

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a 'mock' examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 'key questions' in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the 'tests' as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#).

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
Growth Strategy		
A	<p>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</p>	<p>To respond to our growth, we need to develop; the challenge is to maximise our limited space and balance competing priorities. The West End Retail and Leisure Special Policy Area will bring significant jobs growth through a range of commercial development, alongside affordable new homes. Opportunity Areas inspire the redevelopment of brownfield land to intensify delivery of homes and jobs. Special Policy Areas like Soho, Harley Street and Mayfair have enhanced protection, as each brings its own unique contribution to our economy. Heritage and design policies will ensure that new development respects Westminster’s fine grain and historically important built environment.</p>
B	<p>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</p>	<p>Spatial designations such as the Opportunity Areas and Central Activities Zone in the London Plan have been key influencers in where growth will be directed in Westminster. Complimentary to this was the identification of key development sites and large scale regeneration plans – where landowners have confirmed intentions to develop their sites, contributing to the growth of the city. Heritage and conservation considerations have influenced where growth will take place and the nature of it, for example through the identification of locations suitable in principle for tall buildings and high level assessments to determine indicative housing numbers for key development sites.</p>
C	<p>List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery</p>	<p>The dense urbanised nature of Westminster means that most of the city forms part of a growth area, in one form or another. Areas where growth is in principle supported and directed are:</p> <ul style="list-style-type: none"> • West End Retail and Leisure Special Policy Area (WERLSPA) • Tottenham Court Road Opportunity Area • Paddington Opportunity Area • Victoria Opportunity Area • Church Street/ Edgware Road and Ebury Bridge Estate Housing Renewal Areas • The North West Economic Development Area (NWEDA) • The town centre hierarchy; and • The Commercial Activity Zone (CAZ)

KEY QUESTIONS		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		The nature of development means that large strategic sites that are fundamental to the council's growth plans and are dependent on infrastructure investment do not exist in the same way as they do elsewhere in the country. Further investment in public transport provision, such as Crossrail and Crossrail 2, will enhance the business case for many potential development sites, but sites are not dependent on such infrastructure to unlock them.				
1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is 'an appropriate strategy' within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Policy 1 sets out the council's overall strategy for accommodating growth across the city and how this needs to balance competing factors, while policies 2 – 6 identify spatial priorities for key growth areas. Policy 8 sets out how housing delivery will be increased. Policies 14 and 15 provide clear direction on areas for commercial growth, policies 41-43 set out a positive framework for additional building height, and Appendix 1 identifies key development sites.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments:				
2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: While the City Plan does not make site allocations, it identifies a list of Key Development Sites which are considered to have the potential to make a significant positive contribution to the City Plan's objectives and are likely to come forward for development during the lifetime of the plan. Appendix 1 of the Housing Topic Paper (see submission reference EV_H_001) explains the methodology behind the selection of the Key Development Sites and the approach used to identify their indicative capacities and principles for development. More details will				

		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>be set out through the emerging Site Allocations DPD. Further work is being undertaken to assess site capacities and deliverability for the Site Allocations DPD, and to set out the council's methodology in greater detail.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments:</p>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
3.	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	<p>Reason for score: Policy 8 sets out Westminster's housing requirement based on application of the standard methodology and the draft London Plan targets. The policies of the City Plan are more pro-growth and ambitious than its predecessors and therefore it is considered that we can deliver above the draft London Plan target of 1,010 in the first 10 years of the plan period to meet the standard methodology target. This target is considered to be aspirational but deliverable, taking into account Westminster's housing capacity (see Housing Topic Paper - submission reference EV_H_001) and the viability of development typologies(see City Plan Viability report and Addendums – submission references EV_GEN_002 to EV_GEN_004 inclusive).</p> <p>As the council is seeking to confirm a 5 year supply of housing, the appropriate 10% buffer has been applied to the 5 year supply calculations. The Draft 5 Year Housing Supply Statement 2019 (submission reference EV_H_004) confirms that Westminster is able to demonstrate a 5 year supply of land.</p>				
		<p>Implications of taking no further action: The City Plan does not take into consideration draft London Plan's Inspection Panel's Report recommended changes to strategic housing targets, which would if accepted, result in a lower target for Westminster.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: The draft London Plan's Inspection Panel's Report recommends that the strategic housing targets for some London boroughs are reduced from those outlined in the draft version of the plan. This is due to concerns around the delivery of small sites. The council has identified that its housing targets may need to be reduced to respond to this likely change to the draft London Plan.</p>				
		<p>Reviewer Comments:</p>				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
4.	Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: N/A				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right:				
Reviewer Comments:						
5.	Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The City Plan does not look to make site allocations. These will be made as part of a separate Site Allocations Development Plan Document (DPD) on which work has already begun. Part 4 of the Housing Topic Paper (submission reference EV_H_001) sets out how sites that contribute to Westminster's housing supply have been identified, with reference to the NPPF and the Housing and Economic Land Availability Assessment PPG. Appendix 1 of that document provides additional detail on the methodology used to assess Key Development Sites that contribute to housing supply. This assessment was carried out at a relatively high level with more detailed work occurring through the emerging Site Allocations DPD. Further work is currently being undertaken to assess site capacities and deliverability for the Site Allocations DPD, and to set out the council's methodology in greater detail.				

KEY QUESTIONS		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: Further scrutiny of the site selection and assessment process.				
		Mitigation / Action required (if necessary) to move scale to right: More detailed work to assess site capacities and deliverability and set out the site selection and assessment methodology.				
		Reviewer Comments:				
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: We do not believe this requirement is applicable to Westminster as the majority of our housing delivery is reliant on windfall development. Given the nature of development in Westminster, with potential development sites across the city, and the high number of designated neighbourhood areas with some Neighbourhood Areas covering small areas, providing an accurate housing requirement for each is virtually impossible.				
		Implications of taking no further action: None.				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: N/A. The City Plan does not make site allocations. These matters will be addressed by the forthcoming Site Allocations DPD.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
D	<p>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</p> <p>List these targets and the evidence source for this 'need' target?</p>	<p>At least 63,000 office/ B1 based jobs over the plan period (policy 14A). This is based on the 75,058 in figure 9.6 of the London Office Policy Review, then adjusted to reflect the plan period.</p> <p>At least 445,000sq m of additional office/ B1 floorspace (paragraph 14.2). This is based on the 848,160 in figure 9.6 and 213,289 in figure 9.8 of the London Office Policy Review, which are both then adjusted to reflect the plan period, before a mid-point between resulting range is selected.</p> <p>Between 229,944 – 322,286sqm of comparison retail floorspace (para 15.3). This takes the figures of 284,693 and 399,021 from figures 98 and 104 of the Consumer Expenditure and Comparison Goods Floorspace Need in London (GLA report), and adjusts it to reflect the plan period.</p>				
8.	<p>Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: While the plan does not allocate specific sites for commercial growth, it provides a positive framework to accommodate such growth, and evidence is provided in the economy and employment (submission document reference EV_E_002), and commercial growth topic papers (submission document reference EV_E_001), of the deliverability of these targets				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments:				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The plan is supported by an Infrastructure Delivery Plan (submission document reference EV_GEN_007) which identifies infrastructure requirements over the plan period. Each of the chapters in the plan contains policies that enable infrastructure provision.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						
10.	Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The plan is supported by an Infrastructure Delivery Plan (submission document reference EV_GEN_007) which identifies infrastructure requirements (including transport) which was prepared in liaison with infrastructure providers. The IDP identifies the extent of the funding gap and sets out a strategy to seek to address the gap. The approach to infrastructure planning is appropriate to the type and level of detail of the plan, which does not contain site allocations.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						
Process and Outcomes (see also Toolkit Parts 2 and 3)						

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
E	What are the cross boundary strategic matters affecting your local plan policies update? List these.	<p>As set out in section 5 of the statement of common ground with the Mayor and neighbouring authorities, strategic cross boundary issues affecting the City Plan are:</p> <ul style="list-style-type: none"> • Housing delivery and affordable housing; • Office floorspace protection and growth; • Tottenham Court Road Opportunity Area; • Town Centres and High Streets; • Strategic Cultural Areas; • Transport; • Waste; • Heritage and protected views; • Green infrastructure; and • Thames Policy Area 				
11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: The Duty to co-operate statement (submission document reference CORE_012) sets out the strategic issues which the council has co-operated with its partners on and the outcome of that co-operation (See specifically Figure 3). See also Statement of Common Ground with Neighbouring Boroughs (submission document reference SCG_004 and SCG_005)				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
F	<p>Are there any aspects of the local plan policies update not in conformity with national policy? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p>	<p>The Planning Policy for Traveller Sites explains that “planning authorities should make their own assessment of need for the purposes of planning” and, where suitable, help meet the needs of this community by identifying sites. Although the council has not carried out a need assessment for gypsies and travellers, the council is confident it was not needed given the available evidence of need produced by the Mayor and the lack of representations in relation to this matter at both informal and Regulation 19 consultation (further details can be found in the Housing Topic Paper – see submission document reference EV_H_001). Policy 11J of the City Plan is positive and flexible and explains how applications for pitches or sites would be assessed in accordance with national policy</p> <p>The Local Plan policies do not recognise the importance of providing adequate overnight lorry parking facilities in line with paragraph 107 of the NPPF. Land values and high level of public transit accessibility mean that it is not feasible or efficient to provide overnight lorry parking facilities in Westminster. Parking facilities for lorries that service the borough are generally provided on land outside of the borough. In addition, the Local Plan policies do not recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time as per paragraph 104(f) of the NPPF. Westminster does not contain any airfields. Neither raise conformity issues.</p>				
12.	<p>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Our residential parking policy differs from that set out in the draft London Plan and the Mayor considers this to be a conformity issue, the council disagrees and a Statement of Common Ground has been signed setting out both party’s positions (see submission document reference SCG_003).</p> <p>The Mayor has expressed concerns to the approach to strategic waste management with regards to managing the London Plan Apportionment at Regulation 19 stage. However, the council is confident it has made positive steps</p>				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		towards addressing this issue and has agreed a Statement of Common Ground with the Mayor (see submission document reference SCG_004).				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: Further engagement with London Boroughs to seek to pool the London Plan waste apportionment in the lead up to Examination in Public.				
		Reviewer Comments:				
13.	<p>Is the local plan policies update:</p> <ul style="list-style-type: none"> in conformity with any 'higher level' plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? 	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The City Plan directly aligns with, and delivers on a number of key pledges in, the council's overarching vision and strategy 'City For All'. The City Plan provides a framework to guide future neighbourhood plans – clearly identifying in Appendix 3 which are strategic policies they need to follow. Figure 5 and the text on page 15 of the plan also refer to the presence of numerous neighbourhood areas and forums in Westminster, and the council's role in supporting neighbourhood planning.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments:				
14.	Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England)	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

		Assessment				
	KEY QUESTIONS	<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?	<p>Reason for score: We have complied with our duty and consulted both formally and informally in line with the council's Statement of Community Involvement – as set out in the Consultation Statement (submission document reference CORE_010) and Duty to co-operate statement (submission document reference CORE_012).</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The IIA process included the consideration of reasonable alternatives, which were evaluated against their likely impacts on the objectives making up the IIA assessment framework (see submission document reference CORE_006). The narrative explains why the chosen option is a highly justified approach.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The likely significant effects of the draft City Plan policies have been iteratively assessed as part of the Integrated Impact Assessment (IIA) process (submission document reference CORE_006). A detailed appraisal against the IIA assessment framework assessed the likely significant impacts of the proposed individual policies as well as any significant cumulative effects of the plan as a whole.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Section 2.2 of the IIA describes how the iterative IIA process has led to a series of recommendations that have informed policy changes and provides details on the key changes (see submission document reference CORE_006), including where any likely significant negative impacts of proposed policies were identified. Through this process, we ensured that the policies constituted a positive and appropriate framework for the delivery of the City Plan's objectives.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The IIA clearly sets out how each policy has been assessed. An EQIA addendum to the IIA was drafted post-Regulation 19 to explain the methodology the council used in its equalities assessment. This document (submission document reference CORE_007) demonstrates how policies have been influenced by this assessment				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The HRA Screening Report has considered the draft plan policies in combination with other plans and projects.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The HRA Screening Report screens out the need for a Full HRA (or Appropriate Assessment) and does not identify any mitigation measures. This question is therefore not applicable.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The screening outcome of the HRA Screening Report was negative, meaning that no likely impact was identified. There were therefore no implications that that needed to be addressed in City Plan policies.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						
Housing Strategy						
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Policy 8 states that the council has identified a sufficient supply of land to meet and exceed the housing requirement in full. This is further demonstrated in the Housing Topic Paper (submission reference EV_H_001) and Draft 5 Year Housing Supply Statement 2019 (submission reference EV_H_004).				
		Implications of taking no further action for local plan soundness and/or effectiveness: Further scrutiny of the housing trajectory and windfall assumptions in latter part of the plan period. City Plan policy does not take into consideration the draft London Plan's Inspection Panel Report's recommended changes to strategic housing targets.				
		Mitigation / Action required (if necessary) to move scale to right: Further consideration of the housing trajectory and windfall assumptions. Taking into account likely revised London Plan targets.				
Reviewer Comments:						
G	Is there any unmet need in neighbouring areas that you have been formally asked to	No				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	accommodate? If yes, then list the amount by each local authority area.					
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably do so?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: We are likely to be meeting unmet need through meeting our 10-year housing requirement under the standard method, as opposed to the annualised London Plan target. Overall, we expect to significantly exceed our 10-year London Plan target.				
		Implications of taking no further action: None.				
		Mitigation / Action required (if necessary) to move scale to right: N/A.				
Reviewer Comments:						
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period? Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The housing trajectory and the strategy for delivery and implementation is clearly articulated and justified in the Draft 5 Year Housing Supply Statement 2019 (submission reference EV_H_004), Housing Topic Paper (submission reference EV_H_001), Housing Strategy Direction of Travel Statement (submission reference EV_H_007) and Draft Infrastructure Delivery Plan (submission reference EV_GEN_007).				
		Implications of taking no further action: Further scrutiny of the housing trajectory and windfall assumptions in latter part of the plan period. City Plan policy does not take into consideration the draft London Plan's Inspection Panel Report's recommended changes to strategic housing targets.				
		Mitigation / Action required (if necessary) to move scale to right: Further consideration of the housing trajectory and windfall assumptions. Taking into account likely revised London Plan targets.				
Reviewer Comments:						

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The ability of the City Plan to provide for a 5-year supply of deliverable sites on adoption and development sites beyond this period is confirmed within the Draft 5 Year Housing Supply Statement 2019 (submission reference EV_H_004), Housing Topic Paper (submission reference EV_H_001), Housing Strategy Direction of Travel Statement (submission reference EV_H_007) and Draft Infrastructure Delivery Plan (submission reference EV_GEN_007).				
		Implications of taking no further action: Further scrutiny of the housing trajectory and windfall assumptions in latter part of the plan period. City Plan policy does not take into consideration the draft London Plan's Inspection Panel Report's recommended changes to strategic housing targets.				
		Mitigation / Action required (if necessary) to move scale to right: Further consideration of the housing trajectory and windfall assumptions. Taking into account likely revised London Plan targets.				
Reviewer Comments:						
26.	Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The housing trajectory (see Draft 5 Year Housing Supply Statement 2019 - submission reference EV_H_004), identifies a supply of over 24,600 net new homes over the plan period. This provides 'head room' of over 2,300 net new homes above the plan period requirement of 22,222.				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: Further scrutiny of the housing trajectory and windfall assumptions in latter part of the plan period. City Plan policy does not take into consideration the draft London Plan's Inspection Panel Report's recommended changes to strategic housing targets.				
		Mitigation / Action required (if necessary) to move scale to right: Further consideration of the housing trajectory and windfall assumptions. Taking into account likely revised London Plan targets.				
		Reviewer Comments:				
27.	Is the Council reliant on the delivery of any 'windfall' sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Westminster has a strong track record of the bulk of its development being delivered through windfall, assumptions that we have factored into our housing trajectory based on average delivery of windfall over the past 10 years.				
		Implications of taking no further action: Further scrutiny of housing trajectory and windfall assumptions in latter part of the plan period.				
		Mitigation / Action required (if necessary) to move scale to right: Further consideration of the housing trajectory and windfall assumptions. Taking into account likely revised London Plan targets.				
		Reviewer Comments:				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Policies 8, 9, 11, 12 and 13 make it clear what size type and tenure of housing is required.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: We have specific policies to encourage housing for specific groups although these do not set overall targets or allocate specific sites to meet this need.				
		Implications of taking no further action: Scrutiny of effectiveness of policies.				
		Mitigation / Action required (if necessary) to move scale to right: Further analysis of delivery trends of different types of housing and analysis to determine need specific to these groups over the plan period.				
		Reviewer Comments:				
30.	Can your affordable housing requirements, including any geographical variations, be justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: They are in conformity with the London Plan and have been viability tested.				
		Implications of taking no further action: None.				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
31.	Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: We have not carried out a Westminster-specific housing need assessment for travellers as required by national policy and the New London Plan. However, the Panel of Inspectors' report on the New London Plan considers that the requirement is too onerous. As explained in the Housing Topic Paper (see submission document				
		Does the local plan policies update make adequate provision for the identified needs?				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		reference EV_H_001), the Council is relying on evidence published for the London Plan examination and as there is no evidence that suggests there is a need for sites for travellers and/or travelling showpeople in Westminster, this is considered proportionate evidence. Accordingly, the City Plan does not allocate any pitches for this use.				
		Implications of taking no further action: None. The policy is flexible enough to allow a pitch if there is an identified need and an application is made.				
		Mitigation / Action required (if necessary) to move scale to right: No action required. As explained in the Housing Topic Paper (see submission document reference EV_H_001), we will cooperate with the Mayor of London if he leads on a London-wide housing need assessment for travellers as suggested by the Panel of Inspector's report.				
		Reviewer Comments:				
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: As explained in question 31 above, the council has not identified any housing need for travellers in reference to available evidence (see submission document reference EV_H_001). The City Plan does not allocate any pitches for travellers as no identified need.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A.				
		Reviewer Comments:				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	No sites for travellers and travelling showpeople have been identified.				
		Justified approaches to plan policy and content				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
33.	<p>Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text?</p> <p>[You may wish to check each policy setting a threshold]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: All thresholds which are set in the City Plan policies are robustly justified within supporting text and in evidence accompanying the plan. All thresholds have been tested for their impact on viability and found to not have an unacceptable impact on the viability of typical developments in Westminster (see submission document reference EV_GEN_001)</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments:</p>				
34.	<p>Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Strategic local plan matters are not deferred to other documents. Matters of non-strategic detail will be covered in forthcoming Supplementary Planning Documents such as on heritage and design principles. This is appropriate and in line with emerging national guidance in the National Design Guide which promotes the use of design codes and guides to support planning policy and provide more detailed and specific design parameters reflecting local context. A forthcoming Site Allocations DPD will provide more detail on the expected scale and nature of development on the Key Development Sites identified in the City Plan, however sufficient strategic level detail is provided in the submission version of the City Plan to guide their development.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>Note that Policy 41 Townscape and Architecture (para 41.17) indicates future intention to <i>publish a list of views of metropolitan importance and prepare guidance on their management</i>. New London Plan Policy HC3 requires boroughs to clearly identify local views in local Plans and strategies to enable the effective management of development in and around the views. A draft list of views was published in the Views supporting paper with the Regulation 19 draft plan (submission document reference EV_DH_003). All London Plan protected views are included within the plan itself but it is considered appropriate for local views to be in guidance which can be more easily kept under review and updated.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
35.	<p>Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?</p> <p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]</p>	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The town centre hierarchy, and the priorities for different levels of the town centre hierarchy, are clearly articulated in paragraphs 15.14 – 15.26. The approach to directing growth to these centres is consistent with national policy.</p> <p>Biodiversity designations are in line with the London Plan and national policy.</p> <p>The Heritage policy (Policy 40) makes clear the different level of protection afforded to different types of heritage asset, having regard to their significance and designation. It differentiates between designated and non-designated heritage assets and provides different criteria for different types of asset. It makes clear at paragraph 40.4 that the world heritage site is of the highest level of significance and para 40.27 notes that although the highest level of protection will be afforded to designated heritage assets and those considered to be most significant, non-designated heritage assets can also contribute to local character and will be afforded a proportionate level of protection. This is consistent with national policy.</p>				

KEY QUESTIONS		Assessment														
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>														
		Implications of taking no further action: None														
		Mitigation / Action required (if necessary) to move scale to right: N/A														
36.	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	<table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th data-bbox="851 598 1108 638">-2</th> <th data-bbox="1108 598 1366 638">-1</th> <th data-bbox="1366 598 1624 638">0</th> <th data-bbox="1624 598 1881 638">+1</th> <th data-bbox="1881 598 2150 638">+2</th> </tr> </thead> <tbody> <tr> <td data-bbox="851 638 1108 766">No, we do not meet this requirement</td> <td data-bbox="1108 638 1366 766">No, we may not fully meet this requirement</td> <td data-bbox="1366 638 1624 766">Unclear whether our plan meets this requirement or not</td> <td data-bbox="1624 638 1881 766">Yes, we are likely to meet this requirement</td> <td data-bbox="1881 638 2150 766">Yes, we are confident our plan will meet this requirement</td> </tr> </tbody> </table>					-2	-1	0	+1	+2	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		-2	-1	0	+1	+2										
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement										
<p>Reason for score:</p> <p>The following uses are restricted either in certain locations or at certain scales and it is considered that these are justified in supporting text and accompanying evidence:</p> <ul style="list-style-type: none"> • Temporary sleeping accommodation • Restriction on the size of new homes to no more than 200sqm • Restriction to no more than two non A1 uses at ground floor in a row in the International Shopping Centre or no more than three at ground floor in other shopping centres. • Hotels are directed to the CAZ (except for predominantly residential parts) and town centres and large hotels are not considered acceptable in the Soho Special Policy Area • Over-concentration of entertainment uses will be prevented where this harms residential amenity or the vitality and character of the local area. • Hot food take-aways are prohibited within 200m walking distance of a school • Shisha smoking premises are prevented in units underneath or adjacent to existing residential properties • New residential parking is prohibited throughout the city except for parking zones B & F • New transport related structures affecting waterways (e.g. new bridges) will only be acceptable where there is an overriding strategic case. • Highly vulnerable uses are not acceptable in Flood Zone 3 and More Vulnerable Uses directed away from Surface Water Flood Risk Hotspots 																

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
37.	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: A series of existing standards have been adopted into the City Plan e.g. Accessibility standards: (set in Building Regulations), Nationally Described Space Standards (set by central government and adopted by the New London Plan), nationally used BREEAM standards. All standards have been tested for their impact on viability and found to not have an unacceptable impact on the viability of typical developments in Westminster (see submission document reference EV_GEN_001)				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				

KEY QUESTIONS		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
Deliverability						
38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Viability of the City Plan policies update has been suitably tested in the City Plan Viability report and its Addendums (submission references EV_GEN_002 to EV_GEN_004). Paragraphs 1.25- 1.31 of the report sets how the policy context has informed its development. This includes the NPPF, Mayoral CIL and Westminster CIL. Paragraphs 1.32-1.37 summarises the City Plan policies the report identifies and assesses as potential having cost implications for development.				
		Implications of taking no further action: The City Plan Viability report was produced prior to new PPG guidance on viability.				
		Mitigation / Action required (if necessary) to move scale to right: Further work on to take into consideration the new PPG on viability.				
Reviewer Comments:						
39.	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence? Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
Reason for score: Where initial viability testing resulted in an unreasonable impact on viability, policies have been revised – in particular Policy 10 which was amended between informal consultation on the City Plan in November 2018 and Regulation 19 consultation in June 2019 (see Housing Topic Paper – submission document reference EV_H_001). As set out in Section 6 of the independent Local Plan Viability Review (submission document reference EV_GEN_001) the policies in the City Plan are not expected to have an unreasonable impact of the viability of typical						

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>					
		development experienced in Westminster. An addendum (submission document reference EV_GEN_003) to the Viability Report were created post-Regulation 19 in response to criticism that the approach taken in Policy 10 was unreasonable. Policy 10 was arrived at following the advice in the main viability report and the addendums confirmed the policy is appropriate.					
		Implications of taking no further action: None					
		Mitigation / Action required (if necessary) to move scale to right: N/A					
		Reviewer Comments:					
40.	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	-2	-1	0	+1	+2	
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
		Reason for score: The Monitoring Framework in the City Plan (see pages 175 – 179) has been devised to ensure the policies can be effectively monitored and the sources of information to check the key performance indicators have been chosen based on their availability and robustness. The City Plan policy’s performance will be reviewed annually through the Authority Monitoring Report.					
		Implications of taking no further action: None.					
		Mitigation / Action required (if necessary) to move scale to right: N/A					
		Reviewer Comments:					

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
41.	<p>Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>?</p> <p>Where triggers for plan review and/or update are identified are they justified and proportionate?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Monitoring Framework in the City Plan (see pages 175 – 179) sets out at what point a review will be triggered based on the results of the KPI assessment – see column ‘Trigger for review / review mechanism’. The triggers have been carefully considered to take into account the robustness of the data upon which the KPI is based and have been set at timeframes which enable the policies in the City Plan to have had meaningful effect on delivery e.g. housing delivery is assessed after three years. The Local Development Scheme also sets out the expected reviews of the City Plan in future.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
<p>Reviewer Comments:</p>						
Plan effectiveness (and associated policy clarity)						
42.	<p>Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years <u>from adoption</u>? Does the evidence relied on to support those policies correspond/cover this whole period?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The City Plan covers the period 2019 – 2040 and therefore exceeds 15 years with a period up to 2040. Appendix 3 of the plan identifies which policies are strategic. Evidence documents cover different periods, appropriate to the issue.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
<p>Reviewer Comments:</p>						
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
43.	Does the local plan policies update clearly set out which adopted Development Plan policies it supersedes?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Submission document CORE_19 sets out which adopted policies are replaced by the City Plan 2019 - 2040				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The objectives of the Plan are clearly articulated on pages 24-25 of the Plan. Each policy has been drafted in plain English to make its meaning clear. Where the policies have been misunderstood and this has been communicated to the council through consultation responses, the meaning has been clarified through minor modifications. Where appropriate, thresholds or numerical ranges have been used in the policy to make it clear what scale of development they apply to.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
45.	For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: All maps in the City Plan are referenced and explained in the Plan. The Council has also submitted a Policies Map that clearly defines the policy areas (see submission documents reference CORE_003 and CORE_004). The Council has also produced a Schedule of Changes to the Policies Map (see submission documents reference CORE_005) that explains all changes to spatial designations (from the adopted Policies Map, to the Regulation 19 Publication Draft and the Submission recommendations).				
45.	Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?					

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Plan has been positively prepared and policies are positive setting out the types of development the council wants to see in the city rather than prescriptively prohibiting the development it is less in favour of. In several places throughout the plan, innovative solutions are sought from developers to identified issues – signalling that the Plan is an enabler of development rather than a set of black and white rules.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
47.	Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed. [Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Where a floorspace threshold is stated which indicates whether a policy applies depending on the scale of the development, this is sufficiently justified in the supporting text and in accompanying evidence. Likewise, standards for residential development (in policies 12 and 13) such as space standards are clear whether they apply e.g. for residential extensions, new-builds or heritage assets. The Plan contains spatial policies that direct certain types of uses to different parts of the city, or seek to restrict uses in certain locations e.g. hotels are deemed appropriate in				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		the Central Activities Zone and town centres. The reasons behind the locations chosen for different uses are sufficiently explained throughout the plan and its evidence base.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
I	<p>State how many policies are in your local plan update?</p> <p>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</p>	There are 46 policies in the City Plan 2019 – 2040. As set out in the schedule of policies (submission document reference CORE_019) all current adopted planning policies will be replaced upon adoption of the new City Plan. Cross referencing of policies has generally been avoided throughout the Plan as all policies in the Development Plan should be read together and will carry equal weight. Likewise references to the NPPF is limited to a small number of instances.				
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The plan is much more concise than previous Westminster DPDs which is largely due to avoiding unnecessary repetition within the plan and with the London Plan and NPPF. Any duplication within other planning policy documents is to highlight the local importance of an issue and provide a local interpretation to the policy. Cross-referencing between policies has been avoided as the plan needs to be read as a whole.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
Reviewer Comments:						

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The City Plan has been carefully drafted to avoid duplicating other requirements and policies- it only makes reference to other requirements where necessary to signpost an applicant to a requirement if this is needed for clarity. The City Plan also does not repeat NPPF policy or London Plan policy – as the latter forms part of Westminster’s Development Plan it is not considered necessary to repeat these policies.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: As part of the development of the City Plan, the council has been very mindful of the need to make the plan accessible and clear for both applicant and decision maker. The Council has sought to avoid vague references to wording such as ‘where appropriate’ and where it is included, the Plan to seeks to explain what it means e.g. an appropriate marketing period is explained in the Glossary; an appropriate unit size mix is explained in the Annual Affordable Housing Statement; situations where external amenity space is considered inappropriate is explained in terms of built nature of Westminster providing constraints. The Regulation 19 consultation revealed				
[For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]						

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>where the policies were misunderstood and a series of minor modifications have been proposed to tighten clarity of meaning.</p>
		<p>Implications of taking no further action: None</p>
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>
		<p>Reviewer Comments:</p>

Date of assessment:	
Assessed by:	
Checked by:	
Overall Score:	
Comments:	