

**CITY
PLAN
2019 – 2040**

**DUTY TO CO-OPERATE
STATEMENT
SUBMISSION VERSION**

NOVEMBER 2019

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1 Duty to cooperate

1.1 Background and legal requirements

The 'Duty to cooperate' is a statutory duty for local planning authorities. Section 110 of the Localism Act inserted Section 33A into the Planning and Compulsory Purchase Act 2004 and states that all local planning authorities must co-operate with other local planning authorities, county councils and bodies or other persons as prescribed. According to Section 33A, authorities need to specially cooperate while preparing their development plan documents.

Paragraph 24 of the National Planning Policy Framework (NPPF) (2018) also states that "local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries". Moreover, according to paragraph 25 local authorities should also "collaborate to identify the relevant strategic matters which they need to address in their plans" and "engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers)".

Paragraph 27 of the National Planning Policy Framework (NPPF) (2018) has also introduced a requirement to produce Statements of Common Ground throughout the plan-making process to document where effective cooperation is (and is not) taking place as plans are drawn up and taken through the statutory process to adoption. More information about it can be found in section 3.

Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 identifies the following prescribed bodies with whom all planning authorities should co-operate with:

- The Environment Agency
- Historic England
- Natural England
- The Mayor of London
- The Civil Aviation Authority
- The Homes and Communities Agency
- Each established Primary Care Trust
- The office of Rail Regulation
- Transport for London
- Each integrated transport authority (Transport for London)
- Each highway authority
- The Marine Management Organisation
- Each local enterprise partnership

The National Planning Guidance – Plan-making (2018) details how Duty to cooperate Statements should be produced.

1.2 Westminster's context

National and regional planning context

During the preparation of the City Plan 2019-2040, the Ministry of Housing, Communities and Local Government published a revised National Planning Policy Framework (July 2018), with minor updates in early 2019. The Westminster City Plan 2019-2040 has been produced in accordance to the 2019 revised version of the NPPF.

In a London context, the Mayor's London Plan sets the Spatial Development Strategy for the whole of London and sets objectives for strategic issues such as housing delivery, affordable housing, commercial growth, the role of the CAZ, infrastructure delivery, climate change, and sustainable transport. Planning for strategic matters central to the duty to cooperate therefore largely takes place at the London-wide level to inform the London Plan, and is co-ordinated by the Greater London Authority (GLA). As per other local plans in London, the Westminster City Plan 2019 – 2040 is required to be in general conformity with the London Plan.

Currently the London Plan is under review. A draft replacement London Plan was consulted on in December 2017, examination commenced in 2018, and a series of post examination modifications was published in July 2019. The Panel of Inspectors report on the replacement plan is expected shortly.

A number of neighbouring planning authorities have recently reviewed their Local Plans or are currently reviewing them. Figure 1 summarises the status of all neighbouring planning authorities Local Plan review:

Figure 1 - Neighbouring planning authorities' Local Plan revision status

Authority	Local Plan status
London Borough of Lambeth	<ul style="list-style-type: none"> The existing Local Plan was adopted in 2015. A Local Plan review began in 2017 and consultation on a draft Local Plan took place in 2018. Adoption is expected to take place by September 2020.
London Borough of Camden Royal Borough of Kensington and Chelsea	<ul style="list-style-type: none"> The existing Local Plan was adopted in 2017. A Consolidated Local Plan was adopted in 2015 and a review was completed in September 2019.
City of London	<ul style="list-style-type: none"> The existing Local Plan was adopted in 2015. A Local Plan review began in 2017 and consultation under Regulation 19 is expected to take place in 2019 and Examination in Public and adoption in late 2019/early 2020.
London Borough of Brent	<ul style="list-style-type: none"> The existing Local Plan was adopted in 2010 and reviewed in 2015. A Local Plan review is ongoing. It is anticipated that a revised Local Plan will be submitted to the Secretary of State in Spring 2020.

London Borough of Wandsworth	<ul style="list-style-type: none"> • The existing Local Plan was adopted in 2016. • A review of the Local Plan was started in 2018. Adoption is expected to take place in Autumn 2021.
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Neighbourhood planning in Westminster

The council has formally designated a total of 21 Neighbourhood Areas covering most of the area of the City of Westminster. If a Neighbourhood Area has a designated Neighbourhood Forum, it has powers to make a Neighbourhood Plan which becomes part of Westminster's Development Plan. The council therefore has a working relationship with all its designated Neighbourhood Forums. At moment of writing, a number of Neighbourhood Forums had developed a Neighbourhood Plan or were working on it. Figure 2 summarises the status of all Neighbourhood Forums plan's preparations:

Figure 2 - Neighbourhood Areas and Neighbourhood Plans

Neighbourhood Area	Neighbourhood Plan status
Bayswater	N/A
Belgravia	<ul style="list-style-type: none"> • Early drafting stages of Plan.
Church Street	N/A
Churchill Gardens	N/A
Ebury Bridge	N/A
Fitzrovia (West)	<ul style="list-style-type: none"> • Regulation 14 consultation on draft Neighbourhood Plan closed.
Hyde Park and Paddington	N/A
Knightsbridge	<ul style="list-style-type: none"> • Referendum was held on 18th October 2018. • The Neighbourhood Plan was formally made on 11th December 2018.
Little Venice and Maida Vale	N/A
Maida Hill	<ul style="list-style-type: none"> • Early drafting stages of Plan.
Marylebone	<ul style="list-style-type: none"> • Early drafting stages of Plan.
Mayfair	<ul style="list-style-type: none"> • Mayfair's Neighbourhood Plan was submitted to the council in February 2018. • Examination started on 25th August 2018 and at time of writing and residents and a

	business referendum are scheduled for October 31 st .
Notting Hill East	<ul style="list-style-type: none"> • Informal Draft Neighbourhood Plan
Pimlico	<ul style="list-style-type: none"> • Regulation 14 consultation on draft Neighbourhood Plan closed.
Queen's Park CC	<ul style="list-style-type: none"> • Informal Draft Neighbourhood Plan
St James	<ul style="list-style-type: none"> • Informal Draft Neighbourhood Plan
St Johns Wood	N/A
Soho	<ul style="list-style-type: none"> • Regulation 14 consultation on draft Neighbourhood Plan closed.
South East Bayswater	N/A
Victoria	<ul style="list-style-type: none"> • Informal Draft Neighbourhood Plan
Westbourne	N/A

2 Westminster's key stakeholders and partners

This section sets out who are Westminster's key stakeholders and partners. The council has a working relationship with all of them and has therefore engaged with them when preparing the City Plan 2019-2040. The council will continue to engage with all its stakeholders and partners.

2.1 Statutory stakeholders (including neighbouring local authorities)

a. **The Mayor of London / the Greater London Authority (GLA):**

The Mayor of London published in 2016 the current London Plan and in 2017 published a draft replacement London Plan, which is currently being examined in public. The London Plan is the statutory spatial development strategy for Greater London and Westminster's City Plan and development policies need to be "in general conformity with it". Accordingly, the council and the Mayor of London have a working relationship and engage and meet on a regular basis to discuss any strategic matters or potential general conformity issues. Between 2016 and time of writing, both authorities have discussed a wide range of planning strategic issues such as:

- Housing and the Strategic Housing Land Availability Assessment,
- The results of the Mayor's Academic Forum
- Changes to the CAZ boundary
- Changes to spatial designations
- Environment policies
- Parking standards
- Town centres boundaries

b. **The London Economic Action Partnership (LEAP):**

The local enterprise partnership for London and Westminster is the London Economic Action Partnership (LEAP). The council is a member on the London Economic Action Partnership through which the Mayor of London and Transport of London engage with the London boroughs, entrepreneurs and business to identify strategic issues and plan for economic growth and job opportunities in London.

c. **Neighbouring local authorities and the Central London Forward partnership (CLFP):**

The council engages on a regular basis with its six neighbouring boroughs: the London Borough of Brent, the London Borough of Camden, the City of London, the London Borough of Lambeth, the London Borough of Wandsworth and the Royal Borough of Kensington and Chelsea. Officers regularly meet with neighbouring boroughs to discuss strategic and cross-boundary issues.

The council is a member of the Central London Forward partnership which has eight core members: the City of Westminster, the London Borough of Camden, the City of London, the London Borough of Islington, the Royal Borough of Kensington and Chelsea, the Lambeth London Borough, the London Borough of Southwark and the London Borough of Wandsworth. The

partnership also has four associate members working on employment and skills policy and programmes: the London Borough of Hackney, the London Borough of Tower Hamlets, the London Borough of Lewisham and the London Borough of Haringey. The partnership was established to advocate and support the collective interests of its membership through the provision of strategic policy advice, research, advocacy and programme management. It also facilitates collaboration between boroughs.

d. London Councils and the Association of London Borough Planning Officers (ALBPO):

Westminster City Council is a member of London Councils, a cross-party organisation that represents London's 32 borough councils and the City of London Corporation. London Councils represents its members in front of the Government, the Mayor of London and any other bodies and works to develop policies that will help the members deliver the best possible deal for their residents.

London Councils runs a number of committees, networks and forums. In relation to planning issues, the Association of London Borough Planning Officers (ALBPO) is run by London Councils. Westminster City Council's Planning Policy Officers attend the regular meetings of the ALBPO Development Plans Committee and the ALBPO Policy Officers Sub-Group where strategic matters and new development plans are discussed.

e. Historic England (HE):

Historic England is the government's adviser on the historic environment. The concentration of Heritage assets in Westminster is unlike any other part of London and the council therefore maintains a working relationship with different teams of the London Regional Office of Historic England to ensure that the council's policies protect and enhance Westminster's unique environment. Officers from the council engage continuously with Historic England on determination of listed building consent applications and planning applications affecting heritage assets and on development of projects for the public realm and other enhancements. A number of key strategic projects such as the "Palace of Westminster Restoration and Renewal Programme", the programme of works on Buckingham Palace and the Northern Estates programmes involve regular meetings with Historic England and other stakeholders.

f. The London Waste Planning Forum (LWPF):

The LWPF is a forum for local authorities, the GLA, the Environment Agency and other public and private sector organisations that are concerned with strategic waste management in London. Westminster is a member of the LWPF and cooperates with its partners on cross-boundary strategic waste management. Issues discussed include the management of waste apportionment targets as set out in the draft New London Plan.

g. Waste Planning Authorities:

The National Planning Policy for Waste and the draft London Plan requires Waste Planning Authorities to plan for strategic waste management as a

matter of duty-to-operate. In its capacity as a Waste Planning Authority and with no strategic waste management sites of its own, the council contacted local authorities which manage significant levels of waste generated in the city (list of authorities in Appendix 3). A letter, Appendix 4, was sent to these authorities and followed with various discussions and shows. Appendix 5 details written responses received.

h. **Other statutory consultees:**

The council has a working relationship with a wide range of other **specific statutory consultees**. Officers from the council engage in an ongoing basis with transport infrastructure providers such as **Transport for London**, **Network Rail** and the **Highways Authority for England** to discuss the provision of transport infrastructure among other strategic issues. Similarly, the council works together with a wide range of water supply, social, energy and other local needs infrastructure providers such as **Thames Water**, the **National Health Service** and the **Metropolitan Police**. The **River and Canal Trust**, the **Marine Management Organisation**, **Natural England**, the **Environment Agency**, the Civil Aviation Authority and the Homes and Communities Agency.

A comprehensive log of meetings that have taken place between the council and its statutory stakeholders is attached as Appendix 1.

2.2 Non-statutory stakeholders and partners

a. **Neighbourhood Forums and Amenity Societies:**

Westminster's designated Neighbourhood Forums can produce Neighbourhood Plans which need to be in general conformity with both the London Plan and Westminster's City Plan. Officers from the council maintain a working relationship with the Neighbourhood Forums and meet and discuss issues of interest on a regular basis.

b. **The West End Partnership (WEP):**

The WEP promotes "good growth" in the West End and its unique cultural offer. The partnership also works to secure effective management of the area, look at financial models that support investments and support a connected and resilient Digital West End. The Leader of the council Nickie Aiken is the Chair of its Board where a wide range of public and private sectors institutions are represented including the Mayor of London, the London Borough of Camden, the Business Improvement Districts, Westminster Property Association, the London School of Economics or Soho Society. Officers from the council maintain a working relationship with the West End Partnership and meet and discuss policies that affect the West End. The West End Partnership was set out in 2013 to promote "good growth" in the West End.

c. **The Cross-River Partnership (CRP):**

The CRP helps deliver projects relating to place making, health and wellbeing; air quality, diversity and inclusion, freight, transport and active travel, energy, environment, culture and lighting among others. Westminster is a partner together with the London Borough of Camden, the City of London, London

Borough of Islington, the Royal Borough of Kensington and Chelsea, London Borough of Lambeth, London Borough of Southwark, London Borough of Wandsworth, London Borough of Lewisham and the London Borough of Hammersmith and Fulham. A large number of Business Improvement Districts are also represented on its board. Officers from the council maintain a working relationship with the Cross-River Partnership and meet and discuss policies and projects that affect the City of Westminster.

d. The World Heritage Site Steering Group:

The Palace of Westminster and Westminster Abbey, including St Margaret's Church was inscribed as a cultural World Heritage Site in 1987. A World Heritage Site Steering Group meets around twice yearly to provide co-ordination between the landowners and stakeholders with an interest in the site. The council chairs the steering group which also includes representatives from the Palace of Westminster, Westminster Abbey, ICOMOS United Kingdom, the Greater London Authority, Transport for London, the Royal Parks, Historic England and the London boroughs of Lambeth, Southwark, and Wandsworth. The group has been working together to address the recommendations published by UNESCO following the 2017 site monitoring mission.

e. The Business Improvement Districts (BID):

A number of Business Improvements Districts cover different areas of Westminster and are supported by the council and the Greater London Authority. BIDs have taken an increasing role in place leadership and driving local economic growth. The council has a working relationship with the Marble Arch Partnership, the Northbank BID, the Baker Street Quarter Partnership BID, the Heart of London Business Alliance BIDs, the New West End Company BID, the Paddington Now BID, the Fitzrovia Partnership, the Victoria BID, the Victoria Westminster BID and other business organisations.

f. Westminster Property Association (WPA):

The Westminster Property Association represents about 250 developers, property and land owners, occupiers and professional advisers in Westminster. The council engages with the association on a regular basis when considering new planning policy approaches or economic development policy. Both Members and officers have met regularly with WPA representatives to discuss emerging City Plan policies.

i. Other non- statutory consultees and partners:

Westminster council is one of a number of organisations working to manage change across the city. The council works on a wide range of strategies, policies and projects that are often but not always led by the organisation itself. The council has a record of effective partnership engagement and works closely – both formally and informally - with a large number of partners, for example, when delivering large-scale council projects (e.g. Oxford Street District, Strand-Aldwych), when delivering regeneration and housing renewal projects or when planning for London's future infrastructure (e.g. Crossrail, Tideway project).

A log of meetings that have been taken place between the council and its non-statutory stakeholders and partners is attached as Appendix 2.

3 How co-operation has influenced City Plan 2019-2040

3.1 Policy evolution as a result of co-operation

Discussions on strategic matters with the council's key stakeholders and partners has influenced the City Plan 2019-2040 policies. Figure 3 details how policies have evolved following discussions and helps demonstrate that the council has complied with its duty-to-cooperate. Figure 3 and Appendices 1 and 2 are not an exhaustive list of every discussion the council has had with relevant stakeholders and partners but is a high-level summary of all the engagement work the council has done.

Figure 3 – Policy evolution as a result of co-operation

Strategic issue	Key stakeholders	Outcome of co-operation
Air quality	Department for Transport, LB Lambeth, LB Wandsworth, LB Camden	<p>General support for the policy approach to addressing poor air quality including the expansion low pollution zones.</p> <p>Influencing central government policy through responding to consultations.</p> <p>Discussion on feasibility of requiring outstanding BREEAM standards led to a review of London Plan evidence.</p> <p>Evidence gathering on existence of District Heating Undertakings near Westminster's border revealed a potential site at Kensal and exploratory work being undertaken in City and Camden. Some neighbouring authorities have a requirement for major schemes to connect to existing undertakings – City Plan policy now references potential to link to South Kilburn in Brent.</p> <p>Further exploratory work will continue and information sharing with a view to potentially connecting schemes across borders where feasible to contribute to strategic air quality improvements.</p>
Green infrastructure	GLA, LB Camden, Wild West End	<p>General support and acknowledgement that policies on green infrastructure align. Cross-borough support for policies which increase green space particularly near areas over the border where there is deficiency such as around the Tottenham Court Road opportunity area. Camden and Westminster agreed to cooperate further on this to address the deficiency.</p> <p>Sharing of data sources to keep evidence bases up to date and complimentary. Discussions with Wild West End continue to see how best to develop the value matrix for the area -a city wide value matrix which will inform the forthcoming Green Infrastructure strategy</p>

Flooding	LB Lambeth, Thames Water, Thames Water	General support for policies on drainage, SUDs and flooding, advice that the policy should support future updates to the network has shaped the Policy 36 (Flood Risk). Concerns about access to Thames flood defences and impact of new planting on the North bank will be taken into account in forthcoming North bank SPD.
Grand Union Canal	Marine Management Organisation, River and Canal Trust, RBKC	<p>General support for the policy approach to environmental issues.</p> <p>Earl’s Court and Kensal are opportunities in RBKC which are connected to Westminster via the Grand Union Canal.</p> <p>Discussion took place regarding ambitions for the canal’s future use and focus, including improving biodiversity across the length, which has influenced the development of Policy 32 (Waterways and Waterbodies). Likewise linking destinations in RBKC & Westminster via the canal has been explored and all of these issues are supported in Policy 5 (NWEDA)</p>
Heritage	Historic England, Westminster World Heritage Site Steering Group, Greater London Archaeological Advisory Service, LB of Camden, City of London Corporation, RBKC, LB of Lambeth, LB of Southwark, LB of Wandsworth, LB Lambeth, GLA	<p>Lengthy discussion and on-going engagement with Historic England have significantly influenced the development of several policies in the City Plan related to heritage. This includes weaving a stronger narrative throughout the document on heritage to ensure it is adequately represented. This led to inclusion of positive references to heritage throughout the spatial strategy policies in particular, as well more references to the importance of heritage to Westminster’s economy.</p> <p>Policy 40 (Heritage) and 41 (Townscape and Architecture) are those which have been the most influenced by discussions with Historic England. This engagement led to a much more comprehensive policy on heritage and more detail on how Westminster will manage its valuable assets. The Council has also discussed this approach with neighbouring borough who endorse the general principles of the policy and confirm it does not prejudice any of their local policy approaches to heritage.</p> <p>Comments from Historic England on how the Unitary Development Policies have evolved into the revised City Plan policies led to the production of a Heritage topic paper to explain to stakeholders the thinking behind the changes made to Westminster’s approach to protecting its heritage. Likewise, helpful challenges from Historic England on the methodology used to determine the indicative housing figures for the Key Development Sites in Appendix 1 of the plan led to the production of a paper to explain this methodology to</p>

		<p>re-assure stakeholders that heritage was proportionally considered as part of this exercise.</p> <p>There has been also specific engagement with the Greater London Archaeological Advisory Service who have presented and explained their findings in relation to the new Archaeological Priority Areas in Westminster to ensure the new areas and arrangements are correctly reflected within policy.</p> <p>In response to the UNESCO sponsored mission visits to Westminster World Heritage Site and the threat of it being placed on the UNESCO World Heritage in Danger list, the council is working closely with London Borough of Lambeth, GLA, Historic England and other neighbouring boroughs to address UNESCO's recommendations and improve the management of the World Heritage Site including development of the Management Plan and through partaking in and improving the World Heritage Site Steering Group. We have worked together on views analysis to understand the impact of higher buildings on the Outstanding Universal Value of the WWHS and its setting. This has informed the development of the WWHS element of Policy 40, including significant strengthening of it to sufficiently protect the site from inappropriate development. We have also been involved in development of and commenting on Lambeth's policy approach to tall buildings and view protection. The Council also participates in the recently established Historic England meetings for London World Heritage Site coordinators, attended by the GLA and other stakeholders.</p> <p>Sharing of evidence between authorities and discussion on the benefits of including local views in the local plan led (along with consideration of consultation comments) to the re-instatement of reference to local views in Policy 41 (clause H). We have also discussed with neighbouring authorities the methodologies and tools used to assess views which has helped us to develop our own approach and evidence base.</p>
<p>Housing</p>	<p>GLA, LB Lambeth, LB Wandsworth, LB Camden, City of London, LB Southwark, LB Brent</p>	<p><i>Housing capacity</i></p> <p>Westminster participated in the pan-London Strategic Housing Land Availability Assessment, co-operating fully with the Mayor and other authorities to compile an up to date assessment of potential housing capacity across London. This resulted in the revised housing targets set out in the London Plan for all London borough. The Council also engaged with the Mayor on the development of the pan-London Strategic Housing Market Assessment which has informed the development of the City Plan housing policies, complementing locally specific housing evidence.</p>

		<p><i>Affordable housing</i> Westminster have discussed with neighbouring authorities their approach to implementing the Mayor's Affordable Housing and Viability SPG (and subsequent relevant new London Plan policy) which has influenced the development of Policy 9 in the City Plan and will further inform the council's forthcoming Affordable Housing SPD to contribute to the strategic delivery of affordable housing across London.</p> <p>Westminster's approach to the tenure split in the City Plan (Policy 9) was discussed with neighbouring authorities and the Mayor to ascertain how the council's approach contributes to the delivery of social and intermediate housing across London.</p> <p>The council also discussed with neighbouring authorities our respective approaches to different affordable housing products including shared ownership to understand how the products work elsewhere, which has influenced policies in the housing chapter of the plan.</p> <p><i>Housing delivery</i> Prior to adopting a higher housing target in its draft City Plan, Westminster engaged with all neighbouring authorities to confirm that they did not require Westminster to accommodate any of their unmet housing need. This enabled Westminster to confirm its approach to its housing target. Discussions with the Mayor were also productive as the adoption of a higher housing target was welcomed as a means to contribute to the delivery of London's strategic housing need.</p> <p>Discussions regarding the London Plan methodology for small sites has influenced how small sites are accounted for in the City Plan's housing trajectory (Policy 8)</p> <p><i>Specialist housing types</i> Westminster partook in the Mayor's Academic Forum which led to the development of the student housing policy in the London Plan, of which the City Plan is closely aligned (Policy 11, clauses G-I). The access to data provided as part of that forum has been used to underpin Westminster's approach to student housing, in particular the approach to affordable contributions.</p> <p>Westminster discussed with neighbouring authorities their existing and projected demands for gypsy and traveller pitches, which confirmed that there is no unmet need which Westminster is expected to meet. The new London Plan was underpinned by evidence</p>
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		<p>for gypsy and travellers in Westminster which has directly influenced the Policy 11 (clause J).</p> <p>Westminster discussed with neighbouring authorities their approach and tools used to maintain a register for people or groups interested in self/custom build housing. We also discussed the volume of applicants of local registers and how local need is met. This has influenced the development of Policy 12 (Innovative Housing Delivery) but also associated activities around the implementation of Westminster's register and monitoring of self/custom-build projects.</p>
Waste	<p>London Waste Planning Forum, LB Lambeth, GLA, LBs Lewisham, Southwark, Brent, Camden, all authorities receiving Westminster's waste currently (see appendices 3, 4 and 5)</p>	<p>Westminster approached all London authorities to ascertain their capacity for managing municipal and other waste in order to inform policy 38E for pooling apportionments in compliance with the draft London Plan. The council also contacted all authorities – in London and beyond – to ascertain their capacity for managing all waste generated in Westminster over the plan period in order to comply with the NPPW for the management of waste arisings across the seven waste streams and inform the development of policies 38 A-D for reducing, re-using and recycling waste material and shift to a circular economy in compliance with national and sub-regional waste policies.</p> <p>Discussions with neighbouring authorities who abut the River Thames support the London Plan on the movement of waste to processing plants, practicalities of encouraging uptake and how to influence the sector led to references to use of pier facilities in Policy 32 (Waterways and Waterbodies) which has been clarified by a minor modification post-Regulation 19 to directly refer to movement of waste.</p>
Transport	<p>TfL, Network Rail, GLA, LB Lambeth, LB Wandsworth, RBKC, City of London, LB Southwark, LB Brent, Department for Transport</p>	<p><i>Coach station</i></p> <p>Multiple discussions and engagement with TfL on the re-location of Victoria Coach Station has helped Westminster to understand TfL's intentions for this site. This has influenced positive support in the policy for the re-location of this facility (Policy 4 and 27) but has enabled a reactive policy stance to be created in the eventuality that the coach station does not re-locate and the use is intensified (Policy 27). This includes place policy wording to mitigate potential negative impacts as a result with references to coach stops in Policy 27.</p> <p><i>Parking</i></p> <p>Discussions with neighbouring authorities and TfL and the GLA regarding Policy 28 (Parking) and its impacts beyond its borders led to the change in policy position between informal consultation on the City Plan in 2018 and the Regulation 19 version of the policy (i.e. adopting car free for most of the city). Gaining an understanding of how car-free residential development</p>

		<p>operates in central London boroughs helped to positively influence the policy shift, including the higher requirements for electric vehicle charging points to contribute to strategic air quality objectives for London. The council have also discussed with TfL the availability of car clubs within Westminster and examined data TfL have shared which has influenced how the council consider policy 28 will operate in practice to lower car-ownership across the city.</p> <p><i>Bridges</i> The Council have discussed the matter of river crossings with the London Borough of Wandsworth so that each authority can understand the others' standpoint. Although no agreement could be reached on this matter (as detailed in a statement of common ground), the discussions were productive in helping the City Plan to more clearly explain the reasoned justification for its position on new river crossings (Policy 32 Waterways and Waterbodies)</p> <p><i>River freight</i> Discussions with neighbouring authorities who abut the River Thames on the London Plan support for river freight, practicalities of encouraging uptake of this method of goods movement and how to influence the sector has helped to development references to river-borne freight in Policy 32.</p> <p><i>Cycle superhighways</i> Discussions with neighbouring authorities and the GLA around the practical problems of installing new cycle superhighways, but the need to provide policy support to enable the strategic delivery of new cycle infrastructure across London has influenced the development of Policy 26.</p>
<p>Economy</p>	<p>Central London Forward, LB Wandsworth, GLA, TFL, River and Canal Trust, LB Lambeth, RBKC, LB Camden, LB Southwark, LB Brent</p>	<p>General support for the principles of the policy has helped the policies to progress forwards.</p> <p>Discussion on areas of commercial growth have informed complementary policy approaches.</p> <p>Westminster discussed with the GLA and all neighbouring authorities whom fall within the Central Activities Zone (CAZ) the importance of an Article 4 Directions to remove permitted development rights for offices to change to residential use to preserve the strategic office function of the CAZ.</p> <p>Discussions around the benefits and practical difficulties of protecting and encouraging affordable workspace has also influenced the development of this policy and will further influence the development of a potential forthcoming SPD on affordable workspace.</p>

		<p>Town Centre/Retail health check data and survey updates shared between authorities which has helped with the development of Westminster’s Town Centre Health Check Surveys – particularly those on the city border and where information was available of centres in other authorities. The Council have also liaised with the GLA when updating the Town Centre Health Checks.</p> <p>Discussion about the London-wide priorities to promote and protect LGBTQI+ venues contributed to this being explicitly referenced in Policy 21.</p>
<p>Building height</p>	<p>LB Wandsworth, LB Lambeth, GLA, TFL, LB Southwark LB Brent, Historic England</p>	<p>General support for the principles of the policy has helped the policies to progress forwards.</p> <p>Westminster have shared their methodology and discussed their approach to tall buildings with its neighbouring authorities and all are in agreement that the Westminster approach complements others’, subject to impact on strategic views being taken into account. The Council rely on the pan-London LVMF to strategically protect views across London – this is reflected in the Policy 41 (Townscape and Architecture) and its supporting text.</p> <p>Initial concerns from neighbouring authorities on the impact of the City Plan building height policy on conservation areas has been addressed in Policy 42 (clause D – which references valued townscapes and heritage without restricting them to just within Westminster) and discussions with neighbouring authorities on the practicalities of requiring community support for landmarks up to 30 storeys influenced an amendment to this policy between informal and Reg 19 consultation to remove this clause (previously clause H in Policy 42 of the informal draft City Plan November 2018).</p> <p>Specific concerns from Historic England have positively helped to shape the policy, such as more clarity provided on what is meant by a tall building in a Westminster context to ensure the policy is implemented effectively (i.e. removal of reference to 30 metres in Policy 42).</p> <p>Confusion around how what is the definition of context and how local contexts have been arrived at have been addressed via topic papers supporting the examination of the City Plan.</p> <p>Lambeth and Westminster have worked together on ‘views and approach’ work on the Westminster World Heritage Site in relation to the impact of tall buildings.</p>

		<p>Concerns from neighbouring authorities around the upwards extensions policy have led to a number of refinements, including moving the policy from the previous Density and building height policy (policy 40 in the informal consultation draft City Plan November 2018) into Policy 41 Townscape and Architecture (in the June 2019 publication draft City Plan)</p> <p>See also – engagement regarding the Westminster World Heritage Site explained above which is also relevant for the development of the approach to building height in Westminster.</p>
North bank	Thames Water, City of London, GLA, TFL, Historic England, Port of London Authority	<p>Positive support for the principles of improving this section of the Thames embankment where it is acknowledged that the area is underutilised, particularly from the City of London whom have similar ambitions in the adjacent space at Blackfriars which is identified as a key area of change. The Council will work closely with the City of London when developing the SPD for this area to ensure planning guidance for both locations complement one another. The City of London expect the Blackfriars area to be greener, see public realm investment, more play space and celebration of culture – these themes mirror the City Plan.</p> <p>Confusion around the 2018 informal draft wording of the policy on North bank led to the policy to be clarified of its intentions by linking it clearly to public realm improvement ambitions in Policy 1 (Spatial Strategy). Further discussions on the City Plan’s ambitions for this policy will influence the form and nature of the emerging North bank SPD, such as recognition of the significant heritage assets in the area and potential for new tranquil areas and making the area more pedestrian friendly. These discussions have helped to develop other policy areas in the plan, such as the walking and cycling policy and public realm policy.</p>
Opportunity Areas	GLA, TfL, LB Camden	<p>Building height policy and its implications for Victoria Station discussed between Westminster and TfL/Network Rail and information was fed into the Westminster Building Height Study which forms the baseline of Policies 42 & 43.</p> <p>Principles of the policy for Tottenham Court Road are supported and complementary to the approach in Camden. WCC and Camden agreed to collaborate on the green infrastructure needs/proposals in this area as they come forward (this is supported by Policy 35 Green Infrastructure).</p>

3.2 The draft Infrastructure Delivery Plan

Alongside the City Plan 2019-2040, the council has also published a draft Infrastructure Delivery Plan. Its content has been informed by effective engagement with a wide range of stakeholders and partners. During the process, the council has engaged with partners including:

- United Kingdom Power Network;
- National Health Service (HUDU);
- Thames Water;
- The Royal Parks;
- The Port of London Authority;
- The Metropolitan Police;
- The London Ambulance Service;
- The London Fire Brigade; and
- A series of communications providers.

The council will continue to engage with all its stakeholders and partners when preparing a new version of the Infrastructure Delivery Plan.

4 Statements of Common Ground

Alongside the duty-to-cooperate, the 2018 revision to the NPPF introduced a requirement to produce Statements of Common Ground throughout the plan-making process. These are a written record of the progress made by planning authorities on strategic cross-boundary issues as they prepare local plans. They document where effective cooperation is (and is not) taking place as plans are drawn up and taken through the statutory process to adoption.

In support of the City Plan 2019-2040, the council has produced a joint Statement of Common Ground with the Mayor of London and its neighbouring boroughs. The statement covers the following strategic cross-boundary issues:

- Housing delivery and affordable housing;
- Offices;
- Tottenham Court Road Opportunity Area;
- Town centres and high streets;
- Strategic Cultural Areas;
- Transport;
- Waste
- Heritage and protected views; and
- Green infrastructure.

In addition, further Statements of Common Ground focussing on detailed matters raised at Regulation 19 consultation have also been prepared with the following partners:

- Transport for London (on parking);
- Sport England (on protection of existing sports facilities);
- Historic England (on heritage policies);
- The Environment Agency and Thames Water (on various policies in the Environment chapter of the City Plan).

5 Conclusion

During the production of the City Plan 2019-2040, the council has actively engaged with key stakeholders and partners on all strategic matters. The submitted plan is the culmination of a number of processes, activities and levels of engagement and co-operation, as set out within this document. The City Plan responds to the views expressed and comments made during its preparation by several of the prescribed bodies.

Where prescribed bodies have raised no issues with the contents of the plan, it should be noted that they were invited to comment on the contents of the plan at each stage of public consultation.

This report, the Authority Monitoring Reports, the Consultation Statements and the Statements of Common Ground show how the council has complied with its duty-to-cooperate and will be used during the Examination in Public to show that the City Plan 2019-2040 is based on effective joint working across local authority boundaries.

Appendix 1 Schedule of meetings with statutory stakeholders

Date	Consultee	Strategic issues discussed
16 th Nov 2016	Department for Transport	<ul style="list-style-type: none"> • Consultation on policy proposal of the Ultra-Low Emissions Zones • Waiting and Loading
17 th Nov 2016	Historic England	<ul style="list-style-type: none"> • Heritage management
21 st Nov 2016	GLA	<ul style="list-style-type: none"> • Housing
23 rd Nov 2016	GLA	<ul style="list-style-type: none"> • Strategic Housing Land Availability Assessment
2 nd Dec 2016	GLA	<ul style="list-style-type: none"> • Mayor's Academic Forum
17 th Jan 2017	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
19 th Jan 2017	Westminster World Heritage Site Steering Group	<ul style="list-style-type: none"> • Updates from all World Heritage Site stakeholders and planning for forthcoming UNESCO monitoring mission visit
24 th Jan 2017	LWPF	<ul style="list-style-type: none"> • Local, regional, inter-regional and national updates
14 th Feb 2017	LB of Camden	<ul style="list-style-type: none"> • Code of Construction Practice • Basement policy revision
17 th Feb 2017	TfL	<ul style="list-style-type: none"> • Consultation on taxis
2 nd Mar 2017	London Boroughs Neighbourhood Planning meeting	<ul style="list-style-type: none"> • London Boroughs Neighbourhood Planning meeting
2 nd Mar 2017	TfL	<ul style="list-style-type: none"> • Mayor's Transport Strategy
14 th Mar 2017	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
13 th Mar 2017	TfL	<ul style="list-style-type: none"> • Direct Vision Standards consultation
16 th Mar 2017	Central London Forward	<ul style="list-style-type: none"> • Current economic analysis
25 th Apr 2017	Central London Forward Board	<ul style="list-style-type: none"> • Consultants presented analysis to Leaders and Chief Executives of CLF (including Westminster's Chief Executive and Leader)
26 th April 2017	LWPF	<ul style="list-style-type: none"> • London wide forum
28 th Apr 2017	Central London Forward	<ul style="list-style-type: none"> • Further discussion on the work of the consultants presented on 25th April 2018.
5 th May 2017	GLA	<ul style="list-style-type: none"> • The Green Factor

9th May 2017	GLA	<ul style="list-style-type: none"> • Strategic Housing Land Availability Assessment
11th May 2017	LB of Wandsworth	<ul style="list-style-type: none"> • Wandsworth's Employment and Industry Document • Article 4 Directions • Tall Buildings • Neighbourhood Planning and Local Plan updates from both boroughs
16th May 2017	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
25th May 2017	GLA and TfL	<ul style="list-style-type: none"> • Proposed Regulation 18 notification and areas of change in both Westminster's and London's Plans • Minor boundary changes to CAZ • Changes to spatial designations • Draft Mayor of London Affordable Housing SPG
14th June 2017	Historic England / Greater London Archaeological Advisory Service	<ul style="list-style-type: none"> • Presentation of revisions to archaeological priority areas
30th Jun 2017	LB of Camden, City of London Corporation, RBKC	<ul style="list-style-type: none"> • Regulation 18 consultation points and likely plan changes, recent experience at examination • UNESCO World Heritage Site and the long-term management including views experience and undertaking to develop similar/shared policy approaches for boroughs affected
30th June 2017	LB of Lambeth, LB of Southwark, LB of Wandsworth, GLA, Historic England	<ul style="list-style-type: none"> • World Heritage Site Management Plan
11th Jul 2017	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
9th Aug 2017	MMO	<ul style="list-style-type: none"> • Marine Planning, The South-East Marine Plan, Westminster specific issues/priorities
25th Sep 2017	River and Canal Trust	<ul style="list-style-type: none"> • City plan revision and the right kind of growth • Policy on mooring, environmentally friendly canal use and biodiversity • The NWEDA
25th September 2018	Historic England	<ul style="list-style-type: none"> • World Heritage Site development of attributes of Outstanding Universal Value
26th Sep 2017	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues

28th Sep 2017	LB of Lambeth	<ul style="list-style-type: none"> • City plan revisions (both Westminster and Lambeth) • Cross-border strategic matters (tall buildings, housing targets, brownfield registers, post-permission viability review, mayoral CIL proposals and AH payments in lieu, flooding).
19th Oct 2017	World Heritage Site Steering Group	<ul style="list-style-type: none"> • Findings of the UNESCO 2017 monitoring mission report and recommendations, discussion on how to progress these.
17th Nov 2017	Historic England	<ul style="list-style-type: none"> • Heritage policies
24th Nov 2017	GLA	<ul style="list-style-type: none"> • GLA presented findings of SHLAA and SHMA with discussion on methodology
27th Nov 2017	Central London Forward	<ul style="list-style-type: none"> • Cross-London planning strategic issues
26th Jan 2018	ALBPO Development Plans Committee and ALBPO Policy Officers Sub group	<ul style="list-style-type: none"> • Cross-London planning strategic issues
12th Feb 2018	LB of Brent	<ul style="list-style-type: none"> • General planning policy updates including Regulation 18 consultation
13th Feb 2018	World Heritage Site Steering Group	<ul style="list-style-type: none"> • World Heritage Site Management Plan workshop
16th Feb 2018	ALBPO Policy Officers Sub group	<ul style="list-style-type: none"> • Cross-London planning strategic issues
6th March 2018	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
14th Mar 2018	World Heritage Site Steering Group	<ul style="list-style-type: none"> • Further discussion, presentations and updates about progress on the recommendations of the monitoring mission to the site in 2017
16th April 2018	LB of Lambeth, GLA	<ul style="list-style-type: none"> • World Heritage Site Setting Study
19th April 2018	ALBPO Policy Officers Sub group	<ul style="list-style-type: none"> • Cross-London planning strategic issues
26th April 2018	Thames Water	<ul style="list-style-type: none"> • Thames Water provided an update on TE2100
1st May 2018	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
16th May 2018	LB of Lambeth	<ul style="list-style-type: none"> • Local Plans review update • Statements of Common Ground, • The presumption in favour of sustainable development

		<ul style="list-style-type: none"> • Waste management • Flood risk and prevention, • Neighbourhood planning, • Housing delivery and viability • Article 4 Directions • Consultation Statement responses
16th May 2018	LB of Camden, City of London Corporation, RBKC	<ul style="list-style-type: none"> • General planning policy updates including Regulation 18 consultation
16th May 2018	LB of Brent, LB of Camden	<ul style="list-style-type: none"> • General planning policy updates including Regulation 18 consultation
21st Jun 2018	ALBPO Policy Officers Sub group	<ul style="list-style-type: none"> • Cross-London planning strategic issues
3rd July 2018	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
16th August 2018	ALBPO Policy Officers Sub group	<ul style="list-style-type: none"> • Cross-London planning strategic issues
6th Sep 2018	LB of Camden	<ul style="list-style-type: none"> • General planning policy updates including Regulation 18 consultation
18th Sep 2018	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
16th Oct 2018	World Heritage Site Steering Group	<ul style="list-style-type: none"> • Further discussion, presentations and updates about progress on the recommendations of the monitoring mission to the site in 2017
18th Oct 2018	ALBPO Policy Officers Sub group	<ul style="list-style-type: none"> • Cross-London planning strategic issues
13th Nov 2018	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
28th Nov 2018	Thames Water	<ul style="list-style-type: none"> • Policy about drainage infrastructure and SUDs in the draft City Plan • Amenity impacts • Basement development • Thames Water's pre-app advice • The Northbank
5th Dec 2018	LB of Lambeth	<ul style="list-style-type: none"> • Update on both Westminster and Lambeth's Local Plans • Statement of Common Grounds and strategic matters that need attention (Tall buildings and protected views, including WWHS / Transport and air quality / Waste management / The River Thames / Housing / Economy / Other infrastructure projects)
5th Dec 2018	LB of Wandsworth	<ul style="list-style-type: none"> • Update on both Westminster and Wandsworth's Local Plans

		<ul style="list-style-type: none"> • Statement of Common Grounds and strategic matters that need attention (The World Heritage Site / Air pollution and environmental policies / Transport / Housing methodology / Office Demand) • Neighbourhood Planning
7th Dec 2018	RBKC	<ul style="list-style-type: none"> • Update on both Westminster and RBKC's Local Plans • Statement of Common Grounds and strategic matters that need attention (Housing / Transport / The NWEDA and the Canal) • Neighbourhood Planning, CIL and Town Centres policies were also discussed
11th Dec 2018	City of London Corporation	<ul style="list-style-type: none"> • Update on both Westminster and the City's Local Plans • Statement of Common Grounds and strategic matters that need attention (Housing, Transport, Views, the Northbank) • Other issues discussed included waste management, CIL expenditure and Neighbourhood Planning.
11th Dec 2018	Historic England	<ul style="list-style-type: none"> • Update on the draft City Plan production • Historic England's concerns in relation to new draft policies • Main issues discussed included tall buildings, the Heritage representation throughout the Plan, the lack of detail of new draft policies and the World Heritage Site.
11th Dec 2018	GLA, TfL	<ul style="list-style-type: none"> • Update on both Westminster and London's Plans • Main issues discussed included the housing target, affordable housing requirements, the Soho Special Policy Area, the town centres hierarchy, the Victoria Opportunity Area, Active Travel, parking policies conformity issues, the Northbank, extensions, tall buildings and views.
12th Dec 2018	Network Rail	<ul style="list-style-type: none"> • Telephone conversation to discuss impact of draft City Plan policies on Network Rail assets.
13th Dec 2018	LB of Camden	<ul style="list-style-type: none"> • Update on both Westminster and Camden's Local Plans • Statement of Common Grounds and strategic matters that need attention

		<p>(Housing, the West End, the Soho Special Policy Area, the Tottenham Opportunity Area, Gypsies and Travellers, waste management and green infrastructure)</p> <ul style="list-style-type: none"> • Other issues discussed included CIL, Neighbourhood Planning and Article 4 Directions.
18th Dec 2018	LB of Southwark	<ul style="list-style-type: none"> • Update on both Westminster and Southwark's Local Plans • Statement of Common Grounds and strategic matters that need attention (Housing, Employment, Tall buildings, Transport and Waste management) • Other issues discussed included the London Plan Examination in Public, Article 4 Directions and Neighbourhood Planning.
18th Dec 2018	Met Police	<ul style="list-style-type: none"> • Update on the draft City Plan • Policies approach to "Secured by Design", crime reduction, requirements to developers and CIL.
20th Dec 2018	LB of Brent	<ul style="list-style-type: none"> • Update on both Westminster and Brent's Local Plans • Statement of Common Grounds and strategic matters that need attention (Housing, Employment, Tall buildings, Transport and Waste management) • Other issues discussed included Neighbourhood Planning.
25th Jan 2019	Joint POS, DM, POS SP, POS London & ALBPO	<ul style="list-style-type: none"> • Cross-London planning strategic issues
25th Jan 2019	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
19th Feb 2019	Historic England	<ul style="list-style-type: none"> • Draft City Plan 2019-2040 policies and evidence base
1 March 2019	LB of Lambeth	<ul style="list-style-type: none"> • Tall buildings in Vauxhall and impact on WHS
12th Mar 2019 (2pm-4pm)	ALBPO Policy Officers Sub Group	<ul style="list-style-type: none"> • Cross-London planning strategic issues
4th Apr 2019	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues
9th Apr 2019	Historic England	<ul style="list-style-type: none"> • Draft City Plan 2019-2040 policies and evidence base
2nd May 2019	Historic England	<ul style="list-style-type: none"> • Discussion about the Greater London Historic Environment Record

		<ul style="list-style-type: none"> • Development of evidence on the historic environment focused around the World Heritage Site
4th June 2019	Riverside Energy Park Examining Authority	<ul style="list-style-type: none"> • Support for DCO Riverside Energy Park, Bexley
5th July 2019	Joint POS, DM, POS SP, POS London & ALBPO	<ul style="list-style-type: none"> • Cross-London planning strategic issues
12th July 2019	GLA	<ul style="list-style-type: none"> • LES: Submission of Recycling and Reduction Plan
16th July 2019	ALBPO Development Plans Committee	<ul style="list-style-type: none"> • Cross-London planning strategic issues • SoCGs • Housing Delivery Test
17th July 2019	GLA & Transport for London	<ul style="list-style-type: none"> • London plan • City Plan update • Issues likely to be raised in the GLA response to the City Plan Regulation 19 consultation (e.g. Housing, Retail, Waste and Parking).
24th July 2019	London Boroughs Neighbourhood Planning Group	<ul style="list-style-type: none"> • Neighbourhood Plan updates and issues • Use of Memorandums of understanding • Size of Neighbourhood Areas
25th July 2019	ALBPO	<ul style="list-style-type: none"> • Borough updates on plans, London Plan, viability
29th July 2019	Historic England	<ul style="list-style-type: none"> • Tall buildings, key development sites, heritage
18th September 2019	Historic England	<ul style="list-style-type: none"> • Heritage policies
23rd September 2019	RBKC	<ul style="list-style-type: none"> • Key Development Sites methodology & Historic England response
4th October	GLA	<ul style="list-style-type: none"> • Discussions on SoCG (including waste and parking standards)
9th October 2019	Transport for London Commercial Development	<ul style="list-style-type: none"> • Housing figures for TfL Sites
15th October	London Waste Planning Forum	<ul style="list-style-type: none"> • Draft London Plan EiP • Discussions on WCC apportionment
15th October	South East London Joint Waste Planning Group	<ul style="list-style-type: none"> • Potential to pool with the Group • Requirements for Plan submission • WCC waste data study • SELJWPG waste tech paper update
15th October	Environment Agency & Thames Water	<ul style="list-style-type: none"> • Statement of Common Ground

15th October	NHS	<ul style="list-style-type: none"> NHS Key Development Site (St Mary's Hospital)
18th October 2019	LB of Lambeth	<ul style="list-style-type: none"> SoCGs

Appendix 2 Schedule of meetings with non-statutory stakeholders and partners

Date	Consultee	Strategic issues discussed
10th Oct 2017	WPA	<ul style="list-style-type: none"> Mixed use policy Payment in lieu formula Neighbourhood planning Air quality Parking The London Plan
5th Jan 2018	Knightsbridge Neighbourhood Forum	<ul style="list-style-type: none"> Neighbourhood Plan update
6th Feb 2018	Queen's Park Community Council	<ul style="list-style-type: none"> Neighbourhood Plan update
8th Feb 2018	Knightsbridge Neighbourhood Forum	<ul style="list-style-type: none"> Neighbourhood Plan update
10th Mar 2018	Maida Hill Neighbourhood Forum	<ul style="list-style-type: none"> Neighbourhood Plan update
27th Mar 2018	Belgravia Neighbourhood Forum	<ul style="list-style-type: none"> Neighbourhood Plan update
1st May 2018	Knightsbridge Neighbourhood Forum	<ul style="list-style-type: none"> Neighbourhood Plan update
2nd May 2018	Soho Neighbourhood Forum	<ul style="list-style-type: none"> Neighbourhood Plan update
21st May 2018	Fitzrovia West Neighbourhood Forum	<ul style="list-style-type: none"> Neighbourhood Plan update
6th Jun 2018	Soho Neighbourhood Forum	<ul style="list-style-type: none"> Neighbourhood Plan update
12th Jun 2018	Soho Neighbourhood Forum	<ul style="list-style-type: none"> Neighbourhood Plan update
8th Aug 2018	Queen's Park Community Council	<ul style="list-style-type: none"> Neighbourhood Plan update

22nd Aug 2018	Victoria Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
22nd Aug 2018	Marylebone Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
8th Oct 2018	Pimlico Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
17th Oct 2018	Westminster Amenity Societies Forum	<ul style="list-style-type: none"> • City Plan update • Oxford Street District public realm works
28th Nov 2018	Fitzrovia West Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
3rd Dec 2018	Amenity Societies (SEBRA, Portland Village, Covent Garden Community Association)	<ul style="list-style-type: none"> • Cabinet Member for Place Shaping and Planning and officers met with Westminster's amenity societies to discuss policies in the draft City Plan 2019-2040. • Discussion about extensions, residential use in town centres, the Code of Construction Practice, Special Policy Areas and other planning issues.
6th Dec 2018	Neighbourhood Forums	<ul style="list-style-type: none"> • Officers met with Westminster's Neighbourhood Forums to discuss policies in the draft City Plan 2019-2040. • Issues discussed included the Special Policy Areas, the Northbank, the saved UDP policies, building heights, views, retail and change of use to residential.
10th Dec 2018	WPA	<ul style="list-style-type: none"> • Officers met with WPA to discuss policies in the draft City Plan such as Tall buildings and density, the Mixed-use policy, the affordable housing provision and units' sizes.
11th Dec 2018	Amenity Societies	<ul style="list-style-type: none"> • Cabinet Member for Place Shaping and officers met with Westminster's amenity societies to discuss policies in the draft City Plan 2019-2040. • Issues discussed included the saved UDP policies, tall buildings, size limit for new homes, neighbourly management, amenity impacts, air quality, town centres and hotel delivery.
13th Dec 2018	BIDs (NVEC, Paddington, Baker St, Heart of London)	<ul style="list-style-type: none"> • Deputy Leader and officers met with Westminster's BIDs to discuss policies in the draft City Plan 2019-2040. • Main issues discussed included the disconnect between planning and licensing, the Northbank, the Soho Special Policy Area, parking and hotels delivery.

17th Dec 2018	Marylebone Association	<ul style="list-style-type: none"> • Cabinet Member for Place Shaping and officers met with Marylebone Association to discuss new City Plan policies and other council's work. • Issues discussed included City Plan policies on amalgamation of units, size limit for new homes and the saved UDP policies. • Other issues discussed included the Planning Review and Design Review Panels.
24th Jan 2019	Maida Hill Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
5th Feb 2019	Soho Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
4th Mar 2019	Victoria Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
13th Mar 2019	Mayfair Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
17th Apr 2019	Pimlico Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
18th April 2019	Notting Hill East	<ul style="list-style-type: none"> • Neighbourhood Plan update
13th May 2019	Fitzrovia West Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
19th June	Mayfair Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update (Examiner's report comments)
3rd July	Belgravia Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update • Re-designation discussion • Neighbourhood CIL apportionments
3rd July	Knightsbridge Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood CIL apportionments • Local infrastructure project ideas and next steps
3rd July	Fitzrovia West Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood CIL apportionments
3rd July	Hyde Park and Paddington Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood CIL apportionments
27th September	Pimlico Neighbourhood Forum	<ul style="list-style-type: none"> • Neighbourhood Plan update
17th September	Westminster Amenity Societies Forum	<ul style="list-style-type: none"> • Planning update • Planning Policy discussions on a wide range of subjects such as environment,

		<p>heritage, design, building height, housing, amenity and play space.</p> <ul style="list-style-type: none"> • Other issues discussed included rough sleeping, short-term letting and shisha smoking.
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Appendix 3 Authorities contacted in relation to strategic waste management

The following authorities were identified as being in receipt of over 1,000 tonnes of waste annually between 2013 and 2017 from Westminster. They were therefore contacted under the duty-to-cooperate to establish if waste management facilities would remain available over the City Plan 2019-2040 period to continue to receive waste from Westminster.

Authority contacted in relation to strategic waste management
LB of Barking & Dagenham
LB of Barnet
LB of Bexley
Bedford Borough Council
LB of Brent
Buckinghamshire County Council
LB of Ealing
Essex County Council
Royal Borough of Greenwich
LB of Havering
Hertfordshire County Council
LB of Hillingdon
Kent County Council
LB of Lewisham
LB of Merton
Milton Keynes Council
LB of Newham
Sandwell Council
Slough County Council
LB of Southwark
Surrey County Council
Thurrock
LB of Wandsworth
Wokingham Borough Council

A larger number of authorities has been contacted by the council in relation to strategic waste management. The council will continue to engage with all of them when assessing its policy approach to waste.

Appendix 4 Duty to cooperate letter template sent in relation to strategic waste management

XXXXXX Authority

Address

Westminster City Council
64 Victoria Street
London
SW1E 6QP

18th March 2019

Dear Sir/Madam,

Duty to Co-operate – Waste Planning

The City of Westminster is the waste planning authority for the administrative district which covers around eight square miles. Over three quarters of Westminster is designated as a conservation area and the city contains over 11,000 listed buildings and structures. Five Royal Parks take up close to a fifth of the city's land area and Westminster is also the location for a large proportion of London's Central Activities Zone which provides thousands of jobs for workers across London and far beyond. Westminster is home to a dense residential population, but also caters for many of London's visitors with the city being home to important tourist sites synonymous with London such as the Houses of Parliament, Buckingham Palace and international shopping destinations of Oxford Street and Bond Street.

All of these uses create pressures and constraints on the city's ability to process the waste generated within the borough boundary. We therefore rely on co-operation with waste planning authorities within London and beyond to facilitate the management of waste that originates from Westminster premises and construction sites.

The Mayor's Draft Replacement London Plan has allocated Westminster a 1.2% apportionment figure to contribute to the ambitions for London to be self-sufficient with regards to the management of waste by 2026. Boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage their waste apportionment. The City of Westminster is currently preparing a draft local plan which will include waste planning policies for the authority. However, with no sites available for waste processing facilities within Westminster's borough boundary, waste will continue to be exported to other locations. The duty to co-operate requires co-operation between authorities on issues which impact on planning, including provision of waste management facilities.

The City of Westminster has interrogated the Environment Agency's Waste Data Interrogator and the table below provides an indication of the amount of waste from Westminster which were managed in your authority between 2013/14 and 2016/17. This data should not be viewed as exhaustive since a threshold of 1,000 tonnes has been applied for all wastes except hazardous waste where a 50-tonne

threshold has been applied. There are limitations to the availability of data for waste originating in the Westminster, due to its restricted geographic area and tendency of private waste contractors to consolidate and transfer waste loads prior to being received at the final treatment facility destination.

	2013/14	2014/15	2015/16	2016/17
Waste (tonnes)	XX	XX	XX	XX

Waste projections indicate that waste tonnages from Westminster may increase during the period of the local plan (up to 2040). However, behaviour change, waste minimisation, recycling and economic factors will tend to minimise any potential increases and may result in a fall in total waste tonnages.

The waste policies in the City Plan 2019-40 form the waste plan for Westminster and will be subject to formal public consultation in May 2019. I am writing to you ahead of this consultation to establish the position regarding the availability of waste management facilities in your authority. Please could you confirm whether:

- you agree that the amount of waste managed by your authority originating in Westminster is a matter of strategic importance;
- your authority has capacity to take any of the waste apportioned to Westminster in the London Plan; and
- your authority can continue to receive waste at comparable levels to those in 2013/14 – 2016/17 from Westminster in the future up to 2040.

If your authority will not be able to meet these requests, I kindly ask that you provide your reasons.

Please contact planningpolicy@westminster.gov.uk if you wish to discuss this, otherwise I look forward to receiving your response.

Yours faithfully,

XXXXXXXXXXXX

***City and Planning Policy Team Leader
Policy, Performance and Communications
Westminster City Council***

Appendix 5 Responses related to strategic waste management

This section summarises the key responses received at time of writing from authorities and waste planning groups who receive waste originating in Westminster.

These authorities were asked whether they consider this to be a matter of strategic importance, if they have capacity to take any of the waste apportioned to Westminster and whether they can continue to receive waste at comparable levels to 2013/14 – 2016/2017.

Westminster is continuing to engage with these authorities to ensure compliance with the draft New London Plan and the National Planning Policy for Waste.

Authority	1 – Is this a matter of strategic importance ?	2 – Confirm whether you have capacity to take Westminster’s apportioned waste	3 – Confirm whether you can continue to receive waste at comparable levels
LB of Barking & Dagenham/ East London Waste Authority (ELWA)	No comment	The constituent ELWA boroughs are working together to commission a new Joint Waste Plan alongside their respective Local Plan work. The programme for this is still to be finalised but it is envisaged that a new Waste Plan can be prepared and adopted within the extended period for operations continuing at the existing waste sites.	We will ensure Westminster City Council is consulted on both our Local Plan and the Joint Waste Plan as they progress.
LB of Barnet	Yes	Barnet is not in a position as an individual borough to take any of the waste apportioned to Westminster, because it is part of the wider North London Waste Plan (NLWP) group.	Yes, Barnet can continue to receive waste at comparable levels until 2025 at least.
Bedford Borough Council	No	No comment	Only for two more years maximum due to lack of space and sites. Unless new sites become available although it is unlikely.

LB of Brent	No	Brent manages its waste through the joint West London Waste Plan. It is not possible to commit to accepting waste until the review of the plan is undertaken.	Brent manages its waste through the joint West London Waste Plan. It is not possible to commit to accepting waste until the review of the plan is undertaken.
Buckinghamshire County Council	No	No comment	Yes, Buckinghamshire are able to continue receiving waste until 2021 at least.
LB of Ealing / West London Waste Partnership (WLWP)	Yes	The draft New London Plan (2017) is currently proposing to revise the apportionment figures allocated to each London Borough. Upon adoption of the draft New London Plan (2017), each borough will need to review whether there is sufficient capacity (existing or allocated) to manage the revised apportionment figures. Therefore, it is not possible to commit to accepting the waste apportionment of another local authority before this review has been undertaken. Please note that this response has been shared with the other members involved in the preparation of the West London Waste Plan	Not possible to commit until the New London Plan waste figures review is undertaken.
Essex County Council	Yes	No comment	Yes, but not to the same scale as in 2017. Due to site capacities.
Royal Borough of Greenwich/ South East London Joint Waste Planning	No	The Royal Borough of Greenwich are part of the South East London Joint Waste Planning Group. If Westminster are	Yes, Greenwich are able to continue receiving waste at comparable levels.

Group (SELJWPG)		requesting that this group take on Westminster's Waste Apportionment requirements, the council will need to make a formal request via the Chair.	
London Borough of Havering	Yes	No	Havering and its partner East London boroughs have a waste development plan valid until 2021. The authorities are in the process of agreeing a way forward to update this plan. Until that work has been concluded, it is not possible to make any commitments on the capacity to take waste from other authorities. I understand that East London is likely to be looking at a c.15 year period for its next waste plan and as such would not be able to comment on the period to 2040.
Hertfordshire County Council	No	No comment	Yes, Hertfordshire are able to continue receiving waste at comparable levels.
LB of Hillingdon	Yes	Hillingdon manages its waste through the joint West London Waste Plan. It is not possible to commit to accepting waste until the review of the plan is undertaken.	There is uncertainty as to whether Hillingdon can continue to receive waste at comparable levels all the way until 2040 due to unknown site capacities.
Kent County Council	No	No comment	Yes, as long as levels similar to 2015-2017 are maintained rather than the hundreds of thousands in 2013/14 (As long as we do not ramp up significantly).
LB of Merton / South London Waste Partnership (SLWP)	No	Although there is potential for the SLWP boroughs to be net self-sufficient in LACW and C&I terms by 2021, it is still far from assured. Furthermore, the waste management capacity to deal with the other principal waste stream, Construction Demolition and	Yes, Merton are able to continue receiving waste at comparable levels.

		Excavation waste, is insufficient. Consequently, the South London Waste Plan boroughs are not currently in a position to take any of the waste apportioned to the City of Westminster in the New London Plan.	
Milton Keynes Council	Yes	No comment	Awaiting information from sites. The only landfill site is due to close in 2022 but may apply to extend its planning permission. Cannot guarantee at this time that they can take waste after 2022.
LB of Newham	Newham's ability to continue to meet its waste apportionment figure as per the London Plan is a matter of strategic importance. It is not of specific strategic importance to Newham where the waste that makes up its apportionment figure comes from.	No	Yes, although the capacity of Barbers Road site is unknown as it is LLDC rather than Newham. Other sites closures are not imminent.
North London Waste Plan authorities	Yes	The North London Boroughs are at the latter stages of preparing the NLWP with consultation under Regulation 19 ending on 12 April and submission to the Secretary of	The majority of Westminster's waste received in North London goes to P B Donoghue, Claremont Rd, Barnet. This site is part of the Brent Cross Cricklewood development and is expected to close in 2025 and therefore would not continue to

		State expected in July 2019. It is not therefore a good moment to incorporate Westminster into the NLWP at this stage.	receive Westminster's waste after this date.
Old Oak and Park Royal Development Corporation (OPDC)	OPDC is supporting host boroughs (Brent and Ealing) to meet their apportionment targets through the joint West London Waste Plan (2015). When the draft London Plan (2017) is adopted, boroughs will need to review whether there is sufficient capacity (existing or allocated) to manage the revised apportionment figures. Therefore, it is not possible to commit to accepting the waste apportionment of another local planning authority before this review has been undertaken. Please note that this response has been shared with the other members involved in the preparation of the West London Waste Plan. Also refer to responses sent by Brent and Ealing.		
Sandwell Council	No	No comment	Yes, Sandwell are able to continue receiving waste at comparable levels.
Surrey County Council	Yes	No comment	Yes, Surrey are able to continue receiving waste at comparable levels.
LB of Wandsworth/Western Riverside Waste Authority	No	The council will review its waste management sites. Initial work indicates that no spare capacity to assist Westminster. Local Plan Reg 18 to be published for comment in March 2020. At this point we shall be in a better position to assess if there is additional capacity and if could be shared. Council continues to work with the boroughs of the Western Riverside Waste Authority to assess if pooling is appropriate and this area is prioritised if any such arrangement where to happen in the future.	Yes, Wandsworth are able to continue receiving waste at comparable levels.
Wokingham Borough Council	No	No comment	Wokingham along with three other Central and Eastern Berkshire Authorities are

			currently working in collaboration with Hampshire County Council to provide a Joint Minerals and Waste Plan. Regulation 18 draft consultation was only just completed and therefore a final decision on all site allocations is yet to be made.
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