

Westminster City Plan 2019 – 2040: Statement of Common Ground

1. Executive Summary

- 1.1 This Statement of Common Ground has been prepared to demonstrate that Westminster's City Plan 2019 – 2040 is '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of paragraph 35 of the National Planning Policy Framework (NPPF). It focusses on areas of agreement or disagreement between the council, its neighbouring boroughs and the Mayor of London on strategic cross-boundary matters covered in Westminster's City Plan. It is not intended to demonstrate agreement between all parties on all matters raised (i.e. neighbouring boroughs agreement with one another), and does not preclude individual boroughs producing their own Statements of Common Ground covering a different geography and/ or issues in support of their own plans. Furthermore, it is worth noting that in a London context, collaboration on many strategic issues that go beyond borough boundaries (e.g. distribution of housing targets, identification of major areas of growth etc) are largely addressed through the London Plan.
- 1.2 In addition to this Statement of Common Ground and the one being prepared with the London Borough of Lambeth (for the reasons set out in paragraph 2.2 below), additional statements are being prepared to address detailed matters raised through Regulation 19 Consultation on the Westminster City Plan by the following partner organisations:
- Transport for London;
 - Sport England;
 - Historic England;
 - The Environment Agency;
 - Thames Water.
- 1.3 In the spirit of collaboration, the document has been prepared as a live document, that can be updated as matters progress and agreement is reached on any outstanding issues. It therefore includes details on mechanisms for review and updating.

2. Parties involved

- 2.1 This Statement of Common Ground has been prepared in agreement with the following parties:
- London Borough of Brent
 - City of London Corporation
 - London Borough of Camden
 - London Borough of Wandsworth
 - Royal Borough of Kensington and Chelsea

- Mayor of London – included due to his strategic planning powers
- London Borough of Southwark – included due to its close proximity to the borough boundary and shared protected views of the Westminster World Heritage Site

2.2 A separate Statement of Common Ground has been prepared with London Borough of Lambeth to align with their approach of producing bilateral statements with each of their neighbouring boroughs, and the close alignment of both local plan submissions.

3. Signatories

City of London Corporation agree to the matters referred to in paragraphs 5.2.3, 5.2.4, 5.3.2, 5.4.2, 5.4.7, 5.4.8, 5.5.3, 5.5.5, and 5.5.8 of this statement

Signed Paul Baskett
 Position POLICY & PERFORMANCE DIRECTOR, D&E
 Date 14/11/2019

London Borough of Brent agree to the matters referred to in paragraphs 5.2.3, 5.2.4, 5.3.5, 5.4.2 of this statement

Signed P. Lewin
 Position: Team Leader Planning Policy
 Date: 21st October 2019

London Borough of Camden agree to the matters referred to in paragraphs 5.2.3, 5.2.4, 5.3.2, 5.3.3, 5.3.5, 5.4.2, and 5.5.7 of this statement

Signed DBP
 Position: Chief Planning Officer
 Date: 22 October 2019

London Borough of Southwark agree to the matters referred to in paragraphs 5.2.3, 5.2.4, 5.3.2, 5.4.3, and 5.5.8 of this statement

Signed Simon Buran
 Position: Director of Planning
 Date: 24 October 2019

London Borough of Wandsworth agree to the matters referred to in paragraphs 5.2.3, 5.2.4, 5.3.2, 5.4.2, 5.4.4, and 5.5.8 of this statement

Signed.....

Position.....


Date.....

City of Westminster agree to the matters referred to in paragraphs 5.2.3, 5.2.4, 5.3.2, 5.3.3, 5.3.5, 5.3.7, 5.4.4, 5.4.5, 5.4.8, 5.4.9, 5.5.3, 5.5.5, and 5.5.7 of this statement

Signed... Richard Beddoe
Position... Cabinet Member for Place
Shaping and Planning
Date... 28/10/2019



Royal Borough of Kensington and Chelsea agree to the matters referred to in paragraphs 5.2.3, 5.2.4, 5.3.2, 5.3.5, 5.3.7, 5.4.2, 5.4.5, 5.5.8 of this statement

Signed...  JONATHAN WADE
Position... HEAD OF SPATIAL PLANNING
Date... 23/10/2019

The Greater London Authority, on behalf of the Mayor of London agree to the matters referred to in paragraphs 5.2.3, 5.2.4, 5.2.5, 5.3.2, 5.3.3, 5.3.7, 5.4.3, 5.4.7, 5.4.8, 5.4.9, 5.5.3, 5.5.5, and 5.5.8 of this statement

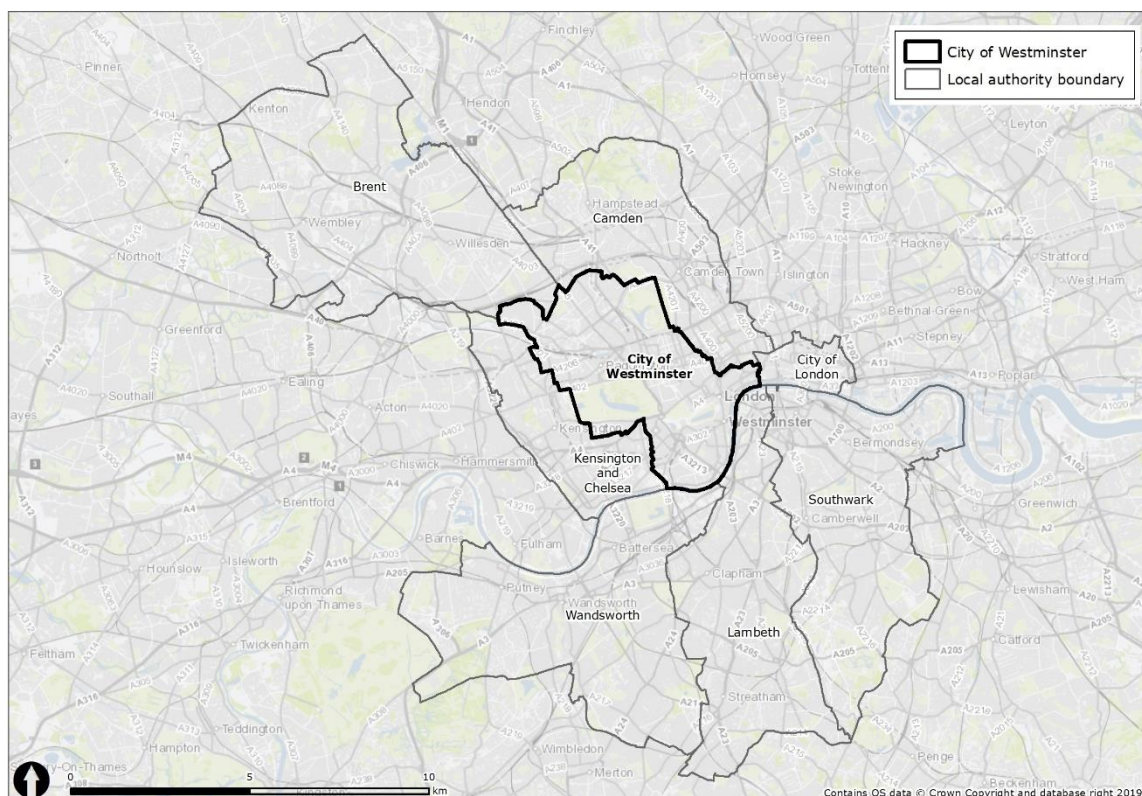


Signed.....Juliemma McLoughlin.....

Position.....Chief Planner.....

Date.....22 October 2019.....

4. Strategic geography



- 4.1 Sitting at the heart of central London, the City of Westminster is bordered by the London Boroughs of Camden, Brent, Lambeth and Wandsworth, the City of London, and the Royal Borough of Kensington and Chelsea. The London Borough of Southwark is also in close proximity to Westminster's south-eastern border at the River Thames.
- 4.2 Taken together, the area shown in the map above has therefore been identified as the strategic planning area for the purposes of this Statement of Common Ground. These boroughs represent key Duty to Co-operate partners, and contain areas most likely to be directly affected by the growth anticipated in Westminster's City Plan.
- 4.3 While the role of Westminster as a centre of culture, commerce and governance clearly has a far wider reach than the geography set out above, this relationship is addressed through broader collaboration on the London Plan.

5. Strategic Matters

5.1 Introduction

- 5.1.1 This section documents key strategic matters covered in Westminster's City Plan that are of cross-boundary significance. It summarises where agreement has or has not been reached with the relevant key partners to which the issue relates. Its focus is

the cross-boundary planning policy implications of the growth anticipated in Westminster's City Plan. The cross boundary impacts of growth being promoted in neighbouring authorities Local Plans will be addressed through separate Statements of Common Ground produced by the relevant local authority. Such statements may cover a different geography to the one identified here.

- 5.1.2 The council's Duty to Co-operate Statement also provides further details of how Westminster's City Plan has been informed by ongoing engagement with key partners, including those that are not party to this Statement of Common Ground.

5.2 Housing delivery and affordable housing

- 5.2.1 Across London, the delivery of new housing including affordable housing is arguably the biggest strategic issue the region faces. Through the London Plan and in line with Planning Practice Guidance, Paragraph: 013 Reference ID: 2a-013-20190220, the Mayor of London sets 10-year housing targets for each local planning authority, based on evidence of housing need and development capacity across the capital. Through their own local plans, authorities must then plan to meet or exceed London Plan targets to ensure they are in general conformity with the London Plan.
- 5.2.2 The current London Plan (consolidated since 2011) was adopted in 2016, though a draft replacement London Plan, which proposes revised housing targets based on updated evidence has subsequently been through examination. All local planning authorities that are part of this Statement of Common Ground have fed into the new figures – either expressing their support or objection to the new figures, based on a localised understanding of development capacity.
- 5.2.3 The findings of the Panel of Inspectors are anticipated before the end of 2019, with full adoption of the new London Plan expected in early 2020. Until the outcome of the examination is known, the minimum future housing targets for each local planning authority is unclear. At this stage:
- **Westminster, Camden, City of London, Royal Borough of Kensington and Chelsea, Southwark**, all agree that they can meet or exceed the total numerical housing target assigned to them by the **Mayor of London** in the Draft London Plan, within their own borders.
 - **Brent** state that they cannot meet or exceed the total numerical housing target assigned to them by the **Mayor of London** in the Draft London Plan within their own borders. They have therefore objected to the Draft London Plan and await the findings of the Panel of Inspectors. If targets and capacity remain unchanged, the issue will be addressed through their Local Plan and its accompanying Statements of Common Ground.
 - **Wandsworth** object to the total numerical housing target assigned to them by the **Mayor of London** in the Draft London Plan. Notwithstanding this Wandsworth Council are working towards meeting their own targets within its own borders. Wandsworth has therefore objected to the Draft London Plan and awaits the findings of the Panel of Inspectors. If targets and capacity remain

unchanged, the issue will be addressed its Local Plan and accompanying Statements of Common Ground.

5.2.4 In terms of affordable housing, to ensure a consistent approach across London, **Westminster, Camden, City of London, Royal Borough of Kensington and Chelsea, Southwark, Brent and Wandsworth** all agree to the broad approach set out by the **Mayor of London** in the Draft London Plan that developments providing less than 35% affordable housing require a viability assessment. All authorities also support the Mayor's strategic target of 50% affordable housing across London, and a threshold of 50% affordable housing on public land where viable.

5.2.5 To clarify Westminster's support for the Mayor's approach to affordable housing, and in response to the Mayor's consultation response on this matter minor modifications have been proposed to Westminster's City Plan post Regulation 19 as set out in the council's schedule of modifications. The **Mayor of London** supports these modifications.

5.3 Commercial development

Offices

5.3.1 The continued commercial success of the Central Activity Zone, which covers much of Westminster and also its neighbouring boroughs, is vital to London's world city status.

5.3.2 **Westminster, City of London, Royal Borough of Kensington and Chelsea, Camden, Wandsworth, Southwark** and the **Mayor of London** all agree that:

- An increase in office floorspace is sought across the CAZ to sustain London's economic competitiveness;
- Article 4 Directions are required across the CAZ (as a minimum) in order to protect central London's strategically important office supply against conversion to residential use under permitted development rights. All local planning authorities have therefore introduced such measures, supported by the Mayor of London.

Tottenham Court Road Opportunity Area

5.3.3 Within the CAZ, Tottenham Court Road has long been identified as an Opportunity Area in the London Plan - due to its scope for intensification aligned to public transport improvements. As set out in the London Plan, the Opportunity Area straddles the Westminster and Camden boundaries. **Westminster** and **Camden** agree with the **Mayor of London** that the area offers scope for commercial-led intensification and public realm improvements, and that across the entire

Opportunity Area, the London Plan indicative growth targets can be achieved through the growth policies in their respective plans.

Town centres and high streets

5.3.4 Several designated town centres and high streets in Westminster are either close to or straddle the city boundary. Examples include:

- International Centres – West End and Knightsbridge
- CAZ Retail Clusters - Charing Cross Road
- Queensway/ Westbourne Grove Major Centre
- Local Centres - Kilburn Lane, Kilburn Road, Shirland Road/ Chippenham Road, Harrow Road District Centre, Pimlico Road, Motcomb Street, and Abbey Road/ Boundary Road

5.3.5 Furthermore, other centres exist entirely outside Westminster that provide amenities to people living in Westminster – e.g. Notting Hill Gate, and Kilburn Major Centre. **Westminster, Brent, Camden, and Royal Borough of Kensington and Chelsea** therefore agree to share analysis of the health of town centres and high streets that are on or close to the borough boundary to inform a collaborative approach to their future vitality and viability.

Strategic Cultural Areas

5.3.6 Westminster's City Plan identifies Strategic Cultural Areas in Knightsbridge, Millbank, and the West End. The area designated in Knightsbridge is also designated in the London Plan, and extends into the Royal Borough of Kensington and Chelsea - where it is designated as the South Kensington Strategic Cultural Area.

5.3.7 **Westminster, Royal Borough of Kensington and Chelsea, and the Mayor of London** agree that existing arts and cultural uses around Exhibition Road should be protected, and the enhancement or growth of cultural uses supported in this area.

5.4 Infrastructure

Transport

5.4.1 Transport is by its nature a cross-border strategic issue - the approach in Westminster's City Plan to managing the impacts of growth on the transport network can have significant impacts beyond Westminster's boundaries. The plan therefore seeks to prioritise sustainable modes of travel including walking, cycling and public transport, to minimise congestion and pollution from private car use. It does however recognise the high levels of growth expected in areas where there is already very high on-street parking stress. It therefore allows for limited provision

for off-street car parking in new developments in the Paddington and Marylebone areas only (parking zones B and F). This represents a significant reduction in allowance for new off-street car parking than in previously adopted policies in Westminster, and earlier drafts of the plan – in response to concerns raised by the Mayor of London, Transport for London, and the London Borough of Lambeth.

- 5.4.2 **The City of London, Camden, Brent, Royal Borough of Kensington and Chelsea, and Wandsworth** support the emphasis in the plan on sustainable modes of travel.
- 5.4.3 The **Mayor of London** (including Transport for London) and **Southwark** consider Westminster's approach to car parking too relaxed towards new provision. Constructive dialogue with the Mayor of London and Transport for London is ongoing, and a separate Statement of Common Ground with Transport for London that goes into further detail is being prepared.
- 5.4.4 Westminster and Wandsworth disagree with how Westminster's City Plan refers to waterway crossings. The Draft London Plan policy supports new river crossings, and **Wandsworth** consider Westminster's reference to 'in principle' opposition to be overly restrictive and should not set out an overriding assumption against the principle of new river crossings. **Wandsworth** maintain that impact on the open character of the Thames needs to be balanced against the strategic transport objectives such schemes can meet. **Wandsworth** consider other parts of the City Plan provide useful parameters against which the suitability of river crossings can be assessed and is content for these to form the basis of the policy on river crossings. **Westminster** maintains that policy does not explicitly rule out new crossings, particularly where an overriding strategic case for the proposal can be demonstrated, and the plan is therefore in conformity with the NPPF and London Plan on this matter.
- 5.4.5 Policy in Westminster's City Plan recognises that the Grand Union Canal provides a major asset that offers opportunities to enhance the setting of new developments, and provide attractive walking and cycling routes. Opportunities also exist for any such enhancements to stretch beyond the city's boundaries such as to Kensal Canalside Opportunity Area. **Westminster** and **Royal Borough of Kensington and Chelsea** therefore agree with the principle of enhanced access and movement along the canal, and across it where there is an overriding strategic case for it.
- 5.4.6 Similarly, Westminster's City Plan also recognises the opportunities for improvements to the north bank of the Thames – including public realm enhancements that enhance the pedestrian environment. City of London have similar aspirations for the Blackfriars area to the east, while the South Bank in Lambeth already benefits from a welcoming pedestrian environment and cultural uses.
- 5.4.7 **City of London** and the **Mayor of London** agree with **Westminster's** broad ambitions for the North Bank.

- 5.4.8 Further collaboration between **Westminster, the City of London, and the Mayor of London** is agreed as detailed policy guidance for the North Bank comes forward – to ensure co-ordinated proposals within the Mayor’s requirements for a Thames Strategy.

Waste

- 5.4.9 The scale of commercial activity that takes place in Westminster results in unusually high levels of waste production. The highly urbanised nature, lack of brownfield/ex-industrial sites and heritage sensitivities of the city also means identifying sites for future waste management is a significant challenge. This has led to the Mayor raising conformity issues with the London Plan during regulation 19 consultation. A summary of the Mayor’s position, and how Westminster have sought to address this, is summarised below.

The Mayor’s Position

- The Mayor has said that the City Plan was not in general conformity with the London Plan because the Plan does not address how Westminster accounts for its waste apportionment target.

Westminster’s Position

- Westminster’s waste evidence base clearly demonstrates through a site survey that WCC does not have land to provide for waste management facilities to fulfil its obligation to manage its waste apportionment¹.
- To date, through its contract with Veolia, Westminster has been using various facilities in South East London to manage its waste.
- Westminster’s contract with Veolia runs until 2031. These facilities will have capacity to continue to meet the South East group’s waste as well as Westminster’s. None of the facilities are operating at capacity and are also receiving waste imports from outside London. The Group is currently updating their technical paper to ascertain capacity requirements and Westminster is exploring options to offer support in this. Additionally, there is a planned expansion of the Energy from Waste site at Belvedere.
- The total tonnage processed at these facilities has been a rolling tonnage of approx. 160ktps for several years. This is already 84% of the Draft London Plan’s apportionment and supports the baseload requirements for the facilities operations.
- Despite this, Westminster is not in a formal pooling arrangement with the South East London Joint Waste Planning Group, SELJWPG.
- In March 2019, Westminster carried out its Duty to Co-operate and approached boroughs and partnerships to establish current and future capacity of waste facilities in order to explore possibilities of pooling its apportionment and increases thereof.

¹ WCC Waste Evidence Base: App 3, Fig 5. Constraints for sieve analysis

- Following examination of DtC responses received, Westminster carried out a study on partnership pooling². This study concludes that there is scope to partner with the South East London Waste Planning Group.
- Westminster has now begun informal discussions with the Group members to explore the possibility of joining the partnership.
- Westminster intends to adopt a similar approach taken by the City of London in its partnership-working with the Group.³
- In support of this, Westminster will be undertaking its own Waste Data Study to understand the profile of all waste arisings as stipulated in the NPPW and associated guidance. This will support the monitoring of arisings and capacity requirements and inform pooling arrangements. This study will be considered alongside updates of the Group's Technical Paper as each group member goes through its Local Plan.

Areas of agreement

- Following officer level discussions on 2nd October 2019, the **Mayor** acknowledges that **Westminster** is making efforts to secure a waste partnership agreement.
- The **Mayor** considers these actions to be a positive step towards addressing earlier concerns and conformity with the London Plan waste apportionment target.
- The **Mayor** may reconsider his position on the apportionment conformity objection subject to satisfactory evidence being provided regarding Westminster's active engagement with other London Authorities and agreement of how the future management of its waste will be secured, such as through a Memorandum of Understanding with the relevant London Waste Planning Authority.
- **Westminster** will carry out a full waste data study to support a forthcoming Waste SPG and to understand the management requirements of arisings of all waste streams and to inform any future partnership-working and associated technical work.
- **Westminster** agrees that the City Plan should demonstrate more clearly how it accounts for its waste apportionment
- **Westminster** remains fully committed to honouring its contract with Veolia at the very least until the stated end of the current contract.

5.5 Conservation and enhancement of the built and natural environment

Heritage and protected views

- 5.5.1 Westminster has a truly outstanding heritage, that merits strong protection as set out in the policies in Westminster's City Plan.
- 5.5.2 Without proper planning, Westminster's heritage value can be compromised by growth in neighbouring boroughs. Likewise, growth in Westminster can have impacts beyond the city's boundaries.

² Possible Partnership-working to meet the draft London Plan Apportionment, Oct 2019

³ Waste Apportionment Investigation of the potential for working with other boroughs, Nov 2010

- 5.5.3 Given their strategic significance to London's identity, protected views of St Paul's Cathedral and Westminster World Heritage Site must not be compromised by the growth anticipated through Westminster's City Plan or the City of London Local Plan. Buildings height policy, and in particular the identification of where additional height is supported, has therefore been informed by the views identified in the London View Management Framework – as set out in the buildings height study that accompanies the plan. **Westminster, the City of London, and the Mayor of London**, therefore agree to apply the provisions of the London Views Management Framework to ensure that the approach to building height in the Westminster City Plan and the City of London Local Plan and development in the two areas does not compromise protected views.
- 5.5.4 Policies in Westminster's City Plan have also been subject to extensive negotiation and collaboration with Historic England, to ensure efforts to consolidate and update adopted policies do not downplay the importance of the city's heritage when planning for future growth. A separate Statement of Common Ground has been prepared to show where agreement has been reached with Historic England on detailed matters post Regulation 19 consultation.
- 5.5.5 The south eastern boundary of Westminster adjoins the Temples in the City of London, which provide a concentration of barrister's chambers and other uses associated with the legal profession that have close functional relationships with uses in Westminster such as the Royal Courts of Justice. Together this cluster of uses positively contribute to the strategic functions of the CAZ, and hold significant heritage and townscape value. The **Mayor of London**, the **City of London**, and **Westminster** agree that policies within the City Plan including those on heritage and townscape will help support measures in the City of London's Local Plan to maintain London's role as the centre of judiciary in the UK.

Green infrastructure

- 5.5.7 In terms of the natural environment, an open space deficiency exists across the Westminster and Camden border. Growth anticipated through Westminster's City Plan may result in opportunities for increased green infrastructure provision to help address this - to the benefits of residents and workers across administrative boundaries. Like-wise the same is true of future growth in Camden. **Westminster** and **Camden** therefore agree to share open space evidence, and that the support offered in the City Plan for new green infrastructure could have cross boundary benefits. A separate Statement of Common Ground has been prepared with Sport England to address playing pitch and built sports facilities provision in the City.

Thames Policy Area

5.5.8 The River Thames provides a major asset that Westminster, City of London, Southwark, Lambeth, Wandsworth and Royal Borough of Kensington and Chelsea all border. All authorities recognise the importance of this setting and have complementary policy approaches to shape future development within the area designated through the London Plan as the Thames Policy Area. **The Mayor of London, City of London, Southwark, Wandsworth and Royal Borough of Kensington and Chelsea** all support the boundaries to the Thames Policy Area identified in the Westminster City Plan, which adjoin boundaries in neighbouring authorities, and the policy approach to development within this area.

6. Governance arrangements

6.1 The process for sign-off of the Statement of Common Ground differs amongst partner organisations. Some partners require political approval, whilst others can be approved at a senior officer level – as set out in the table below.

Organisation	Officer lead	Senior or political approval of the SCG	Sign off
Westminster City Council	Executive Director of Policy, Performance and Communications	Cabinet member for Place shaping and Planning – Cllr Richard Beddoe	Cabinet member for Place shaping and Planning – Cllr Richard Beddoe
London Borough of Brent	Planning Policy Team Leader	N/A	Planning Policy Team Leader – Paul Lewin
City Corporation of London	Policy and Performance Director	Chairman and Deputy Chairman of Planning and Transportation Committee	Policy and Performance Director – Paul Beckett
London Borough of Camden	Director of Regeneration and Planning/ Chief Planning Officer	Cabinet Member for Investing in Communities and Inclusive Growth	Chief Planning Officer
London Borough of Wandsworth	Principal Planner, Policy Team	Cabinet Member for Strategic Planning and Transportation – Councillor Paul Ellis	Director of Environment and Community Services
London Borough of Southwark	Planning Policy Manager	N/A	Director of Planning
Royal Borough of Kensington & Chelsea	Head of Spatial Planning	N/A	Head of Spatial Planning
Mayor of London	Chief Planner	Jules Pipe Deputy Mayor, Planning, Regeneration and Skills	Juliemma McLoughlin Chief Planner

7. Timetable for agreement, review and update

- 7.1 This statement has been informed by on-going engagement between partners as Westminster's City Plan has been developed – as documented in the separate Duty to Co-operate Statement.
- 7.2 It has been prepared as a living document, that can be reviewed and updated as necessary should further agreement between parties be necessary through the examination process.
- 7.3 As the statement focusses on issues of relevance to Westminster's City Plan, post examination it will only need further updating once work commences on any future revisions to the City Plan. Ongoing collaboration between partners will however continue through regular meetings on a one to one basis and through attendance at group meetings where cross boundary issues are discussed.