

64 Victoria Street
London
SW1E 6QP

Reference: WCC_LETTER_006

31st March 2020

Dear Mr Ward and Mr Fleming,

I hope you are well given the current public health situation. I have seen the latest updates from the Planning Inspectorate regarding the impact the Covid-19 pandemic will likely have on forthcoming hearings. If there are any specific updates for the City Plan's examination, please communicate them via our Programme Officer as soon as you are able.

Documents uploaded to the Examination Library

As referred to in previous correspondence, the council has been working to prepare a suite of documents in response to queries raised by the Inspectors to date. Please see below an update on each of these:

Document	Status & document reference
Statement of Common Ground: Mayor & TfL re. parking policy	Complete: SCG_003_V2
Statement of Common Ground: Marylebone Cricket Club	Complete: SCG_008
Statement of Common Ground: Environment Agency & Thames Water	Agreed with Thames Water; pending approval with Environment Agency – agreement anticipated by 06/04/2020
Statement of Common Ground: Mayor (re. General Conformity)	Complete: SCG_007_V2
IIA Topic Paper Addendum: Reasonable alternatives	Complete: CORE_024
Housing Topic Paper Addendum: Key Development Sites	Combined into one Housing Supply Topic Paper. Complete: EV_H_013
Housing Topic Paper Addendum: Windfall Housing Supply	
Housing Topic Paper Addendum: housing requirement	
Revised 5 year land supply statement	Being finalised following work on the Housing Topic Paper, will follow this letter in a few days
Updated Local Development Scheme	Complete: CORE_023

In addition to this the council has also recently completed its latest Authority Monitoring Report for 2018/19 and this has been provided to you and will be uploaded on in the Examination Library (EV_GEN_013)

Documents relating to the waste policy

In addition, the council have also been working to resolve the objections to Policy 38 Waste management raised at Regulation 19. This has been done through a Statement of Common Ground with Bexley Borough Council (SCG_009) and a Waste Data Study (EV_ENV_022) (as referred to in minor modification M/E/15 in the Schedule of Proposed Modifications). The Study sets out how Westminster is planning for the seven waste streams, recommends a series of further amendments to Policy 38 and is supported by Statements of Common Ground between Westminster City Council and (i) The Mayor (ii) North London Waste boroughs and (iii) recipients of Westminster's strategic waste exports¹.

Implications of the Housing Supply Topic Paper

While the council remains strongly ambitious in terms of housing delivery, it acknowledges that the levels of supply must not be conflated with this ambition in the local plan. In response to questions and comments in INSP2 we have been pulling together the data and information requested in a publishable format to demonstrate the soundness of the evidence underpinning the housing policy. In doing so, the council has taken the opportunity to re-examine the sources of supply, which are explained in the new Housing Topic Paper (EV_H_013). This included a re-examination of the deliverability and developability (including assessment of the suitability, availability and achievability) of all known housing sites, including those shown as 'key development sites' in Appendix 1 of the submitted Plan² and our assumptions on the contribution windfall housing will make to the supply of housing over the Plan period. We have also considered the implications for Westminster's housing target of further progress on the examination of the draft replacement London Plan since Westminster's City Plan was submitted.

Our conclusion is that there is robust evidence to demonstrate that the housing target set for Westminster in the London Plan can be met over the Plan period, but the ambitions to deliver over and above this target to meet the housing requirement as calculated by the standard method (NPPF para 60) should not form the target set in Westminster's local plan.

¹ Barking & Dagenham, Brent, Cambridgeshire, Essex, Hertfordshire, Hillingdon, Kent, Merton, Newham, North London, Northamptonshire, ODPC (Ealing), South East London Boroughs Group, Surrey, Thurrock, Windsor, Maidenhead & Woking. N.B. Havering also are in receipt of Westminster's waste however we have been unable to secure dialogue to agree a SCG at this time.

² In line with NPPF para 67 and PPG para 017

As such, the council seeks to revise its housing target to align with the London Plan (intend to publish version) as follows:

From (in the submitted City Plan 2019 – 2040)	To (proposed main modification)
22,222 homes over the plan period and 1,495 homes per year in the first ten years of the plan	20,685 homes over the plan period and 985 homes per year, every year

Full justification for why the council now considers this necessary is set out in the new Housing Supply Topic Paper (EV_H_013). The council would like to make it clear that while the housing target may change, the overall *ambition* within the Plan to exceed the housing target remains and policy will clearly set out that the target is a minimum which we expect to be exceeded.

There will also be implications for supporting text and other policies in the plan where the housing target is mentioned (e.g. the monitoring framework). The schedule of modifications is being updated with these proposed amendments and will be sent to you in a few days following this letter. A further addendum to the Integrated Impact Assessment to take account of this modification is also being prepared and will be shared with you in due course.

Appendix 1 of the Plan

Following my previous correspondence regarding the status of the sites in Appendix 1 to the submitted plan, I would like to take this opportunity to re-iterate that the sites in the submitted version of the Plan are not site allocations (and therefore do not require flood risk sequential and exception testing).

The council has considered the terminology and format of the Appendix and would like to clarify through a renewed Appendix that these sites are deliverable and developable sites within Westminster's housing trajectory which have been identified in line with the requirements of the NPPF (paragraph 67) and PPG (paragraph 017). A revised format for the Appendix is therefore proposed and will be shown in the forthcoming revised Schedule of Modifications to make this clear. The site boundaries will also be removed from the policies map.

Please note - the updated Local Development Scheme (CORE_023) provides more clarity on the relationship between the City Plan and forthcoming Site Allocations DPD (note – the timescales for the latter have also been updated).

Yours sincerely

Kimberley Hopkins MRTPI
City and Planning Policy Team Leader
Westminster City Council