

City of Westminster – Core Strategy Submission Draft Examination

Inspector’s Draft Matters and Issues for Examination

Matter 1: Parts I and II, and General Approach

Issue: Whether Parts I and II of the Core Strategy (CS) set out a vision and strategic objectives appropriately, focussing on the key issues for the City of Westminster to address over the plan period? Whether the general approach of the DPD is consistent with the nature of CSs given in PPS12?

1. Planning Policy Statement 12: Local Spatial Planning (PPS12) describes the nature of core strategies in section 4. Do the early chapters of the CS accord with paragraphs 4.1-4.3 on setting a vision and strategic objectives? Are the context, issues and challenges which are described correct and balanced?
2. Is the Government Office for London (GOL) correct that the CS contains too many development management policies which detract from the positive policies and would be more appropriate in a future Development Management DPD? GOL referenced Policies CS18-23, 28-31, 32-41? Is CS1 also a DM policy?
3. What precisely is the time horizon of the CS, and does it accord with para 4.13 of PPS12 which states that it should be at least 15 years from the date of adoption? How does this relate to paragraph 2.36 on employment, 2.38 on West End Special Retail Policy Area, and 2.40 Housing Trajectory, which all address different and generally shorter time horizons?
4. Should the sub-section, Westminster’s Spatial Strategy (Page 19 onwards) include an over-arching policy which outlines the way forward for the next 15 years?
5. If an over-arching policy were added, should it make clear what the priorities will be for housing and commercial development in the principal different parts of Westminster over the plan period?
6. GOL also queried whether there were sufficient references to the evidence base in the CS, commenting that there was only one reference to the Sustainability Appraisal? Are all policies underpinned by evidence, and are links sufficiently clear in the CS?
7. Are the Central Activities Zone (CAZ), the Special Policy Areas in Policy CS2, the Opportunity Areas (CS3-5), the Core CAZ (Policy CS6), and the other locations covered by Policies CS7-13 to be regarded as “strategic sites” as described in PPS12, 4.6 and 4.7?
8. Are all the detailed boundaries adequately justified, having regard for the London Plan eg. Policy 5G.1 (CAZ) and paragraph 2.13 (Opportunity Areas)? Have all been reviewed as part of the CS planning process?
9. Has the risk described in paragraph 4.7 of PPS12, that site specific detail can date too quickly for a plan which should have a life span of 15 years or longer, been fully assessed? Will the CS be sufficiently flexible to deal with likely future change?
10. And is paragraph 4.11 of PPS12 satisfied (the specific infrastructure requirements of any strategic sites should be included in the CS)?

City of Westminster – Core Strategy Submission Draft Examination Matter 2: Part III Local Spatial Strategies

Issue: Whether the extent, character and function of the Central Activities Zone (CAZ) are clearly defined, and whether Policies CS1 onwards will contribute properly to meeting the objectives for the growth and prosperity of the CAZ, as set out in the London Plan.

1. Is Part III consistent with PPS4: Planning for Sustainable Growth with particular reference to its Policies EC3, EC4 and EC5?
2. Do Policies CS1, CS6 and CS7 adequately reflect the perception of and ambitions for the CAZ contained in Policies 5G.1 – 5G.5 of the London Plan?
3. Is the prominence given to securing residential floorspace consistent or inconsistent with the London Plan aims?
4. Is the CS sufficiently clear how extensive the CAZ is within Westminster; that it contains Marylebone and Fitzrovia (Policy CS8) and the Royal Parks (Policy CS11) as well as the core areas? Is it right that commercial uses should be considered appropriate across the CAZ, and the definition of character areas must not introduce inflexibility or restrain economic development?
5. In Policy CS1, have the thresholds of 200sqm and 400sqm been justified by robust and credible evidence, and if so, where can this be found?
6. Is the policy restrictive and potentially onerous for developers, with particular reference to the development of Higher Education; provision of new medical facilities; D1&D2 assembly and leisure uses; and given the existence of other constraining factors such as heritage status and sustainable building requirements?
7. Is the policy sufficiently robust given the recent economic downturn, and should it make reference to viability considerations?
8. Does Policy CS1 provide sufficient detail as to what type of development proposals will be subject to it, and when or where land use swaps or residential credits (as referenced in the supporting text), might be permitted in place of on-site provision of residential accommodation?
9. Is Policy CS2 justified or should market forces and the changing requirements of occupiers determine the best way forward for the Special Policy Areas?
10. Are all the Special Policy Areas appropriately described and is their designation under-pinned by up-to-date evidence as to their suitability for protection/specialist development, with particular reference to Portland Place, Harley Street, St James's?
11. Is Policy CS6, which encourages large-scale retail development in the West End International Shopping Centre's primary shopping frontage, sound or should a range of shop sizes there be sought?
12. Does Policy CS6 address the development or enhancement of cultural functions including theatres in the CAZ satisfactorily?
13. Is Policy CS6, with the limitations on new entertainment uses in the West End Stress Area, justified or is it too inflexible?

14. Should the more flexible approach to providing residential floorspace at the eastern end of Oxford Street, as signalled in Policy CS7, be extended to other parts of the West End, in the light of the recent economic downturn?
15. Is there a case, based on promoting vitality and viability, for permitting some A2, A3 and A4 uses on the primary shopping frontages within the West End SRPA (Policy CS7 supports A1 uses)?
16. On oases of rest and Policy CS7, should the policy go further by supporting 'swaps' of some bars and pubs for higher quality outlets?
17. Paragraph 3.43 and Policy CS9 refer to "a Strategic Cultural Area" designation. Please explain the status.
18. Is the Core Strategy sufficiently supportive of future development at Chelsea Barracks? Or, do Policies C20 and CS13 provide unreasonable constraints?
19. Should Policy CS10 for Pimlico be written on similar lines to Policy CS12 for the North Westminster Economic Development Area, to ensure that the Core Strategy addresses problems arising from deprivation in parts of Pimlico? Is it right that the Victoria Opportunity Area's development offers potential regeneration benefits to the neighbouring Pimlico area and should this be explained in the DPD?
20. What does the CS expect to deliver for the CAZ over the plan period? (PPS12 paragraphs 4.1 and 4.4 expect the delivery strategy to be central to the CS, and to set out how much development should happen, where, when and by what means it will be delivered).
21. Are there clear arrangements for managing and monitoring the delivery of the CAZ policies?

**City of Westminster – Core Strategy Submission Draft Examination
Matter 3: Paddington, Victoria and Tottenham Court Road Opportunity
Areas**

Issue: Whether the Core Strategy sets out appropriate policies for these areas, in general conformity with the London Plan, which will deliver the desired levels of growth and regeneration.

1. On Policies CS3, CS4 and CS5 for the Opportunity Areas, is it clear what (how much, where and when) the CS is promoting for each of the Opportunity Areas over the plan period, as distinct from what has already been achieved? How will the development of these areas be phased? Can critical supportive infrastructure be delivered and funded?
2. If the Replacement London Plan were taken forward, would the CS policies for the Opportunity Areas be in general conformity?
3. Should Policy CS3 for the Paddington Opportunity Area (POA) refer to the Grand Union Canal and Paddington Basin, and their integration with new development in the locality? Should the Royal Mail site be included in the POA?
4. Is the final paragraph referencing the policy for tall buildings justified?
5. On Policy CS4, should the Victoria Opportunity Area be extended to include Stockley House, to give a higher housing target and a more relaxed position on tall buildings?
6. Is there conflict in Policies CS4 and CS5 between the first sentence "At least 1,000 new homes ..." and later statements which permit more flexibility? Could these conflicts harm effectiveness?
7. Should the Tottenham Court Road Opportunity Area (CS05) be extended as proposed by Noved Investment Company to achieve a more comprehensive mixed use masterplan?
8. Is Policy CS5 achievable, and is it under-pinned by capacity assessment and an audit to confirm that supportive social infrastructure (education, health care, public open space etc) can be provided?

**City of Westminster – Core Strategy Submission Draft Examination
Matter 4: Part 1V, Policies 14 to 17 - Housing Provision**

Issue: Whether the Core Strategy promotes an appropriate level of new housing which is evidence-based, capable of delivery and flexible.

1. How much new housing development will the Core Strategy provide between adoption and 2025/26 (ie. for a 15 year period)?
2. Does the Core Strategy satisfy paragraph 53 of PPS3. In particular:
 - Is the level of planned housing development in general conformity with the London Plan?
 - Has the Council had regard for the level proposed in the emerging Consultation Draft Replacement London Plan (770 dwellings per annum) and can it meet this target?
 - Does Policy CS14 set out the policy for new housing development in an unambiguous and credible manner? Paragraph 2.40 of the Core Strategy suggests that housing is a priority land use for delivery, but does Policy CS14 reflect this priority and demonstrate that the Council will proactively promote the desired level of new housing development?
 - Should Policy CS14 clarify those parts of the City wherein residential use may not be a priority (eg, Core CAZ, Opportunity Areas?)
 - Does Figure 38 provide reassurance that the Core Strategy will deliver at least 680 dwellings per annum as suggested in the accompanying text?
 - Does Figure 12 Housing Trajectory (and paragraph 2.40) improve understanding of the programme for housing delivery? What numbers exactly are included in it?
 - What evidence is there that continuous delivery of housing for at least 15 years from the date of adoption will take place?
3. Are there sufficient specific deliverable sites to provide the required level of new housing over the first 5 years from the likely date of adoption of the DPD, as expected by PPS3 paragraph 54? (See Rolling Land Supply for Housing 2009 [CS/EB/32])
4. Has the Council undertaken all the steps outlined in paragraph 55 of PPS3 and, if so, should these be reflected more fully in the Core Strategy? Does the DPD satisfy PPS12, paragraphs 4.1(3) and 4.5 on making clear spatial choices about where development should go within the Borough?
5. Is the third paragraph of Policy CS14 sufficiently flexible for circumstances where existing residential accommodation is sub-standard, or where listed building status may make a reduction in the number of units the 'optimal' solution?
6. Is the Core Strategy sufficiently clear as to how much new housing development is likely over the plan period in the Opportunity Areas? Policies CS3, 4 and 5 cover a historical period from 2001 and imply much larger numbers than are given in paragraph 4.4.
7. A major challenge for the Central Activities Zone is outlined in paragraph 2.27 of the Core Strategy, that single-office developments are preferred to

mixed use with housing development. How much new housing development is planned for the CAZ, and how will the Council ensure that housing targets are achieved there?

8. Is the approach to windfall housing development described on Page 70 and Appendix 4 of the Core Strategy consistent with PPS3, paragraph 59, and fully justified?
9. Strategic Objective 4 (Page 17 of the DPD) seeks to increase the supply of good quality housing across all parts of the city to meet Westminster's housing target. Do the policies and proposals in respect of housing demonstrate that this objective can be met?
10. Is the Core Strategy flexible; is it promoting plan, monitor and manage adequately? Page 139 identifies a risk to housing delivery and Page 143 provides a key indicator for new homes under Objective 4, but what action will be taken (and when) if housing completions do not occur as expected or sites do not come forward?

Issue: Whether the Core Strategy provides appropriately for affordable housing provision, and meeting the accommodation needs of gypsies and travellers? Whether Policy CS15 is likely to promote an appropriate mix of housing.

1. On Policy CS15, should hostels and Houses in Multiple Occupation be given protection having regard for the likely level of demand (eg some hostels for nurses may no longer be needed), or impact on neighbouring residential accommodation (some HMOs)?
2. Should student housing be regarded as specialist housing and its provision be encouraged in order to free up the private-rented sector to help meet local housing needs – should the CS acknowledge this and promote student housing?
3. Affordable Housing Evidence [CS/EB/01] provides information on past affordable housing completions. Westminster Housing Strategy, 2007-12, provides figures to deliver 700 new affordable homes 2007-10 (Page 23). How do these figures correlate?
4. What progress has been made towards achieving the target of 598 affordable dwellings, 2008-11, as referenced on Page 75 of the CS?
5. Do the targets in Policy CS16 for affordable housing (at least 22% by 2012 and 30% thereafter) reflect assessment of likely economic viability of land for housing, taking account of risks to delivery and the likely levels of finance available for affordable housing (as advised in PPS3, paragraph 29)?
6. Should the policy make clear that viability will vary on a site by site basis, and that some individual sites may not be able to afford to provide the target level of affordable housing?

7. Is the threshold in Policy CS16, of either 10 or more additional units or over 1,000sqm floorspace, demonstrably viable and practicable, having regard to the DTZ report [CS/EB/02]?
8. Does the approach to off-site affordable housing provision accord with PPS3, paragraph 29, which refers to 'the presumption' that provision will be made on site, but states that it may be made off-site where it can be robustly justified and would contribute to the creation of mixed communities?
9. Should more be written about financial contributions and the off-site delivery options?
10. Has the Council considered setting separate targets for social rented and intermediate affordable housing, and should the CS address this distinction more fully?
11. Should Policy CS17 be updated to be in general conformity with the consultation draft replacement London Plan, which shows provision of two gypsy and traveller pitches within the Borough, 2007-17? Is Policy CS17 too restrictive bearing in mind the approach sought in Circular 1/2006: Planning for gypsy and traveller caravan sites, in particular that core strategies should contain criteria-based policies which "must be fair, reasonable, realistic and effective in delivering sites"?

City of Westminster – Core Strategy Submission Draft Examination Matter 5: Business and Employment

Issue: Whether Policies 18, 19 & 21-23 of the Core Strategy (CS) are sufficiently supportive of economic growth and prosperity recognising the limitations to what can realistically be achieved in the context of the already intensively built-up area.

1. Should Policy CS18 be written more positively: is it out of line with PPS4 and the London Plan's approach to planning for the CAZ ?
2. Since PPS4 considers new commercial development in town centres to be acceptable, is Policy CS18 inconsistent with national policy, and unreasonably placing the burden of proof on the developer?
3. Policy 3B.2 of the London Plan states that the Mayor seeks a significant increment to the stock of offices. Has the CS had regard for this policy?
4. Should paragraph 4.28 of the CS refer to the draft London Plan figure of 12sqm per worker, 2009?
5. Does Policy CS19 cover all the areas where substantive new office development should be encouraged? Should the policy also refer to seeking the highest quality of new floorspace?
6. Is there evidence-based justification for provision of workshops and studios in conjunction with office space? Is it clear where they would be considered appropriate? Has viability been considered, especially in the context of achieving mixed use development, high quality design, sustainable buildings etc?
7. Should this section of the CS encourage small and medium enterprises directly, recognising their potential regeneration benefits, ability to create jobs at low cost etc?
8. Does Policy CS21 address the protection and enhancement of the world class theatres, museums and concert halls in Westminster adequately?
9. Is Policy CS22 in general conformity with London Plan Policy 3D.7 which seeks to provide some 40,000 additional hotel bedrooms and improve the quality, variety and distribution?
10. Is it right to seek to separate hotel development from residential areas, and has CS22 highlighted the right areas for new hotels; is it clear how "a predominantly residential character" will be defined?
11. Is Policy CS23 appropriate, or should it refer principally to discouraging new entertainment uses in the defined Stress Areas for developments of the largest scale? Or, should it be more restrictive, in particular to protect the core of St James's area?

**City of Westminster – Core Strategy Submission Draft Examination
Matter 6: Part V, Creating Places, Policies 24 to 27**

Issue: Whether the Core Strategy's policies for heritage, views and design are consistent with the promotion of high quality inclusive design.

1. PPS5: Planning for the Historic Environment was published in early 2010. It uses the term "heritage assets" which also features in Policy CS24. Is the CS broadly consistent with the new PPS?
2. Having regard for the Planning (Listed Buildings and Conservation Areas) Act 1990, 16(2) and 72(1), should Policy CS24 refer to "preserving or enhancing" its listed buildings, conservation areas etc?
3. Should Policy CS25 be more locally distinctive and indicate better how the Westminster World Heritage Site is to be treated in the LDF?
4. Should there be a policy referring specifically to tall buildings and listing the criteria which would be used to assess whether or not such buildings would be acceptable?
5. Are the effects across Borough boundaries given sufficient consideration? How might development of the Vauxhall, Nine Elms, Battersea Opportunity Area affect Westminster? Does the Borough work with neighbours, eg via the London View Management Framework, as suggested by the GLA?
6. Is Policy CS25 in general conformity with the London Plan's Policy 4B.9 on tall buildings; is the statement that "Westminster is not generally appropriate for tall buildings" founded on robust and up-to-date evidence? Is it recognised that tall buildings could make a positive impact on views and townscape?
7. Should Part 5, and Policies CS24 and CS25 make more direct references to the Royal Parks?
8. Does Policy CS27 add anything to national and London Plan policy? Would it be more locally distinctive and effective if it included details of design principles? Should it acknowledge the need for sustainable development to be viable, in accordance with PPS1: Climate Change Supplement?
9. Should Policy CS28 refer to 'Safer Places and Secured by Design' to make it robust?

City of Westminster – Core Strategy Submission Draft Examination Matter 7: Transport and other Infrastructure

Issue: Whether the Core Strategy is underpinned by good infrastructure planning, including transport.

1. Is the CS in general conformity with the London Plan in respect of planning obligations for transport improvements, in particular to support the development of Crossrail? Should the CS be changed in any or all of the following ways, as suggested by Transport for London (TfL):
 - By the addition of a general policy on transport-related planning obligations, to include contributions for public transport, cycling and walking
 - By making clear that contributions will be needed for Borough-wide measures and for site-specific works
 - By making a clear distinction as to what could be funded from CIL and more traditional planning obligations
 - By making explicit the requirement for contributions to Crossrail, in line with the draft replacement London Plan and forthcoming SPD? The Mayor's letter to WCC dated 31 3 10 proposed additional text in the reasoned justification for Policy CS42 with a reference to SPG-Use of planning obligations in the funding of Crossrail. In addition, please note that Crossrail is mentioned specifically in the DCLG's Community Infrastructure Levy – An overview, March 2010.
2. Should Policy CS40 set out the requirements for transport assessments and travel plans for large scale developments, and define the threshold for 'large scale'?
3. Should Policy CS40 refer to the protection of existing facilities for river transport, in accordance with the London Plan Policy 4C.7, and Policy CS41 to its use for servicing and deliveries (Policy 4C.8)?
4. Should Policy CS41 promote the uptake of Construction Logistics Plans and Delivery and Delivery & Servicing Plans, in line with the London Freight Plan, Nov 2007?
5. Should Policy CS42 refer more specifically to support for upgrade to main line rail station at Victoria; to improvements in underground line capacity, for Cycle Superhighways, the Mayor's Cycle Hire Scheme, Legible London and to improvements in local bus and taxi infrastructure, and to coach infrastructure?
6. Should the reference to 'Cross River Transit' be removed if it is no longer in the TfL Business Plan to 2017/8?
7. Should a general policy be added on safeguarding land for transport functions, in line with London Plan SPG 'Land for Transport' 2007?
8. Should a car parking strategy be set out, with parking standards added as an Appendix; and is there a case for reducing workspace car parking?
9. Does the CS need to acknowledge that a Crossrail station in the Kensal area would affect the nature of the local economy?
10. Is Policy CS31 sufficiently robust to resolve problems with noise in the CAZ?
11. Is Policy CS29 consistent with the recent revision of PPS25, in particular with the location of policing facilities in flood zone 3?

12. Should the River figure more prominently in the CS? Should the Key Diagram show the River Piers? Should Policies CS27, 38 & 39 refer to use of the River as a means of transport for construction waste materials, for transporting materials to fuel energy systems? And should the Glossary include river transport under "Sustainable Transport Modes"?
13. Should the opening section of the CS on Infrastructure (2.44 onwards) make more reference to water infrastructure?
14. Should Policy CS32 be augmented as proposed by Thames Water to ensure that the water and wastewater infrastructure necessary to support new development can be provided?
15. Westminster Infrastructure Plan [CS/EB/67] refers to the problems for sewerage infrastructure (Page 66 onwards), and the Thames Tideway project. The Thames Tideway Tunnel is to be taken forward (London Plan Policy 4A.17). Has the CS taken sufficient account of the forecasts for and provision of sewerage infrastructure? Is Policy CS29 too focussed on fluvial flooding, and does Policy CS44/ para 5.85 need updating on the Tunnel?
16. Are Policies CS38 and CS39 consistent with PPS1 Supplement on Climate Change and are they capable of delivery? Is the economic viability of some major development schemes likely to undermine their achievement? What has been the experience of recent "major developments" in the Borough?
17. Is paragraph 5.61 correct in its references to efficiencies at Pimlico (see GLA representations)?
18. Should the CS include reference to the opportunities for reducing carbon emissions in the existing building stock?
19. Policies CS34-37 address open space and green infrastructure. Should the section be re-named "... green and blue infrastructure"?
20. Is Policy CS36 likely to be effective, or is it too restrictive of new development and too protective of biodiversity interests?

City of Westminster – Core Strategy Submission Draft Examination Matter 8: Implementation

Issue: Whether the Core Strategy is sufficiently focussed on delivery and implementation.

1. Is the delivery strategy central to the CS; in general does the CS set out clearly how much development is intended to happen where, when and by what means it will be delivered (PPS12, paragraphs 4.1(3) & 4.4)?
2. Does the Westminster Infrastructure Plan [CS/EB/67] provide support for the CS's policies and proposals and demonstrate that they are deliverable? Does it highlight the main challenges for the plan period and provide evidence as to who will address them and how they will be funded?
3. Any observations on the following from the Westminster Infrastructure Plan:
 - Table 2: Projected requirements (Page 9), relevant and significant items (Pages 10-11), and demand and cost estimates (Table 2-1 Page 35) – are these a reasonable summary of requirements?
 - Next steps and recommendations (Page 13) – have any of these been followed up, and with what results?
 - Are the priorities in paragraph 6.4, Page 195, and subsequent locations, indicative costs and responsibilities agreed?
 - In paragraph 6.8, it is suggested that WCC should engage with infrastructure providers to emphasise the urgent need for strategic planning. Has this advice been followed in specific cases?
 - Would the matrix in Table 6-1 make a useful addition to the CS?
4. What are the priorities for infrastructure requirements to deliver the CS, and what are planning obligations under Policy CS32 expected to contribute? Should CS32 and the supporting text be more precise and indicate what physical, social and green infrastructure is required for the CS to be effective?
5. Should paragraph 5.41 and Policy CS32 be amended to refer to the new CIL Regulations, and to ensure that planning obligations and CIL are not duplicated?
6. Is Policy CS32 sufficiently clear that planning obligations will be sought where the tests in C5/2005 are met, and where it would be viable to do so?
7. Is the purpose of CS33 clear; Would Policy CS33 be too restrictive for Higher Education and some other community services; Would it be helpful to refer to "no net loss"?
8. Is Policy CS33 in line with the London Plan Policy 3A.18 which refers to policing facilities? Should it refer to the role of HM Court Services?
9. Does Part VI of the CS explain satisfactorily how the process of plan, monitor and manage will be pursued? At what point might the Council intervene if monitoring suggests that policies are not being fulfilled? What are the contingency plans if proposals are not being realised?
10. Could Figures 56 and 57 be modified to improve effectiveness?

City of Westminster – Core Strategy Submission Draft Examination Matter 9: Waste Infrastructure and Policy CS43 Sustainable Waste Management

Issue: Whether the approach to waste management is consistent with national policy (notably PPS10 paragraphs 16-21) and whether the departure from the London Plan is justified; whether Policy CS43 will deliver sustainable waste management for the period of the plan and an appropriate level of self-sufficiency.

Questions

1. What is the existing situation with regard to waste arisings, and their treatment? Do the Municipal Waste Strategy (2004) [CS/WCC/13] and Waste Evidence Base (2009) [CS/EB/64] accurately describe the trends, current position and likely future changes? Have 'construction, excavation and demolition waste' been considered?
2. PPS10, paragraphs 16&17 expect the policies and proposals in the Core Strategy to be in line with RSS (the London Plan). Does the failure of the Core Strategy to identify some 3has of land to provide waste facilities place the DPD out of conformity with the London Plan and mean that it is inconsistent with national policy?
3. Are the circumstances identified and measures proposed by WCC sufficient to justify its position. In particular:
 - the emphasis given in Policy CS43 to minimising, re-using, re-cycling etc, protecting existing waste sites and requiring major new development to include on-site recycling and composting facilities wherever possible?
 - the use of micro-waste treatment technologies? What is the realistic capacity for developing these over the plan period?
 - the Council's exercise to identify potential sites described in the Waste Evidence Base 2009? Was that sufficiently thorough and were its findings credible and robust?
 - efforts to work jointly with other local authorities. Has any progress been made since correspondence was sent out in September 2009?
4. PPS12 expects a core strategy to set out how much development is intended to happen where and when (paragraphs 4.1 and 4.5). The time horizon of the core strategy should be at least 15 years from adoption (paragraph 4.13). PPS10, paragraph 16 states that the document should look forward for at least 10 years from the date of adoption. Does the Core Strategy take a sufficiently long term view and put forward sufficiently clear proposals for future waste management?
5. Is the identification of new waste sites a suitable topic to be delegated to a future DPD, or does the approach amount to the Core Strategy ducking a critical decision?
6. Is the reference to a Waste Development Plan Document in Policy CS43 justified, since the Local Development Scheme [CS/LDF/03] does not refer to such a document?

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