

## **Examination in Public – Post Submission Amendments – Consultation Responses**

Responses from:

CABE

Charlotte Street Association

City of London

English Heritage

Natural England

Project Blue

The Coal Authority

Theatres Trust

Westminster Property Association

Organisation Name: CAFE

07 September 2010

Vivienne Blake  
City Planning Delivery Unit  
11<sup>th</sup> Floor  
Westminster City Hall  
64 Victoria Street  
London SW1E 6QP

Our ref: CSE-20142



Dear Vivienne Blake

## **WESTMINSTER'S CORE STRATEGY- SCHEDULE OF POST SUBMISSION AMENDMENTS**

Thank you for consulting the Commission for Architecture and the Built Environment (CABE).

Unfortunately, due to limited resources, we are unable to comment on this document. However we would like to make some general comments which you should consider.

A good spatial plan is essential to achieving high quality places and good design. CABE believes that getting the local development framework core strategies right is one of the most important tasks planners are undertaking.

We have run workshops with local planning authorities to look at how design is being embedded in core strategy documents, which form part of the local development framework. The workshops offer local authorities independent informal advice from an expert panel and allowed us to identify the strengths and weaknesses of current approaches to spatial planning and how design, functionality and space are dealt with in core strategy documents.

Three key messages for local planning authorities preparing core strategies have emerged from our workshops. These are now embedded within a CABE publication called ***Planning for places: delivering good design through core strategies***. This publication is available to download from the CABE website [www.cabe.org.uk/publications/planning-for-places](http://www.cabe.org.uk/publications/planning-for-places)

The three key messages are also applicable to other LDF documents and you should keep these in mind when preparing other Development Plan Documents and Supplementary Planning Documents:

### **Tell the story**

A good core strategy needs to tell the story of the place, explain how it works and highlight its qualities and distinguishing features. Telling the story helps everyone understand how the qualities of the place have shaped the strategy and its priorities for future quality. For more information about telling the story, please refer to the CABE website: [www.cabe.org.uk/planning/core-strategies/tell-the-story](http://www.cabe.org.uk/planning/core-strategies/tell-the-story)

### **Set the agenda**

Use the core strategy to say what is wanted for the area, express aspirations and be proactive and positive about the future of the place and say how this will be achieved. Set out what is expected in terms of design quality and where necessary provide links to the relevant development plan documents or supplementary planning documents. For more information about setting the agenda, please refer to the CABE website: [www.cabe.org.uk/planning/core-strategies/set-the-agenda](http://www.cabe.org.uk/planning/core-strategies/set-the-agenda)

### **Say it clearly**

Make the core strategy relevant and understandable to a wide audience. Use diagrams to inform the text and communicate the strategy and show what quality of place means. For more information about saying it clearly, please refer to the CABE website: [www.cabe.org.uk/planning/core-strategies/say-it-clearly](http://www.cabe.org.uk/planning/core-strategies/say-it-clearly)

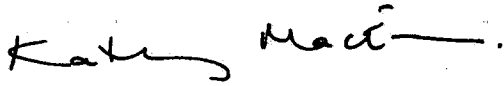
It is also important that there is a clear priority for design quality and place-making objectives in the core strategy, setting out the key principles. This needs to be explicit so that it cannot be challenged when applications are being determined.

We would also like to respond by drawing your attention the following CABE Guidance that you might find useful:

- *Making design policy work: How to deliver good design through your local development framework*
- *Protecting Design Quality in Planning*
- *Creating Successful Masterplans – a guide for clients and Design Reviewed Masterplans*
- *By Design: urban design in the planning system towards better practice* (published by DETR)

These, and other publications, are available from our website [www.cabe.org.uk](http://www.cabe.org.uk)

Yours sincerely

A handwritten signature in black ink that reads "Kathy MacEwen". The signature is written in a cursive style with a horizontal line at the end.

Kathy MacEwen  
**Head of Planning Advice**



Organisation Name: Charlotte Street Association

# Charlotte Street Association

## Response to Westminster Core Strategy – Schedule of Post Submission Amendments

### Change No 11 – Tottenham Court Road Opportunity Area

It is regrettable that WCC's proposed change ignores both the evidence put forward at the EIP by CSA and the subsequent submission by CSA to the Inspector (HD/21). There is no point in repeating the arguments made in our submission.

WCC's proposed changes are totally inadequate and in no way address the shortcomings in the Core Strategy identified by CSA. They reflect a reactive response as exemplified by the statement 'most of the key sites within the OA do not yet have planning permission' rather than the proactive approach required by London Plan policy 5.36 requiring a visionary development framework.

WCC's Core Strategy in relation to the TCROA fails to meet the requirements of –

- PPS 12 on deliverability
- LP 5.36 requires visionary joint development framework for TCROA
- RPL 2.13D LDFs to develop more detailed proposals for OAs
- RPL 2.58 LDFs should set realistic programmes and timescales for delivery
- RPL 2.13 C(b) provide necessary social and other infrastructure to sustain growth and where appropriate provide a mix of uses
- LP 3.07 Open space provision
- RPL 7.18 A(c) ensure that future open space needs are planned for areas with potential for subsequent change such as OAs.

**Conclusion: The CSA has set out its proposals for what should be done to remedy these deficiencies in WCC's Core Strategy in its submission to the Inspector (HD/21) and urges the Inspector to support these proposals in her recommendations.**

Organisation Name: City of London

Thank you for the opportunity to comment on the Post Submission Amendments to the Westminster Core Strategy.

The City of London has the following comment to make:

*Amendment Number 34 page 131 Part V Waste Infrastructure Paragraph 5.81 and  
Amendment Number 35 page 132 Part V Waste Infrastructure Policy CS 43*

*The City of London recognises the difficulties experienced by central London boroughs in meeting their London Plan Waste Apportionments. We support the City of Westminster's proposed change, including the intention to tackle it's waste apportionment through joint working, since this is the only option available to central London boroughs. However we believe that there is a need for the Mayor to take a more strategic approach to waste apportionments, which reflects emerging evidence on deliverability of waste sites, thus eliminating the need for elaborate negotiations between deficit and surplus borough to meet joint waste apportionments.*

If you have any queries on this please contact:

Janet Laban

Planning Policy Officer

City of London Corporation

Organisation Name: English Heritage

Dear Sir/Madam

Thank you for consulting EH on the below. English Heritage has now had the opportunity to review the amendments tabled by WCC for consideration by the Inspector. As the tabled amendments reflect those changes agreed by EH and WCC in their Statement of Common Ground dated 30/6/10, we do not wish to make any further comments at this stage.

Kind Regards

Samantha

Samantha Coates  
English Heritage

Organisation Name: Imperial College



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It is felt that this change is required in order to be clear that the Core Strategy is sound in terms of the requirements of PPS3 and both the adopted and emerging London Plan.

The second part of Imperial's objection to Policy CS15 is that it is not flexible in its approach with regard to protecting existing specialist floor space. As set out in Imperial's further written statement, from time to time it may be beneficial, as part of Imperial's strategic estates strategies, to release older and/or poor-quality, non-purpose built student accommodation in order to facilitate the development of high quality purpose built accommodation in the borough. The way the policy is currently written would potentially preclude this as Imperial would have to demonstrate that the non-purpose student accommodation would meet different residential needs as part of a published strategy by a local service provider. Obviously Imperial has no control over the publication of such strategies. In any case such properties maybe better used for general purpose housing if they were originally built for this purpose. As such, it is considered that the following change is made to Policy CS15:

2. All specialist housing floorspace and units will be protected to meet those specific needs except where the accommodation is needed to meet different residential needs ~~as part of a published strategy by a local service provider~~. Where this exception applies, changes of use will only be to residential care or nursing homes, hostel, Houses in Multiple Occupation or dwelling houses use.

At the hearing, it was also mentioned that there was no strategic recognition of the presence and role of HEI's in the borough; the contribution that they make to Westminster's unique character; and role within London as a world city and the need for the Council to support the development needs of institutions such as Imperial. However, I address this issue under Matter 2 (Local Spatial Strategies).

### Matter 2 (Local Spatial Strategies)

At the hearing session on the 28 July, the Council confirmed that University facilities were exempt from the requirements of Policy CS1 (Mixed use in the central Activities Zone) through the definitions of Social and Community Facilities (Private) and Social and Community Facilities (Public) in the Glossary of the Core Strategy. This is welcomed by Imperial. It was also confirmed that the definition of private educational facilities did not include student accommodation and that student housing would be dealt with under Policy CS15 (Meeting Housing Need). However, Imperial made the point at both this hearing session and that held on the 27 July that they would object to a policy in the City Management Plan that sought the provision of general needs housing as part of student housing schemes associated with HEIs.

Although the policy is not explicit, Imperial highlighted that the policy should not apply to affordable business space provided to support small and start-up businesses as this would effectively preclude the ability for institutions such as Imperial to provide such facilities on viability grounds. The Council responded to this by stating that all commercial space would be considered on a level playing field. Imperial strongly object to this as the provision of affordable business space which supports small start-up companies is clearly different from, for example, the provision of a large commercial development to accommodate the head quarters of a multinational company.

At the hearing session, the Council confirmed that they had no evidence to support the 200 sqm and 400 sqm thresholds set out in the policy. Clearly, this is contrary to the provisions of paragraph 4.36 PPS12, which states that core strategies must be founded on a robust and credible evidence base. In addition, I explained Imperial's relationship with the Imperial College Healthcare NHS Trust and highlighted a number of benefits that private medical facilities provide, in terms of relieving pressure on the NHS and contributing towards training of healthcare professionals and research into new cures and treatments. The Council did not confirm that any research had been done in terms of the impacts that this policy will have on the viability of the provision of private medical facilities. For these reasons Imperial consider that the policy is not supported by a robust and credible evidence base and agree with the suggestion that this policy is removed from the Core Strategy and reconsidered through the process of developing the City Management Plan.

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Through Imperial's representations to the Core Strategy, they have raised concern that there is no recognition of the strategic role that HEIs have in terms of contributing to the unique character of the City and its role within a world class city. Imperial College is a world class academic and research institution, ranked top =5<sup>th</sup> in world rankings. Despite its presence in Westminster, the Council does not recognise nor support the development needs of Imperial or any other HEIs located in the borough. At both this hearing and that held on the 27 July, this omission was raised by Imperial and by Westminster Property Association. The Council stated that they would be willing to include some wording in part one of the strategy to address this. Imperial suggest that the following changes are made in this regard:

3. Paragraph 2.21 and 2.22 of the Core Strategy should be amended as follows:

2.21 Westminster is a nationally and internationally important location for offices, retail, media and creative industries, arts and culture, academic, research and medical institutions, entertainment and tourism, which it accommodates together with the functions of government and the state. ~~The locations of these strategic land-uses overlap and all converge in the West End.~~

2.22 Provision of all types of housing within these areas is also intrinsic to its uniqueness and success. From flats in Soho to large residential neighbourhoods such as Pimlico, this residential element plays a major role in defining the character of different parts of the CAZ. The mix of uses must be carefully managed to ensure that a healthy and safe residential environment is maintained.

4. A new paragraph under 2.28 should also be added, which states:

Westminster is home to world-class academic, research and medical institutions that lead the way in innovation and in pioneering new research and technology. Such institutions have a strong relationship with business and support important economic sectors, such as the knowledge economy. This is an important part of Westminster's and London's economy. The Council will support the synergy between academic, research and medical institutions and business by supporting their development needs to enable them to thrive.

5. The Strategic Objectives, Nos. 1 and 4 (page 17) should be amended as follows:

1. To accommodate and support sustainable growth and change that will contribute to enhancing London's role as a sustainable world class city, including its international business, retail, cultural and entertainment and world-class academic, research and medical functions within and outside the Central Activities Zone; whilst maintaining ~~its~~ Westminster's unique and historic character, mix, functions, and townscapes.

4. To increase the supply of good quality housing of all types 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.

#### Matter 5 (Business and Employment)

Imperial's further written statements provide background on their current activities in the knowledge economy and highlight Imperial's rationale to expand its capacity in this regard. As explained at the hearing and through the further written statements, Imperial currently has an incubator unit in Westminster located at the University's South Kensington Campus. However, the incubator facility is operating to full capacity and is now oversubscribed. A lack of 'grow on' space has meant that businesses have had to stay on at the Incubator facility beyond their envisaged 2-3 year stay on period. This has limited the opportunity for other businesses to move into and benefit from the facility.

Responding to this problem by forced moves, due to the lack of existing incubator and grow-out space would potentially damage these companies at a crucial stage in their development, which would be completely counterproductive. Those businesses that have been successful and have had to move into 'grow-out' space have had no option but to move to premises in Oxfordshire and Surrey. Westminster and London therefore

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loses out on the investment opportunities that arise from these businesses and Imperial loses out on key academic research staff who choose to move with these businesses.

At the hearing session, I highlighted that the Council had failed to recognise and support the knowledge economy and its relationship with HEIs, such as Imperial, which is contrary to paragraph EC2.1 (C) of PPS4 (Planning for Sustainable Economic Growth). This states that local planning authorities should ensure that their development plan positively plans for the location, promotion and expansion of clusters or networks of knowledge driven or high technology industries. The Council stated that this is because this was a new area. However, policy 3B.5 (Supporting Innovation) of the adopted London Plan (2008) states that boroughs should ensure an adequate supply of environmentally attractive, high quality and affordable premises, 'incubator units' and sites for synergy between business and research and academic institutions. Moreover, paragraph 3.162 of the adopted London Plan (2008) states that innovation is an important factor in underpinning the London economy and paragraph 3.164 recognises the relationship between major medical research institutions, such as Imperial, which help support important economic sectors. It goes on to say that these research institutions should be retained and their development needs supported. As such, it is not correct to state that this is a new area and in any case, the failure to acknowledge, support and positively plan for the knowledge economy is inconsistent with national and regional policy. The draft replacement London Plan (October 2009) continues to support this position through policy 4.10 (New and Emerging Economic Sectors).

In light of the above, it is therefore considered that amendments are made to the Core Strategy. From statements made by the Council at the hearing session of the 4 August, it is understood that the Council are prepared to do this. Imperial would like to suggest that the following amendments are made to the Core Strategy in this respect:

6. A new paragraph under 2.28 should be added as set out in point 4 above.
7. Add a new paragraph under 4.30 should be added, which states:

The Council recognise that there is a shortage of high quality, affordable space in the borough to support small businesses. This type of space is important in supporting innovation associated with small businesses and the synergy between the City's academic, research and medical institutions and business. This in turn supports important and growing economic sectors such as the knowledge economy. The Council will support the provision of affordable business space to sustain and encourage small businesses and promote the relationship between academic, research and medical institutions and the business sector.

I hope this information is helpful but please do not hesitate to contact me if you have any questions or queries.

Yours sincerely

Sarah Beuden  
Associate

cc. Steve Howe, Director of Estates, Imperial College London  
John Anderson

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Organisation Name: Natural England



Organisation Name: Project Blue

CPB/ER/DP1793

15 September 2010

Vivienne Blake  
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Dear Madam,

**CORE STRATEGY - SCHEDULE OF POST SUBMISSION AMENDMENTS BY THE CITY COUNCIL**

We write on behalf of our client Project Blue (Guernsey) Ltd to make representations in respect of the Schedule of Post Submission Amendments by the City Council.

We endorse change 19 which states "Land and buildings should be used efficiently, and larger development sites should optimise the number of units in schemes, taking into account other policies and objectives." The removal of reference to "maximise" will ensure that residential schemes can be developed to respond to site specific constraints and opportunities rather than forcing as many units as possible onto a site.

We welcome change 43 which amends the preferred uses of the Chelsea Barracks site to:

***"Residential, community and local services including shops and green open space for play. Hotel use is likely to be acceptable in principle as part of the mix of uses."***

It is considered that this range of uses will allow the delivery of a vibrant mixed use development. It is understood that this range of preferred uses will take precedence over Policy CS20 which directs new retail floorspace to designated shopping centres and CS22 which when applied strictly would not allow hotel provision on the Chelsea Barracks site

We trust that these representations will be passed onto the Inspector and taken into account in the final version of the Core Strategy. Please contact Chris Beard of Emma Rodley of this office should you wish to discuss these representations further.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'C. Beard'.

DP9

Organisation Name: The Coal Authority

Planning Department  
Westminster City Council

24 August 2010

[sent via email: [ldf@westminster.gov.uk](mailto:ldf@westminster.gov.uk)]

Dear Lisa

**Core Strategy – Post Submission Amendments**

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk), on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our departmental direct line (01623 637119).

With kind regards

Yours sincerely



**Miss Rachael A. Bust** *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MIPS, MRTPI*  
**Deputy Head of Planning and Local Authority Liaison**

Organisation Name: Theatres Trust

Our Ref.: RF/3108

### **Post Submission Amendments to the Core Strategy**

Thank you for your email of 18 August consulting The Theatres Trust on the Schedule of Post Submission Amendments for the Core Strategy Development Plan Document.

The Theatres Trust is the National Advisory Public Body for Theatres and a Statutory Consultee. The Town & Country Planning (General Development Procedure) Order 1995, Article 10, Para (v) requires the Trust to be consulted on planning applications which include 'development involving any land on which there is a theatre.' It was established by The Theatres Trust Act 1976 and The Theatres Trust (Scotland) Act 1978 'to promote the better protection of theatres'. This applies to all buildings that were either built as theatres or are used for theatre presentations, in current use, in other uses, or disused.

We are disappointed that despite the Inspector's queries regarding Issue No.12 for Policy CS6 and Issue No.8 for Policy CS21, there are no amendments tabled by the Council that address our related concerns.

*Issue No.12: Does Policy CS6 address the development or enhancement of cultural functions including theatres in the CAZ satisfactorily?*

*Issue No.8: Does Policy CS21 address the protection and enhancement of the world-class theatres, museums and concert halls in Westminster adequately?*

Rose Freeman  
Planning Policy Officer  
The Theatres Trust  
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[planning@theatrestrust.org.uk](mailto:planning@theatrestrust.org.uk)

Organisation Name: Westminster Property Association

City Planning Delivery Unit  
11th Floor  
Westminster City Hall  
64 Victoria Street  
London  
SW1E 6QP

**Our ref.** NJB/JCW/J5152

**Your ref.**

**By email and post**

**For the attention of Ms V Blake**

15 September 2010



Dear Sir

## **Westminster Core Strategy – Schedule of Post Submission Amendments**

We act on behalf of Westminster Property Association. We are writing to respond to the City Council's Schedule of Post-Submission Amendments which has been published following the end of the public hearings into the Submission Core Strategy.

In setting out this response, in the interests of brevity and clarity, we have not restated our arguments or justifications and rely on our previous written representations, responses to the Inspector's issues and matters, and the comments made verbally during the hearings. Instead we have simply set out the topics on which we consider the City Council's amendments have not addressed the points raised by WPA.

Overall, WPA is disappointed that few of the comments and suggestions it made during the public hearings and in representations on the Submission Core Strategy have been reflected in the proposed changes. Consequently it is unfortunate that, despite WPA having engaged constructively with the City Council throughout the production of the Core Strategy, a number of areas of serious concern about the soundness of the Core Strategy remain at this stage. It is important to emphasise, for the benefit of the Inspector, that the WPA represents the major landowners and developers within the City of Westminster. Whilst only being a single party the WPA therefore represents a number of very significant stakeholders in the delivery of the Core Strategy.

### **Mixed Use**

We note that the City Council has not sought to amend the text of Policy CS1 (Mixed Use in the Central Activities Zone) to provide a broader strategic direction for the City. We continue to suggest that it would be appropriate to include a more broadly based strategic policy that directs the overall development of the City at the start of the Core Strategy.

We also continue to suggest that the alternative wording for Policy CS1 put forward by the WPA during the hearings would be a suitable alternative. For convenience, the text is set out below:

**“The City Council will encourage development which promotes the City's World City functions, manages its heritage and environment and supports its livings, working and visiting populations.”**

London (West End & City) Birmingham Cardiff Glasgow Leeds Manchester Milton Keynes West Malling

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The City Council has not amended paragraph 2.40, which continues to state that housing is the priority land use for delivery. WPA considers that the Core Strategy should place equal priority on housing and commercial development in the Core CAZ, as suggested in the text submitted by WPA during the hearings:

**“As a general principle, housing is acceptable on all sites within Westminster and is the priority land use for delivery except within the Core CAZ and Opportunity Areas where housing and commercial development are given equal priority.”**

[underlined text is WPA's suggested addition]

The City Council has not amended Policy CS6 (Core Central Activities Zone). WPA considers that, given the World City function of central Westminster and its importance as an office location, there is a lack of clear intentions regarding office development in the policy. The policy provides only a neutral recognition that the Core CAZ is “appropriate” for a range of commercial uses and contains no specific encouragement. Equal priority should be provided for office development. This was reflected in the text of the additional bullet put forward by WPA for inclusion in Policy CS6 during the hearing sessions:

- “ • **Office floorspace is encouraged throughout the area, especially where an improvement in the quality of stock would be achieved.”**

## Housing

The proposed changes do not address the lack of a reliable evidence base demonstrating the viability of the affordable housing target. WPA continues to consider that the proposed 100sqm average unit size is unjustified and that, if a floorspace figure is necessary, it should be 129sqm as this is the average unit size within Westminster, rather than an average of the Westminster and Greater London figures.

## Employment

The City Council has made no further changes to Policy CS18 (Commercial Development). WPA remains fundamentally concerned that this policy requires the principle of commercial land uses to be justified in areas in which they should be acceptable, such as the Core CAZ.

The addition to the reasoned justification to Policy CS19 (Offices and other B1 floorspace) is noted. Despite this however WPA considers that the intention of the second paragraph of Policy CS19, relating to the provision of a range of business floorspace, remains unclear. The amendment to the reasoned justification does not clarify in what circumstances a range of non-office floorspace will be required. The amendment to the reasoned justification also does not address the absence of robust evidence of current market failure requiring intervention. WPA maintains that the second paragraph of CS19 should therefore be deleted.

The City Council has made no further changes to Policy CS22 (Hotels and Conference Facilities). WPA remains of the view that it would be helpful to introduce additional criteria into the policy to allow for the conversion to housing of existing hotels that do not make a positive contribution to achieving Westminster's tourism objectives.

**Heritage**

We note the changes the City Council proposes to Policy CS24. WPA remains of the view that, firstly, the wording of the policy should reflect the statutory tests of “preserving or enhancing” rather than “conserving and enhancing”, as now proposed. It remains unclear to what extent conservation and enhancement are, in all cases, mutually compatible. Secondly, WPA considers that the policy should either relate only to designated heritage assets or, alternatively, should recognise that different levels of significance should be attached to designated and non-designated heritage assets, respectively.

WPA objects to the introduction of the reference to “settings” in Policy CS24. The inclusion of settings in the list of heritage assets could give the impression that the setting of a heritage asset is a heritage asset in itself, which is not the case. Furthermore, it may not be desirable to conserve the setting of a heritage asset in all cases, as conservation may not be compatible with realising enhancements to the setting. Policy HE8 of PPS5 recognises that the effect of an application on a heritage asset’s setting is a material consideration in determining the application. There is no requirement for Policy CS24 to go further than this as the weight to be attached to this material consideration can be determined on a case-by-case basis.

**Views**

WPA supports the changes made to the reasoned justification to Policy CS25, regarding tall buildings.

**Planning Obligations**

WPA supports the introduction of specific reference to compliance with the relevant legislation into Policy CS32.

We trust that these comments on the Schedule of Post-Submission Amendments will be passed on to the Inspector for her consideration. Should you have any queries regarding these comments please contact Nick Brindley or James Wickham of this office.

Yours faithfully

A handwritten signature in black ink that reads "Gerald Eve LLP". The signature is written in a cursive, flowing style.

**Gerald Eve LLP**

Cc P Houston Esq – Westminster Property Association