

Date: 10 February 2020

**EXAMINATION OF THE WESTMINSTER CITY PLAN 2019-2040**

**NOTE No 3 FROM THE APPOINTED INSPECTORS**

**TO WESTMINSTER CITY COUNCIL**

Dear Ms Hopkins

1. Thank you for your response to our Note 2 by way of your letter reference WCC-letter-005 dated 3 February 2020. We respond as follows:

*General*

2. Noting that the publication of additional documentation is scheduled for 31 March 2020, we do not now anticipate that Examination Hearings will commence before June or July. That is in order to give time for Representor or public comments as appropriate, depending on the detailed content of the new evidence, and for the preparation of Matters, Issues and Questions and the submission of Position Statements where required.

*Clarification Re Q9a of Insp Note 2 – Conformity with the London Plan*

3. It cannot be overlooked that the New London Plan has not been adopted and the date of its eventual adoption and the details of the modifications to be made to the adopted version remain unclear at this time. Therefore, whilst practically it is reasonable to seek conformity with the New London Plan, including proposed modifications, strictly for soundness the Plan must be in general conformity with the extant version until the New LP is adopted. We suggest that the primary evidence might be related to conformity with the New LP but that further evidence could be needed to address any material differences between the extant and emerging versions, if the New LP is not adopted once Hearings for the City Plan 2019-2040 begin.

*Clarification Re Paragraphs 4 and 8 of Insp 2 – Key Development Sites*

4. The term Key Development "Sites" may imply the need for more detailed evidence of suitability, including in particular flood risk in Zone 3. If the City Plan 2019-2040 is to serve in effect as a Core Strategy with no more than broad areas of development subject to the Site Allocations DPD in due course, this could beneficially be made clearer in the interests of justification and effectiveness. Whilst it is clear that the Site Allocations DPD will add further detail to the Key Development Site details in the City Plan, it is not clear in the City Plan or the supporting documents whether or not the City Plan is seeking to allocate these sites. On our reading of the document it seems that the City Plan is seeking to allocate them. We particularly draw your attention to the Schedule of Proposed Changes to the Policies Map (page 56 onwards).

*Clarification Re Paragraph 13 of Insp 2 – Supplementary Planning Documents*

5. The City Plan should stand alone in defining the basis of quantitative provisions for matters such as affordable housing and developer contributions. Therefore, for the City Plan to be effective and sound in itself, it might be necessary to elevate some content of the projected SPD to development plan status.

*B J Sims and L Fleming*

Inspectors