since January 2018 Consumer Price Index (CPI) inflation has risen 20%, meaning that a proportion of the increases currently proposed will only serve to off-set inflation since 2018. The consultation proposes to avoid this sporadic approach to increasing statutory planning fees in future by introducing an annual increase in planning fees that matches the CPI rate of inflation for the previous year.
- 3.3 To better recompensed Local Planning Authorities (LPAs) for work undertaken to identify and remedy unauthorised development, the consultation proposes that fees for retrospective applications would in future be double the normal application fee.
- 3.4 Currently applicants may make a second application within 12 months of an initial application (irrespective of the outcome of the first application) without a fee being required where the second application is substantially the same as the first application. This can cause LPAs significant expense as a result of assessment and processing costs. The 'free go' is often used by applicants to avoid seeking pre-application advice (by using the first application to secure advice). The consultation proposes to remove the 'free go' for repeat applications.
- 3.5 In addition to amendments to fees the consultation addresses current resourcing, capacity and diversity challenges across LPAs, albeit the consultation seeks ideas on how to resolve these issues from respondents rather than offering firm proposals or commitments to additional resources or strategies.
- 3.6 Allied to proposals to increase statutory planning fees, the consultation sets out significant proposals for changes to performance indicators that the DLUHC uses to monitor LPA performance. The consultation proposes 'tightening' the existing Planning Guarantee, which currently allows applicants to secure a refund for their planning application fee where the application is not determined in 26 weeks. The consultation suggests that it should be reduced to 16 weeks for non-major applications.
- 3.7 The consultation identifies the government's contention that some LPAs have used extensions of time (EOTs) as a device to 'mask' slower performance in terms of speed of decision making. To address this, the consultation proposed exclusion of EOTs and Planning Performance Agreements (PPAs) from LPA performance metrics for speed of decision making in future.
- 3.8 There are changes proposed in the consultation to the way in which data is captured within current performance indicators, so that non-major applications are monitored separately

where they comprise Householder development or relate to a proposal to approve details pursuant to a condition.

- 3.9 The final section of the consultation focuses on new performance metrics that the DLUHC may in future introduce to monitor the performance of LPAs. These include a new form of metric to measure the quality of decisions linked only to the success of appeals and not all applications, separate measurement of the use of extensions of time, measurement of how quick applications are booked in following initial receipt, monitoring of enforcement performance and separate assessment of the proportion of applications reported to planning committee and the proportion refused that are subsequently lost at appeal. The consultation identifies the DLUHC's longer term desire to develop a further measure which focuses on measurement of customer experience. Such a metric would align with the Council's desire that the planning service is focused on customers.
- 3.10 The DLUHC consultation on planning fees and performance closes on 25 April 2023 and the Council's formal response will be circulated to the Committee in advance of the committee meeting.

4. Permitted Development Rights Changes: Renewable Energy

- 4.1 The consultation was launched by the DLUHC on 28 February 2023². It seeks views on proposals to make various amendments to permitted development rights related to campsites, renewable energy and film making. Whilst changes related to campsites and film making would not have significant impacts in Westminster, the proposals to relax rules that apply to when planning permission is required for solar panels in conservation areas and World Heritage Sites are relevant.
- 4.2 The changes proposed to permitted development rights for solar equipment follows a commitment the Government made in its British Energy Security Strategy to review the existing permitted development rights for rooftop solar, as well as consider the best way to make use of public sector rooftops. The broad aim of the consultation proposals is to increase the amount of solar equipment installed on buildings, reducing the pressure for solar installations in greenfield settings.
- 4.3 At present there are a number of permitted development rights that allow the installation of solar equipment at roof level on domestic properties, provided the installation accords with criteria controlling the appearance of the equipment. The consultation proposes relaxing the criteria controlling the appearance of solar equipment so that they can project 0.6 metres above flat roofs on domestic buildings. The consultation also proposes to allow solar equipment on a wall of a domestic property which fronts a highway in a conservation area, which is currently precluded. It asks whether LPAs support these changes and if so whether there are any limitations that should be imposed on their appearance.
- 4.4 There are existing permitted development rights for the installation of stand-alone solar equipment within the curtilage of a dwellinghouse or a block of flats. The existing rights are subject to a number of limitations and conditions, for example the rights do not apply where the development would result in the presence of more than one stand-alone solar or where the surface area of the solar panels forming part of the stand-alone solar would exceed 9 square metres. The rights do not apply in conservation areas if the stand-alone solar would be installed closer to the highway than the dwellinghouse. The consultation

² <https://www.gov.uk/government/consultations/permitted-development-rights-supporting-temporary-recreational-campsites-renewable-energy-and-film-making-consultation/permitted-development-rights-supporting-temporary-recreational-campsites-renewable-energy-and-film-making-consultation#scope-of-the-consultation>

proposes the removal of the limitation on their provision in conservation areas, meaning that in future stand-alone solar structures could be constructed between a domestic building and a highway within a conservation area. There are similar existing rights for stand-alone solar equipment in the curtilage of non-domestic properties and the consultation also proposes allowing these within conservation areas in future.

- 4.5 For solar equipment on non-domestic buildings, currently where a building is in a conservation area or a World Heritage Site, solar equipment which generates electricity up to 1MW cannot be installed on a roof slope which fronts a highway. Where the electricity generated is up to 50kW the solar equipment cannot be installed on a wall which fronts a highway in a conservation area or World Heritage Site. The consultation proposes the removal of these limitations to maximise deployment of solar panels on the roofs and walls of non-domestic properties in conservation areas.
- 4.6 Solar equipment installed under expanded permitted development rights will continue to be required to comply with building regulations and will need the approval of the building owner.
- 4.7 The DLUHC consultation on changes to permitted development rights changes closes on 25 April 2023 and the Council's formal response will be circulated to the Committee in advance of the committee meeting.

5. New Infrastructure Levy

- 5.1 The consultation was launched by the DLUHC on 17 March 2023 and closes on 9 June 2023³. It seeks views on the design of a future Infrastructure Levy (IL), which is proposed to be introduced via future secondary legislation pursuant to the Levelling Up and Regeneration Bill (LURB) once it has made its way through Parliament. The IL is currently expected to be introduced in the early 2030's and is intended to replace the current CIL and Section 106 mechanisms as a single method for capturing contributions from new development towards the delivery of infrastructure, including affordable housing provision.
- 5.2 The intention of IL is to make sure that local authorities receive a fairer contribution as a proportion of the money that typically accrues to landowners and developers as a result of new development to ensure they can deliver supporting infrastructure. Like CIL, it will retain a neighbourhood share. It is proposed that IL will be charged on the value of the property at completion per square metre and applied above a minimum threshold. Levy rates and minimum thresholds will be set and collected locally, and local authorities will be able to set different rates within their area. This approach is intended to allow developers to price the value of infrastructure contributions into the value of the land and for Levy liabilities to be reflected in market conditions. By basing the IL liability on the GDV at completion, the intention is that local authorities will be able to share the uplift where GDVs are higher than anticipated.
- 5.3 The LURB requires local authorities to prepare Infrastructure Delivery Strategies. These will set out a strategy for delivering local infrastructure and spending Levy proceeds. The LURB will also enable local authorities to require the assistance of infrastructure providers, the local community, and other bodies in devising these strategies and their development plans.

³ <https://www.gov.uk/government/consultations/technical-consultation-on-the-infrastructure-levy/technical-consultation-on-the-infrastructure-levy>

- 5.4 Government is intending to design IL to deliver at least as much affordable housing as developer contributions deliver now. To do this, a new 'right to require' will enable local authorities to set out what proportion of the Levy they want delivered as affordable homes and what proportion they want delivered as cash. As the developer will be obliged to deliver these apportionments, the 'right to require' is intended to afford greater protection to policy compliant levels of affordable housing.
- 5.5 The consultation focuses on the elements of design of the Levy that will be delivered through regulations, which will follow once the LURB has received royal assent. The consultation is split into chapters addressing specific technical aspects of the proposed Levy. The contents of each chapter are summarised below:

Chapter 1: Fundamental Design Choices

- The scope of the Levy – the types of development it will apply to.
- They types of infrastructure under the Levy – whether the infrastructure is integral to the site or not and how this will impact how it is secured.
- Use of S106 – the extent to which the use if Section 106 agreements will continue to be used to secure infrastructure.

Chapter 2: Levy Rates and Minimum Thresholds

- Rate Setting – the rate at which the Levy should be set and the minimum thresholds below which no Levy is charged.

Chapter 3: Charging and Paying the Levy

- Charging the Levy – when should the Levy begin to be paid by developers.
- Payment of the Levy – how should the payment process be completed once a scheme has been completed.

Chapter 4: Delivering Infrastructure

- Forward Funding Infrastructure – how to develop a process for allowing borrowing against future Levy proceeds to forward fund infrastructure.
- The Infrastructure Delivery Strategy – what should be included in an Infrastructure Delivery Strategy to enable local authorities to take a more strategic and unified approach to infrastructure planning and delivery.

Chapter 5: Affordable Housing

- Affordable Housing - views are sought on the proposed 'right to require' and in what circumstances exemptions from the Levy for register provider-led schemes could be appropriate.

Chapter 6: Other Areas

- The Neighbourhood and Administrative Share – both a neighbourhood share, and administrative share of the new Levy will be retained to support funding of local community priorities and Levy administration respectively.
- Exemptions and Reduced Rate – what suitable exemptions or reduced rates should be included. The consultation includes proposals to apply exemptions to qualifying small sites and publicly funded infrastructure. Views sought on enforcement mechanisms that could be used.

Chapter 7 Introducing the Levy

- Test and learn – given the substantial change the IL will represent to the existing process for securing infrastructure the consultation seeks views on how best to take a test and learn approach prior to national roll out.
- Transition to the new system – the consultation seeks views on transitional arrangements for sites delivered over the longer term. Development permitted prior to the introduction of IL will be subject to existing CIL and S106 obligations.

5.6 It is currently proposed that IL will be introduced following a series of pilots carried out during between 2025 and 2030, with full national roll out of IL in place of CIL and S106 not expected until the early 2030's.

5.7 The current consultation is a highly technical consultation focusing on the detailed mechanics of the emerging IL system. The consultation runs until 9 June 2023. The Council's response to the consultation can be shared with the Committee following its submission to the DLUHC, which is expected in early June 2023.

6. Environmental Outcomes Reports – Replacement of Environmental Impact Assessments

6.1 The consultation was launched by the DLUHC on 17 March 2023 and closes on 9 June 2023⁴. It seeks views on a proposed new system of environmental assessment ('Environmental Outcomes Reports') to replace the current EU-derived environmental assessment processes of Strategic Environmental Assessment and Environmental Impact Assessment (EIA).

6.2 Whilst relatively rare in Westminster due to the constrained size and scale of many sites within the city, environmental assessments are still required for the very largest redevelopment schemes that come forward. Typically, environmental assessments are required for schemes with comprising 1 hectare or more of urban development which is not dwellinghouse development; or development including more than 150 dwellings; or where the overall area of the development exceeds 5 hectares. Recent examples of schemes requiring an environmental assessment include Church Street Sites A, B and C, Paddington Green Police Station, South Molton Triangle and Ebury Bridge Estate.

6.3 The consultation sets out that government intends to place environmental issues at the heart of the reformed system by introducing what it describes as an 'outcomes-based approach'. The intention is that development will support strategic national level goals that are to be set out in a new Environmental Improvement Plan (EIP). The proposed reforms intend to streamline the current system, so it delivers better environmental outcomes and is more understandable for all participants than the current EIA process, which the government considers has become inefficient, prone to duplication, risk averse, lacking in focus and suffering from the inclusion of questionable data.

6.4 For communities the government contends that its reforms will deliver a more navigable system that will give people a clearer understanding of how development will affect the environment without having to search through high volumes of material for the relevant information. The proposed system is intended to take a stronger approach to mitigation

⁴ <https://www.gov.uk/government/consultations/environmental-outcomes-reports-a-new-approach-to-environmental-assessment/environmental-outcomes-report-a-new-approach-to-environmental-assessment#background-to-environmental-assessment>

to give communities confidence that action will be taken to minimise the environmental effect of large-scale development where they are expected to occur.

- 6.5 For developers the consultation sets out the government's new outcomes-based approach, which is intended to provide the certainty developers need to embed environmental considerations into the earliest stages of a project. This certainty is intended to allow developers to focus on delivering for the environment rather than using the environmental assessment process to guard against the risk of legal challenge. The changes are therefore expected to reduce costs and delays from unnecessary work.
- 6.6 For decision-makers the reforms being consulted on set out that clearer information will be submitted allowing decision-makers to make more robust decisions, with greater confidence. By being supported by improved data, the new approach is intended to allow decision-makers to better understand how local decisions play into national priorities. Reforms to the content of assessment reports so that they are shorter and simpler, and a more robust approach to monitoring and mitigation, are intended to increase transparency and ensure greater confidence in decisions.
- 6.7 To support environmental interests the new system is to be designed to establish a golden thread from national commitments through to the individual developments. In future under the proposals, assessments will focus on the critical environmental issues and will be underpinned by better access to robust data. A stronger focus is to be placed on monitoring and ensuring mitigation measures are delivering, so that remedial action can be taken if required.
- 6.8 For policy makers, planning and environmental professionals, government plans to introduce a more navigable framework that will support the creation of a robust evidence base to inform future policies and assessments. Focused reports will pinpoint the most important environmental considerations and ways of managing them. Better access to the most important information will ensure policy makers continuously learn and develop their approach over time.
- 6.9 The core principle set out in the consultation is that the new Environmental Outcomes Reports (EORs) should be focused on measurable outcomes. The consultation document states that Outcomes should:
- drive the achievement of statutory environmental targets and the Environment Improvement Plan;
 - be measurable using indicators at the correct scale;
 - be designed using the knowledge and experience of sector groups and environmental experts;
 - have an organisation responsible for monitoring overall progress of specific outcomes i.e., a responsible 'owner';
 - be reviewed on a regular basis to ensure they remain relevant, and;
 - do not duplicate matters more effectively addressed through policy.
- 6.10 It is proposed that outcomes will reflect national priorities, but that they should be applicable to assessments at various spatial scales, including the project level. The assessment should set out how a development contributes to the delivery of an outcome. Government intends that this will be achieved by the introduction of a national indicator set. It is likely that EORs and the indicators they are assessed against will be

used to amplify government initiatives, such as Biodiversity Net Gain and Local Nature Recovery Strategies.

- 6.12 The consultation seeks views on how best to enhance the content of environmental assessments. Government sets out that the current approach to EIAs is typically too long and duplicitous and the proposals set out steps to streamline environmental assessments and provide additional guidance around assessment of reasonable alternatives.
- 6.13 In addition to review of the format of environmental assessments, the consultation also proposes streamlining of the process for determining whether an environmental assessment is required (often referred to as ‘screening’). The government proposes clearer criteria determining which types and scales of development require environmental assessment to remove current ambiguity and uncertainty around some smaller scale Category 2 scale developments.
- 6.14 The new EOR system will introduce a consistent hierarchy for mitigation in legislation (via the LURB) for the first time:
- Avoidance: Measures that prevent adverse effects on the environment– for example, the avoidance of sensitive sites or use of alternative technologies.
 - Mitigation: Measures that lessen the magnitude or significance of adverse effects on the environment.
 - Compensation: Measures that offset adverse effects on the environment – for example, enhancing a nature site nearby.
- 6.15 Monitoring is required under the current environmental assessment regime. The consultation indicates that the government’s research reveals it can be intermittent and patchy at the strategic level, and inadequate at the project level. The consultation sets out that the government will explore how monitoring of EORs can be better resourced and supported by enhanced powers to require the mitigation measures set out in assessments to be delivered.
- 6.16 The changes outlined to the current environmental assessment regime are reliant on primary legislation set out in the LURB, which is currently progressing through Parliament and has yet to receive Royal Assent. The changes will also require subsequent introduction of secondary legislation and are therefore unlikely to come into force before 2025.
- 6.17 The consultation runs until 9 June 2023. The Council’s response to the consultation can be shared with the Committee following its submission to the DLUHC, which is expected in early June 2023.

7. Financial Implications

7.1 None.

8. Legal Implications

8.1 None.

9. Conclusion

- 9.1 The current range of consultation exercises being undertaken by the DLUHC demonstrates the extent of change that may be expected in future to a wide range of existing planning practices and processes, many as a result of changes to primary legislation set out in the Levelling Up and Regeneration Bill.

If you have any questions about this report, or wish to inspect one of the background papers, please contact: Oliver Gibson (ogibson@westminster.gov.uk / 07971026919)

Appendix

N/A

Background Papers

None.

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