

Summary of the main issues raised in responses to the Publication Draft Core Strategy

	Issue	Reg 29	Soundness	Comment	Respondent
General					
1.	Includes policies that are too detailed			✓	Government Office for London
2.	Quantum of development/timetables			✓	Government Office for London
3.	More information on dependencies			✓	Government Office for London
4.	Targets should be extrapolated for plan period			✓	Government Office for London
5.	Risks section should include contingency plans			✓	Government Office for London
6.	Vision/Obj: detail locations/timescales			✓	Government Office for London
7.	Onus changed for WCC to demonstrate where it states "where the Council considers..."		✓	✓	LaSalle Investment Management: Legal & General: Selfridges Retail
8.	Obj: new to identify needs of local communities and develop detailed strategies to meet them		✓		Charlotte Street Association
9.	No evidence of involving local community or a neighbourhood approach taken in Fitzrovia		✓		Charlotte Street Association
10.	Refer to benefits from world class higher education and healthcare facilities		✓		Imperial College London
11.	Further promotion of Edgware Road			✓	Councillor Adams
12.	Westminster's contribution to GDP should be 2.2% rather than 22%		✓		WCC Premises Management Unit
13.	Identify UCLH as key partner			✓	University College London Hospitals NHS Foundation Trust
Mixed Use					
14.	Do not apply to private social/community		✓	✓	Howard de Walden Estate: Imperial College London: LaSalle Investment Management: Noved Investment Company: Selfridges Retail: University College London Hospitals NHS Foundation Trust
15.	Do not apply to commercial other than offices		✓		LaSalle Investment Management: Selfridges Retail

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16.	Do not apply to COU from office to other commercial uses			✓	Legal & General
17.	Do not apply to B8			✓	Royal Mail
18.	Do not apply to A1			✓	Hammerson UK
19.	Equal priority commercial/housing: CAZ			✓	The Crown Estate: Howard de Walden Estate: Legal & General
20.	Equal priority commercial/housing: Core CAZ		✓		Covent Garden London: Land Securities: Howard de Walden Estate: Westminster Property Association
21.	Equal priority commercial/housing: OAs		✓		Covent Garden London: Land Securities: Howard de Walden Estate: Westminster Property Association
22.	Equal priority commercial/housing: Marylebone/Fitzrovia (except residential areas)			✓	Howard de Walden Estate
23.	Greater emphasis on housing supply		✓		BT
24.	Maximise residential / residential-led mixed use		✓		BT
25.	More flexibility		✓	✓	The Crown Estate: Legal & General: The Mercers' Company: Noved Investment Company: Targetfellow Estates
26.	Flexibility for retail in Primary Shopping Frontages should extend to any large retail in CAZ		✓		The Crown Estate: Noved Investment Company
27.	Flexibility for retail in east end Oxford St should extend to all WESRPA			✓	LaSalle Investment Management: Selfridges Retail
28.	Flexibility should apply to ChgXRd		✓		Noved Investment Company
29.	Remove flexibility applied to TCROA		✓		Charlotte Street Association
30.	Remove flexibility applied to WESRPA		✓		Charlotte Street Association
31.	More flexibility on periphery of TCROA			✓	Aviva Investors Global Services
32.	More flexibility for other benefits in OAs				Aviva Investors Global Services
33.	Other land uses than residential achieve other benefits RE strategic international business, retail, cultural, entertainment		✓		Noved Investment Company
34.	Results in poor design			✓	Covent Garden London: The Crown Estate: Land Securities: Howard de Walden Estate: Legal & General

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35.	Refer to housing swaps and credits		✓	✓	Aviva Investors Global Services: Covent Garden London: Howard de Walden Estate: Hammerson UK: Legal & General: Land Securities: Universities Superannuation Scheme: Westminster Property Association
36.	Allow housing off-site with equal priority		✓		Covent Garden London: GVA Grimley: Howard de Walden Estate: Legal & General: Land Securities: TA: Westminster Property Association
37.	Remove vicinity test			✓	Legal & General
38.	Allow off-site only in the vicinity		✓		Charlotte Street Association
39.	Refer to cascade of options in policy itself		✓		Noved Investment Company
40.	Encourage rather than restrain development		✓		Legal & General
41.	'Commercial floorspace' inconsistent with Glossary 'commercial development'			✓	Aviva Investors Global Services: Hammerson UK
Special Policy Areas					
42.	Portland Place: delete			✓	Howard de Walden Estate
43.	Harley Street: increase flexibility to facilitate residential		✓		University College London Hospitals NHS Foundation Trust
44.	St James's inconsistent with other SPAs, no justification, inconsistent with wider Core CAZ role and as office/residential location, retail/galleries not considered to be unique clusters		✓		The Crown Estate
45.	Blanket protection should not be pursued; make subject to surplus to requirements or re-use has identified community benefit		✓		Imperial College London
46.	Concern about Strategic Cultural Areas (figure 15)		✓		Imperial College London
Opportunity Areas					
47.	POA/VOA: include airspace above railway			✓	Greater London Authority
48.	POA: clarity on relationship to Paddington SPA		✓		Imperial College London

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49.	POA: object to North Westminster Community School		✓		Imperial College London
50.	POA: refer to Grand Union Canal and Paddington Basin			✓	British Waterways
51.	POA: refer viability			✓	Royal Mail
52.	POA: St Mary's Hospital site must embrace potential of waterside location			✓	British Waterways
53.	VOA links to Vauxhall/9 Elms			✓	Greater London Authority
54.	VOA: include Stockley House within the Victoria Station boundary		✓		Hammerson UK
55.	VOA: targets subject to future market demand and requirements		✓		BT
56.	TCROA: boundary include Goldbeaters House, Manette Street		✓		Noved Investment Company
57.	TCROA: sites on ChXRd have potential to include retail at basement/1 st floor		✓		Noved Investment Company
58.	TCROA: no capacity assessments within context of heritage constraints, and identified sites insufficient to meet target		✓		Charlotte Street Association
59.	TCROA: need supporting infrastructure and social audit to identify need		✓		Charlotte Street Association
60.	OAs are appropriate locations for world class institutions and facilities (Obj 5)		✓		Imperial College London
Core CAZ					
61.	Housing: insufficient recognition of importance of residential		✓		BT
62.	Commercial: higher priority for support for commercial uses		✓		The Crown Estate
63.	Retail/WESRPA: remove presumption for large units, need range in keeping with character		✓		Charlotte Street Association

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64.	No enhancement/development for cultural function except Millbank, which is not in CAZ		✓		The Theatres Trust
65.	WESRPA: flexibility RE basement/ 1 st floor		✓	✓	Aviva Investors Global Services: Charlotte Street Association
66.	WESRPA: need analysis of buildings to be retained, and which replaced		✓		Charlotte Street Association
67.	WESRPA: add requirement for replacement of small units with similar		✓		Charlotte Street Association
68.	WESRPA: consider the needs and growth of small and medium enterprises			✓	Workspace Group
69.	WESRPA: designation should be to 'sustain and enhance', not to 'manage issues affecting' the area, to ensure investment in public realm and floorspace quality		✓		The Crown Estate
70.	Take account of Royal Mail's role as infrastructure provider in dealing with large sites			✓	Royal Mail
Marylebone/Fitzrovia					
71.	Recognise contribution of shops outside Local Shopping Centres, which are part of WESRPA function		✓		Charlotte Street Association
72.	Allow commercial across area as part of mixed use		✓		University College London Hospitals NHS Foundation Trust
73.	Objectives of whole CAZ should be applied and confirm that it is in CAZ		✓		The Crown Estate
Knightsbridge					
74.	SCA implies new uses which there is no room for		✓		The Knightsbridge Association
75.	Relationship to RBK&C plan RE Montpellior Street		✓		The Knightsbridge Association
76.	Refer Exhibition Road project (partnership with RBK&C)		✓		Imperial College London

Pimlico					
77.	Should include Chelsea Barracks		✓		Project Blue (Guernsey)
78.	Needs equivalent to NWEDA approach to tackle deprivation, linked to VOA			✓	South Westminster Renewal Partnership
79.	Objectives of whole CAZ should be applied and confirm that it is in CAZ		✓		The Crown Estate
Royal Parks					
80.	Royal Parks: refer in Unique City, CAZ, tourism text (para 4.36-3.38), para 5.1, CS24			✓	The Royal Parks
81.	Royal Parks: label Kensington Gardens Map pg 28			✓	The Royal Parks
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NWEDA					
82.	All waterways should be within boundary, not form boundary		✓		British Waterways
83.	Housing: refer to suitability of residential / residential-led development		✓		BT
84.	Recognise contribution a new Crossrail station in the Kensal area could have on area			✓	Royal Borough of Kensington & Chelsea
85.	D1 should not be restricted and should be encouraged in industrial locations to support training and skills improvement			✓	Workspace Group
86.	Supporting text should note that Harrow Road/A40 is TfL Road Network			✓	GLA
Outside CAZ/NWEDA					
87.	Recognise contribution of shops outside Local Shopping Centres		✓		Charlotte Street Association

88.	Fails to take account of PS Chelsea Barracks		✓		Project Blue (Guernsey)
89.	Retail ok on PS e.g. Chelsea Barracks		✓		Project Blue (Guernsey)
90.	Description of Belgravia inaccurate		✓		Project Blue (Guernsey)
91.	Consider the needs and growth of small and medium enterprises			✓	Workspace Group
Housing					
92.	Housing Target: VOA use DRLP (1,000 to 1,500)		✓	✓	Greater London Authority: Hammerson UK
93.	Housing Target: Refer DRLP			✓	Greater London Authority: Project Blue (Guernsey)
94.	Housing target: include total, annual, completions phased, referencing, trajectory			✓	Government Office for London
95.	Gypsy & Traveller pitches: use DRLP			✓	Greater London Authority
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96.	Gypsy & Traveller pitches: criteria don't meet Circular 01/2006			✓	Greater London Authority
97.	'Maximise' rather than 'optimise'		✓		Covent Garden London: Land Securities: Howard de Walden Estate: Westminster Property Association
98.	Optimising housing delivery should also apply to existing sites and infilling		✓		Church Commissioners
99.	Acknowledge that housing is not the only use competing for land			✓	LaSalle Investment Management
100.	Loss ok to comply with minimum housing standards		✓		Premio
101.	Loss ok because of heritage		✓		Premio
102.	Loss ok to achieve a better mix		✓		GVA Grimley: Premio
103.	Loss ok to provide more overall residential floorspace		✓		GVA Grimley
104.	COU to residential from employment in policy not supporting text		✓		BT
105.	Ref to LP densities in policy not supporting text		✓		BT

106.	Need not provide where COU would result in unacceptable amenity for future residents of the new housing			✓	LaSalle Investment Management
107.	Specialist housing: Some LSPs don't have strategies: should be responsibility of WCC to maintain records		✓	✓	Imperial College London: LaSalle Investment Management
108.	Specialist housing: loss ok having regard to marketing and demand			✓	LaSalle Investment Management
109.	Specialist housing: loss ok if surplus to requirements or replaced with better quality in better location		✓		Imperial College London
110.	Specialist housing: Loss ok (medical staff hostel accommodation) subject to LSP estate management strategy		✓		University College London Hospitals NHS Foundation Trust
	Issue	Reg 29	Soundness	Comment	Respondent
111.	Specialist housing: should include student housing			✓	Workspace Group
112.	Important to meet needs for student housing			✓	Workspace Group
113.	HMOs: only protect where no conflict with residential amenity or character of area		✓		Church Commissioners
Affordable Housing					
114.	Strategic target: 30%		✓	✓	Aviva Investors Global Services: Covent Garden London: Howard de Walden Estate: Land Securities: Metropolitan Police: Westminster Property Association
115.	Strategic target: 22%			✓	LaSalle Investment Management
116.	Target: not clear how 30% target for Paddington SPA and CAZ relate to POA		✓		Imperial College London
117.	Threshold: Standard charge below threshold			✓	Greater London Authority
118.	Threshold: No floorspace threshold		✓	✓	Covent Garden London: Howard de Walden Estate: Land Securities: Noved Investment Company: Westminster Property Association

119.	Threshold: No floorspace threshold: CAZ			✓	Covent Garden London: Howard de Walden Estate: Land Securities: Westminster Property Association
120.	Threshold: 1,300sqm floorspace threshold		✓		Covent Garden London: Howard de Walden Estate: Land Securities: Westminster Property Association
121.	Provision: Off-site equal priority			✓	Legal & General
122.	Provision: Off-site can be faster		✓		Project Blue (Guernsey)
123.	Provision: Refer to land use swaps and credits		✓	✓	Legal & General: BT
124.	Provision: Refer to payment in lieu		✓	✓	BT: Church Commissioners: Covent Garden London: GVA Grimley: Howard de Walden Estate: Hammerson UK: LaSalle Investment Management: Legal & General: Land Securities: Royal Mail: Westminster Property Association
125.	Provision: Payment in lieu equally acceptable		✓		Church Commissioners: Project Blue (Guernsey)
126.	Provision: Payment in lieu contributes to WCCs Community Build programme		✓		Project Blue (Guernsey)
127.	Provision: Refer to intermediate housing		✓		Metropolitan Police
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128.	Provision: Remove vicinity test		✓		Church Commissioners
129.	Provision: Apply vicinity test as tightly as possible		✓		Charlotte Street Association
130.	Provision: More flexibility for surplus medical staff accommodation for greater healthcare benefits or re-provision elsewhere			✓	University College London Hospitals NHS Foundation Trust
131.	Criteria: Confirm viability will be taken into account		✓	✓	Hammerson UK: LaSalle Investment Management: Noved Investment Company: Royal Mail: University College London Hospitals NHS Foundation Trust: Workspace Group
132.	Criteria: where feasible		✓		GVA Grimley
133.	Criteria: Take account of other S106 and other requirements			✓	Legal & General
134.	Criteria: Suitability and viability of donor site not vicinity should be main criteria for cascade		✓		BT
135.	Criteria: Individual circumstances of site		✓		Covent Garden London: Howard de Walden Estate: Land Securities: Westminster Property Association: Workspace Group

136.	Criteria: Refer site-specific targets in CMP		✓		Covent Garden London: Howard de Walden Estate: Land Securities: Westminster Property Association
137.	Criteria: Encourage rather than restrain development		✓		Covent Garden London: Howard de Walden Estate: Land Securities: Westminster Property Association: Workspace Group
138.	Criteria: take other regeneration benefits into account			✓	Workspace Group
139.	Criteria: take availability of public subsidy into account			✓	Workspace Group
140.	Criteria: staircasing should not be included		✓		Imperial College London
141.	Not different enough from UDP to address shortfall in AH, but more onerous therefore less AH units		✓		Church Commissioners
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142.	Not appropriate in St James's due to cost of high quality design needed in this area, occupiers will be socially isolated, the homes will be too big and because of flooding considerations			✓	St James's Conservation Trust
Business & Employment					
143.	Commercial: delete test for scale/ intensity/ character and function (if retained, only outside Core CAZ)		?	✓	Covent Garden London: Howard de Walden Estate: LaSalle Investment Management: Land Securities: Selfridges Retail: Universities Superannuation Scheme: Westminster Property Association
144.	Commercial: unduly restricted outside NWEDA & CAZ		✓		The London Business School
145.	Commercial development should be allowed across CAZ		✓		Selfridges Retail
146.	Commercial development should be allowed in all town centres		✓		Selfridges Retail

147.	Commercial: object to reference to range of business floorspace		✓	✓	Covent Garden London: Howard de Walden Estate:LaSalle Investment Management: Land Securities: Noved Investment Company: Westminster Property Association
148.	Commercial: include reference that the Council may require replacement of premises suitable for small and medium sized businesses		✓		Charlotte Street Association
149.	Commercial: also refer to small office suites in the range of business floorspace		✓		Charlotte Street Association
150.	Commercial development encouraged in Core CAZ, same as retail		✓	✓	Covent Garden London: Howard de Walden Estate: Legal & General: Land Securities: Westminster Property Association
151.	Commercial: recognise benefits especially from small and medium sized businesses			✓	Workspace Group
152.	Commercial development encouraged in CAZ			✓	Legal & General
153.	Commercial: require floorspace quality			✓	Legal & General
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154.	Commercial: include floorspace figures for office/retail			✓	City of London Corporation
155.	Commercial: refer to 12sqm per worker (para 4.28)		✓		Charlotte Street Association
156.	Retail: more flexibility RE loss of A1		✓	✓	Church Commissioners: LaSalle Investment Management: Selfridges Retail: Westminster City Council Property Division
157.	Retail: remove restrictions on A2		✓		Barclays Bank
158.	Retail: remove restrictions on A3 & A4		✓		Church Commissioners
159.	Retail: allow minor changes to overall floorspace			✓	Aviva Investors Global Services
160.	Retail: require larger units to remain flexible			✓	Aviva Investors Global Services
161.	Hotels: ok anywhere subject to no impact on residential amenity		✓		Project Blue (Guernsey)
162.	Hotels: not ok in Knightsbridge SCA		✓		The Knightsbridge Association
163.	Hotels: not ok in TCROA		✓		Charlotte Street Association
164.	Hotels: loss ok if better hotel quality, offer, market demand		✓		Targetfellow Estates

165.	Hotels: loss ok if meets tourism objectives and increased housing		✓		Covent Garden London: Land Securities: Howard de Walden Estate: Westminster Property Association
166.	Hotels: directing hotels to certain locations is superfluous due to ref to streets with predominantly residential character			✓	LaSalle Investment Management
167.	Hotels: may be acceptable outside OAs and Core CAZ. Determine on site-by-site basis		✓		Imperial College London
168.	Hotels: add public safety as one of the adverse effects of the hotels in Pimlico, Bayswater and Queensway			✓	WCC Premises Management Unit
169.	Entertainment: too restrictive (incl. in Core CAZ), should apply criteria instead		✓		LaSalle Investment Management: Noved Investment Company: Selfridges Retail
	Issue	Reg 29	Soundness	Comment	Respondent
170.	Entertainment: CS6, CS8, CS13 new licences will only be granted as an exception to the Statement of Licensing Policy within Stress Areas, rather than any particular floor area			✓	WCC Premises Management Unit
171.	Entertainment: should also apply the licensing objectives under the Licensing Act 2003			✓	WCC Premises Management Unit
172.	TAC: inadequate protection of theatres		✓		The Theatres Trust
173.	TAC: blanket protection should not be pursued; make subject to surplus to requirements or re-use linked to improvements to higher education establishments		✓		Imperial College London
Heritage, Views and Tall Buildings					
174.	Heritage: 'and' should be 'or'		✓		Aviva Investors Global Services: GVA Grimley: Hammerson UK: The London Business School
175.	Heritage: too generic		✓		English Heritage
176.	Heritage: should not use 'heritage assets' as PPS15 only draft		✓		Aviva Investors Global Services: GVA Grimley: Hammerson UK
177.	Heritage: include more on World Heritage Site		✓		English Heritage

178.	Heritage: historic environment includes canals (para 2.25)			✓	British Waterways
179.	Heritage: not unnecessarily protect and retain buildings that are not statutorily protected			✓	BT
180.	Views: should not be blanket refusal, not if it can be seen, but if it causes harm		✓		Aviva Investors Global Services: Hammerson UK: Workspace Group
181.	Views: refer London View Management Framework		✓		GVA Grimley
182.	Views: should not include metropolitan views		✓		Hammerson UK
183.	Views: include list of local and metropolitan views			✓	LaSalle Investment Management
184.	Views: reference to open sky beyond			✓	The Royal Parks
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185.	Views: should also include impact on views in other boroughs			✓	Royal Borough of Kensington & Chelsea
186.	Views: acknowledge density sought in Battersea/9 Elms OA (incl. local views)			✓	London Borough of Wandsworth
187.	Views: incorrectly labelled			✓	The Royal Parks
188.	Views: picture not accurate pg 90			✓	The Royal Parks
189.	TB: policy framework too fragmented, need own policy with criteria for assessment (including impact on Conservation Areas)		✓	✓	English Heritage: Hammerson UK: Royal Borough of Kensington & Chelsea
190.	TB: should not exclude other sites in POA, subject to criteria only		✓		Westminster City Council Property Division
191.	TB: VOA should state that any opportunities identified for TBs should be maximised			✓	BT
192.	TB: Disagree there are limited opportunities in VOA		✓		Hammerson UK
National & International Uses					
193.	More flexibility for surplus sites			✓	University College London Hospitals NHS Foundation Trust
194.	Refer to London Business School		✓		The London Business School

Design					
195.	Include viability		✓	✓	Premio: LaSalle Investment Management: Legal & General: Noved Investment Company: Royal Mail: Selfridges Retail: Workspace Group
196.	Include feasibility, particularly conversions / listed buildings			✓	Royal Mail: Workspace Group
197.	Could compromise other benefits		✓		Noved Investment Company
198.	Include design principles, not just sustainability criteria			✓	LaSalle Investment Management
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199.	Reference to noise and air pollution inconsistent with those policies		✓		Noved Investment Company
200.	Needs statement about relationship with CMP policies		✓		The Knightsbridge Association
Health, Safety, Well-being					
201.	Refer to Safer Places and Secured by Design		✓		Metropolitan Police
202.	Flood: exclude some policing facilities		✓		Metropolitan Police
203.	Flood: Refer groundwater pollution through contaminated land			✓	Environment Agency
204.	Noise/Air Pollution: take into account existing use as may not be able to reduce		✓		Noved Investment Company
205.	Noise/Air Pollution: take into account sensitivity of neighbouring uses		✓		Noved Investment Company
206.	Noise Pollution: inadequate policy, only aspirational		✓		Charlotte Street Association
207.	Noise Pollution: lacking enforcement measures			✓	St James's Conservation Trust
208.	Light Pollution: include new policy		✓		Charlotte Street Association
209.	Housing Quality: acknowledge that specialist housing has different requirements		✓		Imperial College London

Planning obligations and Infrastructure Delivery

210.	S106: refer Crossrail	✓			Greater London Authority
211.	S106: refer transport (general)	?		✓	Greater London Authority
212.	S106: refer courts			✓	Her Majesty's Court Service
213.	S106: refer policing		✓		Metropolitan Police
214.	S106: refer water and sewerage infrastructure		✓		Thames Water
215.	S106: refer medical facilities			✓	University College London Hospitals NHS Foundation Trust
216.	S106: prioritise local needs over regional			✓	Legal & General
217.	Infrastructure: refer higher education institutes			✓	Imperial College London
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218.	Infrastructure: should be delivered primarily by the public sector		✓		Aviva Investors Global Services: Hammerson UK
219.	Infrastructure: developers must demonstrate water/sewerage capacity, if inadequate, provision, if no provision, refuse		✓		Thames Water
220.	Infrastructure: state that expansion of water/sewerage infrastructure is OK		✓		Thames Water
221.	Distinction between S106 and CIL (e.g. Bus network), flexibility and ensure no duplication	?	✓	✓	Aviva Investors Global Services: Greater London Authority: Hammerson UK: LaSalle Investment Management
222.	Acknowledge viability and opportunity for other planning benefits		✓	✓	LaSalle Investment Management: Noved Investment Company: Royal Mail: Workspace Group
223.	Encourage rather than restrain development		✓		Legal & General: Workspace Group
224.	Should mitigate impact where effects, on balance, are unacceptable		✓		Noved Investment Company: Workspace Group
225.	Form and scale of obligations should relate to development impact		✓		Noved Investment Company: Workspace Group
226.	Inappropriate to ensure development complies with plan policies		✓		Noved Investment Company
227.	Refer Circular 05/05		✓	✓	GVA Grimley: Workspace Group

Social/Community					
228.	Not prove floorspace not needed if no net loss or if it accords with criteria subject to LSP strategy		✓		Metropolitan Police: Westminster City Council Property Division
229.	Clarity about how demand for alternative uses are assessed		✓		Noved Investment Company
230.	Flexibility incl. type/quantum, reasons for availability, location outside Westminster		✓		Noved Investment Company
231.	Allow uses other than residential where there are other area-based priorities e.g. retail in Core CAZ		✓		Noved Investment Company
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232.	Require assessment of development RE social/community facilities, if inadequate, provision, if no provision, refuse		✓		Charlotte Street Association: LaSalle Investment Management
233.	Clarify that private medical facilities are ok outside Harley Street SPA		✓		Imperial College London
234.	Growth and change of academic and related health facilities should be supported outside CAZ (Obj1)		✓		Imperial College London
235.	Designate sites for social/community uses needed to meet need in OAs			✓	LaSalle Investment Management
236.	Set threshold for requiring social/community facilities			✓	LaSalle Investment Management
237.	Housing: must be supported by medical facilities			✓	University College London Hospitals NHS Foundation Trust
238.	Refer courts			✓	Her Majesty's Court Service
Green Infrastructure					
239.	Open Space: always require new, not improved		✓		Charlotte Street Association
240.	Open Space: not always feasible or necessary to provide on site		✓		Noved Investment Company

241.	Open Space: refer to need arising from development where need is demonstrated		✓		LaSalle Investment Management: Noved Investment Company
242.	Open Space: not apply blanket protection of all open spaces and allow land swaps		✓		Imperial College London
243.	Biodiversity: loss 'avoided' in the first instance			✓	Natural England
244.	Biodiversity: SINC management of Royal Parks ecological value <i>and</i> heritage			✓	The Royal Parks
245.	BRN: safe navigation not ecological value/biodiversity habitat is priority for canals		✓		Port of London: British Waterways
246.	BRN: biodiversity emphasis unduly restricts regeneration potential of canals		✓		British Waterways
247.	BRN: 2 refs to transport inconsistent		✓		Port of London
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248.	BRN: refer to permanently moored vessels			✓	Port of London
249.	Open Space Deficiency assessment does not take waterways into account			✓	British Waterways
250.	Open space includes waterways which are also subject to development pressure (para 2.49 & 5.49)			✓	British Waterways
251.	Reference to 'green and blue' infrastructure			✓	British Waterways
252.	Include additional references to canals (para 5.47, 5.49, 5.50)			✓	British Waterways
253.	Correct reference is Grand Union Canal (Paddington Arm) and Paddington Basin (Fig 16, para 3.9)			✓	British Waterways
Energy					
254.	Include cooling hierarchy			✓	Greater London Authority
255.	Check efficiencies for PDHU			✓	Greater London Authority
256.	Include reference to retrofitting			✓	Greater London Authority

257.	Renewable: remove target and make where feasible, practical & viable		✓	✓	Royal Mail: Covent Garden London: Land Securities: Howard de Walden Estate: Westminster Property Association: Legal & General: Workspace Group
258.	Renewable/ Decentralised networks: add flexibility particularly for conversions and listed buildings and where better reductions through other methods			✓	Royal Mail: Land Securities: Howard de Walden Estate: Westminster Property Association: University College London Hospitals NHS Foundation Trust
259.	Decentralised networks: make where feasible, practical & viable		✓	✓	Covent Garden London: Land Securities: Howard de Walden Estate: Westminster Property Association: Legal & General
Transport					
260.	Set out requirement for transport assessment and travel plans			✓	Greater London Authority
	Issue	Reg 29	Soundness	Comment	Respondent
261.	Refer to upgrades in line capacity			✓	Greater London Authority
262.	Refer to Mayor's cycle hire scheme			✓	Greater London Authority
263.	Refer to Legible London			✓	Greater London Authority
264.	Planning applications should provide for buses			✓	Greater London Authority
265.	Provide for coaches			✓	Greater London Authority
266.	Refer to diversion of buses during Crossrail construction			✓	Greater London Authority
267.	Policy on safeguarding for transport functions			✓	Greater London Authority
268.	Policy on parking and car-free development			✓	Greater London Authority
269.	Include upgrade to Victoria Station as well as Underground station		✓		Hammerson UK
270.	Water-based: protect piers and support passenger boat services		✓		Port of London: British Waterways
271.	Water-based: reference to peak flows only applied to water-based transport – inconsistent		✓		Port of London
272.	Water-based: refer to importance of piers in text		✓		Port of London
273.	Water-based: reference for waste/construction		✓		Port of London: British Waterways
274.	Water-based: reference for biofuel		✓		Port of London

275.	Transport: show piers on Key Diagram		✓		Port of London
276.	Remove Crossrail 2 and cross river transit as they are outside the plan scope			✓	LaSalle Investment Management
277.	Servicing/deliveries: should not stop development where provision is difficult			✓	LaSalle Investment Management
278.	Servicing/deliveries: refer to river transport		✓		Port of London: British Waterways
279.	Servicing/deliveries: Royal Mail cannot share			✓	Royal Mail
280.	Servicing/deliveries: Refer construction logistics plans and delivery and servicing plans			✓	Greater London Authority
281.	Parking: add reduction of work space parking		✓		Charlotte Street Association
Waste					
282.	Identify sites at start of plan period	✓			Greater London Authority
	Issue	Reg 29	Soundness	Comment	Respondent
283.	Partner with other boroughs who have surplus capacity under DRLP	✓			Greater London Authority
284.	Include % borough vs partnership, current vs future			✓	Government Office for London
285.	Include Waste DPD timetable			✓	Government Office for London
Flood-related Infrastructure					
286.	Support Thames Tideway Tunnel			✓	Government Office for London: Greater London Authority: Thames Water
Proposals Sites					
287.	PS1: List Paddington Mail Centre and Delivery site separately			✓	Royal Mail
288.	PS2: refer to academic space and private medical facilities		✓		Imperial College London
289.	PS6: include Stockley House		✓		Hammerson UK
290.	PS14: remove small offices reference		✓		Land Securities

291.	PS15: is 0.93ha not 0.41ha			✓	Royal Mail
292.	PS19: amend boundary as permission granted for artist's studio		✓		British Waterways
293.	Goldbeathers House, Manette St should continue to be PS		✓		Noved Investment Company
294.	107-109 & 111 Charing Cross Rd should be PS		✓		Noved Investment Company
295.	Include National Heart Hospital, Westmoreland St for healthcare or residential/residential-led mixed use			✓	University College London Hospitals NHS Foundation Trust
296.	PS housing numbers may change		✓		The Eyre Estate
Glossary					
297.	Glossary: LSP refer courts			✓	Her Majesty's Court Service
	Issue	Reg 29	Soundness	Comment	Respondent
298.	Glossary: Define 'major new development' RE CS38		✓		Covent Garden London: Land Securities: Howard de Walden Estate: Westminster Property Association
299.	Glossary: Sustainable Transport should include river		✓		Port of London

Expressions of support for the Publication Draft Core Strategy

Section	Full Support	Qualified/Partial Support
Overall	Cllr Adams: City of London Corporation	English Heritage (heritage, Royal Parks, SPAs): South Westminster Renewal Partnership
Part II General		The Royal Parks
Vision	Howard de Walden Estate: The Royal Parks: Universities Superannuation Scheme	
Objectives	The Royal Parks: University College London Hospitals NHS Foundation Trust: Universities Superannuation Scheme: Westminster Property Association	BT: Royal Mail: The Theatres Trust
Spatial Strategy	University College London Hospitals NHS Foundation Trust: WCC Premises Management Unit (lack of land, improving existing stock)	
Part III General	City of London Corporation	
CAZ boundary	Greater London Authority: Targetfellow Estates: University College London Hospitals NHS Foundation Trust	
CS1 Mixed Use	Workspace Group	Aviva Investors Global Services: BT: Charlotte Street Association: LaSalle Investment Management: The Mercers' Company: Royal Mail: Selfridges Retail: Universities Superannuation Scheme
CS2 SPAs	The Pollen Estate (Savile Row)	Imperial College London
CS3 POA	Greater London Authority (homes targets): The Royal Parks (tall buildings)	Imperial College London: Royal Mail: WCC Premises Management Unit (homes targets)
VOA boundary		Greater London Authority
CS4 VOA	Royal Mail: The Royal Parks (tall buildings): WCC Premises Management Unit (Strutton Ground)	BT: Greater London Authority (homes targets): Hammerson UK (mixed use flexibility): WCC Premises Management Unit (homes targets)
TCROA boundary	Greater London Authority	
CS5 TCROA	Greater London Authority (homes targets): Legal & General: Royal Mail	Charlotte Street Association (tall buildings): WCC Premises Management Unit (homes targets)

CS6 Core CAZ	Aviva Investors Global Services: GVA Grimley: Royal Borough of Kensington & Chelsea (Knightsbridge retail): Targetfellow Estates: WCC Premises Management Unit (Berwick/Rupert Street): Workspace Group	Howard de Walden Estate: Hammerson UK: LaSalle Investment Management: Royal Mail: Selfridges Retail
WESRPA boundary	The Mercers' Company	
CS7 WESRPA	Universities Superannuation Scheme	Aviva Investors Global Services: LaSalle Investment Management: Selfridges Retail
CS8 M/F	Targetfellow Estates	
CS9 KB	Imperial College London: Royal Borough of Kensington & Chelsea	
CS10 Pimlico	WCC Premises Management Unit (Tachbrook Street)	
The Royal Parks boundary	The Royal Parks	
CS11 RPs	The Royal Parks	
CS12 NWEDA		BT: Royal Borough of Kensington & Chelsea: Workspace Group
CS13 O/S CAZ/NWEDA	Royal Mail	
Part IV General		City of London Corporation
CS14 Optimising Housing Delivery	Church Commissioners: LaSalle Investment Management: Royal Mail: WCC Premises Management Unit (housing highest priority): Workspace Group	BT: University College London Hospitals NHS Foundation Trust
CS15 Meeting Housing Needs	WCC Premises Management Unit	LaSalle Investment Management: Royal Mail
CS16 AH	BT	LaSalle Investment Management: University College London Hospitals NHS Foundation Trust (target): Workspace Group
CS17 Gypsies and Travellers		
CS18 Commercial		Royal Mail: Universities Superannuation Scheme
CS19 Offices / B1	LaSalle Investment Management: Royal Mail	Howard de Walden Estate: Hammerson UK (offices in VOA): Legal & General
CS20 Retail	Royal Mail: Westminster Property Association	Aviva Investors Global Services: LaSalle Investment Management: Selfridges Retail

CS21 TAC	LaSalle Investment Management: Royal Borough of Kensington & Chelsea: Workspace Group	Imperial College London
CS22 Hotels	Church Commissioners: Workspace Group	LaSalle Investment Management: Targetfellow Estates
CS23 Entertainment		
CS24 Heritage	Selfridges Retail	The Royal Parks
Views boundaries	The Royal Parks	
CS25 Views	Greater London Authority: LaSalle Investment Management: Selfridges Retail	The Royal Parks
Approach to tall buildings	Greater London Authority	
CS26 Nat/Internat Uses		University College London Hospitals NHS Foundation Trust
CS27 Design	Environment Agency: WCC Premises Management Unit (improving existing stock): Workspace Group	LaSalle Investment Management: Royal Mail: Selfridges Retail
CS28 H, S & W-B	WCC Premises Management Unit (residential amenity)	Metropolitan Police
CS29 Flood	Environment Agency	
CS30 Air		
CS31 Noise		
CS32 Plan Obs / Infrastructure	BT: Metropolitan Police	Aviva Investors Global Services: GVA Grimley: Her Majesty's Court Service: Hammerson UK: LaSalle Investment Management: Royal Mail: University College London Hospitals NHS Foundation Trust
CS33 S/C	Imperial College London: LaSalle Investment Management: University College London Hospitals NHS Foundation Trust	Her Majesty's Court Service: Metropolitan Police
CS34 OS	LaSalle Investment Management: The Royal Parks	Imperial College London
CS35 SINC		The Royal Parks
CS36 BRN	Environment Agency: The Royal Parks	
CS37 Biod & GI	Environment Agency	
CS38 DENs	LaSalle Investment Management: Greater London Authority	Royal Mail
CS39 Renewables	Aviva Investors Global Services: LaSalle Investment Management: Greater London Authority	Howard de Walden Estate: Royal Mail: University College London Hospitals NHS Foundation Trust

CS40 Peds & ST	Universities Superannuation Scheme	LaSalle Investment Management: Greater London Authority
CS41 S & D	LaSalle Investment Management	
CS42 MTI	LaSalle Investment Management: London Borough of Wandsworth (river services & piers, Crossrail 2)	Greater London Authority: Port of London
CS43 Waste	City of London Corporation: Port of London	Greater London Authority
CS44 Flood Infrastructure	Environment Agency	
Part VI Partnerships	WCC Premises Management Unit (housing provision)	Greater London Authority
Part VI Risk/Review	City of London Corporation (Implementation Plan)	
Appx 1 Proposals Sites		The Eyre Estate (28): Imperial College London (2 & 3)

Abbreviations

CAZ	Central Activities Zone	POA	Paddington Opportunity Area
CIL	Community Infrastructure Levy	PS	Proposals Site
ChgXRd	Charing Cross Road	S106	Section 106 of the Town & Country Planning Act
COU	Change of Use	SCA	Strategic Cultural Area
HMOs	Houses in Multiple Occupation	SPA	Special Policy Area
LP	London Plan	TAC	Tourism, arts and culture
LSP	Local Strategic Partnership	TB	Tall buildings
NWEDA	North Westminster Economic Development Area	TCROA	Tottenham Court Road Opportunity Area
OA	Opportunity Area	VOA	Victoria Opportunity Area
Obj	Strategic Objective	WESRPA	West End Special Retail Policy Area
PIL	Payment in lieu		