

# Core Strategy

## Technical Papers for Submission Draft





# Contents

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Technical Paper 1: Waste.....	2
Technical Paper 2: Crossrail Contributions .....	6
Technical Paper 3: Housing.....	9
Technical Paper 4: Loss of Social and Community Floorspace .....	11
Technical Paper 5: Loss of Hotels .....	13
Technical Paper 6: Tall Buildings.....	15
Technical Paper 7: Views .....	18
Technical Paper 8: Draft Replacement London Plan .....	20
Technical Paper 9: Monitoring.....	23

# Technical Paper 1: Waste

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## ***Background to Soundness Issues Raised***

1. Policy 4A.25 of the London Plan (Consolidated with Alterations since 2004) states that Boroughs in their DPDs should identify sufficient land to provide capacity to manage the apportioned tonnages of waste set out in Table 4A.6 (page 232 of the London Plan). It adds that Boroughs preparing joint waste DPDs may wish to collaborate by pooling their apportionment requirements. Studies undertaken by the Mayor indicate that the land-take of waste facilities required in Westminster to meet its waste apportionment is 3 hectares.
2. There are no suitable sites within Westminster to meet the waste apportionment. The City Council has received no positive response from other Boroughs to pool apportionment.

## ***Submission Draft Core Strategy (SDCS): Policy CS43 Sustainable Waste Management***

3. The Council has taken a pragmatic and realistic approach to the management of waste and what is achievable within Westminster during the evolution of Core Strategy waste policy, in line as far as possible with national and regional policy, and through taking account of consultation responses and officer-level meetings.
4. The aim of policy CS43 is as follows:
  - to require the minimisation of waste, increase in re-use, recycling and composting of waste, and the reduction in amount of waste disposed at landfill in order to meet the waste reduction targets set out in the London Plan;
  - to ensure sufficient opportunities for the provision of waste management facilities in appropriate locations, in accordance with London Plan waste apportionment, including:
    - protection of existing waste 'sites' such as cleansing depots, micro-recycling sites, and micro-waste treatment technologies (in-vessel composters) etc, which together take up a land area of 1.1 hectares;
    - require all major new development to provide on-site new waste management facilities;
    - commitment to keep looking for a suitable site within Westminster during the lifetime of the Core Strategy; and
    - production of a Waste DPD to secure any new sites that come forward.

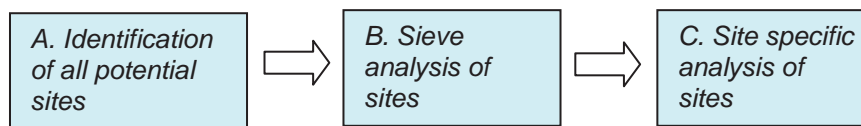
## ***General Conformity Comments***

5. Following the publication of the Publication Draft Core Strategy, waste apportionment has been highlighted by the Mayor of London as a potential issue of general conformity. The Mayor's response states that:
  1. The wording of the policy implies the identification of new sites has not and will not be carried out for some time. The council needs to identify new sites at the beginning of the development plan period to ensure it can meet its apportionment target. The phrase 'during the lifetime of the plan' should be removed; and

2. Given the constraints on land availability (working with other councils to pool waste apportionment)...remains the most suitable solution to meeting the boroughs apportionments targets. Following amendments to the draft replacement London Plan waste apportionment figures, neighbouring boroughs which identified enough land to meet the previous apportionment targets, will find they have surplus capacity, which Westminster should take through partnership working arrangements.

### **Issue 1. Identification of new sites**

6. The City Council has endeavoured to identify waste sites at the beginning of the development plan period. In order to identify appropriate sites to meet the apportionment targets the City Council published a Waste Evidence Base (WEB) alongside the Publication Draft Core Strategy. The WEB included the detailed and comprehensive 'three-stage' analysis of potential sites in Westminster:



A. The identification of all potential sites illustrated that:

- there are no Strategic Industrial Locations in Westminster;
- there are no Local Employment Areas in Westminster;
- there are no existing waste management sites in Westminster;
- there is no vacant industrial land in Westminster;
- the few 'brownfield' sites that do exist in Westminster tend to be sites currently in use with 'development potential'.

B. Based on locational criteria for the selection of sites for waste management set out in PPS10 (included Annex E), and London Plan Policy 4A.23, a sieve analysis was undertaken of identified sites under A above. This process removed sites that impacted upon the World Heritage site, listed buildings, sites of importance for nature conservation, strategic housing sites, Crossrail line 1 safeguarding, and sites not connected to A roads or railways.

C. Following the 'sieve' analysis of sites the 10 remaining sites were subject to a detailed site analysis which assessed technological practicalities of each site (such as site size), planning issues (land use conflict, traffic and access etc) and timing considerations (i.e. site availability). This detailed analysis illustrated that no sites are suitable for waste management in Westminster, due to the following factors:

- too small, using London Plan size thresholds; or
- surrounded by residential uses in close proximity; or
- are likely to be in use for the foreseeable future; or
- are not financially viable.

7. In the absence of current waste sites the CS policy contains the commitment to keep looking for a suitable site within Westminster during the lifetime of the Core Strategy; and to secure any new sites that come forward in a waste DPD.

### **Innovative approach**

8. Recognising the lack of sites for waste management facilities, the City Council has attempted to take a more 'micro-approach' to the sustainable management waste, through the trialling of in-vessel 'rocket' composters on a housing estate in Church

Street ward. This facility contains two in-vessel composters which have capacity to process 100 tonnes of food waste per year each. Two further sites in Westminster are currently being appraised for their potential. Although such sites are outside of the scope of London Plan waste management sites due to their small size, they will nevertheless make an increasing contribution towards the apportionment over the lifetime of the Core Strategy and are therefore protected by Policy CS43. This approach has been supported by the Mayor.

## ***Issue 2. Joint working***

9. At meetings during summer 2009, both Greater London Authority and Government Office for London officers noted that the only further action that could be taken to address the issue would be Member-level contact seeking partnership working to pool the apportioned waste with other boroughs. They suggested eight potential local authorities.
10. Westminster's Cabinet Member for City Management wrote to eight local authorities (Lewisham, Southwark, Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond-upon-Thames) who potentially had surplus capacity in September 2009. Although no positive responses were received, officers are continuing to explore options to joint work with other boroughs.
11. There are already cross-boundary contractual arrangements in place with commercial operators for the management of waste produced in Westminster. At present, 75% of municipal waste produced in Westminster is disposed of at the Selchp Waste to Energy facility in Lewisham, although a proportion of this is sent via the Brent Transfer Station. Waste for landfill is currently disposed in Buckinghamshire (via Brent Transfer Station) and Essex (via Western Riverside Transfer Station in Wandsworth). Recycling and composting waste is dealt with at a range of locations, including Smugglers Way recycling centre in Wandsworth. The civic amenity sites at Smugglers Way and Western Riverside are also available for Westminster residents to deposit household waste. These contractual arrangements reflect the commercial reality of waste management within London for Westminster. Revised contracts for waste disposal are likely to be awarded in 2013/14 and are due to commence in 2016/17.

## ***Draft Replacement London Plan***

12. The amendments to the draft replacement London Plan waste apportionment figures published on 7 December 2009 reduced the waste apportionment targets for all of the London boroughs, and as stated by the Mayor, could potentially create a surplus of capacity in other London boroughs / sub-regional waste partnerships. These amendments were published after the PDCS was published, but also have potential for change at later stages of the development of the London Plan, including at the London Plan Examination in Public. As such they have not been included in the Core Strategy to date.
13. However, the City Council would argue that as these boroughs have **identified available land capacity** to meet current apportionments, Westminster's outstanding apportionment should be re-apportioned in the DRLP to utilise this surplus capacity in other boroughs / waste partnerships in the first instance. This outstanding apportionment is currently approximately 1.9 hectares, taking the safeguarded sites identified in the Submission Draft Core Strategy and Proposals Map into account. The

evidence base supporting the DRLP does not identify any sites suitable for a waste facility in Westminster and therefore the apportionment is both unreasonable and undeliverable.

14. In the second instance, if the DRLP does not re-apportion Westminster's shortfall to those boroughs with capacity, once the DRLP is published there will be no legal requirement for them to continue to safeguard the additional capacity, and they are therefore most likely to release or reallocate the surplus capacity for other uses.
15. The City Council will continue to approach other boroughs / waste partnerships with a view to joint working, particularly those who have a new surplus of waste capacity once the new waste figures have been agreed following the London Plan Examination in Public. The City Council is confident that land exists within London to meet Westminster's, and indeed London's new waste apportionment in the DRLP, and that contractual arrangements can be made to effectively manage the disposal of Westminster's waste. The City Council will continue to work towards that end, both through planning mechanisms and the re-let of Westminster's waste disposal contracts.

# Technical Paper 2: Crossrail Contributions

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## ***Background to Soundness Issues Raised***

1. The *Draft London Plan Crossrail Alterations* and related draft Supplementary Planning Guidance (SPG) were published for consultation in May 2009 and a revision to the latter published in October 2009. They require use of planning obligations and once introduced, the Community Infrastructure Levy, to raise a total of £600m to fund Crossrail. These Draft London Plan Crossrail Alterations and related draft SPG were discussed in detail at the Examination in Public (EIP) in December 2009 and final Alterations and revised SPG are likely to be published in Spring 2010. The GLA have suggested that the omission of explicit reference to the requirement for Crossrail contributions, in line with Draft London Plan Crossrail Alterations and related draft SPG, may raise an issue of general non conformity and Transport for London (TfL) suggest some very detailed wording for inclusion in the Core Strategy.

## ***The Core Strategy Approach***

### **(i) The Core Strategy supports Crossrail and provides a framework for seeking developer contributions towards its funding**

2. The Core Strategy clearly highlights the strategic importance of Crossrail to the future of the city of Westminster. Crossrail is integral to the Spatial Strategy expressed in the Core Strategy (see paragraph 2.46). Crossrail is supported and promoted (Policy CS42 Major Transport Infrastructure) and its particular role in unlocking development opportunities and the serious consequences of it not going ahead recognised (*ibid*). Furthermore, in response to the Mayor's proposals outlined under paragraph 1 above, the Council has been unequivocal in its support of Crossrail and the *principle* of seeking developer contributions towards Crossrail.
3. Core Strategy Policy CS 32 supports the use of planning obligations to fund Crossrail and other infrastructure necessary to support development. Although neither Crossrail, nor any other infrastructure scheme or type is explicitly mentioned, Core Strategy Policy CS 32 provides a framework for seeking contributions for Crossrail where it is necessary to do so. Specific reference to Crossrail and every infrastructure project and type of infrastructure would result in a great deal of unnecessary repetition. Further, this degree of specificity might fail to capture key infrastructure needs that arise during the life of Core Strategy.
4. The *Consultation Draft Replacement London Plan (CDRLP)* was published in October 2009, just 5 months after *The Draft London Plan Crossrail Alterations*. The CDRLP replicates the priorities for planning obligations set out in the London Plan Draft Crossrail Alterations. However, it differs in that the policy on Funding of Crossrail by expanding the policy to cover other types of strategic transport – not just Crossrail. Core Strategy Policy CS.32, as currently drafted, is sufficiently flexible as to accommodate this change.

### **(i) Hierarchy of LDF Policy and Guidance related to Planning Obligations**

5. Core Strategy Policy CS 32 sets out the Council's strategic approach to planning obligations which are an important tool to enable delivery of the spatial priorities in the

Core Strategy. The City Management Plan Development Plan Document (general development management policies) will identify priorities for planning obligations. It will include reference to Crossrail given its strategic importance; affordable housing; and the other priorities also articulated in the Core Strategy. This type of detailed development management policy is more appropriate for inclusion the City Management Plan. The Council also intend to provide more detailed guidance on the application of these policies in a new Planning Obligations Supplementary Planning Document. The hierarchy of policies and guidance envisaged was outlined in Publication Draft Consultation Statement (regulation 27), 2009 p 91, in response to comments on the Core Strategy Publication Draft, and is illustrated in Figure 1 below.

**Figure 1: Westminster Statutory Development Plan - Hierarchy of Planning Obligations Policies**

The Draft London Plan Alterations (2009) new Policy 3C.12A establishes a requirement for development to contribute towards funding Crossrail. The Draft Replacement London Plan (2009) expands this approach to other strategically important infrastructure.

The London Plan (2008); Draft Alterations; and Replacement London Plan identifies priorities for planning obligations to be reflected in boroughs Development Plan Documents.

**Westminster Core Strategy Development Plan**

**Document:** sets out the overall approach to planning obligations in support of policies in the 'development plan' and highlights the particular role of planning obligations in funding supporting infrastructure.

Key infrastructure required in support of the Core Strategy is also outlined (CS33 - 44) this includes CS42 which relates to Crossrail and other Major Transport Infrastructure necessary to deliver the Core Strategy vision.

**Westminster City Management Plan (under preparation):**

will include a policy that will identify priorities for planning obligations in Westminster. This will reflect the priorities set out in the London Plan and the local application of these as defined in Westminster's Core Strategy. Reference to planning obligations will also be made in other policies as appropriate – including affordable housing and Crossrail and other essential public transport improvements.

**Westminster Planning Obligations Supplementary Planning Document:** is currently being prepared and once adopted will replace the current Planning Obligations Supplementary Planning Document. This will contain detailed guidance on the application of planning obligation policies set out in the City Management Plan and within the policy framework provided by the Core Strategy Policy and relevant London Plan policies. It will also have regard to relevant supplementary guidance produced by the GLA. It may, subject to emerging government guidance on this point, include more specific details of likely obligations, any tariffs and how these will apply to specific developments.

6. This approach is in line with London Plan (2008) Policy 6A.5 which specifies that a clear framework for planning obligations should be set out in *Development Plan Documents* (in this case the Core Strategy and City Management Plan). This approach also complies with current Government guidance which advocates setting out detailed guidance on the application of policies for planning obligations in Supplementary Planning Documents (see ODPM Circular 05/2005 *Planning Obligations*, paragraph B.26).

### **(iii) Avoiding Repetition of Regional Policies**

7. The Draft London Plan Crossrail Alterations - once published - will have the status of being part of the statutory Development Plan for Westminster. *London Plan Draft Crossrail Alterations New Policy 3A.12A Funding for Crossrail* specifically sets out requirements for developments that Crossrail will partly or wholly address. When the final iteration of this policy is published by the Mayor of London it will be a key factor for determining planning obligations in Westminster. The Council sees no need to simply repeat or replicate the policy in the Core Strategy: indeed Planning Policy Statement 12 paragraph 4.32 advises against this. The GLA's suggestion to include a statement that funding for Crossrail will be sought in line with a policy in the London Plan does not seem necessary; it is noted similar references are not made in relation to all of the other London Plan policies which all permeate the Core Strategy's strategic, spatial policies.

### **Response and proposed way forward**

8. For the reasons set out above, the Council considers the Core Strategy is in general conformity with the London Plan policies on planning obligations and the funding of Crossrail and does not consider the changes suggested by the GLA as necessary. The Core Strategy conforms with, and supports, the Mayor of London's policy approach. The *Draft London Plan Draft Crossrail Alterations* and the related SPG, along with the *CDRLP* will similarly be reflected in the City Management Plan and the Council's Planning Obligations Supplementary Planning Document.
9. The Council considers the objection raised by the GLA is a matter of presentation rather than a substantive issue of general non-conformity and as such suggest no changes at this stage.

# Technical Paper 3: Housing

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## ***Meeting the current borough housing target***

1. Core Strategy Figure 11 *Housing Trajectory for Westminster* shows that Westminster will be able to meet its 680 pa housing target projected forward to beyond 2021. Figure 37 *Westminster's projected housing delivery* and accompanying text in the *Reasoned Justification* for policy CS14 sets out how the target will be met, including allowances for small schemes below 10 units and larger windfall sites.

## ***Meeting the higher target set out in the draft Replacement London Plan***

2. The London SHLAA published in November 2009 has informed a new target for Westminster of 770 units per annum for the years 2011 – 2021 which has been included in the Consultation draft replacement London Plan. The table below shows the breakdown compared to the existing LP target (shown in brackets).

### **Annual Average Housing Provision Targets 2011 – 2021**

	Conventional supply	Non self-contained	Vacant dwellings	Annual target
Draft LP target for Westminster	594 (560)	95 (50)	81 (68)	770 (680)

3. The 5-15 yr housing supply schedules (published December 2008) indicate that in terms of conventional supply, this is likely to be achievable, especially in the earlier years. This is based on the expected delivery date of sites in the 5-15 yr schedules from sites currently under construction, sites with residential mixed/use planning permission, and other known development sites expected to come forward in the future. These figures have been augmented with an allowance for small schemes (currently sites delivering less than 10 units contribute 35% of total housing units delivered in the city), and for larger windfall schemes (important in the later years of the period). Core Strategy Appendix 4 contains a justification for the inclusion of allowances for smaller schemes and windfalls. There are however, some concerns about the provision of non-self contained provision and bringing vacant dwellings back into use. The largest component of new non self-contained accommodation is student housing. Due to the slump in the housing market this is a very attractive form of residential development at present, but it is uncertain as to whether this will remain the case throughout this period. Regarding bringing empty properties back into use, meeting the vacant dwelling target depends on Council funding, which whilst the Mayor's Housing Strategy has a target that 'no more than 1% of homes should stand empty and unused for over 6 months', is not funded by the Mayor. There is therefore no guarantee that 81 units per annum will be sustained into the future. However, in some years the conventional supply is expected to exceed 594 dwellings and therefore may provide some compensation for these uncertainties.

## ***Housing delivery in terms of local spatial policies***

4. The table below shows how the projected housing supply will be sourced in terms of the Core Strategy spatial policies.

### Expected Housing Delivery by Area 2010 – 2019<sup>1</sup>

Area	Estimated Number of Dwellings (from no. sites)
Paddington Opportunity Area	1,200 (5)
Victoria Opportunity Area	487 (7)
Tottenham Court Road Opportunity Area	50 (3)
Core CAZ and named streets (outside the Opportunity Areas)	1,694 (47)
CAZ outside Core CAZ, named streets, and the Opportunity Areas	1,229 (18)
North Westminster Economic Development Area (outside Paddington Opportunity Area)	552 (8)
Outside CAZ (outside the North Westminster Economic Development Area)	1,219 (20)
<b>City of Westminster</b>	<b>6,431</b>

5. This shows all parts of Westminster will make a major contribution to the dwelling target over the next 10 years. The Core CAZ will deliver 35% of dwellings, the remaining parts of CAZ 38%, and areas outside the CAZ 28%. In considering the 6,431 total for the city, it should be noted that this does not include an allowance for small schemes below 10 units or larger windfall sites which may come forward, particularly in the latter part of the period.

#### *The 5-15yr lists published December 2009*

6. The Core Strategy and the information in this paper above is based on the housing delivery schedules prepared for the 2008 AMR. These have since been updated in the AMR published December 2009, but there is no new information here that would indicate any diversion from the information provided above. 25 schemes were removed from the 2009 schedule as they had been delivered (14) or the original scheme was not considered likely to be proceed (11). Four sites with new planning permissions were added to the 2009 schedule along with council owned sites included in the Council's draft Housing Renewal Strategy.

<sup>1</sup> On sites expected to deliver 10 or more residential units (source: 5-15 yr housing schedules 2008)

# Technical Paper 4: Loss of Social and Community Floorspace

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## ***Background***

1. Policy CS33 Social and Community Infrastructure requires all social and community floorspace to be protected. However, where the loss of the floorspace is provided for within a published strategy by a local service provider, and where it is subsequently demonstrated that the overall provision is improved and that there is no demand for an alternative social or community use to take the floorspace, it can the floorspace be converted, but only to residential.
2. Westminster City Council Property Division and Metropolitan Police consider that if the loss of social or community floorspace arises out of a published strategy by a local service provider, there should not be a requirement to satisfy the council that the floorspace is not required for an alternative social / community use.

## ***Discussion***

3. The delivery of social and community infrastructure in Westminster is difficult to achieve as there are more financially viable development options. Without a policy to protect and provide more of these uses, the pressure from other uses and cost of land would prevent new sites and facilities being delivered. Therefore, intervention through the planning process is required because the market would otherwise fail to deliver social and community floorspace.
4. There are also difficulties establishing new social and community facilities, particularly because most applications within Westminster are not of sufficient scale to justify new facilities on site, but nonetheless put pressure on local service provision. Because of land values within Westminster, it is also not usually possible to compete for land already in other uses to provide new social and community facilities.
5. The approach in the SDCS is supported by the London Plan Policy 3A.18. This requires that policies in DPDs ensure that there is no net loss of social and community facilities, and seeks increased provision to deal with the increased population and meet existing deficiencies.
6. Therefore, this policy is in accordance with the London Plan Policy 3A.18 as, even if there is a published strategy by a Local Service Provider or other organisation, the loss of any site currently in social or community use must be resisted unless there are no other organisations requiring the floorspace.
7. This proactive approach will ensure any existing floorspace is not permanently lost if there is another local service provider or similar organisation who requires floorspace. It helps to not only protect the overall level of this type of floorspace in Westminster, but also ensure appropriate increases. In many cases, there will still be development potential on sites, because the council is only requiring the existing social and community floorspace to be re provided (the existing internal and external space on a site). This does not prevent developers from utilising the airspace above the social/community development for other uses.

## ***Conclusion***

8. The council considers Policy CS33 to be in conformity with the London Plan. It is flexible enough to allow existing provision to be reconfigured, upgraded or re-located in order to improve services and meet identified needs, subject to a published strategy by a Local Service Provider. The requirement to satisfy the council that the floorspace is not required for social / community use is a reasonable criteria for release of such floorspace as it protects existing social / community floorspace which is essential in the longer term, and ensures that facilities are available to meet existing and future needs.

# Technical Paper 5: Loss of Hotels

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## **Background**

1. There are over 430 hotels within Westminster, comprising 39% of London's bedspaces, with easy access to a huge range of visitor attractions including museums, theatres, restaurants and shops. The City Council considers that it is important to protect the existing hotel stock as this will help Westminster maintain its strategic role within the London tourist industry.
2. Core Strategy Policy CS22 protects existing hotels where they do not have significant adverse effects on residential amenity. Proposals to improve the quality and range of hotels is encouraged. This policy is considered to be in conformity with London Plan policy 3D.7 which has a target to achieve 40,000 net additional bedrooms by 2026. The emerging London Plan (2009) similarly has a target of 40,000 net additional hotel bedrooms by 2031.

## **Westminster Property Association (WPA) Objection**

3. WPA have objected to policy CS22; that it should allow the loss of low quality hotels where they do not make a positive contribution to the tourism objectives of the City Of Westminster and where the loss of hotels can result in increased housing supply in Westminster. They have provided a report (London Hotel Demand and Supply report 2008) on the forecast hotel supply trajectory to demonstrate that the strategic hotel bedroom target is being exceeded on an annual basis. This will be referred to as the WPA study.

## **Discussion**

4. Policy CS22 only allows for hotels that are causing amenity problems to change use. Further relaxation of criteria for loss of hotels is not considered to be in conformity with the London Plan.
  - The London Plan (2008) recognises that there may be some loss of small scale low quality hotels, but also says that the loss of strategically important hotel capacity in appropriate locations should be resisted (Policy 3D.7 and paragraph 3.291). Most hotels in Westminster are small, accounting for approximately half of the bedroom stock. If the principle of allowing the loss of small scale hotels was accepted, this could have a significant impact on hotel bedspaces to the detriment of the visitor economy in Westminster.
  - The emerging London Plan (2009) does not refer to the loss of low quality hotels, is "seeking to improve the range and quality of provision" (Policy 4.5Aa), and asks LDFs to "identify opportunities for renovation of the existing visitor accommodation stock" (Policy 4.5Cc). It is considered that upgrading and renovation of poor quality stock, that is not causing amenity problems, is a more appropriate policy approach
  - Both the London Plan and emerging London Plan targets are not broken down by borough or annually.

5. If the borough level annual target set out in the WPA study is considered, the City Council considers that the figures provided do not bear scrutiny. The WPA study refers to the GLA study used in the preparation of the London Plan - Hotel Demand in London prepared by Grant Thornton and the Leisure and Tourism Organisation for the GLA, 2006. Despite the GLA study warning that “borough level numbers should be treated with caution” (page 73), the WPA study develops these as the basis for their justification. Borough level targets are extrapolated to provide annual targets and are compared against the London Hotel Development Monitor compiled by Visit London. The London Hotel Development Monitor includes hotels recently opened, under construction, probable and possible. If figures in ‘possible and ‘probable’ categories are excluded, then the extrapolated targets are not met.
6. The WPA study discounts consideration of the City Council’s Annual Monitoring Report figures. The most recent AMR (table 3.10, page 23) shows that over the last 5 years hotel completions accounted for a net change of 1,032 hotel bedrooms, on average providing 206 net additional rooms per year, which is lower than the WPA study forecast predictions.
7. The WPA study only looks up to 2011 because of uncertainty of delivery after this date. The City Council considers that it is likely that growth rates may not be sustained later on in the monitoring period. The GLA study (page 71) recognises that rates of growth in central London are slowing because the “central area is already close to saturation point in terms of the available space to build new hotels and new hotel rooms”.

### ***Conclusion***

8. The City Council considers that WPAs proposed change will not sufficiently protect the strategically important hotel stock in Westminster nor help to achieve the target for additional bedspaces in London, and is therefore not considered to be in conformity with the London Plan.

# Technical Paper 6: Tall Buildings

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## **Introduction**

1. Westminster's Submission Draft Core Strategy (SDCS) does not include a specific policy on tall buildings. This issue is considered within SDCS policies on Opportunity Areas, with further relevant policy in the sections on heritage and views and sustainable design. English Heritage have objected to the lack of a tall buildings policy within the SDCS. This paper sets out the background to this issue.

## **CABE/ EH Guidance**

2. CABE /EH guidance<sup>2</sup> offers advice on good practice in relation to tall buildings in the planning process. It urges planning authorities to consider the scope for tall buildings as part of strategic planning and advises that geographical areas be identified where tall buildings will or will not be appropriate as well as areas which may be 'sensitive' to tall buildings. It also recommends production of an urban design study as good practice and historic characterisation of areas. The guidance states at para. 2.9 " in some places the historic environment considerations may be of such significance that no tall buildings will be appropriate."

## **Westminster's Evidence Base**

3. A High Buildings Study was undertaken for Westminster City Council in 2000<sup>3</sup>. This identified there was very limited scope for tall buildings within Westminster due to the settled low-lying character of its townscape and significant heritage assets. Detailed characterisation of Westminster is almost complete through its conservation area audits, which have been adopted as SPG/SPD for 45 out of 55 conservation areas since 2000. These identify important local views and opportunities for enhancement within conservation areas, which cover 75% of the City. A detailed study of the most significant local views is also in draft form. In line with these studies and the growth areas identified in the London Plan, Westminster has concluded that much of the borough is unsuited to tall buildings because of their potential harm to the historic environment but there may be some limited scope for tall buildings within the opportunity areas at Paddington and Victoria. Planning briefs have been prepared for Victoria and Paddington.

## **London Plan Policy**

4. The London Plan (with consolidated alterations, GLA 2008) provides the regional policy framework for tall buildings at Policy 4B.9: *Tall Buildings, Location*. This says the Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London's character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings. It further states that the Mayor will work with boroughs to help identify suitable locations for tall buildings that should be included in DPDs. These may include part of the Central Activities Zone and some Opportunity Areas.

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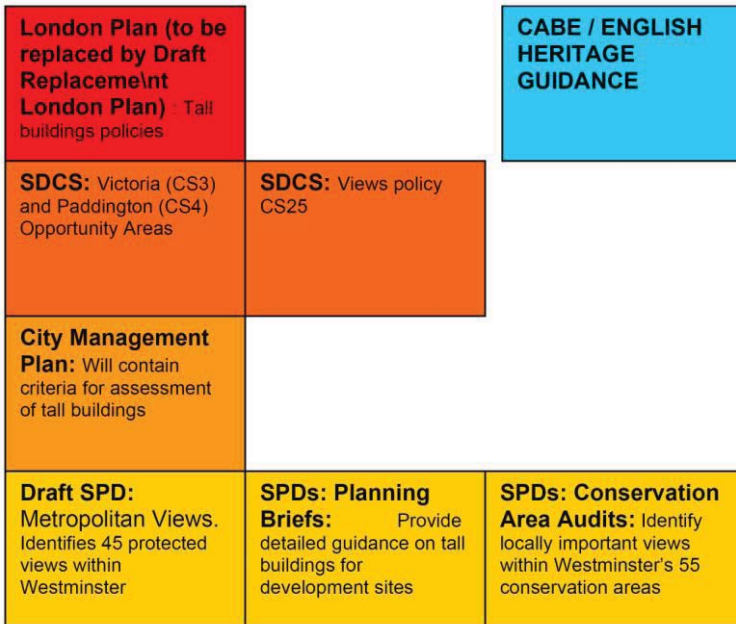
<sup>2</sup> CABE/ EH. Guidance on Tall Buildings July 2007

<sup>3</sup> EDAW City of Westminster High Buildings Study September 2000

5. The Draft Replacement London Plan (2009) has shifted the emphasis away from promoting tall buildings towards the careful management of the planning and design of tall buildings. Policy 7.7 (*Location and design of tall and large buildings*) states that applications for tall buildings should include an urban design analysis that demonstrates the proposal meets a defined set of criteria, including:
- location generally limited to sites in the Central Activity Zone, Opportunity Areas, Areas of Intensification or town centres that have good access to public transport
  - good relation to the scale and character of surrounding buildings and public realm, particularly at street level
  - individually or as a group, form a distinctive landmark that emphasises a point of civic or visual significance, and enhances the skyline and image of London
  - ground floor activities that provide a positive relationship to the surrounding streets and have public access to upper floors, where appropriate
  - should not impact adversely on local or strategic views
  - should not be encouraged in areas sensitive to tall building impact including conservation areas, the setting of listed buildings and World Heritage Sites, historic parks and gardens or other areas designated by boroughs as being unsuitable for tall buildings.

### **Policy Development**

7. At Preferred Options stage, we consulted on Preferred Option 23, which was to: *manage the provision of tall buildings in suitable locations within the Victoria and Paddington Opportunity Areas where they will not have a detrimental impact on local amenity or their wider settings, where they will have a positive effect on the skyline and the local area, and relate well to existing transport infrastructure.* English Heritage did not make any comments relating to tall buildings at issues and options or preferred options stages. In discussion with the Government Office for London prior to the consultation on the submission draft, it was agreed that tall buildings were best dealt with spatially by being specifically referenced in the Opportunity Area policies and this did not need to be duplicated within the document.
8. The SDCS therefore contains guidance on tall buildings within CS3 Paddington Opportunity Area and CS4 Victoria Opportunity Area. The strategic tall buildings policy is contained within the London Plan and it is intended that the detailed criteria for the assessment of tall buildings and new design will be set out in the City Management Plan. This is stated in the reasoned justification for both the policy on Paddington and Victoria Opportunity areas. In areas outside opportunity areas the document states that any proposals for tall buildings would be considered in relation to its impact on views and heritage assets as provided for in policies CS24 and CS25. Planning briefs have also been produced giving specific guidance for opportunity areas.



**Figure One:** Main Tall Buildings Policy and Guidance Documents Applicable to Westminster

**Conclusion**

- The Submission Draft Core Strategy sets out the strategic vision for Westminster and has taken a spatial approach to the location of tall buildings based on detailed evidence base and national guidance from EH/ CABE. The Strategy is in general conformity with the London Plan and the information set out above is considered to be sufficient to demonstrate Westminster's approach to this issue and that this is consistent with national and regional policy.

# Technical Paper 7: Views

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1. This paper outlines the relationship between the views policy CS25 in Westminster's Submission Draft Core Strategy and the Mayor's London View Management Framework (both the adopted 2007 and draft revised 2009 versions).

## ***London Plan (Consolidated with Alterations since 2004)2008***

2. The London Plan establishes a London View Management Framework and identifies 26 strategically important London views, 16 of which are relevant to Westminster. All designated London Views relevant to Westminster are listed below:

### **London Panoramas**

2 From Parliament Hill to central London	<b>PV (2 view points)</b>
4 From Primrose Hill to central London	<b>PV</b>

### **Linear Views**

7 The Mall to Buckingham Palace	
8 Westminster Pier to St Paul's Cathedral	<b>PV</b>
9 King Henry's Mound, Richmond to St Paul's Cathedral	<b>PV</b>

### **River Prospects**

14 Blackfriars Bridge	
15 Waterloo Bridge	
16 The South Bank	
17 Golden Jubilee/Hungerford Footbridges	
18 Westminster Bridge	
19 Lambeth Bridge	
20 Victoria Embankment between Waterloo and Westminster Bridges	
21 Jubilee Gardens and Thames side in front of County Hall	
22 Albert Embankment between Westminster and Lambeth Bridges along Thames Path near St Thomas' Hospital	

### **Townscape Views**

23 Bridge over the Serpentine, Hyde Park to Westminster	<b>PV (2009 only)</b>
26 St James's Park Bridge to Horse Guards Road	

## ***London View Management Framework (Adopted and Draft Revised)***

3. Detailed guidance on the management of all views is set out in the London View Management Framework SPG. This includes the identification of geometrically defined corridors and assessment areas for certain 'protected vistas', which are subject to directions from the Secretary of State. Protected vistas are identified above by 'PV'.
4. The adopted London View Management Framework (LVMF) was first consulted on in 2005 and a much amended version published in 2007. This included 5 protected vistas. Westminster City Council raised significant objection to this document, which reduced protection of strategic views from that set out in RPG3.
5. The Draft Revised View Management Framework (DRLVMF) was published in May 2009, prior to the Submission Draft Core Strategy being agreed for publication. This revised document improves the protection for the Westminster World Heritage Site and has proposed widened viewing corridors. It includes exactly the same views as the 2007 LVMF but has one additional protected view from the Serpentine Bridge towards the Westminster World Heritage Site. Westminster City Council has written in support

of the changes to the document and provided some detailed comments, in particular requesting the inclusion of an additional view from Parliament Square. (This is expected to be included in the Replacement London Plan).

### ***Views in Submission Draft Core Strategy and Proposals Map***

6. The proposals map in Westminster's Submission Draft Core Strategy includes protected vistas from the DRLVMF SPG. The Royal Parks Agency comments on the submission draft noted inconsistencies on the Proposals map, which shows some view cones using co-ordinates from the 2009 DRLVMF and some of which show view cones with coordinates from the 2007 adopted LVMF. The view from the Serpentine was also omitted from this map. The Royal Parks supported the use of views from the 2009 DRLVMF.
7. Several consultees objected to the lack of reference to the view management framework in the SDCS. All references to other documents are set out in the references section. It would be unwieldy and unnecessary to refer to every instance where another document could have a bearing on determining a planning application—particularly in relation to Mayoral documents which have their own status in any case. However, the document does make reference to the 26 views in the London Plan at para. 5.5, which are common to both the adopted and revised LVMFs. Both documents will be included as references at the back of the Core Strategy.

### ***Conclusion***

8. Given the Council's position with regards to the adopted and revised LVMFs, it has been decided to include views as shown in the draft revised London View Management Framework 2009 in the Submission Draft Core Strategy Document.
9. The draft revised London Plan identifies an additional view, from Parliament Square to the Palace of Westminster. This view has not been included on the proposals map as the view was proposed in the DRLP, but not in the draft revised LVMF, and therefore was published too late to be incorporated.

# Technical Paper 8: Draft Replacement London Plan

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## **Background**

1. The council has not included any of the targets in the Draft Replacement London Plan (DRLP) within Westminster's Submission Draft Core Strategy (SDCS). The DRLP was published after the content of the SDCS was agreed for publication.
2. Following informal agreement from the Cabinet Member, Westminster's SDCS was made public on the 1<sup>st</sup> September for consideration by the Planning Sub-Committee (Planning Briefs and Local Development Framework). It was then made into a publication document (e.g. formatting, inserting photos etc) and consultation commenced on the 12<sup>th</sup> November 2009.
3. The DRLP was published in October 2009 for public consultation. This followed two initial introductory documents. The first was the new Mayor's manifesto 'Planning for a Better London', published in July 2008. This set out the Mayor's general approach to planning in London and the role of the GLA. It included two specific sections on the London Plan, and references to potential changes to the London Plan in other parts of the document.
4. The second document was published in April 2009, and specifically related to revising the London Plan. 'A New Plan for London' was published for initial consultation with the London Assembly and the GLA Group. It included a number of statements about the Mayor's proposals when reviewing the London Plan. It did not include specific policy proposals or borough-specific targets.
5. There are 5 changes to borough-specific targets that could potentially affect Westminster:
  1. **Policy 2.13, Annex 1(21)** Reduce Paddington Opportunity Area indicative employment capacity from 23,200 to 5,000 new jobs, and minimum new homes from 3,000 to 1,000, together with an amendment of the time period from 2110-2026 to 2010-2035.
  2. **Policy 2.13, Annex 1(26)** Reduce Tottenham Court Road Opportunity Area minimum new homes from 1,000 to 600 (shared with LB Camden), together with an amendment of the time period from 2110-2026 to 2010-2035.
  3. **Policy 2.13, Annex 1(29)** Reduce Victoria Opportunity Area indicative employment capacity from 8,000 to 4,000 new jobs, and increase minimum new homes from 1,000 to 1,500, together with an amendment of the time period from 2110-2026 to 2010-2035.
  4. **Policy 3.3, Annex 4** A new annual housing target of 770, comprising 594 new homes, 95 non-self contained units, and bringing 81 empty homes back into use.
  5. **Table 3.4** Gypsy and Traveller pitch provision of 2 pitches.
6. In addition, the DRLP states that it will publish new projected borough-level arisings and apportionments of municipal solid waste and commercial/industrial waste at a later date (paragraph 5.77). These were subsequently published on the 7<sup>th</sup> December 2009, together with other late changes to the DRLP. Waste is addressed in a separate

technical note. The GLA have also raised Crossrail contributions in their Section 24 response on general conformity, in relation to draft London Plan alterations specifically relating to Crossrail. These will be addressed by a separate technical note.

## **Response**

7. The following information sets out the council's response to each of the revised targets in the DRLP:

**1. Paddington Opportunity Area:** There has been significant development in Paddington since 2001 with much of the target already met. The council is confident that these revised targets can be met within the area designated on the Proposals Map in the DRLP, within the revised timescale. This is in keeping with the SDCS.

**2. Tottenham Court Road Opportunity Area:** The reduction is welcomed, although the council questions how the figures were arrived at. The council estimates that approximately 60 homes will be provided within Westminster. London Borough of Camden's Submission Draft Core Strategy provides for 600 new homes on their sites (pgs 23-24). The two SDCSs therefore make adequate provision to meet the target.

**3. Victoria Opportunity Area:** The Strategic Housing Land Availability Assessment only indicates 777 homes in this Opportunity Area, and therefore the evidence supporting an increase from 1,000 to 1,500 homes is unclear. Whilst the target of 1,000 homes might be achieved through windfalls, 1,500 is unlikely. The DRLP may assume housing delivery above the railway, but this is very unlikely within the plan period (Network Rail minutes), and there would also be constraints in terms of providing a healthy residential environment. Chelsea Barracks is not included within the Opportunity Area because the policy approach applied to the VOA would be inappropriate on this site in terms of scale, character and land use. The DRLP may also be relying on Chelsea Barracks within their figures, which would account for the change, as this site is expected to accommodate approximately 550 homes, and the GLA originally wanted it included within the Opportunity Area. Therefore, if the new target of 1,500 new homes was imposed, the approximately 550 homes on Chelsea Barracks would be included in the VOA housing target for monitoring purposes only. Ultimately, the same quantum of housing would be provided across the wider area.

**4. Annual Housing Target:** The housing delivery graph in the SDCS (figure 37) does not include provision of non-self contained accommodation or an allowance for vacant homes brought back into use. The SHLAA set an annual allowance of 95 non-self contained homes and 81 vacant homes per annum, and these allowances have been included in the 770 target contained in the DRLP. The council is satisfied that the conventional supply of housing is likely to be achievable, but does have some concerns about the provision of non self-contained housing and empty homes. In any case, the Core Strategy prioritises housing above all other land-uses and seeks to maximise the provision of new homes.

**5. Gypsy and Traveller pitch provision:** The apportionment of Gypsy and Traveller pitches in the DRLP is based on a flawed methodology and is undeliverable. Westminster was informally advised that it would be apportioned 2 pitches in August 2009. At this stage a search for appropriate sites to meet this need was commenced. This is set out in para 4.20 of the SDCS. The GLA was advised of this informally, and was aware of Westminster's draft Core Strategy policy advising of the inability to

identify suitable land by September 2009 when officers met to discuss the draft document.

There is no vacant land in Westminster and housing sites are, without exception, already developed sites. The average density of new schemes in Westminster is 260dha, nearly double that of London as a whole (140dph), compared to 50dph for Gypsy and Traveller sites. It has therefore not been possible to allocate any sites for pitches. Whilst the desire for a wider regional distribution of pitches is acknowledged, unrealistic and undeliverable apportionment fails the Gypsy and Traveller communities, as it is impossible to designate sites to meet their needs.

In the event that the Gypsy and Traveller apportionment remains in the London Plan once it is published, Westminster will need to approach other boroughs to try and secure a joint working arrangement. However the council would not be able to guarantee delivery on this basis as it relies on another local authority which the council has no control over. If no partner could be found, the apportionment would remain unmet.

### **Conclusion**

8. The council felt it would be inappropriate to 'pick and choose' between different sections of the DRLP to suit its purposes: that either all DRLP references and targets are used or none.
9. The Gypsy and Traveller apportionment is entirely new, not an amendment to an existing target. It has not been tested in principle or in detail, and nor has the methodology by which the figures have been arrived at. The council also has outstanding concerns about other housing targets, some of which are at odds the GLA's own evidence base. These targets can only be tested at the Examination in Public, which will be held at about the same time as the SDCS EiP. For these reasons it was decided not to include any of the DRLP targets.
10. Whilst the DRLP needs to be taken into account when drafting the SDCS it does not give rise to general conformity issues. The information set out above is considered to be sufficient to demonstrate deliverability and flexibility in terms of the eventual publication of a new London Plan, regardless of the targets included.

# Technical Paper 9: Monitoring

The following table sets out the monitoring framework to accompany the Submission Draft Core Strategy (SDCS). This will provide the appropriate indicators and targets with which the Core Strategy will be monitored through the Annual Monitoring Report.

Most of the indicators are already in use to monitor the Unitary Development Plan. In most cases, the City Council has long-term data sets allowing meaningful analysis of the effect of planning policies.

As stated in the SDCS, development within Westminster does not tend to be constrained by infrastructure delivery, but rather by the limited development capacity within an already densely developed, historic environment (para 5.38). Therefore, for the most part, a failure to achieve the targets set out below would necessitate a review of the policy approach, and potentially a minor amendment to the Core Strategy itself. Therefore there is not a range of ‘contingency plans’ set out below, because there are none. It is noted, however, that there are a small number of issues that may arise from a revised London Plan, and these are addressed in the Technical Note 8 above.

CORE STRATEGY HEADLINE OBJECTIVES	POLICY REF	KEY INDICATORS’ TOPICS	CORE INDICATOR LOCAL INDICATOR NATIONAL INDICATOR	TARGET	AMR 08/09 PAGE REF
Objective 1: To accommodate the growth and change that will contribute to enhancing London’s role as a world class city, including its international business, retail, cultural and entertainment functions within the Central Activities Zone; whilst maintaining its	1, 2, 3, 4, 5, 6, 7, 8, 9,	Overall land use mix in the different parts of CAZ	LI MIX2	No overall shift in the proportion of the different land uses	P18
	10, 11, 12, 13, 18, 19, 20, 21, 22, 23, 24, 25, 26, 32	Retail development in the West End Special Retail Policy Area (WESRPA), and other shopping centres, and outside shopping centres	LI C2a - LI C2b LI MIX1a-3	Indicative capacity set out in para 2.38 of SDCS and Figure 10 but this is not a target for the reasons set out in para 2.38.	P18 & P32 P15-19
		Hotel development by area	LI T&E1	No overall loss, and hotel development takes place in appropriate locations	P23

unique and historic character, mix, functions, and townscapes.	Development of new arts and cultural uses by area	<b>LISP3 LI T&amp;E4</b>	No target	<b>P24 P24</b>
	Entertainment use development by area	<b>LI T&amp;E3a-b</b>	No overall target, but no new A4, A5 or <i>sui generis</i> nightclub uses with over 500sqm floorspace in Stress Areas	<b>P20</b>
	Development in Paddington, Victoria and Tottenham Court Road Opportunity Areas progress against housing and job targets; and delivery of key social and transport infrastructure identified in the Core Strategy Policy	<b>Being developed as boundaries are confirmed</b>	<b>POA:</b> 3000 homes and indicative capacity for 23,200 jobs 2001 to 2026. <b>VOA:</b> 1000 new homes and capacity for 8000 new jobs 2001 to 2026. <b>TCR OA:</b> 1000 new homes, 5000 new jobs 2001 to 2026 (including Camden).	<b>P63</b>
	Change in land uses in Special Policy Areas.	<b>LISP1 -5</b>	No specific targets but policies to protect and enhance the unique uses defined in each SPA.	<b>P24 -26 &amp;52</b>
	Development affecting identified views.	<b>Being developed</b>	Relevant strategic views will be protected from development breaching viewing corridors, other views will be protected from insensitive development.	

<p>Objective 2: To sensitively upgrade Westminster’s building stock to secure sustainable and inclusive exemplary design which minimises energy and resource consumption and the production of waste, reduces the impacts of local environmental pollution and meets both today’s needs and those of the future, including the effects of a changing climate; creating attractive places that function well whilst ensuring that the historic character and integrity of Westminster’s built fabric and places is enhanced.</p>	<p><b>24, 25, 27, 28, 29, 30, 31, 32, 34, 35, 36, 37, 38, 39, 40, 43, 44</b></p>	Design quality (qualitative assessment)	<b>LI DES5</b>	No specific targets, but new buildings must be of exemplary design quality.	<b>P50</b>
		Sustainable and inclusive design measures as part of applications and, including where relevant, Code for Sustainable Homes level	<b>LI EN5</b>	Development should reduce energy use and emissions in line with national & regional standards as a minimum. Further detailed targets developed in tandem with more specific CMIP policies.	<b>P55</b>
		Protection and creation of heating networks	<b>CI E3</b>	No specific target, but all existing heat networks protected, and seeking upward trend in connection to networks.	<b>P56</b>
		Creation of new heat and cooling networks	<b>CI E3</b>	See above	<b>P56</b>
		Extension of existing heat and cooling network	<b>CI E3</b>	See above	<b>P56</b>
		Achievement of 20% renewable energy generation	<b>CI E3</b>	As stated	<b>P56</b>
		New waste and recycling facilities	<b>NI 192-3 CI W1-2</b>	See also municipal waste strategy. No specific target but monitoring for upward trend particularly for new micro waste sites secured with	<b>P57 P57</b>

Objective 3: To maintain and enhance the quality of life, health and well-being of Westminster's residential communities; Ensuring that Westminster's residents can benefit from growth and change, providing more employment and housing opportunities, safety and security, and better public transport and local services; to work with our partners to foster economic vitality and diversity, improved learning and skills, and improved life chances in areas of deprivation.		Number of developments permitted against Environment Agency advice on flood risk grounds	development e.g. in-vessel composting.	
1, 3, 4, 5, 6, 8, 9, 10, 12, 13, 14, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 40, 41, 42, 43, 44	Business space development by area (Economic Development Area, Central Activities Zone and Opportunity Areas)	<p><b>CIE1</b></p> <p><b>CIBD1 -4 LIC1-2</b></p>	<p>0 permissions</p> <p><b>POA:</b> Business space to provide 23,200 new jobs 2001-2026.  <b>VOA:</b> Business space to provide 8,000 new jobs 2001-2026.  <b>TCROA:</b> Space to provide 5000 new jobs 2001-2026.  <b>NWEDA:</b> No target, but seeking upward trend in commercial activity.  <b>CAZ generally:</b> No target but seek all commercial development to be located in appropriate locations within CAZ.</p>	<p><b>P58</b></p> <p><b>P30 P31-32</b></p>
	Number of vacant units in District Shopping Centres in the Economic Development Area (Church Street/Edgware Road and Harrow Road)	See Health Check Studies	No specific target.	
	Social and community infrastructure improvements and development	LI SOC1	No specific target.	P41

		New entertainment uses in the Economic Development Area	<b>LI T&amp;E3a -b</b>	<b>P20</b>
				No specific target. Entertainment uses to be concentrated in District Shopping Centre to prevent harm to residential amenity.
Objective 4: To increase the supply of good quality housing across all parts of the city to meet Westminster's housing target, and to meet housing needs including the provision of affordable housing and homes for those with special needs.	1, 14, 15, 16, 17	New homes delivered against target of 6,800	<b>NI 154&amp;159 CI H2a-d</b>	<b>P35 P35</b>
		Affordable housing development on site, off site or financial contributions	<b>NI 155 CI H5 LI H2&amp;3</b>	<b>P39 P39 P39-40</b>
		Family housing units	<b>LI H4</b>	<b>P40</b>
Objective 5: To manage the pressures on the city from its national	2, 3, 4, 5, 6, 7, 8, 11,	Proportion of new homes meeting lifetime standards	<b>Being Developed</b>	<b>P63</b>
		New care units for elderly people	<b>LI SOC1</b>	<b>P41</b>
		Tourism-related and visitor accommodation uses	<b>LI T&amp;E1-2</b>	<b>P23&amp;P41</b>

<p>and international roles and functions, business communities and tourism, including the 2012 Olympic and Paralympic Games and their legacy, and to ensure a safe and enjoyable visitor experience.</p>	<p>18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 30, 31, 32, 33, 34, 35, 36, 40, 41, 42</p>	<p>Entertainment uses within Stress Areas</p>	<p><b>LI T&amp;E3a-b</b></p>	<p>No new late night uses over 500sqm in Stress Areas.</p>	<p><b>P20-23</b></p>
<p>Objective 6: To accommodate the safe and efficient movement of growing numbers of people entering and moving around Westminster by facilitating major improvements to the public transport system, improving the public realm and pedestrian environment, managing vehicular traffic, and making walking and cycling safer and more enjoyable.</p>	<p>3, 4, 5, 6, 7, 40, 41, 42, 43</p>	<p>Crime rates associated with the 24 hour economy</p>	<p><b>Being Developed</b></p>	<p>See Crime Reduction Strategy.</p>	<p><b>P63, P48-49</b></p>
<p>Objective 6: To accommodate the safe and efficient movement of growing numbers of people entering and moving around Westminster by facilitating major improvements to the public transport system, improving the public realm and pedestrian environment, managing vehicular traffic, and making walking and cycling safer and more enjoyable.</p>	<p>3, 4, 5, 6, 7, 40, 41, 42, 43</p>	<p>Public transport developments and improvement schemes</p>	<p><b>Being developed alongside new Local Implementation Plan and future Infrastructure monitoring</b></p>	<p>No specific target. To be measured against identified infrastructure schedules, including those set out within the SDCS itself.</p>	<p><b>P63, P48-49</b></p>
<p>Objective 6: To accommodate the safe and efficient movement of growing numbers of people entering and moving around Westminster by facilitating major improvements to the public transport system, improving the public realm and pedestrian environment, managing vehicular traffic, and making walking and cycling safer and more enjoyable.</p>	<p>3, 4, 5, 6, 7, 40, 41, 42, 43</p>	<p>Walking and cycling infrastructure schemes</p>	<p><b>Being developed alongside new Local Implementation Plan and future Infrastructure monitoring</b></p>	<p>No specific target but seeking modal shift towards walking and cycling as annual trend.</p>	<p><b>P13 &amp; P48</b></p>

<p>Objective 7: To protect and enhance Westminster's open spaces, civic spaces and Blue Ribbon Network, and Westminster's biodiversity; including protecting the unique character and openness of the Royal Parks and other open spaces; and to manage these spaces to ensure areas of relative tranquility in a city with a daytime population increased every day by over 1 million workers and visitors.</p>	<p><b>11, 31, 34, 35, 36, 37, 40</b></p>	<p>Net change sites of nature conservation importance</p>	<p><b>CI E2 LI En5</b></p>	<p>No loss of any, or part of any, SINC's.</p>	<p><b>P58 P55</b></p>
		<p>Net change open space</p>	<p><b>LI En3</b></p>	<p>No loss of open space.</p>	<p><b>P59</b></p>
		<p>Improvements to parks, play areas and other open spaces (including measures to protect or enhance tranquility)</p>	<p><b>LI En3</b></p>	<p>No specific target.</p>	<p><b>P59</b></p>
		<p>Green Flag Awards</p>		<p>More green flag awards.</p>	



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