Westminster's Streets and Spaces: Public Realm Guidance SPD Consultation Statement

August 2025

FAIRER WESTMINSTER

City of Westminster

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1 Introduction

1.1 Background

1.1.1. Following the adoption of The City Plan 2019-2040 in 2021, the council committed to developing an updated Public Realm Guidance Supplementary Planning Document (SPD) for Westminster. This new SPD intends to replace the outdated 2011 'Westminster Way' Supplementary Planning Document (SPD), and other Supplementary Planning Guidance (SPGs) related to Westminster's public realm.

1.1.2. Westminster's Streets and Spaces: Public Realm Guidance Supplementary Planning Document (Public Realm SPD) is intended to provide guidance to council officers, developers, neighbourhood forums, community groups, residents and other interested parties, on the implementation of adopted City Plan policies and other legislation relevant to the public realm. It also sets out the council's approach to the design, maintenance and use of the public realm, with a strong focus on sustainability, accessible mobility and environmental issues. The SPD does not introduce new planning policies into the Development Plan, it will however, be a material planning consideration.

1.1.3. The Public Realm SPD has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.1.4. The drafting of the document has involved extensive consultation with members of the community. In Winter 2022/Spring 2023, the council conducted (non-statutory) informal engagement with residential and business community representatives in order to gather initial feedback on key issues related to Westminster's public realm. Workshops with representatives of groups with protected characteristics were held to develop the Inclusive Design Guidance, appended to and which informed development of the SPD guidance in June 2024. The input collected from residents and stakeholders was crucial in shaping the early development of the draft SPD. In late Autumn 2024, formal public consultation was held for a period of six weeks. The aims of the consultation were to identify and address concerns with the guidance; identify where guidance needed further information, and to gain constructive feedback on the usability of the document.

1.1.5. Part 5, Regulation 13 stipulates that any person may make representations about the SPD and that the representations must be made by the end of the formal public consultation.

1.1.6. Part 5, Regulation 12(a) stipulates the council must produce a consultation statement before adoption of the SPD. This consultation statement must set out who was consulted during preparation of the SPD, a summary of the issues raised, and how these issues were incorporated into the SPD.

1.1.7. This Consultation Statement (May 2025) summarises the public engagement (both non-statutory and statutory) that has taken place throughout the preparation of the draft SPD, and both the Materials Palette and the Inclusive Design Guidance appendices. It describes who was consulted and pulls together the key issues raised and how consultation comments have informed the adoption version of the Public Realm Guidance SPD (May 2025) and its accompanying documents.

1.1.8. All consultations have been carried out in line with the council's Statement of Community Involvement (SCI) (2023).

2 Consultation process

2.1 Early engagement 2023

2.1.1 Early informal engagement on the draft Public Realm SPD took place between Winter 2022 to Spring 2023. The activities included an initial email engagement exercise followed by a round of group discussions. These activities were to gather early views from Westminster's stakeholders and residents on key issues about Westminster's public realm to inform development and agree the scope and key principles of the draft Public Realm SPD.

2.1.2 This early engagement was not statutory in nature but was conducted in accordance with the new Statement of Community Involvement and with Fairer Westminster's commitment to improve transparency and involve the community throughout policy development.

2.1.3 This period of engagement targeted the following key groups:

- Westminster's Neighbourhood Forums
- Amenity Societies
- The Business Improvement Districts
- The Great Estates
- Accessibility groups
- Sustainability groups
- Transport for London
- West End Public Realm Group
- Westminster's Youth Council

Email engagement

2.1.4 Initially email notifications were sent to targeted groups. This email informed them of the review, requested any feedback they already had on the Westminster Way Public Realm guidance and asked stakeholders to identify any issues with the public realm.

2.1.5 Following the email engagement exercise, responses were reviewed, and stakeholders were invited to hybrid group sessions to discuss any key issues and themes identified through the response analysis.

Group discussions

2.1.6 Four group discussions were held:

- For BIDs/Great Estates/Sustainability contacts – Tuesday 21st March 9.30-11am
- For Equality Groups – Wednesday 22nd March 9.30-11am
- For Neighbourhood Forums/Amenity Societies – Thursday 23rd March 3.30-5pm or 5-6.30pm
- West End Public Realm Group- Tuesday 21st March 1-2pm

2.1.7 Further group sessions were held on 18th and 20th April for stakeholders who were unable to attend March dates.

Responses

2.1.8 We received 166 individual comments and suggestions which was used to inform and amend the draft SPD.

2.1.9 There was general agreement that the Westminster Way 2011 document needed revision and early engagement on this was welcomed.

2.1.10 Below is a summary of key issues identified.

1. SPD to support ideas identified through made Neighbourhood Plans
2. Recommendations for updating guiding principles
3. New and growing demand for on-street space

4. Protection of public use vs pressure for increased commercial use
5. 2m clearance space not sufficient for areas of high pedestrian footfall (e.g. Soho). Can we establish a new standard for pavement licensing, requiring to factor footfall in to inform a decision?
6. Accessibility/inclusivity
7. Allowing flexibility and innovation (vs rigid approach to palette)
8. Public realm to reflect town centre hierarchy
9. Cross-boundary working to ensure consistency
10. Partnership working
11. Clarity on processes and responsibilities
12. New conditions attached to planning permissions and licensing agreements to ensure maintenance is appropriate
13. Shifting from an highways engineering approach to public realm

2.1.11 Additional wording was added to the draft SPD to reflect the above and sign-post to related activities where appropriate. For example, to specify the relationship between the SPD and Neighbourhood Plans, how the 2m measurement is a minimum standard and that streets with increased footfall will require more space, and that accessibility must also include inclusivity. This last point led to the commissioning of the SPD Inclusive Design Guidance appendix, and increased reference to inclusion within the SPD.

2.2 Formal public consultation 2024

2.2.1 Statutory consultation on the draft Public Realm SPD took place between 7th October and 18th November 2024 for a period of six weeks. The SPD's appendices (The Materials Palette and Inclusive Design Guidance) and a draft Equalities Impact Assessment (October 2024) were also published as part of this consultation. After this round of consultation, the Public Realm SPD was updated to reflect feedback received.

2.2.2 A wide range of stakeholders were invited to comment on the draft, including developers, landowners, local businesses, statutory consultees, neighbourhood forums and residents and the consultation web page was open to all.

Notifications

2.2.3 Awareness of the consultation was raised through a range of mediums. This included email notifications, using the council's website and Commonplace, displaying physical flyers/posters, council newsletters and a social media campaign. These are described in more detail below.

Emails

2.2.4 Email notifications were sent on Monday 7th October 2024 to consultees that were on the council's Planning Consultation Database. The text of this email can be found in Appendix 5.1.

2.2.5 The Planning Consultation Database contained 1,484 consultees at the time of consultation, which included:

- All statutory consultees including the Mayor of London, Historic England, Thames Water, Network Rail, the Environment Agency, Natural England, the Homes and Communities Agency, the National Health Service, the Marine Management Organisation, the Highways Agency and the Coal Authority;
- all ward councillors;
- all neighbouring boroughs;
- all Neighbourhood Forums; and
- other consultees who have expressed an interest in planning policy in Westminster.

2.2.6 Email notifications were also sent to those who had subscribed to receive project updates relevant to Westminster, through Commonplace. The text of this email can be found in Appendix 5.2.

Websites

2.2.7 The council's website advertised the consultation on the page relating to Upcoming Supplementary Planning Documents (SPDs). A screenshot of the website is attached as Appendix 5.3.

2.2.8 The council also published a page on 'Commonplace' which housed the consultation surveys. The page also provided information on the Public Realm SPD, the consultation process, guidance on how to respond surveys and details of the hybrid drop-in session held on Wednesday 13th November 2024 for members of the public. A screenshot of the website is attached as Appendix 5.4.

Posters and flyers

2.2.9 Hard-copy flyers were also produced and distributed to selected libraries in north, central and south Westminster, and used during the hybrid drop-in session. Screenshots of all posters and flyers are presented in Appendix 5.5.

Social Media and Newsletters

2.2.10 Between 16th October and 15th November social media posts were posted on three social media websites, Instagram, LinkedIn and Facebook. Articles were also places in council newsletters. These included a bespoke newsletter for the consultation, MyWestminster and the council's Business newsletter. Screenshots of social media posts and copies of the article text used in newsletters are attached in Appendix 5.6.

3 Respondents

3.1 Respondents

Submission of representations

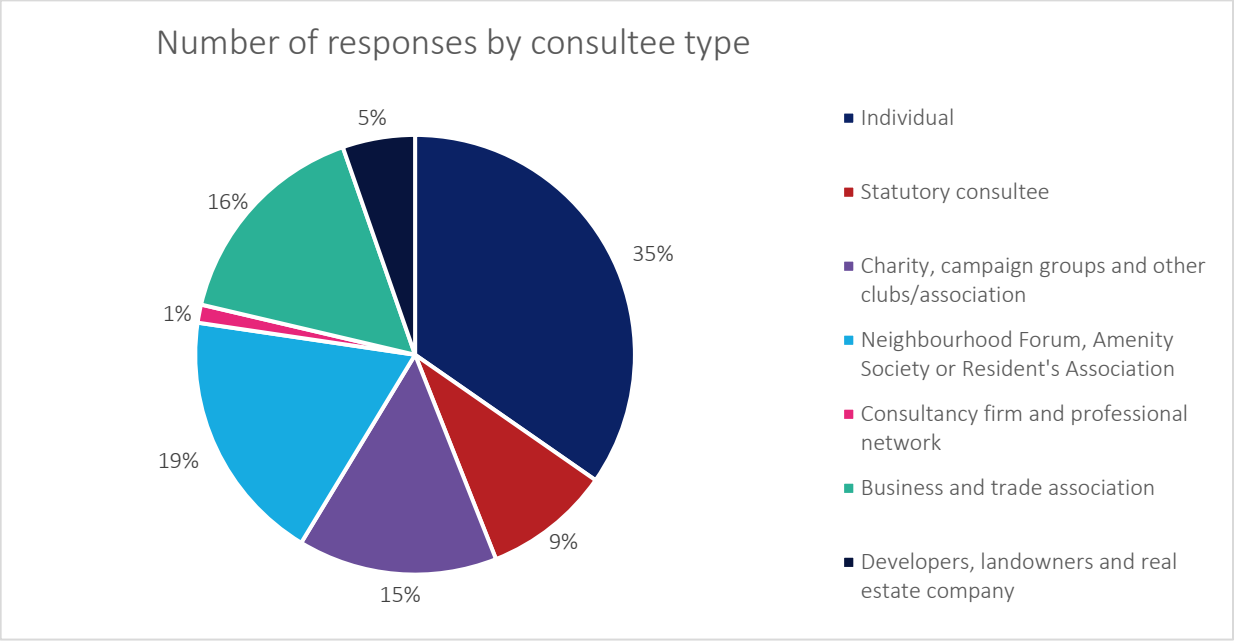
3.1.1. During formal consultation that took place 7th October 2024 – 18th November 2024, the City Council welcomed representations made via online surveys on the council's Commonplace page, via email to planningpolicy@westminster.gov.uk and those raised in person on Wednesday 14th November at City Hall.

Respondents and representations received

3.1.2. In total, 74 individuals/organisations took part in the formal consultation.

3.1.3. They contributed a total of 136 individual responses which were received through online surveys on Commonplace, written responses received via email and verbal responses raised during the hybrid drop-in session on Wednesday 14th November.

3.1.4. Comments were received from a wide range of consultees shown in the figure below:



3.1.5. A list of respondents is provided below, with details also included in Appendix 4.7.

Statutory consultees (7):

- Transport for London
- Environment Agency
- Sport England
- TfL Spatial Planning
- Theatres Trust
- Canal & River Trust
- Historic England

Business and trade associations (11):

- Confederation of Passenger Transport UK (CPT)
- Daniel Rinsler & Co (on behalf of 5 Hertford Street Ltd)
- David Taylor
- Harley Street BID
- Heart of London Business Alliance

- London Heritage Quarter
- Marble Arch London BID and The Paddington Partnership
- New West End Company
- Port of London Authority
- Soho Business Alliance Ltd
- Westminster Property Association

Developers, landowners and real estate companies (4):

- The Howard de Walden Estate
- Grosvenor
- Places for London (TfL)
- Shaftesbury Capital
- The Crown Estate

Individuals (26):

- Individual #1
- Individual #2
- Individual #3
- Individual #4
- Individual #5
- Individual #6
- Individual #7
- Individual #8
- Individual #9
- Individual #10
- Individual #11
- Individual #12
- Individual #12
- Individual #14
- Individual #15
- Individual #16
- Individual #17
- Individual #18
- Individual #19
- Individual #20
- Individual #21
- Individual #22
- Individual #23
- Individual #24
- Individual #25
- Individual #26

Neighbourhood Forums, Amenity Societies and Resident's Associations (14):

- Churchill Gardens Interim Neighbourhood Forum
- Covent Garden Community Association
- Fitzrovia West Neighbourhood Forum
- The Knightsbridge Association
- Knightsbridge Neighbourhood Forum
- Mayfair Neighbourhood Forum
- The Marylebone Association
- Notting Hill East Neighbourhood Forum
- Paddington Residents Active Concern on Transport
- Portland Village Association
- The Queen Anne's Gate Residents' Association
- Seven Dials Trust

- Soho Society
- Victoria Neighbourhood Forum

Consultancy firms and professional networks (1):

- J&L Gibbons

Charities, campaign groups and other clubs/associations (11):

- Anonymous #1
- Central London Freight Quality Partnership (CLFQP)
- Covent Garden Area Trust
- Cross River Partnership
- Exhibition Road Cultural Group
- London Historic Parks & Gardens Trust
- The Guide Dogs for the Blind Association
- Neighbourhood Watch Queensway/Lancaster Gate area
- Swift Conservation
- Tate Gallery
- Westminster Tree Trust

4 Issues and responses

4.1 Issues raised during consultation

4.1.1. This section provides a summary overview of the main issues raised and the council's response. The table below at 4.1.14 looks at each SPD chapter in more detail, summarises the responses and shows how the council has responded to comments received and made changes, where appropriate.

4.1.2. Overall, the new draft Public Realm SPD and its accompanying documents received positive feedback. Respondents supported the aims of the draft SPD document which seeks to help deliver a sustainable, accessible and inclusive public realm. Positive feedback was given on the SPDs noticeable, strengthened approach to inclusion and accessibility and The Westminster Code, and for prioritising pedestrian movement and active travel throughout the document.

4.1.3. Respondents also supported the documents signposting to other SPD documents, relevant council help articles, national guidance and legislation, neighbourhood plans and references to London Plan Policies.

Key issues

4.1.4. Intended users of the document

A number of respondents across consultee types raised that the majority of the guidance was written in a way relevant for Public Realm Planning Applications (e.g. for proposals that require planning permission). They asked for further clarification on how the guidance relates to small scale public realm improvements that don't require planning permission.

We explained the main purpose of SPD's are to provide further detail and guidance on policies set out in Westminster's City Plan / Development Plan. Where planning permission is required, the guidance expands upon relevant City Plan and London Plan policy. For schemes that don't require permission, the guidance should still be followed as it provides best practice guidelines and sets out the council's approach to public realm. For this reason, we have not made any major changes in response to this, however, we have improved wording and phrasing where needed.

4.1.5. Guidance lacks localised detail vs too long and overly prescriptive

The SPD is split between narrative context and guidance highlighted in yellow boxes. There was a conflict in responses mainly between residents, neighbourhood forums/amenity societies and developers/landowners and businesses concerning the level of detailed guidance provided in the yellow boxes.

Residents and forums posited that Westminster is a complex borough that requires local level detailed guidance to reflect the unique needs of wards and neighbourhood planning areas. Many developers, landowners and businesses however, argued that the SPD (and its materials palette) was overly detailed and prescriptive. They called for more flexibility in the guidance and greater appreciation for experimental design approaches. They voiced that currently the guidance is burdensome to businesses and could stifle creation and innovation.

We have recognised both perspectives and believe we have reached an appropriate balance within the document. Where there was room for enhanced detail on certain areas, such as public realm along the canals, this has been expanded on. We have also highlighted more instances where exceptions to the guidance could occur, for example the use of high-level screens in the CAZ, town centres and major transport arteries (such as Picadilly Circus and Shaftesbury Avenue). However, the document still does not seek to provide bespoke guidance on specific geographical areas or spaces. The SPD explains that Conservation Area Audits can be used for guiding design and highlighting key heritage implications. Neighbourhood Plans outline policies that will guide decision-making about new developments in specific neighbourhood areas.

4.1.6. How the guidance applies to public and private space

Residents and landowners had differing views on the demarcation of public verses private space, with many residents raising that the document could be clearer on how the boundary between public and private space is managed. Developers, landowners and businesses requested the removal of private space from the SPD altogether, stating that the requirements in the SPD are not appropriate for private land and the SPDs approach could limit innovation.

We explained that public realm design should be complementary across ownership and that partnership working to achieve cohesion, is encouraged. The purpose of the SPD is to provide a clear, vision for public realm in Westminster that aligns with the five principles in the Westminster Code (such as accessibility, inclusion and sustainability). The SPD provides best practice guidance, not new policy, and we expect these principles to be upheld regardless of ownership status. We have not made any major changes in response to this; however, we have improved wording and phrasing where needed.

4.1.7. Glossary and Information Sources

Respondent across all stakeholder groups raised the need to define terms within the SPD such as public open space, frontage zone, active and sustainable travel. These have all been included in the glossary.

Neighbourhood Forums, the Canal Trust, The Cross River Partnership, TfL, also recommend the including of further guidance documents which were added below relevant yellow box guidance and inserted into Section 6 Information Sources.

4.1.8. Ebikes/escooter and hire cars

Residents, neighbourhood forums and amenity societies and some charities commented on the need for strengthened wording around hire vehicles, including dockless bikes/ebikes and e-scooters and hire cars. Respondents called for tighter guidance to reduce the number of hire cars in Westminster, control the parking/use of ebikes so they are not ridden on pedestrian paths or parked outside of their designated bays. Suggested solutions were using GIS mapping for parking enforcement and sanctions/fines for companies and ebike/scooter users who did not comply.

SPDs cannot introduce new policies themselves. We ensured the guidance referred to the design of cycle and e-scooter hire facilities, however concluded that controlling the behaviour of e-scooter/ebike users is out of scope the guidance. These issues are being considered in line with other Council documents.

4.1.9. Tables and Chairs (and associated street furniture relating to street trading)

Many businesses, developers and landowners raised concerns with the Tables and Chairs guidance, voicing it reads negatively and is overly prescriptive. They also contested the recommended amount of space given to tables and chairs. In addition, along with other respondents, they raised the section was repetitive and confusing to follow. Respondent across different stakeholder groups requested further clarification on where guidance should be applied under different regimes such as pavement licences, planning permission and Highway licenses.

The chapter on Tables and Chairs was rewritten in response to these comments. It provides clearer guidance on the two ways in which the placement of tables and chairs on public highway can be authorised. It also continues to provide recommended space measurements for tables and chairs, explaining that in line the rest of the SPD and City Plan policy, pedestrian movement is a priority.

4.1.10. Planters and Pocket Parks

Residents and neighbourhood forums called for a more positive approach towards planters (and parklets) where they could be a viable way to introduce greenery. They argued the SPD needed to phrase these initiatives as *potentially* permanent greening solutions and be written more encouragingly.

We have carefully considered the responses received and acknowledge the importance of enhancing biodiversity within the public realm. While we support this objective, the guidance could not be entirely rewritten to adopt a strongly encouraging approach, as there are several practical, maintenance, and management considerations that must be taken into account.

Ongoing resource requirements, including funding, watering/drainage and long-term upkeep, must be carefully planned to ensure the features remain effective and sustainable. Additionally, the management of these measures and how responsibilities are co-ordinated between the council and stakeholders must be considered.

4.1.11. Materials Palette Guidance

Developers and landowners raised the SPD should provide more flexibility on how to manage their private spaces and that innovation should be encouraged. They requested private spaces be removed from the Materials Palette Guidance. Whilst this comment is noted, the Materials Palette Guidance seeks to provide recommended materials for use in new public realm projects and maintenance schemes.

Whereas the 2011 Westminster Way guidance advised against both installing *tactile* paving at uncontrolled crossings, and use of tactile "tails" at controlled crossings, and instead advised on their removal, the new SPD follows DfT guidance in relation to tactile paving and this was recognised through the SPD consultation.

The Guide Dogs for the Blind Association were disappointed that the council are not planning to install red blister paving (the DfT guidance provides this flexibility), however we feel that a balance has been struck between the accessibility requirements of public realm users, against heritage considerations and the need for a consistent approach across Westminster. The Association also advised that they have had several reports from vision impaired visitors to Westminster that the standard of tactile surface at crossing points is poor and inconsistent or not in place at all. This supports our push for implementation of the new approach and move to a consistent approach across Westminster.

Other matters

4.1.12. Engagement beyond statutory Public Consultation (alignment with emerging Sustainable Transport Strategy)

Following completion of the SPD's public consultation, the SPD's alignment with the emerging Sustainable Transport Strategy was considered. Amendments to the SPD's Chapter 4.1 Highway Space, Kerbside and Road Safety have been made as a result, to make clearer reference to the potential to reduce carriageway width to facilitate wider pavements - providing advice where vehicle access is still required, whilst no longer assuming that space should be maintained for private cars. In addition, the crossing advice has been rationalised, and text amended to make clearer our support for permeable paving.

4.1.13. Restructuring of SPD following the consultation

Respondents raised that the document was difficult to use and navigate. There were also comments from the Canal & River Trust concerning the need to recognise Westminster's canals (the Paddington Arm of the Grand Union Canal and the Regent's Canal). In response to these comments the document has been reorganised thematically into 9 sections, each with chapters on relevant topic-based guidance. The table below compares the pre consultation structure to the current document.

SPD sections and chapters (during consultation)	SPD sections and chapters (post consultation)
1. Introduction 1.1 The Public Realm and where this guidance applies 1.2 Vision, Objectives and The Westminster Code	1. Introduction 1.1 Key terminology 1.2 Purpose of the document 1.3 Purpose of the document 1.4 Vision and Objectives
2. Strategic and Policy Context 2.1 National Context 2.2 Local Policies and Strategies 2.4 Local context	2. Strategic and Policy Context 2.1 National Context 2.2 London Context 2.3 Westminster's Policies and Strategies 2.4 Local Spatial Context
3. Equality, Accessibility and Inclusion in the Public Realm 3.1 Equality, Accessibility and Inclusive Design	3. User experience in the Public Realm 3.1 Background 3.2 Equality considerations when designing for the public realm 3.3 Equality, Accessibility, and Inclusion in Public Engagement 3.4 Security
4. Topic Based Guidance 4.1 Highway Space, Road Safety and Parking 4.2 Cycling / Active Travel 4.3 Green and Blue Infrastructure 4.4 Microclimate and User Comfort 4.5 Street Furniture 4.6 Paving Materials 4.7 Street Trading / Commercial Activity (Including Tables and Chairs)	4. Movement and recreation in the Public Realm 4.1 Highway Space, Kerbside and Road Safety 4.2 Waterways and Towpaths 4.3 Cycling and Micromobility Transport 4.4 Play and Recreation Space 5. Nature and Sustainability in the Public Realm 5.1 Microclimate and user comfort 5.2 Green and Blue Infrastructure 5.3 Sustainability considerations

4.8 Play and Recreation Space 4.9 Freight, Servicing and Deliveries 4.10 Waste, Cleansing and Maintenance 4.11 Services and Utilities 4.12 Power and Lighting 4.13 Signs and Adverts 4.14 Public Art, Statues and Monuments 4.15 Security	6. Physical infrastructure in the Public Realm 6.1 Pavements 6.2 Street Furniture 6.3 Public Art, Statues and Monuments
	7. Servicing the Public Realm 7.1 Waste, Cleansing and Maintenance 7.2 Services and Utilities 7.3 Power and Lighting
	8. Commercial Activities in the Public Realm 8.1 Street Trading / Commercial Activity (Including Tables and Chairs) 8.2 Freight, Servicing and Deliveries 8.3 Signs and Adverts
5. Glossary	9. Additional resources 9.1 Glossary 9.2 Information sources
6. Information Sources	

4.1.14. The section below looks at each chapter in detail, showing how the council has answered the feedback received.

Issues and how these have been responded to

Issue raised	Council response
General comments, Introduction & Section 2	
• The guidance is long, bureaucratic and difficult to cope with. Condensing is needed. • It is hard to see how residents might use it. • The document is overwhelming. Could this be a series of related papers?	The SPD supersedes over eight previously written supplementary guidance documents, to create one succinct document, resulting in a lengthy guidance document. The layout of the SPD has been revised to aid usability, with new referencing also added to the start of the document. The document has been separated into broken into 9 sections each corresponding to a different theme. Under each theme guidance is laid out by subject with colour coded sections. Guidance points highlighted in yellow boxes.
• The SPD is accessible, clear and understandable but paragraphs should be numbered to make cross referencing easier. • Some respondents have highlighted typos, incorrect NPPF references and that drawings / labels need to be better referenced within the text	Support noted. Paragraphs have been numbered, and typographical errors have been amended. Drawings and labels have been checked and clearly linked to relevant text.
• Support for highlighting the role of neighbourhood planning in the development plan.	Support noted.
• The SPD should exceed standards set in the Knightsbridge Neighbourhood Plan and in Knightsbridge Neighbourhood Forum best practice guidance relating to the public realm.	No change. The SPD supplements the Westminster Development Framework, which Neighbourhood Plans are part of. The SPD works in tandem with Neighbourhood Plans on Public Realm expectations.
• Support reference made to Thames Riverside and Estuary Plan. • Support for forthcoming WCC Riverside Strategy by 2030	Support noted.
• Reference that within 16 metres of the tidal flood defences requires a flood risk activity permit and direct applicants to relevant guidance.	The SPD has been updated to reflect the 16 metres of the tidal flood defences which require a flood risk activity permit with a link added to: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits.
• Support SPD contents, especially Westminster Code and its core principles. It parallels with Active Design (2023). • Active Design guidance should be referenced within SPD policies. A completed Active Design Checklist should be a requirement for proposals	Support noted. Amendments have been made to clearly direct users towards this guidance, which should be read in conjunction with this SPD and City Plan policies.
• SPD seems to repeat London Plan and Department for Transport subject specific guidance.	The SPD ensures guidance aligns with development plan for Westminster (the London Plan and City Plan) and Department for Transport guidance. Links to Department for Transport guidance have been included reference.
• The travel hierarchy (page 18) should include all types of cars as one item below electrical vehicles.	No change. The Travel Hierarchy included in the SPD is taken from the Climate Emergency Action Plan which was adopted by the Council in 2019.
• Support for SPD content. The document is commendable in its scope and thorough in its coverage.	Support noted.

• The SPD should take into account the Knightsbridge Partnerships plans for Brompton Road and adjacent areas.	Links have been added to Section 6 to refer to all WCC adopted Neighbourhood Plans.
• Guidance is too aspirational in areas and needs to be more prescriptive. • Whilst the guidance is simpler, in trying to cover Westminster Way and other SPGs it has lost some detailed guidance and does not impose actual obligations. • The guidance does not help a project manager get to the most practical solution. For example, maintenance requirements need to be really clear who pays to keep the city "clean, safe and maintained". • The SPD should provide greater direction and give clear examples of initiatives and materials that will be supported.	Noted, some guidance has been amended however, SPDs do not introduce new rules, therefore, they are not intended to impose obligations or provide sanctions when guidance is not met. Instead, they provide guidance and elaborate on policies set out in the Development Plan. More design details, drawings and photos have been added throughout the document to support readers. The document is accompanied by the Materials Palette which defines recommended materials for use in new public realm projects and maintenance. The SPD should also be read in tandem with other WCC documents listed in Section 9. Additional resources which provide even further practical guidance. Such as Developer Guide for Highway and Public Ream Works.
• The SPD focuses disproportionately on promoting cycling and active travel at the expense of other forms of transport.	No change. The SPD, in line with the City Plan and London Plan, aims to contribute to the deprioritsation of private motor vehicles. Furthermore, in Westminster, disabled people are more reliant on public transport than private vehicles with only 28% of the population having access to a motor vehicle. Therefore, it is important that active travel is prioritised, where possible, over private vehicles. The guidance ensures active transport infrastructure is not implemented to detriment of other road users.
• WCC is a complex borough with competing demands • The Mayor's focus on sustainable transport is important but must recognise unique challenges specific to different WCC areas • SPD must be flexible in its application to account for local circumstances • SPD claims not to provide guidance for specific locations, but gives overarching principles- this is flawed	The SPD presents WCCs approach to Public Realm for the whole of Westminster and does not introduce detailed, site-specific policy. Where areas have unique challenges, conservation area audits, local strategies and neighbourhood plans should be consulted for further guidance.
• The SPD needs to clearly articulate its intended audience. • The guidance mainly applies to planning applications however, the SPD claims it applies to all changes in the Public Realm. Some sections do not provide any help in making these types of interventions. • This will result in different approaches to public realm, based on whether planning permission is required. • The tone of the SPD should make it clear that this guidance applies equally to all stakeholders – Westminster City Council, Transport for London, developers, property companies, private interests, business operators and highway users.	The main purpose of an SPD is to provide further guidance and direction on the implementation of development plan policies, which will typically be followed by applicants when submitting planning applications. However, the guidance can and should be used to inform all changes within the Public Realm, as it presents the council's current approach to public realm and highlights best practice examples. How this document is to be used by schemes that do not require planning applications has been expanded upon. Who are the intended users of the guidance (page 7) sets out all stakeholders who should have regard for the SPD guidance.

• There is a general lack of clarity about the extent to which the topic guidance is relevant to the different types of public realm.	
• Supports the principle of designing the public realm on the north bank to accommodate large numbers of footfall. • Guidance should also refer to riparian lifesaving equipment and suicide prevention.	Agreed, references with hyperlinks to relevant guidance have been added.
• Overly detailed planning documents can burden businesses, especially since this guidance applies to private areas as well. • Some requirements are not appropriate for private land, the SPDs rigid approach could limit innovation. • SPD guidance should not apply to privately owned land. Developers should have flexibility on how to manage their private spaces, or the result could be uniformity across Westminster. • There should be some flexibility on design elements such as paint colours for street furniture. • In private spaces applicants should be able to choose from wider scope of materials. Limiting choice to the materials palette stifles innovation. • Concerns about the prescriptiveness of the guidance for fixed public seating, bollards, street lighting/lamps and paving materials.	Noted, where possible, attempts have been made to simplify the guidance, however the SPD seeks to clearly outline the council's general approach to public realm development. To ensure the guidance is clear, the SPD must be consistent for both private and public spaces. No additional policy requirements have been added through the SPD. The SPD is in line with national and City Plan policies, which support innovation and contemporary design solutions to achieve exemplary design standards (as long as they are policy compliant). Where there is flexibility for there to be other design elements/materials, the design and material selection will be assessed on its own merits, and whether it is appropriate within the context of the local area.
• Support for SPD's explicit focus on sustainability and response to the climate crisis. SPD should also acknowledge appropriate/holistic design solutions that consider aesthetics, environmental impact, resource-use and long-term resilience.	Support noted. The guidance follows The Westminster Code which advocates a coordinated and holistic approach to the sustainable design, implementation, and management of the public realm.
• Include Westminster's Freight and Servicing Action Plan in the list of key strategic documents	Noted, this has been included.
• Priorities should include public safety and designing out crime	Agreed, priority criteria has been amended to include new point H. Enhancing public safety and designing out crime.
• Safety of pedestrians not being acknowledged. The safe movement of people on foot should be top priority. • Continuing to increase access for bikes without addressing this is unacceptable. • WCC should collect data on bike-pedestrian collisions. • Signage needs to make it clear bikes are not allowed on pavement.	The SPD guidelines advise pedestrian safety is given priority where conflicts arise. Furthermore, development will be required to follow Policy 25 C Cycling which supports improvements to signage and the provision of access that safeguards pedestrian safety. The Highway Authority will also ensure signs following the Highway Code are implemented to indicate when cyclists are not permitted on pavement. The council collects bike-pedestrian collision data, and this is used in Westminster's programme of 'Local Safety Schemes' which sets out preventions for all road collisions, this has been better explained in the SPD.

• Tourism should be encouraged where it has minimal impact and the most value.	Noted, City Plan policies explain benefits of development (such as enhancing tourism) should be balanced against the need to protect local character, residential amenity, impacts of air quality, impacts of biodiversity etc. The SPD provides guidance on how to balance these within a development.
• 1.1 The Public Realm and where it applies should explain the weight of SPD in determining planning applications	Agreed, text has been included to section 1. Introduction.
• Support for principles set out in the SPD, especially the strong emphasis on inclusive design and reducing carbon. • Support for the guidance objectives, which aim to ensure the quality and design of the public realm creates successful places that sustain Westminster's distinctiveness and world-class offer.	Support noted.
• Local Context should be read more positively about The Grand Union canal and Paddington Basin	Agreed, the text has been amended to highlight their benefits
• Visual appearance should remain a primary consideration, and this should be reflected across the SPD. • The SPD should take a proportionate approach to requirements for public realm interventions, recognising the variation in the scale and complexity of proposals.	Aesthetics and visual appearance are not primary objectives of the SPD; however, the SPD does promote the use of high-quality materials and simple, consistent design solutions. These are vital components of visually pleasing and sustainable public realm. Schemes will still need to adhere to policies outlined in the council's development plan guidance and consider all aspects of sustainable development. This includes City Plan policies 38 and 43 which state that public realm is to be attractive to all, carefully designed, use high quality materials and detailing and use imaginative approaches to contemporary architecture and building techniques. Schemes will be assessed on a case-by-case basis, and requirements will tailored to the scale and complexity of the proposed scheme and its impact on public realm.
• SPD needs to acknowledge different types of public realm and allow greater variation in approach based on nature/ownership of the space e.g. areas of public vs private land • SPD should distinguish between scales of project and should use a typology (large-scale schemes, small-scale schemes etc) • SPD should make a distinction between guidance that applies to spaces that incorporate or directly impact the public highway, spaces owned/maintained by the council (or TfL) and privately owned spaces	No change. The purpose of SPD is to provide a uniform approach to public realm in Westminster to encourage consistency to meet accessibility, inclusion and environmental aspirations. Regardless of ownership, the council's approach to inclusion, accessibility, heritage design and sustainability should be consistent across schemes. Where schemes are larger and have wider impacts the guidance addresses these circumstances. For smaller schemes, the guidance addresses specific elements such as signage, bollards and green walls separately. Applicants/those with an interest in public realm will be able to discern where guidance applies to their scheme as the SPD provides guidance on specific Public Realm interventions/features (such as bins, letter boxes, cycle lanes etc.). The guidance and its principles will apply regardless of the size

• In some cases, the SPD guidance suggests economic analysis/viability assessment. This could delay planning applications and add additional burden to developers. • The SPD mentions the consideration of monetary costs in respect of public realm works, but this should be at developers' discretion. Limiting works to those which are 'value for money' further limits successful place-making. • Concern that the commuted sum proposals will very off putting to those hoping to enhance and innovate the public environment, discouraging third party investment into the public realm.	Sustainable schemes are also viable schemes. Public realm schemes must be maintained to a satisfactory standard and the potential cost implications of future repairs/upgrades must be assessed early on. SPDs do not introduce new policies or new requirements. The City Plan and London Plan policies outline in certain cases viability/financial assessments are require but these considerations will be balanced by the decision maker. The guidance will point out where these assessments are likely to be required. Commuted sums are an important mechanism to fund public realm improvements, ensuring that development meets City Plan and London Plan policies and preventing proposals from deteriorating due to lack of funding. The SPD provides an indication of the when this is likely to be required.
• Private and public spaces should not be given the same design considerations (e.g. including planting within public realm designs is often challenging). This will constrain the use of lower carbon soft planting measures.	No change, the SPD aligns with adopted City Plan Policy 7 "development will contribute to the greening of the city" and Policy 34 "developments will, where possible, contribute to the greening of Westminster". These adopted policies do not differentiate between private/public spaces and state that development (in general) should contribute to greening, where possible.
• Suggested text to 2.4 Local Context- *The Gardens Trust must be consulted for applications affecting registered site and should be consulted for any green space which is unregistered, but also a 'green' heritage asset*.	Agreed, text has been added under Registered Historic Park and Gardens and London Squares in Westminster.
• 'Public realm schemes', 'works', 'major public realm interventions', 'public realm interventions', 'development'. Need to be used consistently and defined in the glossary.	Agreed, the SPD has been reviewed in this regard. These terms have been defined in the Glossary.
• Local distinctiveness is crucial in placemaking, and the SPD should support this. • There should be greater allowance for more innovative approaches, it should mention where certain materials are encouraged due to local distinctiveness	Agreed, the SPD does not discourage inventive or creative sustainable design solutions, it emphasises the importance in striking the right balance between preservation of WCCs heritage, accessibility and the meeting the demands of a modern city. As long as proposals are policy compliant, schemes will be assessed based on their merits. The SPD should be read alongside the Materials Palette Guidance which will recommend specific materials for use in new public realm projects and explain how/where specific materials should be used.
• SPD should make greater reference to the importance of early and meaningful engagement.	Agreed, an additional paragraph has been added to Chapter 3.3 Equality, Accessibility, and Inclusion in Public Engagement3 Equality, Accessibility and Inclusion in the Public Realm
• Section on the West End should be amended to accurately reflect residential areas	Agreed, this has been amended

• The SPD needs to define public open and improve clarity on how it distinguishes from public realm.	Agreed, Public Open Space has been given a definition in the Glossary.
• The SPD needs to improve its alignment with forthcoming Sustainable Transport Strategy, and make more explicit references • Future infrastructure changes resulting from the increased use of active travel modes, should be considered equally across all road hierarchies, to minimise their increasing impact	Agreed, text has been amended throughout the document to make clearer references and links between documents. Road hierarchies will be dealt with in the STS and this has been referenced in the SPD.
• The context should make a number of amendments in terms of heritage: o include a base line understanding of Westminster's historic environment, o the choice of language should align more with NPPF o reference the importance of designated and non-designated assets o highlight forthcoming amendments to the Joint Thames Strategy o mention the need for a design led approach informed by historic context o mentioning the sensitivity of Archaeological Priority Areas	Suggestions have been accepted, and relevant amendments have been made to section 2. Strategic and Policy context.
• The document should provide more 'best practice' examples to inspire and engage users • The SPD could reference from and give support to existing public realm plans which would help to deliver improvements in the borough	Agreed, the document includes more images of best practice examples from current schemes.
• Welcomes the SPD draft, particularly its thoroughness and clarity and coverage on climate and ecological emergencies	Support noted
• The policy hierarchy is not clear throughout the document. For example, should alfresco dining take precedence over other street furniture such as cycle parking?	The SPD does not seek to provide a policy hierarchy as SPDs are supplementary in nature and cannot introduce new systems of prioritising policies.
• This West End section is too general; it should not imply all of the streets have high pedestrian flows.	Agreed, wording has been amended, see Strategic and Policy Context.
Many respondents raised issue that were out of scope for this SPD: • The SPD should commit to closing Park Lane southbound and the transfer of all motor traffic to the northbound lane. • The SPD should set out plans to reduce progressively the number of hire cars plying for business in the West End. • Any improvements to the area around Westminster College will encourage negative use of the space from students/visitors. • The SPD should manage noise at night for residents e.g. banning deliveries between 11pm-7am in areas of cumulative impact / adopt specific limits on noise in the public realm at night as per WHO guidelines.	These recommendations are outside the scope for the SPD. Comments about specific schemes in Westminster, behavioural matters such as unlawful use of the pedestrian paths and building design are not within the scope of the SPD. SPDs do not introduce new site allocation policy but instead elaborate on existing policies in the London Plan and City Plan. It's impractical to give a specific time restriction in this SPD given this is reviewed at planning application stage and/or through licensing.

• In all streets, the general roof bulk of the street should not be exceeded • The SPD should state all developments must supply and set out how they will achieve carbon neutrality • The policies should support the West End's intensification through pedestrian priority, prioritisation of alfresco dining and digital signage	It is out scope for this SPD to set additional obligations however planning applications will need to adhere to relevant City Plan policies (e.g. policy 36. Energy). All schemes, regardless of needing planning permissions should adopt principles listed in Chapter 4.6 Paving Materials.
Section 3 Equality, Accessibility, and Inclusion in the Public Realm	
• Support for acknowledging accessibility, however applying 3.7 m minimum for all of Westminster's streets is impractical.	Support noted. The SPD does not stipulate all Westminster streets should be one size but does suggest minimum requirements that should be applied across the borough to ensure our streets are accessible for all. Building Regulation Part B5 (2000) requires that the width of a highway where fire service vehicles will access a building is at least 3.7 meters kerb to kerb. In most cases, compliance with the regulation is mandatory, unless an alternative design solution can demonstrate an equal or better level of safety.
• The lack of safe cycling infrastructure and traffic calming measures excludes less able people and non-car users. • SPD needs to make clear that active travel, traffic reduction and pedestrianisation are prioritised. • "All pedestrians" should be added to the table under Inclusion to reflect the need to ensure and protect the safety of pedestrians. • The SPD should prioritise pedestrian safety. • The focus on cycling and pedestrianisation must be balanced with safety considerations for all road users.	No change. The SPD supports City Plan policies 24 and 25 which state development must contribute to the reduction of the dominance of private motor vehicles and prioritise safe walking and cycling in the city. Chapter 4.1 Highway Space, Kerbside and Road Safety states the council will aim to ensure highways are not dominated by motorised transport and advises that the highway should be designed to prioritise safe active transportation, especially safe walking and wheeling.
• We should survey groups with mobility issues on using areas in Westminster.	The council commissioned Inclusive Design Guidance to inform the SPD (see Appendix 1 of SPD). This commission included two inclusive design workshops with representatives from protected groups.
• SPD assumes all areas should be approached in a uniform way, however Westminster has diverse range of areas. • Majority of the guidance is invalid due to changing volumes of pedestrians/varying times of day.	No change. The SPD presents the council's current approach to the design, maintenance and use of the Public Realm, ensuring Westminster's public realm is safe and inclusive. It does not negate that different areas across the city will have distinctive needs and planning applications will continue to be determined on a case by case basis and with regard to material considerations.
• The SPD does not consider different nationalities and religions. Multilingual signs should be displayed like in Tower Hamlets	Noted. See Appendix 1 Inclusive Design Summary C.
• Support given for Section 3 and SPD's approach to inclusion/accessibility.	Support noted.

• SPD should include guidance on achieving the feeling of safety in public realm and refer to GLA guidance for tackling violence against women, girls and gender-diverse people. • Distinction should be made between public safety through 'Secured by Design' and those affecting the feeling of safety and belonging in public space.	Agreed, reference to The Mayor's Violence Against Women and Girls Strategy 2022-25 has been added. Appendix 1 Inclusive Design Guidance provides detail on the perception and feeling of safety in the public realm.
• Support for inclusion guidance. • This section should cross reference the security section here to ensure protective security measures do not undermine inclusive design objectives.	Support noted. Agreed, this section and Chapter 3.4 Security have been placed together in section 3 User Experience in the Public Realm.
• SPD should recommend walkarounds with people with protected characteristics as part of engagement for new development.	Agreed, this has been added.
• The section misses out those who rely on the car due to mobility issues. • Reliance on active travel fails to account for the needs of essential services, such as ambulances and taxis, which are crucial for elderly and vulnerable residents.	Agreed, 'Equality considerations when designing for the public realm' has been amended.
• SPD presents over reliance on "fragile" infrastructure like lifts, ramps are more favourable.	The SPD recommends the appropriate infrastructure is implemented to improve accessibility and fully supports the provision of level access (which includes ramps). However, as not all users can use ramps, ramp only routes are not recommended, especially when there is a substantial change in ground level.
Table of barriers and design solutions (page 32) • No reference to the requirements of guide dogs and their owners, especially in relation to temporary traffic management and signage associated with road works. • Width required for people with guide dogs should be included in guidance. • Clarify issues within the 'Potential Barriers' column (long-step free bypasses", "narrow widths pavement" and "narrow cycle widths). • Example requirements under chronic illness also apply to other users, merge sections or repeat examples throughout the table	Agreed, reference to design features to support cane users and those with guide dogs has been added. No change, the table provides an **indication** of **some** of the issues which must be considered in the design, development and delivery of public realm schemes, alongside suggested solutions.
• Choice of locations for dockless bike bays should be covered here, bikes can cause obstacles and hazards for visually impaired.	Agreed, Cycle and e-scooter hire facilities guidance has been amended in Chapter 4.3 Cycling and Micromobility Transport
• Support the draft SPD document which provides clear guidance for designing for safety and accessibility, designing for health and wellbeing and ensures that any development for public realm intervention must consider inclusivity as a core consideration within the public realm design process. • The document clearly states Westminster City Council's approach to DEI and what principles will be followed.	Support noted.

• For Canal towpaths footways becoming shared spaces is unavoidable. The SPD should clarify expected exceptions for spaces such as very narrow towpaths.	Agreed, Inclusive design guidance – Operation has been amended.
Inclusive Design Guidance summary • Point E should add a caveat. Given the historic and constrained nature of the canals and their towpaths, Barriers to might irremovable. • Point I definition required for "Major public realm intervention" • Point K SPD should give better explanation of when an EQIA would be needed. • Point C. says that needs should be measured. It is unclear what this means and how such measurement should take place.	No change, wording states *"should"*, indicating this is the council's general approach and best practice, however, may not be applicable in all circumstances. Definition of Major public realm interventions included in Glossary to provide clarity. Agreed, Inclusive design guidance - Design has been amended to better explain when EQIAs and Design and Access Statements should be used. Text has been rephrased to improve clarity
Many respondents raised issue that were out of scope for this SPD: • Crossing at Woodfield Rd needs level strip. • Speakers Corner should be well maintained and preserved as a key London historical tradition. • SPD should have a firm stance on queueing on the public highway due to Class E uses. This impedes minimum 2 m space and has an adverse impact on those with limited mobility. • Major tube stations (Piccadilly Circus and Leicester Square) should be as accessible well	These recommendations are outside the scope of an SPD. The SPD is not providing recommendations on specific streets or areas. Concerning Speakers Corner, the SPD provides guidance about maintenance for the public realm. The SPD guidance does not apply to Royal Parks. We acknowledge that queues outside businesses may have a negative impact on pedestrian movement, however, queues are usually considered a temporary and incidental activity related to the Class E uses and cannot be controlled through planning as they do not constitute a material change to the public highway. We have rephrased guidance in Chapter 4.1 Highway Space, Kerbside and Road Safety to state adequate clear zones for pedestrians should be prioritised over commercial uses.
4.1 Highway Space, Road Safety and Parking	
• Remove point J in Bus Routes and Shelters Guidance as crossing cycle paths is successful in the Netherlands.	No change. The SPD's priority is to ensure the public realm remains safe and accessible to all users. To avoid collisions between cycle traffic and pedestrian traffic the guidelines encourage pedestrian crossings to placed outside of cycle routes.
Parklets and pocket parks • SPD should be more positive about parklets • Provide more guidance on temporary parklets - there should be a different approach to areas of open space deficiency. • There needs to be a maintenance plan and commitment to long term funding • Parklets can supplement surface drainage	Agreed. Parklets and pocket parks guidance has been moved to chapter 5.3 Green and Blue Infrastructure and rewritten to reflect the council's support for these measures. We maintain the need to give clear guidelines on how to implement and maintain parklets, so they are of a good standard. Governance of these measures cannot be low. Whilst we support commercial bodies helping to maintain parklets, they must not be used for commercial purposes.

• Guidance makes implementation of parklets onerous, their use by commercial services should be encouraged. • Further guidance is needed on the management of commuted sums. For any commuted sums received, clear and transparent records should be kept regarding the amount, annual interest attributed, balance remaining, publicly available at request and/or published real-time/annually.	Further guidance on commuted sums is explained in Developer Guide for Highway and Public Ream Works and will be explained further during the planning application stage.
• Supportive of SPD prioritising active transport, of WCC's school streets delivery, of SPD considering different accessibility needs in footway/kerb/ramp design • Welcomes the prioritisation of alternative kerbside uses ahead of parking for private vehicles. • Support for Copenhagen Style Crossing and raised tables	Support noted
• Highway Space guidance, point B could be interpreted as preventing traffic-removal schemes, modal filters, school streets etc.	No change, wording is in line with highway legislation, such as The Road Traffic Regulation Act 1984. The SPD also provides supportive guidance on traffic reduction strategies such as school streets, further on in the chapter.
• Highways Space Guidance, point F should clarify what streets are being referred to.	The guidance refers to all streets, stating all parking, loading and waiting should reviewed and improved. This suggests that after a review, which will include the assessment of street type, a decision on how to improve or potentially rationalise uses should be taken.
• Kerb Zone Guidance should refer to instances where the minimum 450mm-650mm is not necessary	No change. The SPD presents the council's approach to public realm, which includes recommendations of minimum street measurements development is encouraged to follow. Kerb zones are encouraged.

• Some requested consistent and clearer use of terminology throughout the SPD and additional definitions to the Glossary
  ○ Furniture and planting zone should be used consistently throughout the SPD
  ○ Using 'cycle routes' when referring to all instances of cycle infrastructure (such as tracks)
  ○ Official terminology for 'bus stop bypasses' to be used
  ○ Refer to LTN 1/20 guidance concerning the use of bus stop bypasses
  ○ Add “Shared spaces” and “Active Travel” to the Glossary
 	
• 'Bus' shall be defined to explicitly include non-TfL buses operating on London Service Permits
	This has been checked and amended where needed
	
	The guidance does not specify that it applies to one bus service provider.

• Shared space guidance point B should discourage shared walking and cycle paths. • The section focuses on reducing conflict between pedestrians and motor traffic, the conflict between cyclists and pedestrians should also be recognised.	Noted. In general, the council does not discourage shared walking and cycling paths, as long as they are safe and adequately marked. The explanatory text has been reworded to state shared spaces should be designed to reduce conflicts between pedestrians and all road users.

• Shared spaces and bus routes should allow for the provision of setting down, picking up for coaches. Parking facilities for coaches should not be reduced.	No change. Reallocation of highways space will only be approved where appropriate and other road uses have been assessed.

• Respondents requested reference to the following documents:
  o Carriageway Widths Guidance - refer to the Manual for Streets
  o Canal River Trust Guidance Tow Paths for Everyone
	References were added to the guidance and/or added to 9.2 Information Sources

Crossing Design Guidance • Guidance should be less prescriptive to allow for crossings to be the same colour as the general road surface. • Guidance should include diagonal crossings, as they improve pedestrian flow • Lack of clarity over junction terminology	Disagree, inclusive design guidance advises that for road crossings visual contrast between different surfaces can be helpful if used appropriately to signal a change of surface purpose. Agreed, guidance point added, and yellow box has been improved for clarity.
Highway Space Re-Allocation • Suggest text does not refer to pavement widening for cycle hangars specifically • The guidance should advocate for use of carriageway space for cycle hangars, cycle parking or dockless hire zones without the need for pavement widening. • Include caveat at point C for instances of temporary road works. • Guidance point A should include an holistic approach to highway space use	Agreed, this has been reworded to cycle infrastructure, instead of hangars specifically. Agreed, guidance amended.
• Support for the SPDs aims to prioritise people's movement • Support for hierarchy of kerbside activity o Support for discouraging fading steps	Support noted
• Context needs to better reflect the requirements of the Highways Act 1980 • Context should state the likelihood of needing an area-based approach in areas with very high pedestrian flows where there is a much higher than average risk of collision between road users.	Agreed. Text has been amended.
• Prioritising kerbside space, Highways space guidance and Footway widths guidance should include the delivery and collection of goods and requirements for walking freight.	Agreed, this has been added
• Road kerbs purposes should refer to blind and partially sighted pedestrians	Agreed, this has been included
Respondents raised requests to amend or include some images: • Figure 6 should clearly show where the 2.9m should start • Figure 11 The use of a deep tone red makes readability online difficult. • Include photo examples of crossings which reinforce pedestrian priority	Agreed, these have been amended (see images 9 and 16).

• Figure 5 Pavement Zones should include Frontage zone, as defined in the Glossary. The SPD should clarify whether the minimum pedestrian clear width of 2m includes the building edge zone.	No change. Not every street will have a frontage clear zone. The guidance states frontage zones are separate from the footway clear zone.
Ramps and Steps Guidance • More flexibility should be written into guidance. Level access should be provided through change to highway where this is the best course of action and handrails on both sides should not be mandatory.	No change. The SPD provides guidance and best practice using language such as *should*. Guidance is not policy, so where there are exceptions, this will be assessed on a case-by-case basis. Handrail guidance is in line with national standards and guidelines. (Building Regulations 2010 (Part M Access to and Use of Buildings), British Standards (BS 8300-1) and Manual for Streets (DfT, 2007).
• In Highway Space allocation the amenity of residents living in the particular location should also be prioritised over other highway uses.	The main priority for public realm, which runs throughout the SPD, is to protect the safe and unobstructed movement of pedestrians. City Plan policies (such as Policy 7) will continue to ensure development will be neighbourly.
• Support principle of not compromising pedestrian movement for other highway uses, however, prioritising movement of people (as stated on page 34) may clash with Foot widths guidance point H.	Support noted. Comment noted, 4.1 Highway Space, Kerbside and Road Safety – Context has been amended.
• Language such as “Wherever possible” provides too much flexibility in frontage zone guidance.	In some locations commercial tables and chairs may be appropriate in this zone, as per the Pavement License Regime. Guidance on permissible uses is explained in Chapter 8.1 Street Trading / Commercial Activity (Including Tables and Chairs).
Bus Routes and Shelters Guidance • Street furniture should not obstruct views of oncoming traffic, as well as access to and from Bus Shelters • Guidance should include design advice for nighttime bus passengers	Agreed, yellow box guidance has been amended. Agreed, yellow box guidance now refers to bus shelter design measures to enhance passenger safety after dark.
Many respondents raised issue that were out of scope for this SPD: • SPD should set out a timetable for reducing on-street parking. • SPD should set out plans to reduce progressively private off-street parking by a few percent a year, potentially through levying progressively high taxes on all private parking spaces. • Introduce a requirement that taxi ranks be located at the kerbside. • Minicabs should be discouraged due to road congestion, suggests raising prices and restricting pickup/drop-off points to improve safety/traffic".	These recommendations are out of scope for the SPD: The SPD provides guidance on London Plan and City Plan policy, so cannot introduce a new strategy or introduce new fines/levies or policy requirements. Under current policy, the Council will consider reallocating unused or undesirable parking space. Further detail on street parking will come forth in the Sustainable Transport Strategy, due to be published in 2025. Restricting pickup/drop off points for taxi's is out of the scope of this SPD. We would also resist discouraging the use of taxis as the SPD must ensure the Public Realm is accessible for all and can meet all user’s needs, including having available taxis.

• Electric and non-electric scooters are no covered in this chapter, insert guidance to control haphazard placement of scooters and dockless bikes. • Around Edgware Road and Church Street, removal of parking spaces ad increased pedestrian crossings makes no sense. The roads are now too slow • SPD needs to provide greater clarity on how flexible car club schemes would operate in real life	Chapter 4.3 Cycling and Micromobility Transport provides guidance using designated bays in Westminster. Controlling the behaviour of escooter/bike riders is outside the scope of the SPD. In line with City Plan policy, the SPD aims to create a safe and accessible public realm for all, one that prioritises forms of active travel. Reallocating carriageway space for pedestrians and cyclists can increase pedestrian and cyclist comfort and slow the speed of traffic which increases safety. Westminster provides flexible car sharing services through Zipcar Flex, more information can be found here.
Chapter 4.2 Cycling / Active Travel	
• Support for SPDs approach to cycling. Recommends reduction in signal-controlled junctions in low traffic areas.	Support noted. Dedicated signal-controlled junctions for cyclists reduces the risk of collisions, the SPD would not resist their use.
• SPD should prioritise segregated cycle lanes, lack of space is not an excuse as this is done successfully abroad. • Guidance on when each type of segregation for cycle ways should be used would be helpful.	The SPD supports the implementation of segregated lanes and ensuring cycle paths have generous widths, however this must have regard to footway and carriageway space. Where segregated pathways cannot be practically implemented, cycle paths should be a minimum of 2 metres and be clearly demarcated. Guidance states new cycle routes should comply with LTN 1/20 which outlines the different types of cycle lane separation and when each type should be used.
• Supportive of the focus on connectivity and legibility and specific provisions for cycling (e.g. cycle parking) within the SPD.	Support noted
Respondents requested the inclusion of the following guidance documents: • LTN 1/20 and LCDS • Healthy Streets Check for Designers • TfL's Cycling Quality Criteria • TfL's Access control guidance notes	Agreed, resources have been included here and in Section 9 Additional resources.
Respondents highlighted terminology to be updated and typographical errors • Quietways to 'cycleway'	Images are from the adopted City Plan so cannot be amended however ‘Quietways’ has been amended in the text. Typos have been identified and corrected.
• Reference to ‘Active Travel’ in the title of this Section should be removed. As the section includes e-bike cycling.	Agreed, Chapter 4.3 has been renamed to Cycling and Micromobility Transport.

• The guidance could cause confusion over London Plan policy T5 Short-stay cycle parking. The minimum levels of cycle parking for areas with higher cycle parking standards should be referred to.	Agreed, guidance has been amended to include reference to London Plan Policy T5
• Figure 16, the map does not show correct Cycleway routes in the borough (C27, CI0, C51, C3) and includes some old LCN routes and routes that might not meet cycleway quality standards	Map amended.
• More needs to be said on how the council decides protected/nonprotected cycle routes	Segregation, or otherwise, is determined in compliance with LTN 1/20 and TfL's London Cycling Design Standards
• The chapter should include a separate section on Walking	Noted. Edits have been made to make more reference to walking within the chapter. The Further information section at 4.3.3 now includes reference to the council's walking strategy and footway map.
• The term "adequate design mechanisms" used in the guidance is ambiguous	Agreed the guidance has been expanded on
• Provide clarity that cycle parking should be on street or away from pedestrian foot flow if on street is not possible.	Agreed, the guidance has been amended
• The guidance should include a tactile delineator to separate shared pedestrian/cycle routes to assist visually impaired.	Agreed, new guidance point has been included
• The context should put more emphasis on the safety of pedestrians, in line with City Plan Policy 25 • The guidance should align better with Policy 25. City Plan policy does not account for providing cycle parking above London Plan guidelines and requests short stay parking is provided off the public highway in the first instance.	Wording in the context and guidance has been amended to align better with Policy 25.
• The SPD recommends a minimum of 2m, 1.5m would be more appropriate (TfL recommends 1.5m)	No change, the SPD guidance states 2 meters should be applied **where practical** and all new routes should comply with LTN 1/20 and TfL's London Cycling Design Standards
• Dockless bikes and similar modes of transport are not considered to be substitutes from developments providing their minimum policy requirements within their development sites. The guidance does not make clear whether developments need to consider docking stations and dockless bike parking in their schemes.	City Plan policy requires minimum cycle parking requirements to be included as part of development. Currently, there is no policy basis for requiring the inclusion of docking stations/dockless bike parking as part of schemes, so this guidance is intended to clarify that these provisions cannot be included to overcome the minimum requirements for provision within development sites.
• Use of tactile paving around cycle stands as a sole distinction for users is not recommended in the Gov Guidance on the use of tactile paving (2021). Whilst tactile paving isn't discouraged, it shouldn't be relied upon to distinguish cycle stand.	Agreed, guidance has been amended to explain tactile paving shouldn't be relied upon.
Many respondents raised issue that were out of scope for this SPD: • SPD should address dockless cycle hire bikes, how the council will enforce parking	These recommendations are out of scope for the SPD: The council agrees that e-bikes and e-scooters must be used safely in order to maintain a permeable and accessible public realm for all and SPD guidance outlines that such vehicles are

• SPD should provide guidance on the placement of ebikes so crossing aren't blocked. Crossings must remain safe. • SPD should address pavement cycling, e-scooters on pavement, cyclist behaviour • SPD should provide guidance on the appropriate placements/use of e-bikes so public realm is safe for all pedestrians • Ebike users should be required (not just 'expected') to use designated bays. The capacity of each bay should be shown on signage at the bay and on the face of the online map of parking bays • Include new enforcement rule that any wheeled vehicle (escooters/dockless bikes) will be removed from areas blocking the footway without notice Hire cycle is a promising way to reduce traffic, they are an alternative to minicabs/ubers. Competition should be encouraged between cycle hire operators to keep prices low. Charge minicabs for using Central London roads.	expected to use designated bays and road markings to identify these bays must be clear/unambiguous. The guidance has been strengthened however, beyond this, human behaviour concerning the parking of private hire e-bikes/e-scooters and giving penalties/fines/removing bikes without notice is outside the scope of this SPD. Requiring bays to display capacities on designated cycle bays is out of scope for this SPD. The SPD must ensure the Public Realm is accessible for all users and penalising cabs is out of scope for the SPD.
4.3 Green and Blue Infrastructure	
• No mention of prioritising indigenous trees • No reference made to the size or species of trees that should be preserved and/or planted • Consideration should be given to creating greater tree diversity and "future proofing" areas where there is only one dominant species.	The SPD sets out that new trees should be planted according to the principle of 'right tree in the right place' as set out in the council's adopted Environment SPD and Trees and the Public Realm 2011. Appendix D in the Trees and Public Realm 2011 document includes commonly used species in Westminster.
• Street trees lost or damaged due to (re)development projects should be made good by the developer.	Policy 34H of the City Plan ensures that new development should be designed to retain and protect existing publicly owned trees of amenity, ecological and historic value and those which contribute to the character and appearance of the townscape.
• Supporting of guidance including for SuDS.	Support noted
• Include that infiltration SuDS should not be constructed in contaminated ground and should not be used where infiltration can remobilise contaminants already within soils to pollute groundwater. • Consideration could also be given to decompaction, suitable planting and tree cover to take up precipitation.	Agreed, guidance amended.
Respondents requested the inclusion of the following guidance documents: • The Environment Agency's Approach to Groundwater Protection • Natural England's Green Infrastructure (GI) Planning and Design guidance • Natural England's Nature Recovery guidance (2023) • Westminster Local Flood Risk Management Strategy (LFRMS) 2024 - 2030	Reference to these documents have been included.
• Support importance placed on green infrastructure and associated benefits.	Support noted

• The SPD should emphasise the role the Thames and multiple piers in Westminster. They are significant assets in ensuring the public realm invites interaction with the river and facilitates clean river freight into London	Greater emphasis has been made in within the guidance recognising the significant assets of the River Thames and multiple piers within Westminster.
• Would like to see more on SuDS in the SPD.	Further emphasis of the significant role of SuDS has been included in SuDS chapter 5.2.
• SPD must include enforceable measures to protect and enhance green and blue infrastructure. • Include requirement, for every 500 sq. ft of land used or built on, one tree will be planted, inclusively.	No change, the SPD cannot introduce new policy requirements. The SPD establishes maintenance principles that should be considered as part of the planning application for public realm schemes. In addition, City Plan Policy 34H will still apply for new development.
• There's little mention about Westminster's canal assets including direction on materials and contrast at the canal edge in built up/busy locations, commercial activity on the canal, provision of throw lines, wayfinding, accessibility and surfaces, pedestrian priority (in relation to cycling), protecting biodiverse locations, lighting levels, etc.	More has been included concerning Westminster's canal assets with guidance on how the canals interact with the public realm and vice versa (see chapter 4.2 Waterways and Towpaths).
• The chapter advises trees in raised planters are not a sustainable approach to greening which clashes with guidance in subsequent chapters.	Previous chapters 4.3 and 4.5 have been reviewed and modifications have been made in new chapters 5.2 and 6.2 to bring greater clarity to the guidance on these public realm features.
• Strongly support increased biodiversity and spaces supporting health and wellbeing within new public realm schemes. • Supports the draft SPD to support increased greening with good maintenance and management of street trees, green walls and green roofs.	Support welcomed.
• Lack of mention on needed roosting and breeding places for co-domestic species. • Should include planning requirements for schemes to incorporate effectively designed and installed new roost places in accordance with British Standard.	Priority Habitats will be protected in line with City Plan Policy 34F and opportunities to create new habitats should be sought to meet biodiversity net gain and urban greening objectives as per City Plan Policy 34B and 34G. The council's adopted ESPD also provides further incorporating new or enhanced habitats in their designs.
• Greater clarity needed for those who want hanging baskets, particularly what are more sustainable alternatives. • Hanging baskets and baskets over railings can contribute significantly to biodiversity so should take a positive approach.	No change, hanging baskets are supported, however it is noted that they make a limited contribution to biodiversity compared to alternative greening within the public realm. Where possible, more substantial greening is encouraged.
• More emphasis should be made on the cooling effect of trees.	Further emphasis on the importance of cooling from trees is made within Chapter 5.1 Microclimate and User Comfort.
• Sustainability should be adapted at the expense of heritage. Heritage should be considered as a priority within this balance. • The SPD should advocate that SuDS are designed with reference to the historic context and its significance, best secured via early engagement with Conservation Officers, GLAAS, Historic England and relevant others.	Conserving and celebrating Westminster's historic character is a key guiding principle of the Westminster Code developed for this SPD, this has been emphasised more throughout the SPD. Agreed, suggestions have been accepted.

• Provide greater clarification of when measures are required of proposals, whether economic analysis of schemes is required and who partnerships should be formed between.	Modifications have been made to make clear that economic analysis is required of council schemes. Requirements of partnerships will depend on the scheme scope and location.
• Respondents requested definition for the following ○ Public realm schemes	Definition has been added to glossary
• Support for thorough tree guidance regarding new trees	Support noted
• Reference whether CIL and other funding pots could be used for supporting green and blue infrastructure in the public realm. • Where public realm works are not related to a planning application, a mechanism needs to be established for maintenance costs before the scheme proceeds. • Any funding to secure green infrastructure has to be ringfenced otherwise it may be spent elsewhere. • SPD should confirm that commuted sums apply almost entirely to major public realm associated with planning applications.	Agreed, green infrastructure forms one of the priorities for CIL spending in Westminster and is mentioned in Funding and Management/Maintenance of Green Infrastructure guidance, as well as other funding opportunities (such as Greening Westminster). The SPD ensures that securing funding and long-term maintenance will be established on an individual basis with discussions held with the council at an early stage. This will be established as part of any planning condition or planning obligation to ensure that any funding to secure green infrastructure is established and progressed. Further details on funding public realm schemes and how it is allocated is provided in the Developer Guide for Highway and Public Ream Works.
• This section should better reflect that many green and blue spaces have heritage significance, and that integrated management will optimise benefits for both the natural and historic environment.	Agreed, modifications have been made to ensure the management of the natural and historic environment are integrated.
• The chapter should highlight that trees may be specifically protected by TPOs, or more generally if they are within a Conservation Area, and that if trees are protected then consent is required for works to be done to them.	Reference has been made to TPO trees, trees in Conservation Areas, and the need to obtain consent for works to be done.
• "Restore Lost Rivers" should be better explained	This is one of the many priority recommendations within the Green Infrastructure Audit, which is linked in the text.
• SPD should mention the need for a balanced, sustainable approach to economic activity and green infrastructure provision.	8.1.7 Event Spaces has been amended to reflect this.
4.4 Microclimate and User Comfort	
• Support the importance placed on air quality and the need to reduce pollution • Welcome reference to increasing greening to address urban heating and social benefits (increase dwell time) • Support delivery of strategically placed GI • Support encouraging public realm to consider thermal comfort. People's comfort and dwell time in public spaces is a marker of a successful intervention which we believe this document supports.	Support welcomed.
Respondents requested some images were updated (Figures 22 and 23)	Agreed, these have been updated. These images are taken from the adopted City Plan and will be updated after the City Plan full review.

• We support the idea of creating high-quality soundscapes. Efforts to mitigate noise pollution/disturbance in Marylebone must be prioritised.	Support welcomed.
• The Cumulative Impact Assessment should be referenced in the SPD.	Agreed, this has been added to Acoustic Comfort / Environment Guidance
• Include reference to overshadowing water ecosystems and waterside spaces	Agreed, this has been added to Chapter to green and blue infrastructure.
• Refer to the canyoning effect of development along waterways and the effect on towpath/water space which can affect boat navigation.	Agreed, reference to wind impacts from development has been added to 5.1.5 Wind/Air: direction, movement, and speed.
Respondents requested clarification on the following terms and phrases: • "Large scale project" • "public realm proposals and any development which will impact the public realm should" • "adaptive public realm"	Agreed, further text has been added to the chapter to enhance clarity and relevant guidance points have been amended, where needed.
• Pedestrian noise can be a statutory nuisance too	Agreed, text has been reworded to refer to "low-level" human noise
Respondents raised concerns that were out of scope for the SPD: • Tall buildings impact on soundscape • The SPD should match or exceed the requirements of the recently approved new EU Air Ambient Air Quality Directive.	These recommendations outside of the scope of the Public Realm SPD.
4.5 Street Furniture	
• Park furniture and street furniture should be differentiated. Design of Park furniture should reflect forms from nature.	The SPD guidance on fixed public seating applies to seating in Westminster's parks. The yellow box guidance has been amended to include materials should be secured from sustainable sources.
• Saying planters 'can attract anti-social behaviour' is questionable, even so the positives of delivering healthy streets outweigh these negatives • Planters are the only viable greening option in some areas, and flexibility should be afforded to allow for planters where there is no reasonable alternative.	The SPD does not state for fact that planters attract anti-social behaviour. The guidance appreciates the social and environmental benefits of planters and advises they must be carefully sited and designed to avoid attracting inappropriate or dangerous behaviour. Modifications have been made to encourage planters and other innovative greening solutions where there is no reasonable alternative.
• Supports examples of appropriate arm rests to use and measures to protect public infrastructure. • Support for chapter guidance in general	Support welcomed
• Concern for suggested planter height is suggested of 1m. Planters this heigh attract litter and people leaning on them etc.	The SPD recommends a minimum height of 1m ass good practice, but this is not a policy requirement. The design of planters must always have regard for the local setting and avoid encouraging antisocial behaviour, so where appropriate lower planters will be supported.
• Public Waste 'Bring Sites'- these should be done with consultation of the local area	No change. Where planning permission is required, this will be subject to the statutory requirement of assessing a planning application, which includes public consultation.
• Community led initiatives should be supported if they are keeping phone boxes that have been marked as buildings of interest even if they aren't listed	All K2's are listed (and therefore protected). Most K6's are not and are therefore more at risk. Where they have limited or no communication or heritage value, the guidance supports

• The K2 and K6 models are not being maintained. We risk losing them as BT are not managing their maintenance. Support retention of K2 and K6 phone kiosks and resistance to new ones with ad screens • Support the proactive management of listed telephone boxes and suggest that this is expanded to include non-designated telephone boxes with heritage significance. Suggest adding reference to Historic England's Consent for Adapting K6 Telephone Kiosks - https://historicengland.org.uk/advice/planning/consents/consent-adapting-k6-telephone-kiosks/.	removal and also potential alternative uses. Wording has been added to the context and Telephone Kiosks Guidance to show support for alternative uses, where possible and the recommended references have been added to Section 9.1 Information sources.
• This section and the Bollards Guidance lacks references to ground-level lighting/uplighters or on use of bollard lighting.	Detailed guidance on guidance on the lighting of Bollards can be found in the Lighting Master Plan and Lighting Design Guide. This is referenced at paragraph 383.
• Bollards guidance should recommend 1m spacing between bollards to prevent rickshaw access.	No change, 1.2m is recommended for accessibility
• A minimum pedestrian clear zone of 3m is not always achievable • 3m clear zone is inconsistent with the 2m recommended as part of figure 5. • Refer to TfL's Accessible Bus Stop Design Guidance rather than introducing new minimum standards (minimum of 1.2m clearance behind the shelter)	Guidance point E has been amended to include, *where possible.* TfL's accessible bus stop design is already referenced
• The vast majority of bollards have been installed to deter vehicle incursion (not the hostile attack type). We have been removing as many as possible across our network. • The context should add that bollards play an important role in protecting under-pavement vaults in historic streets from damage from HGVs. • SPD should note that many existing bollards are listed (and require consent for removal) or contribute to the significance of a conservation area.	Comments noted. The SPD outlines the council's approach to bollards is based on where there is genuine demonstrable need. In some cases, bollards will be necessary to restrict vehicular access for security, pedestrian safety or protect heritage assets. Therefore, the SPD explains the various uses of bollards (see paragraph 378) and that proposals for their removal will be carefully considered. Text has been added to make clear there is a presumption towards protection of historic bollards.
• SPD should clarify if the guidance solely refers to bollards within the adopted highway. There may be need for bollards within private/open spaces.	No change, the guidance refers to bollards in the public realm which covers all areas listed on page 8 "Where does this guidance apply?" and Bollard guidance point A states bollards should be used where there is evidenced need, for the public benefit.
• Supports examples which show protection of public infrastructure.	Support noted
Respondents asked for clarification on the following words and phrases: • 'passing' and 're passing' is unclear • 'Cherished' items/assets • Street furniture (how this applies to items within their boundary)	Definitions have been added to 9.1 Glossary
• Guidance should reference other Royal Mail furniture, e.g. Parcel Post boxes	Agreed, Post Boxes guidance has been expanded upon and relevant references have been included in 9.2 Information sources.

• The SPD should signpost to Royal Mail Post Boxes: A Joint Policy Statement by Royal Mail and Historic England (https://historicengland.org.uk/images-books/publications/royal-mail-post-boxes/). • Suggest addition of reference to Historic England and Royal Mail guidance	
• Support for seating guidance; Seating also has social benefits • Supports SPD approach to wayfinding • Support SPD guidance on street furniture not increasing street clutter	Support welcomed
• Redundant, poorly maintained telephone kiosks attract vandalism and ASB; their removal is supported when no longer operational.	Support welcomed
• Bin guidance should recommend that new public realm schemes have optimal locations for placing general waste, similar to bring sites for recycling. • Schemes should consider incorporating refuse consolidation areas to minimise bags-off-street • SPD should recommend a single bin design throughout the city to ensure consistency and avoid confusion.	No change, guidance states design and location of litter bins for general waste should acknowledge footfall, be in places that encourage high participation and should fit in with the existing local bin network. Design specifications already states that design should be consistent across any given area.
• WCC are not considering accessibility requirements for blind/partially sighted. Visually impaired people state the tactile crossing standard across WCC is inconsistent.	The DfT provides flexibility on the use of red tactile paving within Conservation Areas. Given that over 75% of WCC is covered by Conservation Area, in which red blister paving would be resisted due to harm to the historical setting, we have taken the decision not to require red paving outside the Conservation Areas. This is to provide a consistent public realm across Westminster. The SPD encourages tactile paving to be a different colour to surrounding material to ensure there is a contrast. Only in very limited situations will tactile paving not provide a contrast.
• Cycle facilities should include scooter and e-scooters	After the passing of future legislation, the council will be better empowered to regulate and enforce. The English Devolution White Paper published in December seeks to enable Local Transport Authorities to be empowered to regulate on-street micromobility schemes. We hope to have more clarification on the responsibility of Local Councils and Transport for London in due course. The SPD provides guidance about the placement of different types of cycle facilities.
• Wayfinding guidance point B advises against signage “branding” an area. The limitations of this and how this will impact innovative design to enhance place identity should be explained • Location branding is well established in Royal Parks • The Canal and River Trust needs to provide branding on their land; therefore, the SPD should show flexibility. • Wayfinding guidance is not appropriate to all schemes on private land; the SPD should encourage flexibility on such schemes	The SPD promotes a consistent approach to wayfinding sign design; therefore, it encourages consistency with Westminster design standards. Our priorities are accessibility and consistency of signage styles, to ensure all users can safely use and enjoy the public realm. The Wayfinding guidance has been reworded to clearly focus only on wayfinding signs in the public highway space. In some cases, the placement of adverts/signs may require express advertisement consent providing a degree of flexibility for landowners when providing signage.

• Branding is important for visitor experience. It's over prescriptive to insist on generic WCC wayfinding signage. Tate should retain their own design and branding on wayfinding signs.	The SPD guidance does not apply to the management of Royal Parks.
• Bin guidance may differ from Canal and River Trust's standards which only provides bins for boating customers.	The guidance must align with City Plan policy states that in the public realm bins must be provided to avoid litter. The text however has been amended to make clear bins should not normally be placed on narrow paths where they may cause obstruction (like towpaths).
• Supports council's approach of right lighting at right time • Suggests motion-activated lighting for nighttime • Suggests lower-level lighting in residential areas	Support welcomed. The SPD reflects the guidance in WCC's Lighting Masterplan, where further details about the use of smart technology and sensors is provided.
• Call for a more diverse palette reflecting local environment and characteristics.	No change, the black street furniture is distinctive to Westminster's heritage and should be maintained consistently throughout the City. Where other colours are proposed, these will be assessed on a case-by-case basis.
• Fig 41 ought to include the 10m double optic Giant Grey Wornum developed for St James and Piccadilly to complete the set.	Images have been updated. The Lighting Masterplan provides further guidance on lighting design and requirements.
• There should be flexibility for listed structures to be sensitively re-located in exceptional circumstances	No change, the council has a statutory obligation to protect listed buildings/structures and has a special regard to the desirability of preserving any features of special architectural or historic interest. In most cases, the removal of listed structures from the public realm is not supported.
• Cycle stands should generally be 'Sheffield type'- the SPD should allow for a more heritage location respectful design.	No change, the Cycle Hangars guidance uses language "*should generally*"
• Variety of seating ought to be promoted and required to cater for different needs. A statement could be added about discouraging rough sleeping and hiding of drugs.	Fixed Public Seating Guidance (including benches) has been amended to encourage a variety of rest options and highlight both design and location should be considered when avoiding anti-social behaviour.
• The guidance on seat height and width is very prescriptive. A range would be better, particularly for schemes within private ownership.	Agreed, a range has been included
• Part M of the guidance on Fixed Public Seating (p76) says that "Impacts of noise and antisocial behaviour should be considered when public realm is in close proximity to public areas." This needs to be better explained.	Fixed Public Seating Guidance (including benches) has been improved to enhance clarity
• The section on tables and chairs (non-commerce) on p77 suggests that non-commercial tables and chairs placed by a business owner, landlord or BID for the general use of the public can be licenced using a Pavement Licence. This is incorrect.	Non-Commercial Tables and Chairs Guidance has been reworded to directly relates to fixed tables and chairs or tables and chairs that are not linked to food/drink establishments
• Could also note the carbon cost of manufacture and the environmental costs of battery manufacture.	Agreed, this has been added to Electric Vehicle Charging.
• Telephone kiosk guidance does not apply to the new generation of open kiosks with digital advertising.	Comment noted, the guidance states these will *generally* be resisted. Applications will be considered on a case-by-case basis.

• Support for the recognition of street lighting as part of character definition but there should be more detailed acknowledgment of Westminster's extensive collection of column and wall-mounted gas lamps. There are a large number of historic wall mounted lamps in Westminster, some of which are listed. The SPD should seek to manage these lamps in line with their significance and the positive contribution to the setting of listed buildings and the character of conservation areas	Agreed, minor modification have been made to Wall Mounted/Catenary Lighting guidance and chapter 7.3 Power and Lighting.
• Difficulties in installing charge point infrastructure due to the presence of underground services, basements and narrow footway, are practical constraints rather than heritage ones, this should be clarified. It should be noted that listed building consent is required for fixings to listed buildings, and consideration should be given to archaeological remains when considering ground works and service runs. • Innovative technology like EV charging and Wi-Fi equipment should be integrated into and respectful to historic character.	Agreed, this has been added to the context, Electric Vehicle Charging and Wi-Fi guidance.
• Utility Cabinet Guidance should advise that utility cabinets are located to avoid and minimise harm to the significance of the historic environment.	Agreed, this has been added to the yellow box guidance
• Drinking fountains should consider placement of other street assets to avoid clutter	No change, the placement of all street furniture should be sited considerately in order to avoid street clutter and the obstruction of public highway.
• The city needs to reduce redundant street furniture that is no longer needed as they disturb the beautiful historical environment.	No change, the council is supportive of rationalisation of superfluous street furniture and creating a clutter free public realm however consideration is needed for heritage assets
• Scaffolding and empty building hoarding should be of high-quality and attractively designed to minimise visual disruption to the area.	The guidance has been amended to explain all hoardings placed on the public highway require a temporary structure licence and specific conditions are attached to each licence. This includes how the hoarding is designed and constructed.
• Drinking fountains guidance should have more emphasis on aesthetics. Designs should be of the highest quality and can be a public art feature.	No change. Street furniture should be of a high-quality design however for drinking fountains and other street furniture maintained by the City Council, ease and cost of maintenance take priority over aesthetics.
• Drinking Water Fountains Guidance should acknowledge listed water fountains and the potential need for listed building consent.	Agreed, Drinking Water Fountains Guidance has been amended to refer to historic drinking fountains and listed building consent.
Respondents raised concerns that were out of scope for the SPD: • EV Chargers- a range of charger types and suppliers should be in an area to encourage competition • Further guidance should be provided to deter people sitting outside residential properties. It intimidates residents leaving and entering, encourages ASB.	These recommendations outside of the scope of the Public Realm SPD: SPD's do not influence range of charger type and suppliers. Applications for public seating will be assessed based on their own merits, impact on residential amenity will be a considered in application process. Behaviour of individuals in the public realm is outside the scope of this SPD.

Suggested wording- Public Seating should be avoided outside of residential buildings which is not an appropriate choice for public seating and ignores the meaning of what a home is meant to be. • The SPD should make more stringent requirements of weekly cleaning/maintenance for owners of telephone kiosks. Many attract litter and pose obstruction to pedestrian movement.	The SPD cannot enforce weekly cleaning, but guidance has been added to encourage regular maintenance.
• Concern that the gas lamp policy referred to in the 'Westminster Lighting Masterplan' and the 'Lighting Design Guide' is incorrect, as it refers to them being retrofitted. These documents and the SPD should be updated to reflect Westminster's current position- https://www.westminster.gov.uk/news/statement-westminsters-historic-gas-lamps.	Text of adopted strategies and design guides cannot be amended at this stage, however, heritage policies in the City Plan and our approach to designated/non-designated heritage assets will still stand.
• SPD should give guidance on location, design, management and provision of cycle hire bays. Cycle hire users are not using designated bays appropriately having a negative impact on other kerbside uses. The SPD needs to address ASB, noise generated from cycle users by advising on bays being in appropriate locations.	The SPD outlines that e-bikes/e-scooters should use designated bays and road markings to identify these bays must be clear/unambiguous. Beyond this, human behaviour concerning the parking of private hire e-bikes/e-scooters is outside the scope of this SPD.
• Public toilets should be prioritised over cycle hangars in Soho	It would not be appropriate to prioritise one use over the other in the Street Furniture guidance. There is no statutory duty for LPAs to provide public toilets, however, the council is exploring ways to enhance its public toilet services.
• Westminster has poor recycling rates in Westminster; unnecessary parking spaces should be used to handle recycling streams • Want to see less street sweeper bins, and better guidance on waste collection around high footfall location that could be designed into public realm schemes.	The SPD does not provide a hierarchy of kerbside activity. Street sweeper bins and waste collection is covered in the Waste Management Strategy.
• The capacity of cycle stands should be clearly stated on appropriate signage. There should be penalties for exceeding capacity.	SPDs cannot introduce penalties and management of cycle stands are outside the scope of this SPD.
4.6 Paving Materials	
• SPD lacks planning for interfaces between public and private spaces. • SPD lacks consideration for visual markers to distinguish between public highways and footpaths at the same level. • Recommends SPD sets out design requirements to clearly distinguish between highway and footpath.	Comment noted. The inclusive design guidance advises clear and consistent delineation between uses. An amendment has been made to the guidance to advise that "Public realm design should be complementary across ownership".

• Asphalt pavements should be avoided and if already in place, replaced with slabs.	No change. The council must prioritise materials with low carbon impact in line with Climate Emergency.
• Provide a measurement for the distance that corduroy paving needs to be placed ahead of a hazard.	This is referred to in TfL guidance document identified in 6.1.1 References yellow box guidance.
• Reference to how blister paving should be used is misleading. • It needs to conform with National Guidance which states blister surface should only be used at designated pedestrian crossings.	Text amended to improve clarity.
• Foot way material should not generally be replaced unless it is defective	Agreed, Carbon Reduction Guidance for Public Ream works guidance has been amended
• The specific guidance provided in previous SPDs/Gs has been lost, now only generalised guidelines. Yorkstone was specified in certain areas, now it is vague	The SPD sets out the principles for material selection. For further information on the suitability of a materials for a certain area, local neighbourhood plans and conservation area audits should be consulted.
Respondents asked for clarification on the following words and phrases: • "Seamlessly combine" is unclear and should be clarified or removed. • "Value for money" Cost analysis should be applied only where necessary and won't be needed for all applications • "negative environmental impacts" • "monetary terms". The SPD should not introduce economic analysis into scheme consideration unless absolutely necessary.	Agreed, words and phrases identified have been removed or further defined in the context/ 9.1 Glossary.
• Respondents identified several images and captions that needed amending (such as Fig 61 showing asphalt filling a hole in paving). • Respondents have requested diagrams or photos to show how the different elements discussed could be combined in practice	The images and captions throughout the SPD have been updated. New images have been included to show blister paving and corduroy paving.
• Supports opportunity to infill historic surfaces to make them easier on the user. • The SPD should mention the historic weigh bridge at The Bays corridor Paddington	Support for the retention and repair of historic materials welcomed. Detailed guidance on specific heritage infrastructure is out of scope for this SPD; however, the guidance has been amended to support the restoration of all historic materials to improve accessibility.
• Support for paving material guidance within this SPD promoting low carbon material choices plus a sustainable and simplified palette of materials.	Support welcomed
• SPD should confirm the use of granite sets for beer delivery locations • Thin paving is cracked by lorries. Thicker specification is longer lasting.	No change, the SPD provides guidance to ensure the appropriate materials are selected for beer delivery locations. For example, Paving Materials Guidance states that the materials (including subbase materials), any fixing methods, and construction depths should be suitable for the planned purpose and assessed to ensure long-term durability.
• It is unreasonable to expect developers to avoid materials with a longer lead time of 4-5months. This also lends developers to choosing materials based on their availability which may not be in the best interests of the scheme/end user/context/environment.	Agreed, the Paving Materials Guidance has been reworded.

• It is not clear what threshold of development EQIAs would apply to.	No change, the SPD specifies that the required complexity of the EQIA will depend on the complexity of the public realm scheme.
• There will be cases where materials are chosen for aesthetics so the SPD should not discount aesthetic considerations/	The guidance advises that *primarily* aesthetic proposals are unlikely to meet the other guiding principles of the SPD
• Environmental, social and economic objectives of sustainable development should all be considered. At times more carbon intensive materials may be appropriate. • SPD should mention the role of well-maintained soft landscaping as a lower carbon option.	Agreed, guidance amended. Carbon Reduction Guidance for Public Ream works guidance now reads- Paving materials used should be low carbon concrete, granite, Yorkstone or asphalt or equivalent, renewable, natural, low carbon materials approved by the City Council. Carbon-intensive materials should be avoided, reduced, or substituted.
• SPD should accept that for some schemes carbon considerations would come at the post planning stage agreed via conditions/s278 agreement	Agreed, however no change. The guidance applies to both planning application and approval of details and legal agreement stages, plus those schemes which are not part of planning applications.
• Suggested wording to be added to Material Sourcing and Transporting Guidance- *"if possible, practical and appropriate, taking into account other aspirations for material selection".*	Suggested wording accepted under Sourcing and Transporting Guidance.
• Support the principle of examining the environmental impact of materials • It is unclear why UK and Europe are the only appropriate sources • The SPD should amend wording to include instances where selecting other countries outside EU/UK have lower carbon emissions	Agreed, Sourcing and Transporting Guidance has been reworded to ensure procurement of materials is from ethical suppliers and has the lowest carbon emission impact, not necessarily from UK/EU.
• It might be better long term to replace historic materials. There should be flexibility for this to be assessed and considered on a case-by-case basis.	Agreed, Paving Materials in the Historical Context guidance has been amended to include retained, *where possible*
• The SPD should mention potential sourcing regulatory schemes	Agreed, reference to relevant regimes have been added
• Crush existing Yorkstone paving and reuse the aggregate rather than retaining it	No change, reuse of Yorkstone slabs as slabs is preferable to the stone being crushed for re-use. The SPD is seeking retention, where possible.
• Include use of material modules that withstand heavier than expected axle loads in the palette • High quality materials that a fastened too well end up being destroyed when needing to lift them • There are areas of special engineering difficulty noted on WCC's GIS, SPD should also mention areas of special surface interest • Excavated materials are often discarded by those who do not care, takes ages to procure replacement	Some amendments have been made to Paving Materials Guidance, where needed.
• Welcome guidance on historic materials.	Support welcomed

• This section should come earlier, as context led design should start by thinking about what is there already and then move to looking at issues of functionality, accessibility, etc. • Links to relevant Historic England documents should be included	Maintaining and celebrating historic character is one of the key guiding principles of the SPD. All parts of the guidance should be read together. Links have been added to the SPD under 6.1.1 References
• Guidance on acceptable paving materials (particularly in CAs) too general, in sharp contrast to the previous document which is too prescriptive.	No change, Conservation Area Audits provide local detail. Neighbourhood Plans similarly contain additional local detail. The SPD is designed to set out the principles for material selection.
• Welcome the use of low carbon materials and construction methods in public realm improvements	Support welcomed
• The SPD should discourage asphalt pavements; repaving may permit planting opportunities	No change, asphalt is a supported material. Its use would be decided upon a case-by-case basis.
Respondents raised concerns that were out of scope for the SPD: • Fully support the principle but note that contractors have not always been aware of the need to respect historic paving [relating to specific vehicle overrun issue]. • The SPD should refer to Carriageway white line markings, Yellow Boxes, Keep Clear markings at schools and specialist thermoplastic icon markings? • SPD does not address ongoing problem of whether to pay more upfront to save maintenance costs or pay less upfront but potentially pay more in the long run due to higher maintenance costs.	These recommendations are out of scope for the SPD. This is a behavioural matter. The contract teams have been informed not to park on the paving in the identified location. White lines, yellow boxes and other road markings are not specifically planning matters. These considerations will be discussed throughout the planning application process.
4.7 Street Trading (including Tables and Chairs)	
Respondents asked for clarity on the following words and phrases: • "Traffic" Most people read "traffic" as vehicles, in this case the context refers to pedestrians	Agreed, where the term "traffic" has been used to refer to pedestrian movement, this has been amended to enhance clarity.
• The guidance should refer to **all** gas heaters, to be consistent with Westminster's air quality and climate change policies • Heaters should be allowed as required; why are Patio style gas space heaters not allowed?	Agreed, Management of Commercial Tables and Chairs in Public Realm Guidance has been amended to refer to all Gas space heaters. Not all heaters are appropriate for the public realm; the SPD provides guidance on which heaters are suitable. The use of patio style gas heaters is discouraged mainly due to environmental concerns, gas heaters a high carbon footprint and are generally inefficient ways of heating public space. The SPD states applications for heaters are *generally* resisted but will be assessed by the council on a case-by-case basis. Where there is an agreed need and appropriate risk

• Guidance on suitable heating for alfresco is unclear. *Generators and heating equipment will generally be resisted unless there is an agreed need* conflicts with Electric radiant space heaters may be allowed.	assessments undertaken, electric radiant space heaters designed specifically for outdoor use may be allowed.
• Al Fresco Dining should be encouraged more; SPD should prioritise business growth. • SPD is focussed on pedestrians and not enough on business especially alfresco dining.	No change, the SPD acknowledges that commercial activity makes an important contribution to the public realm. It supports the safe, well managed placement of Al Fresco tables and chairs. That being said, the SPD needs to align with extant City Plan policy 43 D.2 proposals for trading (including tables and chairs) should not 2. Compromise pedestrian movement or traffic conditions.
• Semi-permanent dividers/screens should be encouraged	No change, *semi-permanent* is not a generally accepted concept in planning practice. Guidance on temporary structures will apply.
• Support for reference to flood risk in this section • Suggestion to include that applicants for kiosks should consider if a flood risk assessment is required and that any kiosks proposed within 16 metres of the tidal flood defences may require a flood risk activity permit, and be referred to https://www.gov.uk/guidance/flood-risk-activities-environmental-permits	Support welcomed Agreed, recommend text has been added to Temporary and semi-permanent kiosks guidance
• There is no mention of holding events in parks or gardens? • Suggest adding text: Appropriate bonds and high-quality restoration of green space afterwards should be included with any application for events. Appropriate protection of grassed areas with trees must take place, to prevent compaction of root protection areas, must be carried out by any Events Organiser.	Agreed, context under Event Spaces has been amended
• This guidance "Fixed Structures e.g. decking and permanent barriers and umbrellas- not generally supported" is restrictive and overly prescriptive. Rules should be relaxed for private land or if decking is used to level the ground or if umbrella supports are within the road surface.	No change, the SPD guidance uses *not generally allowed* and *where possible,* so there is some flexibility in the guidance.
• More clarity is required for cases where the opposite side of the street has no tables and chairs. • Percentages of the street which can be taken up by tables and chairs should be worked out on a case-by-case basis, to reflect the variety in sizes and uses of public realm spaces.	Comments noted, Placement, Layout, And Dimensions Guidance has been reworded to improve clarity that guidance includes scenarios where only one side of the street is used for tables and chairs. This is to be applied to most cases in Westminster, where necessary specific percentages of the street taken up by tables and chairs may be worked out at application stage.
• Supports for initiatives taken by public sector and commercial interests alike, to improve the public realm.	Support welcomed.
• Highways seating is controlled by pavement licence regime which already provides parameters for granting permission. This should not be duplicated or made more restrictive. • Guidance must be proportionate, evidence based and flexible. • The context section of the document does not make the distinction between these 2 licensing/permission regimes clear.	Agreed, the chapter has been rewritten for clarity (see paragraph 8.1.5 Tables and Chairs (and associated street furniture relating to street trading). It avoids repetition of PVL guidance, instead providing clear references to the regime and the differences to Planning Permission.

• Regarding the removal of storage items from the highway during trading hours/not storing items on the highway, where will this apply? • Small stores cannot do this and can only remove items from the highway after trading hours. SPD should explain how to store items on the highway if premises is in use. • WCC should not expect occupiers to have space within the retail unit to store furniture during trading hours. Requiring traders to limit trading space will likely have a negative impact on them. • This guidance is not practicable and should only be applied in emergencies.	No change, the SPD must align with City Plan policy. Policy 43 states kiosks and structures for the sale of goods will be sited to minimise obstruction to pedestrian movement and cleansing arrangements, and they must be capable of quick removal. Furniture that extends into the street must not impede pedestrian movement; highways works or cleansing arrangements. Therefore, the SPD does not encourage furniture to be stored on the highway during trading hours and occupants should provide appropriate storage for such items, outside of trading hours. If internal storage cannot be used during trading hours due to interference with business operations, street furniture may need to be stored offsite. Placement, Layout and Dimensions Guidance has been amended accordingly.
• Legally, pavement licence guidance is incorrect. The legal test (for WCC to prove) is whether land is used privately or as a public highway.	Comment noted, the guidance is legally correct and has been rewritten to enhance clarity. Once the land has been used for passing and repassing continuously for 20 years, then it is deemed part of the public highway—regardless of ownership status under Land Registry Title documents.
Respondents raised the guidance was overly prescriptive • Location guidance not permitting Tables and Chairs outside stations/ near crossings seems overly prescriptive. • There should be minimum distance or detailed specific further guidance for stations and crossings. • Guidance referring to 3.45m wide pavement width being insufficient to place tables and chairs does not take into account low pedestrian areas. The Governments regulations does not provide this stipulation and allows for a minimum of 2.8m. The council website should display pedestrian flow figures for the placement of tables and chairs.	No change, providing a specific minimum distance would be too restrictive and instead the SPD provides a general principal that tables and chairs should not be positioned in these locations. No change, the SPD is providing best practice and guidance for Westminster. It recommends that where the total pavement width is less than 3.45 metres the installation of tables and chairs is *unlikely* to be safe and practical. Applications where pavement width is less than 3.45 metres will be determined based on their merits.
• *"In all locations an absolute minimum clear zone of at least 2m clear width which increases to 4m in streets with heavy pedestrian traffic or poorly scoring pedestrian comfort levels"* - There is no data for the poorly scoring pedestrian comfort levels? The guidance must be based upon evidence. • This should not be a presumption in all locations. Government guidance- inclusive mobility- suggests a minimum of 1.5m distance of free pavement. SPD should suggest lower the 2m in some locations.	No change to guidance. Reference to 2m has been removed from this chapter, however the recommend 2 metres clearway is still covered in Chapter 4.1, Footway widths guidance. This is inline Government guidance Manual for Streets 2007 and Inclusive Mobility guidance from DfT which states the minimum unobstructed width for pedestrians should generally be 2m. See Transport for London (2010), *Pedestrian Comfort Guide* for Pedestrian Comfort scoring in section 9.2 Information sources.

• Without the images, it is difficult to compare newly proposed guidance of 2m minimum clear zone, whilst previous guidelines required 1.8 m. The justification for this is not clear.	
• The 'Location Guidance' covers partially pedestrianised streets where vehicles are banned at certain times of the day (p. 125), but not those with cycles passing through. • The Location guidance should resist proposals which show street furniture such as tables and chairs unrealistically close together with insufficient space for customers to use them.	Agreed, another bullet point has been added to Location guidance point A. Guidance beneath Placement, Layout and Dimensions has been expanded.
• It is unfair to advise that the cumulative impact should not cause zig zag pathways as each street may have differing uses which creates a natural pattern and adds to the charm of an area. • No mention in the guidance that the cumulative impact of numbers of tables and chairs in the public realm. • The cumulative impact of highly concentrated licenses/premises can be a negative impact on an area's character and function.	The SPD is providing guidance on best practice for tables and chairs in the public realm, and how schemes can adhere to City Plan policy. Avoiding zigzag pathways safeguards pedestrian movement, as per City Plan Policy 43 D. Where needed within the Chapter, reference to the cumulative impact of numbers of tables and chairs in the public realm has been included.
• In areas with larger pavements could items such as planters be kept on the highway with a condition that the area should be maintained? • There is no reference to planters, provision for these should be made. • Guidance on other furniture associated with tables and chairs is unclear. Some associated furniture is mentioned in Management, but this might be wrong section?	No change, guidance on planters is provided in Chapter 6.2 Street Furniture. Location guidance point A has been amended to include *"and associated street furniture",* however the location guidance refers to the appropriate location for the designated tables and chairs area. Reference to canopies, umbrellas and other furniture has been moved to Management guidance as this are concerns how canopies/umbrellas etc. are managed within the designated area for tables and chairs.
• Including a clear, definitive list of furniture and fixtures Westminster will approve under the pavement licence (PVL) regime would be beneficial. • Section is unclear, does not represent all the furniture listed under 1.6 of GOV pavement license guidance.	No change, see Paragraph 1.6 of Pavement License Guidance linked in the text.
• The SPD should explain that it's easier to get a tables and chairs license on pedestrianised streets but should discourage this as it will encourage the closure of streets for commercial gain.	No change, the SPD sets out that where pavements have been widened due to high pedestrian demand, the space should not subsequently be used for activities or equipment other than pedestrian movement.

• There was an important principle in Westminster Way that when a footway is widened to allow better pedestrian comfort, the gained space should not then be taken by alfresco dining.	
Respondents asked for clarification on some words and phrases • "Off-set or floating tables and chairs away from the immediate retail frontage will not be supported." Off-set" is not clear, because it usually means 'at an angle'.	Agreed, wording amended.
• "Furniture should be arranged to reduce opportunities for crime." Without guidance on what that looks like, this is fairly meaningless. Guidance from the design out crime team should be added here.	Guidance has been expanded upon and should be read alongside Chapter 3.4 Security.
The guidance should make the following changes to encourage inclusive design: • Add suggested wording *"Where outside seating is proposed for use by businesses or others, a physical solid barrier with a top and bottom tapping rail should be used to demarcate the area where the seating will be located. This will allow it to be detected by long cane users."* • Barriers/enclosures for hospitality staff/customers impede pedestrians, add visual clutter and effectively privatise the street. The SPD needs to provide clear guidance on this. • Placement of barriers/enclosures for hospitality staff/customers is not always consistent, which is an issue for people with disabilities.	Agreed, the Placement, Layout and Dimensions, Management guidance and design expectations have been amended accordingly.
• Supportive of Al Fresco Dining' / Outdoor Tables and Chairs Associated with Licensed Premise Guidance. Recommend the SPD sticks to this wording.	Support welcomed
• Strongly supportive of Placement, Layout, And Dimensions Guidance Point M on vertical drinking.	Support welcomed.
• In 5 Hertford Street's specific case, tables and chairs may remain on the highway outside for permitted hours.	No change to guidance, the function of the highway for passing and re-passing cannot be compromised to facilitate commercial activity, and the general principle is items should not be stored on the highway outside of permitted hours.
• The SPD does not mention allowing licences in parks and gardens. Text should be added to protect heritage and green spaces from adverse effects of tables and chairs. • Events guidance should be expanded to ensure the protection of public realm spaces, particularly green space.	Agreed, context text and Location guidance have been amended. Preservation of green space has been emphasised, reference to City Plan Policy 15 Visitor Economy has been added.
• Al Fresco Dining Guidance includes some of the Pavement Licensing Conditions but not all of them. • These conditions should be applied to those who need full Planning Permission as well. It is not clear if that is the case atm.	The guidance box 'Al fresco dining' / outdoor tables and chairs associated with licensed premises' has been amended to include all conditions set out under The Pavement Licence regime established under the Business and Planning Act 2020, direct reference to adhering with the regime has also been added.

	The guidance box states *Tables and Chairs associated with Licensed Premises Guidance* - this is to provide clarity for those who are applying for licenses only not full Planning Permission.
• Location guidance advises tables and chairs will not be generally permitted outside the frontage of an applicant's premises. This is the only area in which Pavement Licences can be granted so is confusing.	Agreed, this has been amended.
• Street Trading guidance states the function/character of highway should not be compromised. This is written as if it is relevant to all public realm and not just the public highway. How does this guidance apply to privately owned cafe space? • The latter topic guidance (Al fresco dining) is written as if it applies only to chairs and tables on the highway.	No change, the Street Trading guidance aligns with City Plan Policy 43 Tables and chairs in public realm which applies to all public realm in Westminster (regardless of ownership). Where planning permission is not required, the SPD still expects this approach to be applied to ensure Westminster's streets remain accessible to all. The Al fresco guidance is labelled with the heading- tables and chairs **associated with licensed premises guidance.**
• The SPD should direct users to the Licensing Act 2003 and Environmental Protection Act 1990 when referring to consideration of the impact of associated noise and disturbance to residents, occupiers, and other visitors	No change, this Chapter provides guidance on how street trading / tables and chairs can be placed and managed to mitigate these issues.
• Percentages of the street which can be taken up by tables and chairs should be worked out on a case-by-case basis, to reflect the variety in sizes and uses of public realm spaces.	Schemes will be worked out on a case-by-case basis, but the guidance provides general maximum and minimum thresholds that are expected for tables and chairs in the public realm.
• Diagrams do not address courts/alleys with eateries on both sides	No change, this is covered in Placement, Layout and Dimensions Guidance and Figures 95-98. Generally, only 25% of the street should be occupied by tables and chairs, this include when there are establishments on both sides.
• 25% on each side does not address the assessment for long cane users and disability assessments or the effect of temporary street furniture has on heritage assets.	No change, applications must comply with Pavement licences: guidance from local government which includes that where a pavement licence is granted, clear access routes on the highway will need to be maintained, taking into account the needs of all users, including disabled people. Minimizing impact on heritage is covered within the guidance from 8.1.6 onwards, and EQIAs and Design and Access statements may be requested as a condition.
• The areas for tables and chairs often cannot properly accommodate people seated at tables, often meaning customers back chairs onto the clearway, blocking the passage of pedestrians. • The SPD needs to be provide guidance on how much space is required behind chairs within the area dedicated for tables and chairs and only permit tables and chairs if this space is available. No chairs should be permitted with their backs to the kerb.	The guidance provides an indicative plan of an area dedicated for tables and chairs showing appropriate dimensions. The Placement, Layout, And Dimensions Guidance also emphasises that tables and chairs (and associated furniture) must not obstruct pedestrian movement or cause obstructions/hazards. The written guidance has been expanded in light of this comment. Beyond this guidance, the SPD cannot control the behaviour of customers.
• Tables and chairs are permitted in areas with shared surfaces and those that are fully pedestrianised. However, most fully pedestrianised spaces allow cycles. The	Comments noted. No change, removable tables and chairs associated with commercial use

SPD recommends 4m width for 2-way cycling and 2m width for pedestrians. Therefore, any tables and chairs can only be placed in these areas where 6m of width is available. This is not often met, and the guidance needs to be explicit on this.	will only be permitted in appropriate locations adjacent to the premises, at suitable times and where space allows. Applications will be assessed on a case-by-case basis with regards to City Plan policy, Planning Licence regime, safety and accessibility.
Respondents raised concerns that were out of scope for the SPD: • The SPD should provide a list of streets unsuitable for tables and chairs and the reasons why. • The SPD should provide clarification of what is needed on plans for planning applications submission for tables and chairs. For example - At least one chair available for replacement by a wheelchair minimum of 1m is required - will this need to be shown on plans for validation? • Vertical drinking often causes obstruction on pavements; SPD needs to address this specifically. • SPD should have powers for when advice is not followed -such as rubber feet advised on chairs.	These recommendations are out of scope for this SPD This is not necessary. If a street is unsuitable this will be determined on a case-by-case basis. Yes, it is likely this will need to be shown on a planning application to demonstrate the needs of customers with disabilities have been considered. How to submit details for planning applications will be covered at the planning application stage. We agree applicants for pavement licences should ensure the business use keeps within the approved boundaries however it is out of scope for this SPD to provide guidance on the particular behaviours that take place concerning vertical drinking. The SPD does not propose new sanctions or fines if guidance is not followed. If proposals are deemed unsafe or damaging to the environment, this will be handled by the Enforcement Team within the council.
4.8 Play and Recreation	
• Supportive of SPDs focus on playful design and temporary play opportunities. • Supportive of play street orders within the councils Active Streets programme.	Support welcomed
• SPD should encourage involvement of children in cocreation of play schemes	Agreed, guidance amended
• SPD should encourage other temporary uses of street space to reimagine space, Lunchtime Streets events in City of London is an example using street closures.	Agreed.
• SPD should encourage greening within dedicated play space	Agreed, guidance amended
• Suggest adding wording to guidance to refer to resisting the negative impact on green space/heritage	Noted, yellow box guidance has been amended
• There needs to be flexibility for alternative approaches e.g. where the quantity may be less but the quality/reach of alternative provision is much improved	There is a deficiency of play space in the city therefore loss of play space will generally be resisted, developments should be meeting policy guidance outlined in Lonon Plan Policy S4 Play and informal recreation B. Development proposals for schemes that are likely to be used by children and young people should: 5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

• What does shaping of physical features entail, what is expected? There should be examples in this section	Agreed, the context has been amended
• What is 'playful design', examples/ a definition would be helpful.	Agreed, playful design has been added to the glossary
• Conflict may arise between playful design with the guidance in the rest of the SPD which calls for consistency and uniformity	Agreed, Chapter 4.4 Play and Recreation Space guidance has been amended.
4.9 Freight, Servicing and Deliveries	
• Use of Cargo ebikes should be encouraged/prioritised as they create less traffic/are safer for pedestrians	No change, in line with the council's ambition to reduce carbon footprint throughout the public realm, the SPD supports the use of cargo bikes for deliveries. Cargo cycle infrastructure is encouraged in our local centres and high streets and Cycling Provisions Guidance, which states schemes should explore opportunities for facilitating and improving access by cargo delivery bicycles.
• The guidance focuses on people movement and sustainable transport but omits commercial activity, including freight and servicing needs. • The SPD should reflect NPPF Paragraph 117 emphasis on development supporting the efficient delivery of goods. • Enhancing freight efficiency is also a climate emergency solution.	Chapter 8.2 Freight and Servicing addresses the need for public realm schemes to contribute to the management of freight traffic. The chapter has been amended to mention NPPF para 117.
• Welcome the recognition of the importance of FSD activities • Support focus on sustainable last mile logistics operations • Welcome the focus on consolidating freight activities to reduce traffic • Support more effective use of loading bays and the exploration of technology to optimise logistics efficiency.	Support welcomed
• The SPD should recommend micro logistics hubs are placed in areas with high concentrations of deliveries.	The SPD guidance does support the implementation of micro logistics hubs and advises they should be developed particularly in areas that have greater potential for large-scale regeneration and development.
• The SPD should refer to the role of river for freight as an efficient delivery mode that can reduce vehicle congestion and emissions.	Support for river freight is written in Chapter 4.2 Canals and Towpaths, 5.2 Green and Blue Infrastructure and 8.2 Freight, Servicing and Deliveries. It is also written within Westminster's Freight Servicing and Deliveries Strategy and Action Plan which also mentions rail freight to improve FSD operations through "remoding". The Action Plan is linked within the text.
• SPD should support walking freight, emphasise the role in public realm to facilitate this.	Agreed, guidance amended.
• SPD could outline public realm requirements for share cargo bike schemes.	Agreed, Chapter 4.3 Cycling and Micromobility Transport, guidance has been expanded upon to mention cargo bike schemes.
• Support for guidance on incorporating servicing and delivery activity into the Public Realm	Support welcomed. Text has been amended to better align with City Plan policy.

• Guidance provided on on-street servicing is not fully aligned with City Plan Policy 29. E.g.: Text could include the Policy 29 D line: *'the council will seek planning obligations in the form of... the opportunity cost of lost kerbside space.'*	
Respondents asked for clarity on the following words and phrases: • The difference between SMPs and DSPs and when they are required is unclear	Agreed, guidance amended. Reference to SMPs have been removed and definition for DSPs have been added to the glossary.
Respondents suggested making references to the following documents: • TfL's Kerbside Loading Guidance	These have been added to the context and the Section 9 Information Sources, with relevant links.
• Section is useful for public realm schemes that need Planning Permission, not useful for standalone public realm schemes	No change, the guidance should still be applied, even in the absence of a planning application.
• Can 'where viable and there are sufficient electric vehicles operating in the area.' be tagged after 'alternative vehicles.'	Amendment made to the SPD
• Welcome the encouragement of sustainable logistics and Delivery Service Plans.	Support noted
• A threshold needs to be stipulated for which developments will be liable for these additional costs	Policy 29 should be consulted in the first instance, which explains this applies to all development. The Planning Obligations SPD provides details on how developers should cover the costs associated with on-street provision
Respondents raised concerns that were out of scope for the SPD: • The SPD should mention value of Class B8 (storage or distribution) consolidation of commonly ordered group to reduce delivery trips. • The SPD encourages the development and use of "consolidation and micro-distribution facilities". To facilitate this, WCC needs to identify locations and areas for logistics functions to take place (currently categorised as B8 through the planning system) with 24/7 access for HGVs to enable operators to transfer goods to smaller vehicles. • Request specific limits on noise at night • Call for addition of such guidance concerning river freight to clarify how the transition between river and land-based transport could be arranged and managed.	It would not be appropriate for the SPD to comment on use classes as they generally are not directly relevant to public realm schemes, the SPD focuses on guidance for schemes focused on spaces between buildings rather than the specific uses of adjacent buildings. The SPD cannot introduce new policies, so cannot identify locations for particular land uses. Specific limits on noise and new time restrictions are beyond the scope of this SPD. River freight is encouraged throughout the SPD, however specific, technical guidance on how to facilitate "remoding" is beyond the scope of this SPD.
4.10 Waste, Cleansing and Maintenance	
• Support for SPDs approach to maintenance and management	Support welcomed.
• Support for this section.	Support noted.

• Efficient waste management and utility services are essential for maintaining the area's appeal and functionality. • The SPD should provide clear guidance on integrating these services into the public realm without causing disruption.	No change, reference is made to WCC Waste Management Strategy 2016- 2031 and guidance provided in Chapter 6.2 Street Furniture.
• The text reads slightly negatively. • The SPD should make clear that maintenance is not just for developers and should clarify what is expected beyond the council's usual regime. • Only schemes which require additional maintenance costs over and above WCC's usual programme should have to pay a commuted sum.	Agreed, the text has been modified to reflect that only additional maintenance costs will require commuted sums payments for the lifetime of schemes.
Respondents raised concerns that were out of scope for the SPD: • SPD lacks reference to new technology to solve waste issues. Innovative systems such as tagged waste rubbish to identify users and increase accountability, dry recycling areas and scheduling waste collection via GPS should be mentioned. • Fly tipping needs to be addressed, recommends issuing fines • Waste management needs improving with fines for commercial delinquency.	This is out of the scope of the SPD. Recommendations passed onto WCC Waste team. Enforcing fines is out of the scope of the SPD. Fly tipping is an illegal act and should be reported via our website: Report Fly Tipping
4.11 Services and Utilities	
• Support for SPD acknowledging need for Public Toilets • Baby changing facilities should be access to all genders • Whilst the provision of public conveniences is a good idea, they are of no use at all if not properly serviced and maintained.	Support noted. Public Conveniences Guidance has been strengthened regarding servicing and maintenance and recommendations have been passed to relevant team leading on The City Council's Strategy for public conveniences.
• Support for guidance, aspects are environmentally friendly for metropolis such as London.	Support welcomed
• Why are Cycle friendly gulleys not to be used in parking bays or adjacent to them?	No change needed. Low risk areas are not typical areas where cycling will take place, i.e. as mandatory or advisory lanes are generally designed out of these areas so cycle friendly gully is not required, also cycle friendly gullies are more prone to being blocked and are more likely to flood localised areas from storm and autumn due to their design
• The guidance should reiterate the requirement for Flood Risk Activity Permit, and that any work on the river side of the wall may also require a marine management organisation license.	Agreed, suggestions included within the text.
• SPD should provide a set of guidelines on where Public Conveniences are desirable (in area of high footfall) and refer to the commitment to provide them. • SPD needs to recognise need for public toilets; they should be priority. Developers should be obligated to provide public toilets when they build.	No change. Developments should adhere to City Plan Policy 15 L. Policy 15 I of the City Plan states toilets will be required in proposals that generate large retail, leisure and entertainment developments, tourist attractions and transport interchanges.

	Also see Planning Obligations and Affordable Housing SPD which outlines when development is required to deliver public toilets. In addition, WCC's Public Conveniences (PCs) service agreed a strategy and programme of works in the summer of 2023 to address and improve key challenges for the service. See: https://westminster.moderngov.co.uk/documents/s61577/Public%20Conveniences%20Briefing%20Note%20PS%20Sept%202024.pdf
• SPD needs to address how contractor vehicles should be accommodated.	No change. No differentiation is to be made within the SPD between contractor and other vehicles.
• Permission to install new services and utilities should be subject to a requirement to remove redundant and obsolete services and utilities by the end of the installation. Redundant infrastructure often prevents public realm improvements.	Agreed. Guidance has been expanded upon to include the need to remove redundant infrastructure.
• Support for encouraging coordination between statutory undertakers and provision of public conveniences	Support noted
• Current situation in the borough does not align with the proposed guidance on post-works highway restoration. • Call for clear indication of Council's expectations on the timing of interim repairs.	Guidance has been amended
Respondents raised concerns that were out of scope for the SPD: • Guidance points state the obvious. Where are the sanctions if these are not followed? • The requirement for utility companies to restore highway within 6 months is not strictly enforced, resulting in a shabby public realm. Restoration should happen sooner with utility undertakers being held accountable.	 Supplementary Planning Documents (SPDs) do not introduce new rules or policies. Therefore, they are not intended to impose obligations or provide sanctions when guidance is not met. The SPD cannot introduce enforce guidance; however, the guidance has been amended to encourage restoration of highway as soon as possible.
4.12 Power and Lighting	
• The SPD discourages illuminated trees. It should explore alternative eco solutions, such as glow worms. • SPD should have a more flexible or lenient stance towards lighting of trees. Lighting can be done permanently without harming trees and can enhance attractiveness. SPD should add text about brightness, locations and contexts where lighting trees is appropriate. • Lighting of trees could potentially deliver benefits on wayfinding and night-time safety. The SPDs approach of focusing on exceptional specimens considered restrictive.	No change. SPD guidance has been reviewed by Trees and Lighting experts within the council and provides guidance and explains best practice within Westminster (see Chapter 5.2 and Chapter 7.3 for guidance on the lighting of trees). Further details on lighting levels and locations for lighting can be found in the documents listed under 7.3.1. The SPD does not need to encourage leniency in this regard as planning applications will be determined in accordance with planning policies, having had regard to material considerations and the schemes own merits.
• Recommended changes to reference the importance of lighting on biodiversity and buffer zones.	SPD updated to reflect suggestions.

• This section should refer to safety and particularly women's safety as a key objective of lighting to support the Mayor's strategy for ending violence against women, girls and gender diverse people.	Agreed, text amended.
• For gas lighting in and around Covent Garden, the Covent Garden Public Realm Framework Report should be followed. • Heritage should be considered when making changes to lighting. The Covent Garden Lantern supports LED bulbs to replace gas.	Noted. The SPD is not intended to provide detailed location specific guidance as this is covered in elsewhere. Agreed heritage assets should be protected where possible and new lamp column and lantern designs should reflect heritage assets. The text has been reviewed to strengthen the heritage asset.
• The section on gas lighting is inadequate • It is unclear whether gas lighting guidance means unlisted gas lanterns will be converted, or supplementary lamps will be installed? • Oppose removal of gas lamps	The guidance refers to supplementary gas-effect LED lighting being installed alongside the existing gas lamps. The text has been reworded for clarity.
• Support the guidance for avoiding uplighting of trees, which is also detrimental to bats and other wildlife.	Support noted.
• SPD should say more on impact of artificial lighting on ecology and on canal wildlife • SPD should link to the Bat Conservation Trust's guidance on lighting.	No change. Where possible, the SPD is seeking to reduce duplication of existing guidance. The Westminster's Lighting Master Plan provides guidance on lighting and Fauna and flora with specific reference to guidance from Bat Conservation Trust. Further guidance is also provided in the Council's Artificial Lighting Environmental and Ecological Impact Strategy, both documents are referenced in Chapter 7.3 Power and Lighting.
• Concerns about the prescriptiveness of the guidance for street lighting/lamps. One should be able to maintain agency over decisions about the design of specific structures on land within its ownership.	No change, the SPD sets out best practise and guidance, outlining Westminster's approach, however it is not policy. The SPD does explain that the guidance should be followed across Westminster's public realm, including private forecourts adjacent to public highway.
• The SPD advises columns should not be placed in front of windows or doors, but it is hard to avoid all windows. Not placing columns in front of residential windows should be a priority.	Agreed, text amended.
Respondents raised concerns that were out of scope for the SPD: • All remaining gas lamps in Westminster should be listed to give them the same protections as the listed ones. • Too many local offices leave too many lights on all night and at weekends, causing light pollution and unnecessary carbon emissions.	This is outside the scope of the SPD The SPD refers to street lighting and lighting of the public realm. This is a behavioural issue and is outside of the scope of the Public Realm SPD.
4.13 Signs and Adverts	
• Please ensure that any planning permissions or guidance for display advertising follow the recommendations in the Neighbourhood Plan	No change, the SPD is in line with the development plan for Westminster (which include Neighbourhood Plan's). List of adopted neighbourhood plans and links have been added to the information sources

• Other cultural festivals (like Ramadan) are not fixed in the calendar. • There should be flexibility for install and switch on by a certain number of days allowance either side of the period.	No change. The wording of the conditions will allow for time for set up and removal.
• Current wording too restrictive for theatres. • Signage can be considered integral and recognisable element of design and character; SPD should be more positive about theatres signage. • Previous WCC Theatreland Strategy 2006 had greater flexibility and scope • SPD should provide examples of inappropriate signage	No change, the SPD does not discourage theatre signage but instead sets out the circumstances where internally illuminated signs may be appropriate, plus high-level and 3D signage. Providing Space examples of inappropriate public realm designs and schemes is unnecessary, as all schemes will be assessed based on their merits.
• Support for the wording in this section, as several advertisement applications are significantly impacting visual amenity.	Support noted.
• Guidance on banners is unreasonable, WCC has many listed buildings, and this would preclude banners from streets were all buildings are listed • It's not appropriate to apply heritage policy within this guidance, assessment of adverts/banners should be based on legal criteria (amenity and highway safety). • It's not always possible for temporary banners to be suspended from unlisted buildings or multifunctional street furniture, banners on listed buildings should be acceptable.	WCC's preference would be that banners were attached to unlisted, rather than listed buildings and structures. This is inline with the council's statutory obligation to protect listed heritage assets "Wherever possible" has been added to add flexibility to the guidance.
• Public Safety Impacts of Signs and Adverts Guidance needs to be in line with Camden's guidance on awnings.	Camden were invited to provide comment on the draft SPD wording. Minor modification made to guidance that anything projecting over the pavement should be set back to a minimum of 1m from the kerb edge, and that awnings should have a minimum clearance of 2.3m.
• References to A-boards on pages 156, 157 and 160 should also cover single boards mounted on moveable plinths.	References to A-boards refer to Portable Advertisements in general and give A-boards as an example. The guidance should still apply to single board advertisements. Minor modification has been made to include "or similar types of in-street advertisements"
• More rational allocation of kerbside space could reduce amount of highway space taken up by signs.	The allocation of kerb side space is covered in more detail in Chapter 4.1 Highway Space, Kerbside and Road Safety.
• All signs should be placed so as to avoid harm to the setting of listed buildings.	Agreed, guidance has been amended.
• Limiting buildings to one flag per building will impact several high-profile buildings. • Disallowing tethering has not been justified in the text	The current wording does not expressly disallow multiple flags, but instead the SPD presents best practice guidance. Furthermore, in some cases, planning permission will not be required (e.g. to raise a flag of any recognised nation, or diplomatic body of which the UK is a member). Further guidance on this has been added, see: https://www.gov.uk/government/publications/flying-flags-a-plain-english-guide/flying-flags-a-plain-english-guide. Agreed, justification has been added to the guidance.

• 'protect heritage assets' should be amended to 'Conserve and enhance the significance of heritage assets' to better align with planning policy.	Guidance has been amended
• The guidance should require that historic name plates are maintained, along with the need for their siting and style to inform the design of any new signs.	Guidance and context have been amended
• Support resistance to A-boards and other intrusive street ads • A-boards are a nuisance • People might be to deploy A-boards as part of a licensed tables and chairs scheme, so efforts should be made to align the two (licensing and planning) regimes.	Support noted A-boards cannot be placed under pavement licenses - this is explained in Chapter 8.1 Street Trading.
• Use of shrouds on major heritage assets under maintenance might be beneficial, as they offer better visual amenity than the exposure of construction activities • The guidance should reference the potential using of shrouds for short term public art	Guidance has been amended
• The vicinity of Piccadilly Circus and Leicester Square warrants treatment different to the wider borough when it comes to lit signage	No change. An area-based approach for digital screens would not be consistent with the overall scope of the SPD. Planning decisions will be guided by the site's context.
• SPD should provide more robust guidance that respects heritage but doesn't stifle innovation or prevent change. • Inconsistent planning decisions have resulted in confusion and thus a poor landscape of digital screens. • A coordinated and strategic approach on digital signage is supported by stakeholders.	Comments noted, we have amended the guidance to clarify the appropriate locations for digital screens and what supporting information would be relevant for planning applications. The council will keep this rapidly changing aspect of guidance under review.
Respondents raised concerns that were out of scope for the SPD: • Council should take a firm stance on advertisement applications (especially on historic buildings (such as reduce the amount of illuminated sign and condition them to turn off at 10pm) • Support the controlling A-boards but note that there appears to be little enforcement of the existing restrictions. • Support for the removal of redundant signs but note that past requests to remove redundant poles in our area have not been actioned. • Temporary signs for planning and highways notices are usually attached by single-use plastic cable ties and have an adverse visual impact on the streetscape.	These recommendations are out of scope for the SPD Restricting the number of illuminated signs in Westminster is beyond the scope of this SPD. It would not be practical to introduce a lights-out time throughout Westminster. Enforcement on the placement of A boards is out of scope for this SPD. Support noted. The SPD encourages reduction in clutter. The removal of said signs is out of scope for the SPD. Comments are noted, however materials used to hang temporary notices from the council is outside the scope of the SPD.

• Special policies for the area should be set out to allow the cinema industry to thrive while encouraging innovation • The reference to adhesive vinyls on street surfaces should be expanded to cover guidance the use of plain and coloured opaque vinyl in windows.	The SPD cannot introduce new policy areas. No change, vinyls on the inside of windows is not public realm and therefore out of scope for this SPD.
4.14 Public Art	
• Monuments should reflect the diversity of Britain's international history and the current ethnic diversity of Westminster borough.	Agreed, reference is made to the Commission for Diversity in the Public Realm work that the Greater London Authority was undertaking to enrich and add to the current public realm.
• Additional monuments erected into registered Parks and Gardens should not negatively impact the area or character of registered parks/gardens • There should be a presumption against development that will adversely impact the size or scale of any existing listed monument or its setting.	No change, this is reflected within the SPD through the Monument Saturation Zone (also in City Plan Policy 43). Applications for new statues and monuments within this zone will not normally be permitted. The area of concern consists of the five Royal Parks, and seven conservation areas.
• Support for detail within this section, and the importance placed on the role of art in public realm	Support noted
• Further clarification on C is needed- "art….behind gates will rarely be acceptable".	The guidance refers to art being unavailable to the public by being out of sight or inaccessible. This has been clarified through modifications to the text.
• The requirement to replace public art once removed is not being adhered to in certain areas of Westminster.	The SPD states that planning permission will usually be required for the removal of public artwork, and this will be resisted without an equivalent or greater public art contribution.
• Support the ten-year rule on memorials and the limit to one memorial per individual.	Support welcomed
• The SPD should encourage public realm schemes and new developments to reveal hidden heritage and archaeological remains through features like signage, paving, or artworks, enhancing the significance of conservation areas and visible heritage assets.	Modifications have been made to this section to highlight that public realm schemes can be designed to reveal hidden heritage stories.
Respondents raised concerns that were out of scope for the SPD: • Oxford Street, Park Lane, and hotels like the Hilton or Intercontinental are nationally important. A tourist tax such as that in Paris should be applied with exemptions in place for low-income groups. • Statues, Monuments and Memorials guidance could be extended to the naming of buildings and streets. Preference should be given to names which reflect the heritage of the area.	Implementing a tourist tax is beyond the scope of this SPD The naming of buildings and streets is not within the scope of the SPD. For further guidance please see the councils Street Naming and Numbering Guidelines (https://www.westminster.gov.uk/media/document/westminster-street-naming-and-numbering-guidelines).
4.15 Security	

Several respondents raised concerns about CCTV, these have been summarised: • The SPD should emphasise the importance of CCTV as a vital 24-hour security measure to prevent crime and anti-social behaviour, particularly in high-crime and high-density areas like Marylebone where population growth and new developments are increasing. • CCTV guidance in the SPD should be strengthened beyond the current minimal mention, and it should not discourage either public or private installation of CCTV networks.	The SPDs approach to security measures is the right security measures are to be applied in the right places and should be incorporated holistically into the design of a scheme. CCTV is one method of surveillance and where appropriate, the use of CCTV is supported where necessary.
• All commercial developments should be conditioned to provide CCTV	This is beyond the scope of the SPD.
• Welcome requirement for HVM applicants to demonstrate genuine need • Call for removal of HVM equipment (metal bollards) outside 1 Victoria Street, deemed no longer necessary due to the Department of Business, Energy and Industrial Strategy's relocation.	The SPD already provides guidance to reduce clutter in the public realm. Removal of specific HVM measures is beyond the scope of this SPD.
Section 5 Glossary	
Respondents requested the following words and phrases were either added to the glossary or expanded on further: • Frontage Zone • Kerb zone / pavement / footway • Archaeological Priority Area • Listed building • Conservation area • Registered Park and Garden • Listed building consent	Definitions have been added or enhanced for clarity, where needed.
Section 6 Information Sources	
• Include link to Centre for London's "Reducing Street Clutter in Central London	This has been included in Section 9.1 Information Sources.
• Respondents provided a list of location specific logistics hubs studies and reports	Noted, where relevant these have been included
Materials Palette Appendix	
• This palette may be appropriate for WCC spaces but for privately owned spaces alternatives may be more appropriate • Materials Palette should say that in some spaces more innovative approaches could be considered	Comment noted. The Materials Palette Guidance recommends materials for new public realm projects and maintenance, offering guidance and best practice rather than policy. The SPD has been amended to state that "Public realm design should be complementary across ownership".
• There is an ongoing problem of heavier vs lighter duty materials • Regarding appropriate construction materials, areas of special surface should be noted	Agreed. The Materials Palette already references need for the right materials to reflect their intended use, and the need to reinstate. Minor amendment have been made to the SPD text to reflect "materials (including subbase materials), fixing methods, and construction depths

	should be suitable for the planned purpose, based on thresholds, expected loading, existing ground conditions and expected frequency of groundworks"
• 2.1.1 and 2.2.2 conflict	Sentence has been amended to 2.1.2 Known sources of *sandstone* are
• The SPD should acknowledge that DfT guidance accepts the tactile surface may be provided in a colour that is in keeping with the surrounding material in conservation areas or in the vicinity of a listed building.	The SPD allows limited relaxation of colour requirements in conservation areas or near listed buildings, where appropriate, following discussions with vision-impaired groups, mobility specialists, and the council's conservation officers. In such cases, tactile surfaces may use colours that better match the surrounding materials.
• Plastic is not a material which is suitable for many locations in Westminster due to its aesthetic. It should be utilised only as a last resort.	Agreed. The SPD reflects this.
• The Materials Palette states 1:9 but in the SPD it states 1:12 (at page 39). This is confusing.	Agreed, the gradient text has been updated.
• Tone and role of the Materials Palette needs to be clarified, which spaces does it apply to? • It should not hinder innovative schemes coming forward at the right time	The Materials Palette Guidance seeks to provide recommended materials for use in new public realm projects and maintenance schemes. Together with the main SPD it provides guidance and best practise, rather than policy. Future innovations will be considered on their own merits.
Inclusive Design Guidance	
• Disappointed with the range of groups represented and attending workshops, could have involved those with disabilities that use Westminster Adult Education Service • Were amenity groups represented or Neighbourhood Forums? • Suggest a user advisory group be established provided with training and accreditation to act and eyes ears and mouthpiece for protected categories.	Comments noted. The Inclusive Design Guidance was informed by two workshops with representatives of protected groups to explore ways to enhance inclusivity and accessibility in Westminster's public realm. While these workshops did not include Neighbourhood Forums or Amenity Societies, their input was gathered through separate events. The guidance also drew on a comprehensive review of national and local inclusive design and accessibility standards.

5 Appendices

5.1 Council email to consultees

----- Original message-----

From: "Planning Policy: WCC" <planningpolicy@westminster.gov.uk>

Subject: Westminster's Streets and Spaces – Public Realm Guidance Supplementary Planning Document Notice of Public Consultation

Date: Monday, 7 October 2024 10:53 AM

Westminster's Streets and Spaces – Public Realm Guidance Supplementary Planning Document

Notice of Public Consultation

Westminster City Council is undertaking formal consultation on an updated Public Realm Supplementary Planning Document (SPD) for Westminster. This document builds upon policies within Westminster's local development plan and provides guidance to help shape and improve the public spaces between and around buildings, including alleyways, streets, squares, parks, and other open spaces. This guidance aims to steer development in delivering public realm that is accessible, inclusive, and ensures that all members of society can participate, use, and enjoy our public spaces.

The document has been developed collaboratively with members of the community. In early 2023, the council conducted informal engagement with key stakeholders and community groups, which helped shape this consultation draft. We have now reached the final stage of consultation prior to adoption, and we welcome your feedback to ensure the document is robust and fit for purpose. This consultation is running from **7 October to 18 November 2024**.

At this stage, we want to know:

- Whether there are major concerns and potential issues with the guidance
- Whether the SPD is accessible, easy to understand and use
- Whether any guidance has been missed or needs further explanation
- Any other thoughts or ideas on the content of the draft document

Click here to read the full SPD and view our Summary Guide

Representations can be made using our consultation webpage on Commonplace, by email to planningpolicy@westminster.gov.uk or in writing to: City Planning Policy, Innovation and Change, Westminster City Council, 17th Floor, 64 Victoria Street, London, SW1E 6QP. If being sent by email or in writing, representations should be clearly labelled 'Public Realm SPD – response to consultation'.

The council will also be hosting an in-person drop-in event as part of the consultation. Click here to find out more.

Thank you for taking part!

Planning Policy Team

Westminster City Council
17th Floor
64 Victoria Street
London SW1E 6QP

Email:planningpolicy@westminster.gov.uk
www.westminster.gov.uk

Any views or opinions expressed in this email are those of the sender, and whilst given in good faith, do not necessarily represent a formal decision of the Local Planning Authority unless a statutory application is or has been made and determined in accordance with requisite procedures, planning policies and having had regard to material considerations.

5.2 Commonplace email to consultees

News on Westminster's Streets and Spaces - Public Realm Guidance SPD for Westminster

Back to news

Have Your Say: Westminster City Council Seeks Input on Public Realm SPD

Westminster City Council is undertaking formal consultation on the new draft Public Realm Supplementary Planning Document (SPD). This consultation aims to gather insights from a wide range of stakeholders, including residents, consultants, visitors, community groups, and business owners, to shape the final version of the document.

We are inviting feedback on the 15 chapters on the SPD, and two accompanying documents (the Materials Palate and Inclusive Design Guidance).

Your feedback is crucial!

Your input will directly influence the final draft of the Public Realm SPD, enabling the council create a document that improves the quality of the public realm, drives sustainability and creates a cleaner, healthier, more inclusive environment for all.

To take part, please head to our Commonplace page and complete a survey. If you have a prewritten response or evidence to show us, you can upload a PDF in the survey on Commonplace as well!

Share your thoughts with us today!

5.3 Council's website

Upcoming Supplementary Planning Documents (SPDs)

This page contains information on forthcoming supplementary planning documents (SPDs).

Public Realm SPD

We are developing an updated Public Realm Supplementary Planning Document (SPD) for Westminster. This is to replace the 2011 'Westminster Way' SPD and other Supplementary Planning Guidance (SPGs) documents which were revoked following adoption of the City Plan in 2021.

The new SPD provides an opportunity to update the existing framework and reflect changes in our approach to public realm, and political priorities. It has a broader scope than the previous guidance containing key principles and guidance intended to support the implementation of City Plan policies across the City up to 2040.

Consultation

We are currently undertaking a six-week consultation, running from Monday 7 October to Monday 18 November 2024.

This is a formal first step to provide opportunities for everyone to have an input on the content and presentation of the draft document and its appendices, with a view of ensuring that the guidance is robust, accessible, easy to understand and easy to use.

We are asking respondents to:

- identify any issues with the guidance
- feedback on the documents usability and readability
- highlight if there is anything missing or unclear

How to take part?

There are 15 chapters covering different areas concerning the Public Realm and two documents in the appendices, the Materials Palette and the Inclusive Design Guidance. Each guidance chapter and the two appendices have been given their own surveys on Commonplace so respondents can comment on specific guidance areas.

To take part, visit our Public Realm SPD consultation page

Consultation documents can be viewed below.

We received a wide range of responses to the original consultation with the topic areas generating the most comments being affordable housing, affordable workspace, employment and skills, carbon off-setting and viability. Respondents also asked the council to publish the evidence underpinning the SPD guidance, including up to date viability evidence. That's why we are also now publishing our key supporting evidence:



Affordable Workspace Evidence Base (WCC, July 2023)
PDF, 840.1 KB, 18 pages

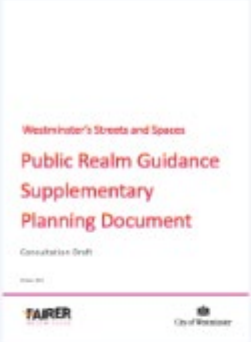


Delivering Net Zero (July 2023)
PDF, 8.57 MB, 317 pages



POAH SPD EqIA (July 2023)
PDF, 782.68 KB, 55 pages

Core documents



Westminster Streets and Spaces, draft public realm SPD
PDF, 10.87 MB, 181 pages



Materials Palette (Appendix 1)
PDF, 1.73 MB, 27 pages



Inclusive Design Guidance (Appendix 2)
PDF, 5.85 MB, 189 pages

Supporting documents



Public Realm equalities impact assessment (EqIA)
PDF, 1.05 MB, 25 pages



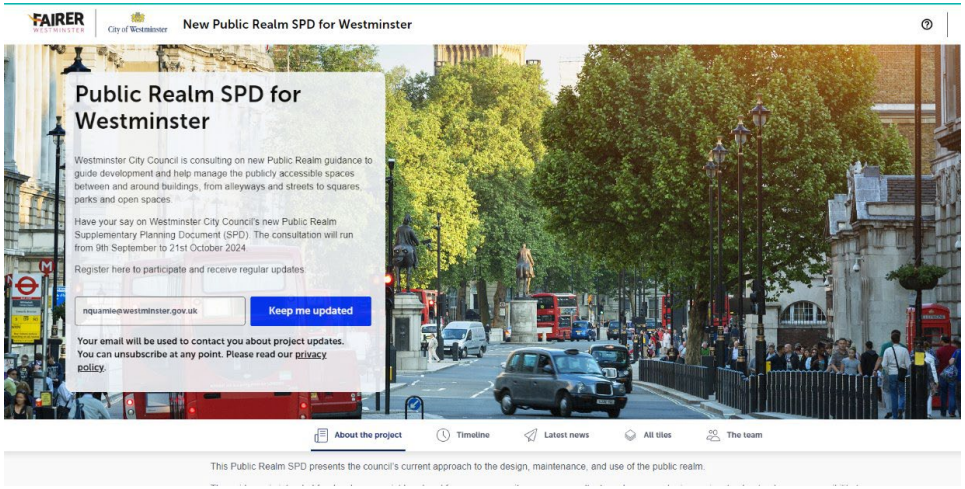
Public Realm SPD summary guide
PDF, 243.97 KB, 13 pages

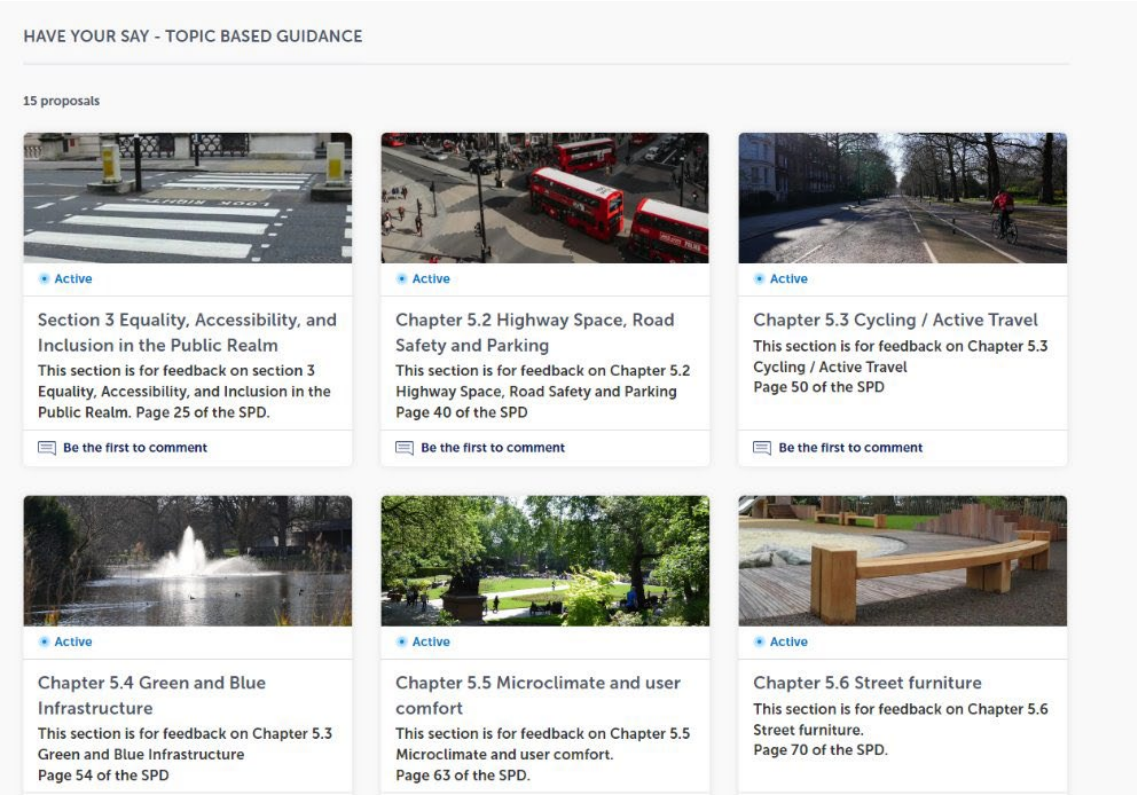
What happens next?

Following the consultation, we will:

- Review and analyse all comments submitted.
- Produce a consultation statement, setting out the main issues raised and how comments were considered.
- Amend the SPD, where appropriate, reflecting on points raised during consultation.
- Seek to adopt the SPD through a cabinet member decision. The final SPD will be submitted to cabinet members for adoption and if approved, the SPD will be considered as a material consideration when making planning decisions.

5.4 Screenshots of Commonplace





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Answer the survey

What is your name? (survey responses without this field populated are not valid)

First name and Last name or Name of organisation

Are you answering as a...

Select one option

- Resident/Individual
- London Borough
- Community Group
- Charity / Voluntary organisation
- Statutory consultee
- Amenity Society
- Councillor
- Business
- Neighbourhood Forum
- Consultant

To which part of Chapter 4.4 does your response relate? (Please specify the section heading, paragraph, box or image within the chapter).

Are you satisfied with this section?

Select one option

- Yes
- Neutral
- No

If you answered yes, please comment your support

If you answered no, please explain why you are dissatisfied

Do you have any other comments or suggestions?

e.g. Do you think anything is missing from this section?

Have a written representation, additional evidence or supporting information to share? Please upload a PDF below.

Upload a file

Please only upload content that you have permission to use.

File size limit: 40 MB

Drop files to upload

Browse files

Supported files

.JPG, .JPEG, .PNG, .PDF

Thank you for your feedback.

Click 'Next' to submit this form and comment on another chapter of the SPD or an accompanying document.

Back

Next

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5.5 Posters and flyers

Posters / flyers



A5 Leaflet

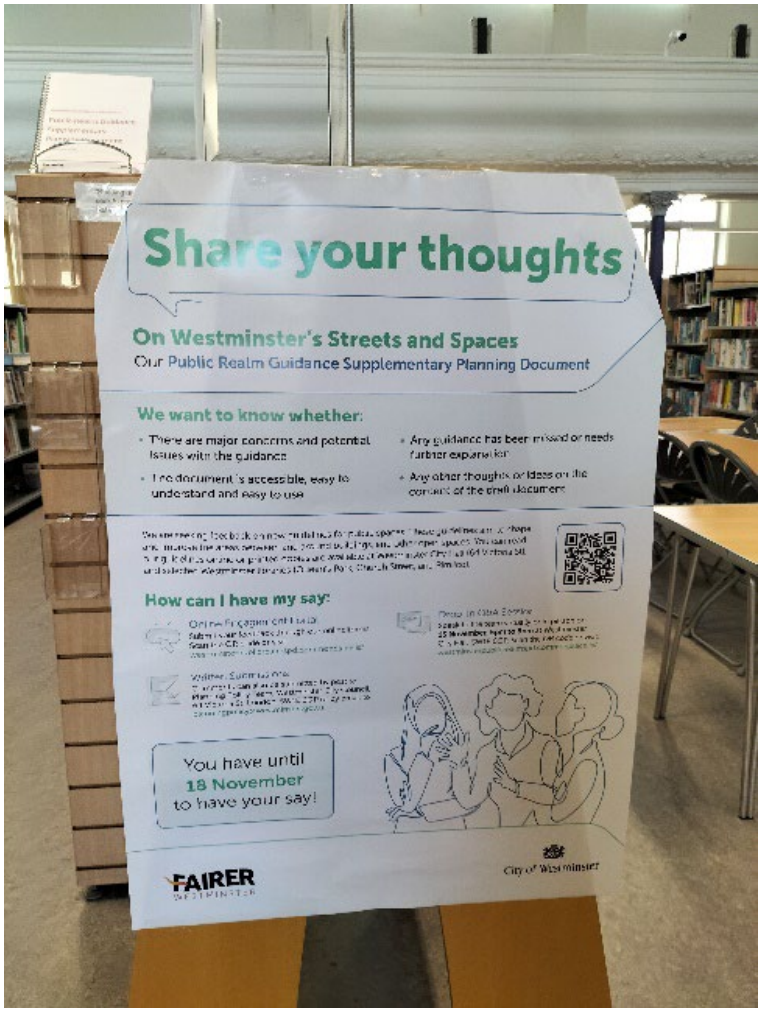


A1 Poster

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Example of library displays





Maida Vale Library Display

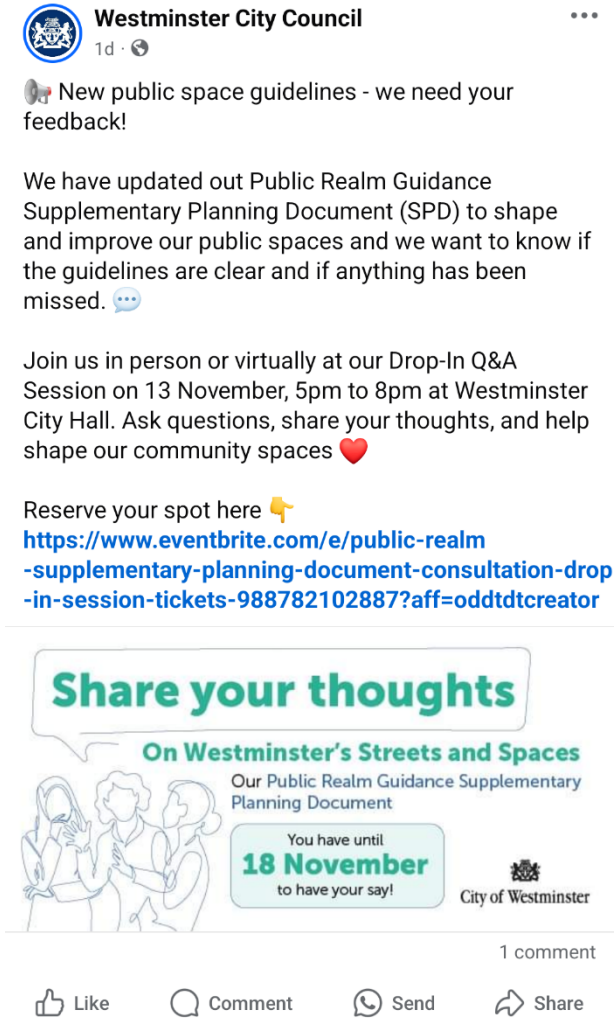
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5.6 Social media posts and Newsletter articles



LinkedIn



Facebook

FAIRER WESTMINSTER

City of Westminster



Instagram

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City of Westminster

Date	Newsletter	Article Text
16 October	Dedicated	Share your thoughts on our new Public Realm Guidance Supplementary Planning Document (SPD). Tell us what you think by 18 November. We are excited to announce the launch of a public consultation on the new Public Realm Guidance Supplementary Planning Document (SPD).. This is your opportunity to help shape the future of Westminster's streets and spaces, including parks, squares, and alleyways. Our goal is to improve the spaces between and around buildings, making them more accessible, attractive, and sustainable for all. From enhancing pedestrian walkways to creating more green spaces, these new guidelines aim to make Westminster a better place for everyone. However, we need your feedback. We need your input to ensure that these guidelines reflect the needs of our community - we're particularly interested in hearing if you think the document is clear and easy to use, if there are any gaps in the guidelines, or if any major issues stand out to you. You can check out the new guidelines using the link or QR code below. Printed copies will also be available at Queen's Park, Church Street and Pimlico Library. **How can I have my say?** **Online:** Submit your feedback through our online forms. Share your thoughts by 18 November: https://westminsterpublicrealmspd.commonplace.is/ **Drop-In Q&A Session:** Speak to the team virtually or in person on 13 November, 5pm to 8pm at Westminster City Hall, SW1E 6QP Reserve your spot: https://westminsterpublicrealmspd.commonplace.is/ **Write to us:** Comments can also be submitted by 18 November via post to Planning Policy Team, Westminster City Council, 64 Victoria St, London, SW1E 6QP or via email to planningpolicy@westminster.gov.uk
18 October	MyWestminster	Have your say on Westminster's public spaces

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		Our new Public Realm Guidance Supplementary Planning Document (SPD) has been developed to enhance the spaces between buildings — including streets, parks, and open areas. We want to ensure the guidelines are not only comprehensive but also easy to understand and use. You can review the document online or pick up a printed copy at Queen's Park, Church Street, or Pimlico Library, and if you think certain parts could be simplified or need more explanation, now's your chance to let us know. Read the new guidelines and let us know what you think by 18 November:
24 October	Business newsletter	Have we missed something in our new guidelines? Our Public Realm Guidance Supplementary Planning Document (SPD) aims to improve public spaces across Westminster and your feedback will help identify any gaps in the guidelines. Whether it's an important detail we've missed or areas that need further explanation, your input will ensure the final document is accessible to all. Your suggestions will be crucial in shaping the future of Westminster's public spaces, so don't miss the opportunity to contribute. Check out the new guidelines and share your feedback by 18 November: https://westminsterpublicrealmspd.commonplace.is/

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5.7 List of respondents

ID	Channel	Name	Respondent type
1	Commonplace	Individual #1	Individual
2	Commonplace	Individual #2	Individual
3	Email	Individual #3	Individual
4	Email	Transport for London	Statutory consultee
5	Commonplace	Individual #4	Individual
6	Commonplace	Individual #5	Individual
7	Commonplace	Individual #6	Individual
8	Commonplace / Email	Portland Village Association	Neighbourhood Forum, Amenity Society or Resident's Association
9	Commonplace	Individual #7	Individual
10	Commonplace	n/a	Charity, campaign groups and other clubs/association
11	Commonplace	Individual #8	Individual
12	Commonplace	Mayfair Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
13	Commonplace	Individual #9	Individual
14	Commonplace	Individual #10	Individual
15	Commonplace	Individual #11	Individual
16	Commonplace	Individual #12	Individual
17	Commonplace	Individual #13	Individual
18	Commonplace	Individual #14	Individual
19	Commonplace	Individual #15	Individual
20	Commonplace	Individual #16	Individual
21	Email	Westminster Tree Trust	Charity, campaign groups and other clubs/association
22	Email	Churchill Gardens Interim Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
23	Email	Knightsbridge Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
24	Commonplace	Individual #17	Individual
25	Commonplace	Paddington Residents Active Concern on Transport	Neighbourhood Forum, Amenity Society or Resident's Association
26	Email	J&L GIBBONS	Consultancy firm and professional network

27	Email	Environment Agency	Statutory Consultee
28	Email	Sport England	Statutory Consultee
29	Email	The Knightsbridge Association	Neighbourhood Forum, Amenity Society or Resident's Association
30	Email	Cross River Partnership	Charity, campaign groups and other clubs/association
31	Commonplace	Individual #18	Individual
32	Email	TfL Spatial Planning	Statutory Consultee
33	Email	Individual #19	Individual
34	Email	Seven Dials Trust	Neighbourhood Forum, Amenity Society or Resident's Association
35	Commonplace	Individual #20	Individual
36	Commonplace	Individual #21	Individual
37	Commonplace	Individual #22	Individual
38	Commonplace	Confederation of Passenger Transport UK (CPT)	Business and trade association
39	Commonplace	Soho Business Alliance Ltd	Business and trade association
40	Commonplace	Individual #23	Individual
41	Email	The Marylebone Association	Neighbourhood Forum, Amenity Society or Resident's Association
42	Email	Port of London Authority	Business and trade association
43	Email	Marble Arch London BID and The Paddington Partnership	Business and trade association
44	Email	The Howard de Walden Estate	Developers, landowners and real estate company
45	Email	New West End Company	Business and trade association
46	Email / Verbal	Central London Freight Quality Partnership (CLFQP)	Charity, campaign groups and other clubs/association
47	Commonplace	Swift Conservation	Charity, campaign groups and other clubs/association
48	Commonplace	Individual #24	Individual
49	Commonplace	The Guide Dogs for the Blind Association	Charity, campaign groups and other clubs/association
50	Commonplace	Theatres Trust	Statutory Consultee
51	Commonplace	Individual #25	Individual
52	Commonplace / Email / Verbal	Soho Society	Neighbourhood Forum, Amenity Society or Resident's Association
53	Commonplace	David Taylor	Business and trade association

54	Commonplace	Exhibition Road Cultural Group	Charity, campaign groups and other clubs/association
55	Commonplace / Email	Daniel Rinsler & Co (on behalf of 5 Hertford Street Ltd)	Business and trade association
56	Email	Canal & River Trust	Statutory consultee
57	Email	Westminster Property Association	Business and trade association
58	Email	London Historic Parks & Gardens Trust	Charity, campaign groups and other clubs/association
59	Email	Individual #26	Individual
60	Email	Covent Garden Area Trust	Charity, campaign groups and other clubs/association
61	Email	Grosvenor	Developers, landowners and real estate company
62	Email	Covent Garden Community Association	Neighbourhood Forum, Amenity Society or Resident's Association
63	Email	Places for London (TfL)	Developers, landowners and real estate company
64	Email	Fitzrovia West Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
65	Email	Tate Gallery	Charity, campaign groups and other clubs/association
66	Email	The Queen Anne's Gate Residents' Association	Neighbourhood Forum, Amenity Society or Resident's Association
67	Email	Notting Hill East Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
68	Email	Historic England	Statutory consultee
69	Email	Victoria Neighbourhood Forum	Neighbourhood Forum, Amenity Society or Resident's Association
70	Email	London Heritage Quarter	Business and trade association
71	Email	Heart of London Business Alliance	Business and trade association
72	Email / Verbal	Shaftesbury Capital	Developers, landowners and real estate company
73	Verbal	Neighbourhood Watch Queensway/Lancaster Gate area	Charity, campaign groups and other clubs/association
74	Verbal	Harley Street BID	Business and trade association

Planning Policy Team

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