

Schedule of Post-Submission Amendments

	Page	Part	Section	Amendment	Reference
1	4	Part I How to use this document	New Paragraph 1.14	<u>1.14 Many of the policies within the Core Strategy refer to where the council considers or is satisfied that something is the case. However, in circumstances where the council is not the final decision-maker, this reference to the council is intended to apply to any decision-maker e.g. a Planning Inspector or the Secretary of State. This applies to Policies CS1, CS2, CS4, CS5, CS6, CS7, CS8, CS12, CS13, CS14, CS16, CS20, CS33, CS38, CS39, CS41 and CS43.</u>	Examination in Public Day Six Matters 7 & 8 - Clarify that the matter lies within the judgement of the council, or whoever else may be the decision-maker for a specific planning application.
2	12	Part II Westminster's Issues and Challenges – Accommodating strategic land uses within a unique Central London mix	Paragraph 2.21	Westminster is a nationally and internationally important location for offices, retail, media and creative industries, arts and culture, <u>higher education institutions</u> , 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.	Examination in Public Day Two Matter 4 - Response to Imperial College London
3	19	Part II Westminster's Spatial Strategy – Employment and the Economy	Paragraph 2.36	Westminster will <u>is projected to</u> accommodate growth in employment of about 90,000 <u>49,000</u> people between 2010 <u>2007</u> and 2024 <u>2021</u> <i>[insert footnote]</i> . <u>This provision will include including up to 23,200 5,000</u> new jobs in Paddington Opportunity Area, 8,000 <u>4,000</u> in Victoria Opportunity Area, and about 5,000 in the Tottenham Court Road Opportunity Area, including those areas within the London Borough of Camden.	Council's Statement Issue 1.3 subsequently adjusted to take account of: - Changes 7-11 below - Amend to meet Core Strategy time period - Use revised figures published in November 2009.
4	19	Part II Westminster's Spatial Strategy – Employment and the Economy	Paragraph 2.36 Footnote	GLAEconomics Working Paper 38, Table 5	Update reference to most recent projections

5	20	Part II Westminster's Spatial Strategy – Employment and the Economy	Paragraph 2.39	Westminster will continue to play a definitive role in London's tourism, arts, <u>educational</u> , service and entertainment sectors. Perceptions of Westminster (and often by extension, of London) will be enhanced by a continued focus on the enhancement of heritage assets and views, improved public realm, open spaces and the pedestrian environment, and the provision of a high quality and safe visitor experience.	Examination in Public Day Two Matter 4 - Response to Imperial College London
6	20	Part II Westminster's Spatial Strategy - Housing	Figure 12	<i>Delete</i>	Examination in Public Day Two Matter 4 - Improve illustrative material relating to housing - Amend timescale to 2010/11 – 2024/25
7	31	Part III Paddington Opportunity Area	Paragraph 3.9	The Paddington Opportunity Area is Westminster's most significant opportunity for large-scale regeneration. This area, designated in 1988 and focused around Paddington Station and the canal, has seen considerable development which has redefined the area. <u>Since 2001, the capacity for over 27,000 jobs had been built</u> By 2008 , over £2 billion had been invested in the area, 35 new companies had located into the area, 8,000 new jobs had been created and more than 900 homes completed. As a major brownfield redevelopment area, the mix of uses has been secured subject to a planning framework, with a focus on its emerging importance within London as an office location.	Examination in Public Day Four Matter 3 - Update targets/figures for Opportunity Areas
8	32	Part III Paddington Opportunity Area	Policy CS3	At least 3,000 <u>1,000</u> new homes and development capacity for 23,200 <u>5,000</u> new jobs will be provided within the Paddington Opportunity Area between 2001 and 2026 <u>2010/11 and 2024/25</u> by provision of a range and mix of uses across the Opportunity Area including...	Examination in Public Day Four Matter 3 - Update targets/figures for Opportunity Areas - Amend timescale to 2010/11 – 2024/25
9	34	Part III Victoria Opportunity Area	Figure 18	<i>Proposals site 9 needs to be extended to include Kingsgate House, as set out in Appendix 1 Site 9.</i>	Mapping error
10	34	Part III Victoria Opportunity Area	Policy CS4	At least 1,000 new homes and development capacity for 8,000 <u>4,000</u> new jobs will be provided within the Victoria Opportunity Area between 2001 and 2026 <u>2010/11 and 2024/25</u> , together with the following...	Examination in Public Day Four Matter 3 - Update targets/figures for Opportunity Areas - Amend timescale to 2010/11 – 2024/25
11	38	Part III Tottenham Court Road	Policy CS5	At least 4,000 <u>600</u> new homes and development capacity for 5,000 new jobs will be provided within the Tottenham Court Road	Examination in Public Day Four Matter 3

		Opportunity Area		Opportunity Area (including within the London Borough of Camden) between 2001 and 2026 2010/11 and 2024/25, together with the following priorities...	- Update targets/figures for Opportunity Areas - Amend timescale to 2010/11 – 2024/25
12	48	Part III Marylebone and Fitzrovia	Policy CS8	... Outside these locations, new commercial uses will not generally be appropriate unless they provide services to support the <u>local residential community in that part of the Central Activities Zone.</u>	Letter from Rosemarie MacQueen to the Inspector 15 th July 2010
13	50	Part III Knightsbridge	Policy CS9	... Outside these locations, new commercial uses will not generally be appropriate unless they provide services to support the <u>local residential community in that part of the Central Activities Zone.</u>	Letter from Rosemarie MacQueen to the Inspector 15 th July 2010
14	52	Part III Pimlico	Policy CS10	... Outside these locations, new commercial uses will not generally be appropriate unless they provide services to support the <u>local residential community in that part of the Central Activities Zone.</u> <u>The council will encourage and support a partnership approach to tackling deprivation, and will work closely with its partners locally including the Victoria Business Improvement District, SW1st, area renewal partnerships, local communities and the private sector.</u>	Letter from Rosemarie MacQueen to the Inspector 15 th July 2010 and Council's Statement Issue 2.19
15	52	Part III Pimlico	Policy CS10 Reasoned Justification	... <u>A partnership approach will help tackle deprivation and inequalities, particularly in relation to the development within the Victoria Opportunity Area.</u>	Council's Statement Issue 2.19
16	62	Part III Queensway and Westbourne Grove	Figure 35	<i>The key labels the shopping centre as a "District Centre". This should be changed to "Major Centre".</i>	Letter from Rosemarie MacQueen to the Inspector 15 th July 2010
17	65	Part V Housing Provision	Paragraph 4.4	... Paddington Opportunity Area <u>is expected to deliver at least 1,000 new homes over the plan period 2010/11 – 2024/25, Victoria Opportunity Area at least 1,000 new homes.</u> Tottenham Court Road Opportunity Area <u>is expected to deliver at least 600 new homes</u> , but the majority of this area lies within the London Borough of Camden and the parts within Westminster's boundary are Crossrail sites in the West End International Shopping Centre so are only expected to contribute about fifty residential units. ... has a London Plan target of at least 2,000 new homes. Many 900 of	Council's Statement Issue 4A.6 subsequently updated to reflect Changes 7-11 above.

				these have been delivered and 1,200 new homes are expected to be delivered between 2010 and 2019. Victoria Opportunity Area has a London Plan target of 1,000 new homes, and nearly 500 about 440 new homes are expected to be delivered between 2010 and 2019.	
18	69	Part V Optimising Housing Delivery	Figure 38	<i>Delete and replace with Westminster's Housing Trajectory (see below).</i>	Examination in Public Day Two Matter 4 - Improve illustrative material relating to housing - Amend timescale to 2010/11 – 2024/25
19	69	Part V Optimising Housing Delivery	Policy CS14 Reasoned Justification	<p>... The graph above shows that Westminster will be able to meet and in some cases exceed the London Plan target of 680 units p.a. target up to 2014 2010/11, and the anticipated increased target of 770 units p.a. after that between 2014 and 2019 there may be some difficulty in meeting a 680 p.a. target, and beyond this it is even less certain. However, the housing delivery graph 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 p.a. Because of this, the council is confident in being able to achieve the target, taking all sources of housing into account.</p> <p>This graph is based on the 15yr Land Supply Assessment 2009/10 – 2023/24 included in the Annual Monitoring Report 2007/8, plus an allowance for windfall sites of 10 or more units and an allowance for sites yielding 1-9 units. <u>It also includes sources of non-conventional housing: bringing vacant homes back into use and non-self contained housing.</u> Westminster has local circumstances which justify including an allowance for windfalls and smaller sites, and that these can legitimately be included in the trajectory as set out in the spatial strategy. The justification is set out in Appendix 4, and is based on the following:</p> <p>... <u>Land should be used efficiently to maximise the number of units on sites taking into account other policies and objectives. 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.</u> Housing densities should reflect the</p>	<p>Examination in Public Day Two Matter 4 - Subsequent changes resulting from new Figure 38 which incorporates non- conventional housing and the draft Replacement London Plan target from 2011/12 - Clarify how the reference to “optimising” housing delivery will be applied</p>

				densities set out in the London Plan. The City Management Plan will address housing densities to be applied to development sites in different parts of the city. ...	
20	73	Part V Affordable Housing	Paragraph 4.17	<i>Move existing text to Policy CS16 Reasoned Justification and replace with the 1st paragraph of 4.19 as follows:</i> The council has agreed a borough affordable housing target with the Mayor of London of 925 units for the three year period 2009/10 – 2011/2012. Future annual delivery targets for affordable housing will also be agreed with the Mayor. These numerical affordable housing targets will be delivered through a range of mechanisms, and new affordable housing delivered through the planning process will be a major contributor.	Examination in Public Day Two Matter 4 - Clarify that the Core Strategy target is a strategic target within the Reasoned Justification for Policy CS16
21	73	Part V Affordable Housing	Paragraph 4.18	<i>Move to Policy CS16 Reasoned Justification</i>	Examination in Public Day Two Matter 4 - Clarify that the Core Strategy target is a strategic target within the Reasoned Justification for Policy CS16
22	73	Part V Affordable Housing	Paragraph 4.19	<i>Move the 1st paragraph to paragraph 4.17 and the remaining text to Policy CS16 Reasoned Justification with the exception of the following text which is deleted:</i> ... by: ... The new policy approach to increasing the amounts of affordable housing delivered in the city and the reasons and justifications for the approach are set out below.	Examination in Public Day Two Matter 4 - Clarify that the Core Strategy target is a strategic target within the Reasoned Justification for Policy CS16
23	75	Part V Affordable Housing	Policy CS16 Reasoned Justification	... Westminster's housing capacity figures show that Westminster cannot meet its affordable housing need of 5,600 additional affordable homes per annum. However, this policy will help the council to achieve the current and future borough targets and maximise its contribution towards the Mayor's target of providing 50,000 affordable homes in	Examination in Public Day Two Matter 4 - Clarify that the Core Strategy target is a strategic target within the Reasoned Justification for Policy

			<p>London between 2008 and 2011. In these 3 years, 598 new affordable homes are expected to be delivered (based on the Local Area Agreement target), equating to nearly 200 new affordable homes per annum.</p> <p>[Moved from paragraph 4.18] The Council wishes to increase the amount of affordable homes delivered in the city and make an appropriate contribution to meeting wider regional housing needs and has therefore monitored and analysed the impact of the previous UDP affordable housing policy in order to inform the development of this policy and overcome any constraints to provision. These constraint factors and the need to facilitate rather than constrain housing delivery through overly onerous policy requirements have been taken into account in determining the threshold and calculation method for the affordable housing policy.</p> <p>[Moved from paragraph 4.17] Between 2001 and 2007/8, 22% of new homes completed in Westminster were affordable. This is substantially below the London-wide strategic target of 50% set out in the London Plan and reflects the lack of RSL led schemes and the predominance of small schemes below the affordable housing threshold in Westminster. Taking into account all the criteria in London Plan Policy 3A.9 it would not be realistic for Westminster to have a 50% target. The 5 year list of deliverable sites over 10 units <u>[insert footnote below]</u> indicates that 30% of these new homes <u>on the list</u> will be affordable, but <u>However</u>, if an allowance for sites of less than 10 units is included (historically about 93% of sites are less than 10 units, yielding about 25% of total units) this reduces the affordable housing proportion to about 22.5% in <u>over</u> the next 5 years.</p> <p>[Moved from paragraph 4.19] In addition to meeting borough affordable housing targets, <u>After this period</u>, the council will seek to increase the proportion of housing delivered as affordable units between 2012/13 and 2024/25 to exceed 30%. <u>This is a strategic target for the proportion of all housing to be provided as affordable housing. It is not a site specific target to be applied to individual development sites, and represents affordable housing from all sources including the council's own developments. The increased target (from the currently achieved 22% of all housing up to 30%) is based on:</u></p> <ul style="list-style-type: none"> • <u>evidence that the 22% was achievable within the context of the</u> 	CS16
--	--	--	---	------

				<p><u>Unitary Development Plan policy framework and that housing in central London has a strong demand as an investment and residential land values compare favourably with the commercial market;</u></p> <ul style="list-style-type: none"> • <u>evidence from the 5-15 year housing delivery schedules and discussions with developers and other stakeholders indicate a pipeline of development sites which will achieve affordable housing;</u> • the introduction of a 1,000 sqm threshold which in the Westminster context is effectively a lowering of the 10 unit threshold and will bring more schemes into the requirement range; • having a floorspace proportion rather than a unit proportion, which is expected to increase the number of units provided in individual schemes; and • working with partners on the Community Build Programme and other schemes to build new affordable homes on underused housing estate land. <p><i>[Original Reasoned Justification text]</i> Beyond 2012, the council is confident that these policies, together with the council's Community Build Programme, will yield an increase in affordable provision to 30% of overall housing delivery. The council will review the impact of these policies in order to sustain and increase this proportion when the Community Build Programme ends.</p> <p><i>[Original Reasoned Justification text]</i> Residential planning applications in Westminster are characterised by a predominance of large market units. The average size of a residential unit given permission between 2005/6 and 2007/8 was about 129 sqm, with market units averaging approximately 140 sqm, compared to an average of 70 sqm for affordable housing. This means that it is not generally appropriate to use a unit calculation for either the threshold</p>	
--	--	--	--	---	--

				<p>at which affordable housing will be required, or the calculation of the proportion of affordable housing to be provided. Instead, a floorspace calculation for both the threshold and the proportion required will be a fairer method and should increase the proportion and number of affordable homes delivered in the city.</p> <p>[Moved from paragraph 4.18] The introduction of a floorspace threshold in addition to the unit threshold is one such mechanism. It will bring more schemes into the requirement range by effectively lowering the previous 10 unit threshold applicable in Westminster, to a threshold reflecting sites' capacity to provide 10 units, whilst leaving the choice open to developers to provide larger units if they so wish. A 1,000 sqm threshold has been tested in the Westminster Affordable Housing Viability Study and is considered to be viable. The Study also assessed the viability of the floorspace approach to calculating the proportion of affordable housing required on different types of residential schemes. These proportions will be set out in the City Management Plan.</p> <p>[Original Reasoned Justification text for the remaining paragraphs]</p> <p>...</p>	
24	75	Part V Affordable Housing	Policy CS16 Reasoned Justification Footnote	[Moved from paragraph 4.19] <u>As</u> set out in the Annual Monitoring Report 2007/08	Examination in Public Day Two Matter 4 - Clarify that the Core Strategy target is a strategic target within the Reasoned Justification for Policy CS16
25	79	Part V Business and Employment	Paragraph 4.22	The working population of Westminster is expected <u>projected</u> to grow by about 400,000 <u>49,000</u> people between 2010 <u>2007</u> and 2024 <u>2021</u> , to about 666,000 <u>677,000</u> . There is significant development for new jobs to be created within the Opportunity Areas. By 2026, <u>There will be capacity for a further 23,200 5,000</u> new jobs within Paddington (<u>capacity for over 27,000 jobs has already been created</u>), 8,000 <u>4,000</u> new jobs in Victoria, and 5,000 new jobs within Tottenham Court Road (shared with the London Borough of Camden). Increases in jobs are	Council's Statement Issue 1.3 subsequently adjusted to take account of: - Changes 7-11 above - Amend to meet Core Strategy time period - Use revised figures

				also sought within the <u>Core Central Activities Zone and North Westminster Economic Development Area</u> , particularly Church Street, Edgware Road and Harrow Road.	published in November 2009.
26	81	Part V Offices and Business Floorspace	Policy CS19 Reasoned Justification	<p>New offices are encouraged within these locations to retain Westminster's strategic role in London's office sector, and support London's global competitiveness. The policy also identifies Westminster's capacity for growth, predominantly in the three Opportunity Areas and North Westminster Economic Development Area.</p> <p><u>In addition to offices, A a range of other B1 business floorspace is required in Westminster to ensure diversity across employment sectors. This supports a range of business activities, including Creative Industries, and employment opportunities. It will be sought where non-office type floorspace such as workshops and studios are appropriate as part of the overall mix of uses because of their location or existing use.</u></p>	Examination in Public Day Five Matter 5 - Clarify that the reference to other B1 floorspace such as workshops and studios is not about offices, but is about other B1 Floorspace (as noted in the title of the policy)
27	81	Part V Offices and Business Floorspace	Policy CS19 Cross Reference box	Cross-reference to Policies CS1 Mixed Use in the Central Activities Zone; CS3 Paddington Opportunity Area; CS6 Core Central Activities Zone; CS12 North Westminster Economic Development Area; CS18 Commercial Development.	Examination in Public Day Five Matter 5 - Clarify that the reference to other B1 floorspace such as workshops and studios is not about offices, but is about other B1 Floorspace (as noted in the title of the policy)
28	91	Part V Heritage	Policy CS24	<u>Recognising Westminster's wider historic environment, its extensive heritage assets will be protected conserved and enhanced</u> , including its listed buildings, conservation areas, <u>Westminster's the World Heritage Site, its historic parks including five Royal Parks</u> , squares, gardens and other open spaces, <u>their settings</u> , and its archaeological heritage. Historic and other important buildings should be upgraded sensitively, to improve their environmental performance and make them easily accessible.	Statement of Common Ground with English Heritage
29	91	Part V Heritage	Policy CS24 Reasoned Justification	The intrinsic value of Westminster's high quality <u>and significant</u> historic environment is one of its greatest assets. To compete effectively with other major, world-class cities the built environment must be respected and refurbished sensitively as appropriate. Any change should not	Statement of Common Ground with English Heritage

				<p>detract from the existing qualities of the environment, which makes the city such an attractive and valued location for residents, businesses and visitors.</p> <p>Detailed policies for each type of heritage asset will be set out in the City Management Plan. Area-based characteristics and detailed measures required to protect and enhance heritage assets have been set out in Conservation Area Audit Supplementary Planning Documents and the Westminster World Heritage Site Management Plan.</p>	
30	93	Part V Heritage - Views	Policy CS25	<p>The strategic views will be protected from inappropriate development, including any breaches of the viewing corridors. Similarly, local views, including those of metropolitan significance, will be protected from intrusive or insensitive development. Where important views are adversely affected by large scale development in other boroughs, the council will raise formal objections. and therefore Westminster is not generally appropriate for tall buildings.</p>	Statement of Common Ground with English Heritage
31	93	Part V Heritage - Views	Policy CS25 Reasoned Justification	<p>Views of buildings and landscapes are an essential part of Westminster's unique heritage. They can be seriously damaged by insensitive development in the foreground or background.</p> <p><u>Westminster is very sensitive to impacts from tall buildings within the borough or in adjacent boroughs by virtue of the disproportionate impact they can have on important views, the skyline and to Westminster's heritage assets.</u> Tall buildings in Westminster or in adjacent boroughs can pose a particularly serious threat to important views.</p> <p><u>Tall buildings are also addressed specifically in relation to Westminster's Opportunity Areas: Paddington Opportunity Area paragraph 3.14 and Policy CS3; Victoria Opportunity Area paragraph 3.19 and Policy CS4; Tottenham Court Road Opportunity Area paragraph 3.23. Detailed policy criteria for tall buildings will be included in the City Management Plan.</u></p>	Statement of Common Ground with English Heritage
32	108	Part V Infrastructure and Development Impacts	Policy CS32	<p>When negotiating planning obligations, the council will require mitigation of the <u>directly related</u> impacts of development; ensure the development complies with policy requirements within the development plan; and, if appropriate, seek contributions for supporting infrastructure.</p> <p>Development will be supported by upgrades to existing infrastructure</p>	Examination in Public Day Six Matters 7 & 8 - Discussions with Westminster Property Association

				<p>and the provision of new infrastructure where necessary to enable it to be sustainable. Working with its partners, the council will identify this infrastructure, its costs and any shortfalls in funding and will ensure this infrastructure is:</p> <ul style="list-style-type: none"> • Phased and delivered in a timely manner to support growth; and • Funded, where necessary, through planning obligations or the Community Infrastructure Levy, <u>where this complies with relevant legislation</u>. <p>Planning obligations and any Community Infrastructure Levy contributions will be sought at a level that ensures the overall delivery of appropriate development is not compromised.</p>	
33	108	Part V Infrastructure and Development Impacts	Policy CS32 Reasoned Justification	<p>Planning obligations, used in line with <u>relevant legislation and current</u> government guidance, can play an important role in managing direct site specific and local impacts of a development and ensuring that the Core Strategy and other development plan policies are achieved. Planning obligations, or if introduced CIL, also have a role in contributing to the provision of supporting infrastructure.</p> <p>Cumulatively almost all development puts additional pressure on infrastructure and should contribute to addressing that impact. While some infrastructure can be directly provided by, and directly serve a specific development, in many cases it will be necessary to pool funding from several developments.</p>	Examination in Public Day Six Matters 7 & 8 - Discussions with Westminster Property Association
34	131	Part V Waste Infrastructure	Paragraph 5.81	<p>5.81 Although Westminster contains no Strategic Industrial Locations, detailed analysis of potential waste locations has been undertaken, using criteria set out in national and regional guidance. This illustrates that any potential sites are currently unsuitable due to a combination of proximity to residential uses, no access to rail and water sustainable modes of transport, sites that have been allocated to deliver housing, or significantly, are within the area safeguarded for the delivery of Crossrail. Despite this, the council is committed to tackling its waste apportionment through:</p> <ul style="list-style-type: none"> • Designating and protecting existing waste sites, including waste cleansing depots and micro-recycling centres; • Rolling out a programme of in-vessel composters which is projected to meet the municipal waste apportionment target; 	Examination in Public Day One Matter 9 - Reference to joint working arrangements to secure remaining waste apportionment

				<ul style="list-style-type: none"> Identifying new sites in line with locational criteria during the lifetime of the plan period; and Requiring new development to provide new waste management facilities; and <u>joint working with other London boroughs to 'pool' waste apportionment.</u> 	
35	132	Part V Waste Infrastructure	Policy CS43	<p>The council will require the minimisation of waste, the increase in the re-use, recycling and composting of waste, and the reduction in the amount of waste disposed at landfill in order to meet the waste reduction targets set out in the London Plan.</p> <p>In order to ensure sufficient opportunities for the provision of waste management facilities in appropriate locations, in accordance with the London Plan waste apportionment, the council will:</p> <p>...</p> <ul style="list-style-type: none"> The council will <u>Secure</u> any new waste sites identified during the lifetime of the plan, other than street cleansing depots, micro-recycling centres and in-vessel composters, within a Waste Development Plan Document. <u>Work in partnership with the objective of securing joint working arrangements with other London Boroughs in order to pool waste apportionment, and set out these arrangements within a Waste Development Plan Document.</u> 	Examination in Public Day One Matter 9 - Reference to joint working arrangements to secure remaining waste apportionment
36	133	Part V Flood and Other Water-Related Infrastructure	Heading	Flood and Other Water-Related Infrastructure	Statement of Common Ground with Thames Water
37	133	Part V Flood and Other Water-Related Infrastructure	Before paragraph 5.83	<i>Insert heading:</i> Thames Tunnel	Statement of Common Ground with Thames Water
38	134	Part V Flood and Other Water-Related Infrastructure	Paragraph 5.85	<p>Thames Water is developing plans for a Thames Tunnel, a scheme to reduce and limit pollution from the sewerage system for the whole of London, in order to comply with EU Urban Waste Water Directive (1991). The Thames Tideway Tunnel project, if approved, is due to commence in 2012, after the Olympics, and be completed by 2020. The council supports necessary infrastructure of this nature, subject to their detail and assessment of impacts.</p>	Statement of Common Ground with Thames Water
39	134	Part V Flood and Other Water-Related Infrastructure	Policy CS44 and Reasoned	<i>Move policy to after paragraph 5.82</i>	Statement of Common Ground with Thames Water

			Justification		
40	134	Part V Flood and Other Water- Related Infrastructure	After paragraph 8.85	<p><i>Insert new policy:</i> Policy CS45 Thames Tunnel The council will work with Thames Water to support the timely implementation of the Thames Tunnel project, including the connection of the combined sewer overflows in the City.</p> <p>Reasoned Justification The Thames Tunnel project will help to reduce and limit pollution necessary to comply with the EU Urban Waste Water Treatment Directive (1991).</p>	Statement of Common Ground with Thames Water
41	145	Appendix 1 Strategic Sites within Victoria Opportunity Area	Site 6 Victoria Railway Station – Area (ha)	<u>4.76</u> 4.53	Council's Statement Issue 3.5
42	145	Appendix 1 Strategic Sites for Victoria Opportunity Area	Site 9 Kingsgate House, Westminster City Hall, Selbourne House – Area (ha)	<u>0.97</u> 0.5	Examination in Public Day Three Matter 2
43	148	Appendix 1 Strategic Sites within Flood Zone 3	Site 25 Chelsea Barracks – Preferred Uses	Residential, community and local services <u>including shops</u> and green open space for play. <u>Hotel use is likely to be acceptable in principal as part of the mix of uses.</u>	Examination in Public Day Three Matter 2 and Day Five Matter 5 - Accommodating local shops and hotel use on the Chelsea Barracks site
44	159	Appendix 4 Housing Delivery	Insert at start	<p><u>HOUSING DELIVERY</u></p> <p><u>The table below sets out the projected delivery of housing for the 15 year period 2010/11 - 2024/25. The council anticipates a net increase in conventional housing of 9,794, and a further 2,640 from non-conventional sources.</u></p> <p><u>The number of dwellings delivered from identified sites reduces over the 15 year period. This reflects the diminishing number of available</u></p>	Examination in Public Day Two Matter 4 Amend timescale to 2010/11 – 2024/25 - Improve illustrative material relating to housing - Provide more

				<p>sites in the city and also the lack of certainty about which sites may come forward in latter periods. The allowance for dwellings from sites delivering < 10 units (200 pa up to 2015/16 and then 150 p.a. until 2024/5) reduces due to the expected decrease in the number of sites available in the latter part of the plan period. The allowance for windfall sites of 10+ units increases progressively throughout the period. This reflects the fact that at the time of writing the council cannot identify the majority of sites that will come forward in the last 5 years of the time period, as outlined above. Sources of non-conventional housing are projected to remain relatively consistent and the allowance accords with the London Strategic Housing and Land Availability Assessment 2009. However, it is noted that delivery of non-self contained units is, in reality, very 'lumpy'.</p> <p>These are the raw figures shown in Figure X Westminster's Housing Trajectory.</p> <p><u>[Insert new table]</u></p> <p><u>Figure 58 Projected Housing Supply from all sources 2010/11 – 2024/25</u></p>	information about the sources of housing
45	159	Appendix 4 Housing Delivery		<p><u>WINDFALL DEVELOPMENTS</u></p> <p>...</p> <p><u>[Delete Housing Delivery figure]</u></p> <p>...</p> <p><u>[Delete Housing Trajectory Figure]</u></p>	Examination in Public Day Two Matter 4 - Improve illustrative material relating to housing
46	161	Appendix 4 Housing Delivery	Insert at end	<p><u>MEETING LONDON PLAN TARGETS</u></p> <p>The targets set out in the London Plan are both an annual target, and an overall target for a set time period. They are updated over time, through changes to the London Plan itself. This makes it difficult to assess performance against the London Plan targets because the overall time period has never been completed before the target has been changed. Whenever a new target is introduced, any surplus housing that may have been built up in previous years does not count against the new target, and the borough essentially starts from zero</p>	Examination in Public Day Two Matter 4 - Provide more information about the sources of housing - Improve illustrative material relating to housing, including delivery against the London Plan

				<p><u>again.</u></p> <p><u>The housing trajectory set out at Figure X assumes an annual target of 680 for the year 2010/11, and a target of 770 for every year after that. It applies these targets cumulatively over the 15 year time period of the Core Strategy. However, the London Plan targets are actually as follows:</u></p> <p><u>1999-2003</u> <u>No London Plan target</u></p> <p><u>2004-2006/07</u> <u>970 p.a. 1997-2016 or 2,910 for the three year period</u></p> <p><u>2007/08 – 2010/11</u> <u>680 p.a. 2007/08 – 2016/17 or 2,720 for the four year period</u></p> <p><u>2011/12 – tbc</u> <u>770 p.a. 2011/12 – 2021/22 proposed target subject to Examination in Public and subject to an early alteration</u></p> <p><u>The figure below shows past and projected performance against these targets. It also rolls out the target of 770 p.a. beyond the 2021/22 time period of the London Plan to cover the entire Core Strategy time period. This figure shows that, although the target may not be reached in any one year, cumulatively sufficient surplus is built up in other years to cover the target over the longer term. When the new 680 p.a. target was introduced in 2007/08, the surplus that had been built up previously was essentially deleted, although in that year the 680 target was exceeded (1,011 homes were delivered) and therefore a surplus was still recorded for that year. However, when the new 770 p.a. target is introduced in 2011/12, this is not expected to be met in that year (528 homes are projected), but a surplus is built up in subsequent years to cover it.</u></p> <p><u>Overall, the figure demonstrates that Westminster has always met its London Plan target, and is confident of doing so in the future.</u></p> <p><u>[Insert new graph]</u></p> <p><u>Figure 59 Housing Delivery Against London Plan Targets 1999 – 2024/25</u></p>	
47	170	Glossary	Flood-related infrastructure	Includes infrastructure to defend against and manage flooding from a number of sources including tidal and fluvial flooding and surface water flooding, such as the Embankment Wall and Thames Tideway	Statement of Common Ground with Thames Water

				Tunnel.	
48	179	Glossary	Social and community facilities (public)	These facilities are available to, and serve the needs of local communities and others, <u>provided by a local service provider or</u> and are often funded in some way by a grant or investment from a government department or public body or the voluntary sector...	Letter from Rosemarie MacQueen to the Inspector 15 th July 2010
49	184	References	New	Employment projections for London by sector and trend-based projections by borough (Working Paper 38) (2009) GLA Economics. Published by the Greater London Authority.	See Changes 3 and 4 above.
50	N/A	Proposals Map	Proposals Site 9	<i>Proposals site 9 needs to be extended to include Kingsgate House, as set out in Appendix 1 Site 9.</i>	Mapping error

New graphic for Change 18

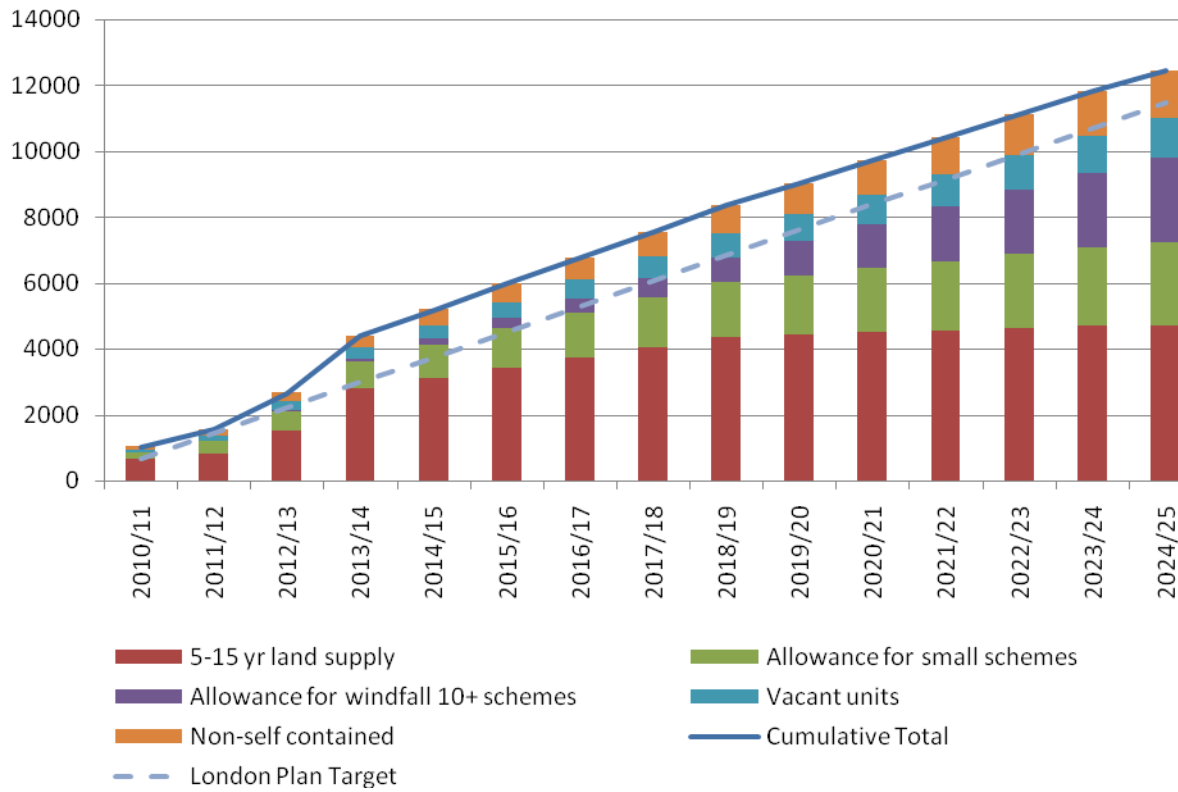


FIGURE 38 WESTMINSTER'S HOUSING TRAJECTORY ~~PROJECTED HOUSING DELIVERY~~

New table for Change 39

	Year	Conventional homes from 5-15 year land supply	Allowance for schemes under 10 units	Allowance for windfalls sites of 10+ units	Total conventional units	Bringing vacant homes back into use	Non-self contained units	Cumulative TOTAL
1	2010/11	656	200	0	856	81	95	1,032
2	2011/12	152	200	0	352	81	95	1,560
3	2012/13	693	200	50	943	81	95	2,679
4	2013/14	1303	200	50	1553	81	95	4,408
5	2014/15	312	200	100	612	81	95	5,196
6	2015/16	312	200	100	612	81	95	5,984
7	2016/17	312	150	150	612	81	95	6,772
8	2017/18	312	150	150	612	81	95	7,560
9	2018/19	312	150	150	612	81	95	8,348
10	2019/20	66	150	300	516	81	95	9,040
11	2020/21	66	150	300	516	81	95	9,732
12	2021/22	66	150	300	516	81	95	10,424
13	2022/23	66	150	300	516	81	95	11,116
14	2023/24	66	150	300	516	81	95	11,808
15	2024/25	0	150	300	450	81	95	12,434
	TOTAL	4,694	2,550	2,550	9,794	1,215	1,425	

FIGURE 58 PROJECTED HOUSING SUPPLY FROM ALL SOURCES 2010/11 – 2024/25

New graphic for Change 41

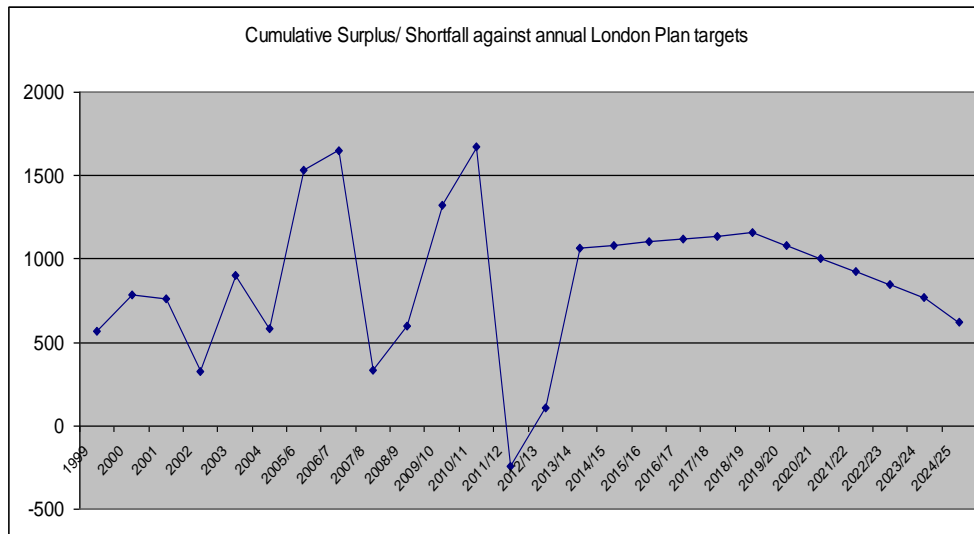


FIGURE 59 HOUSING DELIVERY AGAINST LONDON PLAN TARGETS 1999 – 2024/25

Notes of explanation for specific changes

Changes 3, 4, 25 and 43 Employment Figures

These revised employment figures bring the projections in line with the time period set of the Core Strategy.

We are not wholly convinced as the GLA Economics Papers 18 and 38 combined suggest an increase in jobs within Westminster of 13,000 between 2001 and 2007, an average of 1,857 jobs per year (Working Paper 18 cites actual jobs at 597,000 in 2001 and Working Paper 38 cites 609,000 jobs in 2007). It is acknowledged that this coincided with very favourable economic conditions, and substantial growth in the Paddington area. The projected increase of 49,000 jobs over 15 years seems high as it represents 3,267 new jobs p.a., something of a step-change, and in less favourable conditions.

At a local level, there is an estimated capacity for almost 16,000 jobs in the current pipeline of planning permissions (under construction and with permission). If this is taken to represent a 5 year supply, extrapolated out this would deliver about 47,466 jobs over the plan period.

	A Class and Ents Uses Net FS	Estimated A Class Jobs	Net B1 FS	Estimated B1 Jobs	Net Hotel Rooms	Estimated Hotel Jobs	Total Estimated Jobs
Schemes Under Construction	5823	277	14735	1228	645	645	2150
Schemes Unimplemented	-2706	-129	169206	14101	-300	-300	13672
Total	3117	148	183941	15328	345	345	15822

However, as re-worded within the suggested changes, the 49,000 is set out as a projection and an estimate. It is considered appropriate to leave this in as the best estimate we have and is appropriate within the context of the regional and local evidence base. It is noted that this is not a target, and is merely an indication of the order of growth that might be expected over the plan period, and as such it is considered to be justified.

Opportunity Areas

The council considers that with the current circumstances surrounding the London Plan and draft Replacement London Plan (dRLP), there is more flexibility around the setting of targets for Westminster's three Opportunity Areas. The council is also seeking to address the Inspector's comments about clarity about what has already been delivered in these areas and consistency in the time period of the Core Strategy. On this basis, the amendments suggested below for the Inspector's consideration seek to bring the timescale in line with the housing timescale of 2010/11 – 2024/25.

Changes 7 and 8 Paddington Opportunity Area

The suggested amendments to the background text give a better indication of what development has already occurred in the area. This results from the re-calculations that were submitted to the

Examination in Public. It brings the timescale in line with that for housing across the borough, which is the 15 year period 2010/11 – 2024/25, and therefore ties in with the changes suggested to the housing sections.

The 1,000 homes is derived from the dRLP, and accords well with the sites identified within the Opportunity Area which are projected to bring forward 1,204 units.

The 5,000 employment capacity is based on the fact that the existing target has already been met, but that a new target is coming forward in the dRLP. Pipeline data identifies approximate capacity for 97 jobs from permissions under construction and 7,574 jobs from unimplemented permissions. Because of the nature of Paddington, and the phasing of development there, there is a very high probability of those unimplemented permissions being built (as part of phased, master-planned development of a single site, much of which has already been built out).

Changes 9 and 10 Victoria Opportunity Area

The 1,000 homes remains the same as the published London Plan because the designated Opportunity Area does not include Chelsea Barracks, which would be required to achieve the 1,500 figure in the dRLP, in accordance with the London Strategic Housing Land Assessment. Chelsea Barracks is anticipated to bring forward approximately 600 homes.

The 4,000 employment capacity is based on the revised figure in the dRLP. Pipeline data identifies approximate capacity for 353 jobs from permissions under construction and 5,292 jobs from unimplemented permissions. Victoria does not have the same certainty of delivering unimplemented permissions as noted for Paddington above, and therefore the 4,000 figure in the dRLP is an appropriate target.

Change 11 Tottenham Court Road Opportunity Area

The 600 homes is derived from the dRLP, and is consistent with projected delivery from both City of Westminster and the London Borough of Camden. This is considered by both boroughs to be more appropriate and deliverable, and it better reflects our discussions with the Greater London Authority. The estimate of “about fifty residential units” referred to in paragraph 4.5 is considered to continue to represent an appropriate assessment of Westminster’s contribution to this target, particularly given the demands of Crossrail within the area, and the uncertainty surrounding the Royal Mail site.

The 5,000 employment capacity figure remains unchanged. Again, Westminster will only deliver a proportion of this, with the remainder being provided in the London Borough of Camden. Pipeline data identifies approximate capacity for 17 jobs from permissions under construction and 44 jobs from unimplemented permissions. However, it is noted that most of the key sites within the Opportunity Area do not yet have planning permission, and therefore this does not capture much of the employment floorspace which is expected to come forward, particularly on the Crossrail sites.

Changes 32 and 33 Planning Obligations and Delivering Infrastructure

The first amendment proposed by Westminster Property Association (WPA) has been agreed, to refer to “*directly related impacts*”.

The amendment suggested in the second phrase of this paragraph, to change “*and, if appropriate, seek contributions...*” to “*and, if justified...*” is considered to be unnecessary and undesirable. The current wording of appropriate is carefully included because after 2014 it may not be appropriate to seek contributions for supporting infrastructure via planning obligations as set out in Regulation 123 of the Community Infrastructure Levy Regulations 2010. As discussed during the hearing, the term “justified” was intended to relate to the 3 tests set out in Regulation 122. Therefore this change is not appropriate because it is limiting the comment to just the three tests (that apply in any case) not the changes to the operating framework for planning obligations post-2014. Similarly, there are other circumstances set out in Regulation 123, such as the adoption of a Community Infrastructure Levy, which would make seeking supporting infrastructure inappropriate.

The final amendment sought related to the first phrase of the second paragraph, to change “*the provision of new infrastructure where necessary to enable it to be sustainable*” to “*the provision of new infrastructure where justified...*”. It is acknowledged that the reference to “*necessary*” could be taken to be only referring to one of the three tests in Regulation 122. However, rather than introduce the term “*justified*” it is more appropriate to remove the reference to “*where necessary*” which WPA considered reduced the scope of the policy to just one of the three tests. It is also noted that the policy is not necessarily requiring the infrastructure to be delivered through planning obligation mechanisms, and as noted in paragraph 5.41 of the Core Strategy, “*funding for many infrastructure projects will be from mainstream sources*”. For example, some utilities infrastructure is paid for directly. Therefore, it would be inappropriate to amend the policy in such a way that implied that the provision of infrastructure was only linked to planning obligations, rather than the broader provision of infrastructure through a whole range of mechanisms.

The concern expressed at the hearing was that planning obligations must be sought within the constraints of the legislation, particularly the three tests set out in Regulation 122. We are all in agreement on this. To this end, the most appropriate amendment to the policy is considered to be as follows:

Working with its partners, the council will identify this infrastructure, its costs and any shortfalls in funding and will ensure this infrastructure is:

- *Phased and delivered in a timely manner to support growth; and*
- *Funded, ~~where necessary,~~ through planning obligations or the Community Infrastructure Levy, where this complies with relevant legislation.*

This more specifically addresses the tests set out in national legislation, which might be subject to change over the lifetime of the Core Strategy, as acknowledged during the hearing. This also avoids the ambiguity of the wording suggested by WPA that appears to create a new test of “*justified*”, which does not form part of the legislative tests. We are however, all agreed that the tests must be met in seeking any planning obligations, and the change set out above is considered to address that point. This proposed amendment also directly addresses the issue of preventing ‘double-charging’ through both planning obligations and CIL, as outlined in Regulation 123, and as raised in the hearings.

Changes 34 and 35 Waste

The Greater London Authority have agreed this wording subject to the following comment:

“In the information you submit to the inspector I would ask that you include the proposed timetable for the redrafted LDS and waste DPD you spoke about at the EiP.”

Proposed Timetable:

Local Development Scheme Revision	Revision September-October 2010
Waste Development Plan Document	Drafting Spring-Summer 2011 Public Consultation Autumn 2011 Adoption Winter 2011-2012

It is proposed that the Waste Development Plan Document will be developed alongside, and build upon, the revision to Westminster's Municipal Waste Strategy, and connect contractual obligations with waste planning and capacity provision within Westminster. The timetable is therefore in line with revision to the MWS and proposed re-let of Westminster waste contracts, but is also programmed to commence once there is more certainty in relation to new adopted regional figures for waste apportionment.