

Transport and Works Act 1992

Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006

Transport and Works (Inquiries Procedure) Rules 2004

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**Statement of Case on behalf of  
Land Securities plc and related companies**

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**1 Introduction**

- 1.1 Land Securities and its group companies LC25 Limited and LS Victoria 1 Limited (referred to together in this Statement of Case as "Land Securities") owns a substantial amount of land in the area around Victoria station. It is the largest landowner in the Victoria area, and is by a considerable margin the owner of the largest amount of land affected by the proposed Transport & Works Act Order.
- 1.2 Land Securities has for a period of some years been instrumental in promoting a major regeneration of the Victoria area. It was responsible for the development of Eland House in the mid-1990s, and more recently completed the major development at Cardinal Place in 2006. Land Securities has also been promoting the development scheme which has come to be known as "Victoria Transport Interchange", or "VTI" for short. VTI is centred upon Land Securities' interests but also involves other land. The history of the promotion of VTI schemes is dealt with in more detail below, as is the degree of interaction between Land Securities and the local planning authority Westminster City Council ("WCC").
- 1.3 During the promotion of VTI schemes Land Securities has liaised closely with Transport for London ("TfL") and London Underground Limited ("LUL"). A more detailed explanation of the degree of liaison is given in the main body of the Statement below.
- 1.4 Land Securities' objection to the application for the Victoria Station Upgrade ("VSU") Transport & Works Act Order ("TWAO") was dated 11 January 2008. It was acknowledged by the Secretary of State on 15 January 2008. Land Securities is a statutory objector by virtue of the fact that interests in its land are liable to compulsory acquisition under the TWAO.
- 1.5 Land Securities has indicated that it wishes to be heard at any inquiry into VSU. This request has been acknowledged by the Secretary of State.

**2 Planning History and Policy Context**

- 2.1 The regeneration of the wider Victoria area is of great importance to the public interest. Victoria is a major gateway to Central London from the rest of the UK and indeed from abroad. The importance of regenerating the wider Victoria area is recognised at all levels of planning policy from strategic (the London Plan in its current form) to other Development Plan (Westminster City Council's UDP) to

supplementary guidance (the Victoria Area Planning Brief - as to which please see below for more detail).

- 2.2 By reason of the above in considering whether to sanction (amongst other things) a compulsory expropriation of third party land the Secretary of State will have to take account of the effect of VSU on the ability of Land Securities to develop VTI (or something like it) as part of the test of whether confirmation of the TWAO is in the public interest. This is considered in more detail below.

### ***Planning History***

- 2.3 VTI is not the first regenerative development which has been attempted in the Victoria area. In addition to the developments described above Land Securities itself secured planning permission for the redevelopment of Ellicot House in 1997, but that permission expired without being implemented after WCC had refused Land Securities' application to renew it.
- 2.4 In 1993 Greycoat plc promoted a planning application for the redevelopment of land to the north of Victoria Station. The development would have involved the demolition of buildings in Terminus Place, the provision of a new bus station and pedestrian piazza in front of the station, and improvements to the District & Circle Line and Victoria Line ticket halls. The application was refused by WCC largely on design grounds but in their report to Committee officers of WCC endorsed the need for "dramatic and beneficial change" at what was an important gateway to London. Subsequently in 1995 a revised application was promoted by the same applicant and planning permission was granted. However it was never implemented and has now lapsed.

### ***Planning Policy***

- 2.5 The relevant planning policy background is as follows:
- 2.5.1 the replacement London Plan (2008) incorporating both the Early Alterations and Further Alterations to it, in particular policy 2A.2 which classifies Victoria as an "Opportunity Area". This designation reinforces the strategic importance of the area and supports large-scale regeneration;
- 2.5.2 the Westminster City Council UDP (2007); and
- 2.5.3 the Victoria Area Planning Brief ("VAPB").

The VAPB came about following a consideration of representations by Land Securities to WCC regarding its aspirations for a VTI development.

### ***Adoption of the VAPB***

- 2.6 Land Securities submitted a Masterplan for the VTI development to WCC in November 2005. The Masterplan set out the details of the (then) proposed VTI scheme, comprising a significant amount of commercial and residential development together with the provision of an underground bus station.
- 2.7 TfL and Land Securities worked together to promote the Masterplan, which eventually was reported to WCC's Planning Committee in March 2006.
- 2.8 The VAPB was adopted in April 2006. It sets out a framework for development at Victoria, covering both the VTI and VSU sites, and it both supports major development and outlines WCC's commitment to long-term investment in the

Victoria area. In particular it recognises the advantages to the local area which would be brought about by the increase in jobs, the enhancement of local property values and the delivery of very significant and much-needed improvements to the public realm. In recognition of the importance of these benefits the VAPB also specifically acknowledges the possibility of WCC supporting the delivery of VTI by means of its compulsory purchase powers.

### ***Emergence of a VTI Scheme***

- 2.9 Following on from the adoption of the VAPB Land Securities and TfL continued to discuss their respective development aspirations for the Victoria area. These included TfL's involvement in a VTI development as well as TfL's aspirations for a VSU scheme and the interface between the two. In terms of this interface it should be noted that whilst some VTI schemes may be designed so as to incorporate VSU within them the quantum of development anticipated by a VTI scheme is not dependent upon a VSU scheme coming forward.
- 2.10 Discussions between the parties culminated in an exchange of heads of terms ("HoT") for both VTI and VSU, in March 2007. The VSU HoTs attached a plan of the land-take that was required by TfL on a permanent and temporary basis, and set out the proposals as to when this land would need to be taken and when it would be handed back (for the land taken only temporarily). The intention of the parties was that the HoTs would form the basis for negotiation of more detailed documentation between them for both VSU and VTI. To this end the respective parties' solicitors began negotiating that documentation and negotiations continued up until January 2008 when discussions on the level of compensation to be paid by TfL to Land Securities foundered, and at this point the parties were unable to conclude and sign the documents.

### ***VTI Application***

- 2.11 In the light of the HoTs Land Securities put together and submitted to WCC an application for a major VTI scheme in August 2007. This was informed partly by what was included in the HoTs in March 2007.
- 2.12 TfL were supportive of the principle of the VTI application. A letter of support for the VTI application was provided to WCC by the Transport Commissioner Peter Hendy.
- 2.13 Discussions on the VTI application continued with WCC until December 2007. With the agreement of Land Securities, WCC officers decided to report the VTI application to WCC's Planning & City Development Committee on 6 December 2007 for a progress report. The objective of this interim report was to steer the future negotiation of the planning application.
- 2.14 At the proceedings on 6 December 2007 the Committee resolved that they did not support the VTI application in the form presented and made some recommendations as to how they wished to see the scheme amended. The VTI application remains extant and the Mayor remains supportive of it.

### ***A Further VTI Scheme***

- 2.15 Following the interim resolution of the Committee in December 2007 Land Securities began to consider other possible VTI development schemes, as would be expected of any prudent and responsible developer. Meetings have since taken place with WCC and representatives of the GLA/TfL. Land Securities has proposed

the development of an alternative scheme which for convenience is referred to in this Statement of Case as "VTI2".

- 2.16 Early indications from WCC officers are that VTI2 can be supported, and this has been backed up by a letter in positive terms from the Director of Planning and City Development at WCC. An application for VTI2 is likely to be made by Land Securities in the coming months.
- 2.17 VTI2 would itself still be severely adversely affected by VSU if the TWAO were made in its current form. It would be impossible for any regeneration scheme to be designed on a scale that would make it worthwhile without such a VSU scheme having a significant adverse effect on it.

### 3 VSU Application

- 3.1 As has been mentioned above there has been engagement between Land Securities, LUL and TfL concerning the VSU application over a long period. This includes engagement after the exchange of the HoTs for VSU in March 2007 but in fact Land Securities, LUL and TfL have been in discussions regarding both VTI and VSU for some four and a half years. Engagement has included both technical meetings between the respective principals, strategic meetings on a fortnightly basis held with representatives of TfL and LUL and their advisers at the offices of Land Securities, and ongoing meetings between the respective parties' lawyers with a view to concluding the more detailed contractual documentation proceeding from the HoTs. These meetings were generally minuted.
- 3.2 As has been noted above a proposed land-take plan was attached to the HoTs exchanged in March 2007. The plan formed the basis for the planning of the VTI scheme, whilst negotiations were taking place. This was the case until very late in the day (16 October 2007, in other words just five weeks before the date of application for the TWAO was made) when LUL finally disclosed to Land Securities a draft of the VSU Order showing a very significantly different basis for the land take. The significance of the changes can be summarised as follows:
- 3.2.1 the area of proposed permanent land-take increased. This would reduce the size of Land Securities' land holdings (and consequently the amount of land upon which a VTI regeneration scheme could be delivered);
- 3.2.2 land which had been shown in the HoTs to be required only on a temporary basis was now proposed to be acquired permanently. Again this would reduce the amount of land upon which regenerative redevelopment could take place, but also the location of the land in question (such as Elliot House) is strategically important within the centre of a VTI scheme and so the significance of the change far exceeds simply the land area involved. LUL has said it believes that a TWAO cannot authorise merely the temporary possession and hand-back of the land in question because it would need to demolish a building on that land, and that consequently a permanent acquisition is needed. Land Securities does not consider this to be correct;
- 3.2.3 a greater extent of land is proposed to be acquired temporarily as working space for VSU. This would reduce the amount of land which would be available to contractors working on a VTI scheme and hence delay the point at which works to develop VTI could be commenced; and
- 3.2.4 as a separate point to the above there is an increase in the extent of land over which powers to carry out protective works are sought. Should these powers ever have to be exercised then they would have a significantly adverse effect on the

carrying out of a VTI development. The powers would effectively allow VSU contractors to displace VTI contractors from the development site. Faced with the possibility of this occurring no prudent developer would expose itself to expensive contractors' claims. The only realistic option would be to delay letting a contract for VTI until such time as the protective works powers could no longer be exercised. This would result in a delay to the construction, and therefore to the delivery, of VTI entailing both a delay to the valuable regeneration of the area and a loss of opportunity for Land Securities running into tens of millions of pounds. Plainly the problem becomes more acute the greater the extent of land covered by the protective works powers.

- 3.3 As minutes of the various meetings demonstrate, Land Securities had for some time been asking LUL for the proposed plans from the draft VSU Order but they were not made available until 16 October 2007. At this point Land Securities, through its solicitors, wrote immediately to LUL on 19 October to put it on notice that it considered the change in the proposed land-take to be fundamental. Whilst the HoTs recognised that the areas of land-take may change there was no expectation that the change could be as fundamental as it proved to be until the details were made available at the last minute. It has been suggested on behalf of LUL that Land Securities was aware of the form the final VSU application would take as early as summer of 2007. This is not the case.
- 3.4 The letter from Land Securities' solicitors dated 19 October 2007 was replied to by LUL's solicitors on 24 October 2007. That reply made clear the objectives which LUL sought to achieve in the draft Order. The letter was written before the TWAO was applied for, nevertheless the explanation given in that letter does not support what in fact LUL is seeking in the application for the TWAO.

#### ***The Corner Site Development***

- 3.5 Whilst the expectation had been that both VTI and VSU would be delivered, LUL has had to plan for the possibility that although VSU may be approved VTI may not.
- 3.6 The VTI scheme would provide for development above VSU at the corner of Bressenden Place and Victoria Street. If VTI did not take place there would be a gap in the built development at this point. LUL submitted a separate planning application for what it termed "the corner site development", being the (contingent) built development proposed at the corner of Bressenden Place and Victoria Street in the event that VTI did not go ahead.
- 3.7 LUL's corner site development application was due to be reported to WCC's Planning & City Development Committee on 6 December 2007. This is the same Committee at which VTI was considered on an interim basis by members (as to which see above).
- 3.8 The report to committee on LUL's corner site development application was not favourable. Rather than have the application put up for what would have been a final determination by members LUL elected to withdraw the application. So far as Land Securities is aware the application has not been replaced, and as a consequence there is no extant planning application for the corner site development.
- 3.9 In the absence of even any proposals for the corner site development there is the prospect of an incongruous gap in the streetscape, and an absence of comprehensive development in this important strategic area of London.

### ***Consequences of VSU for VTI***

- 3.10 Were it not for VSU Land Securities would have a reasonable expectation of being to commence the development of a VTI scheme in 2010. As matters stand the consequences for a VTI scheme of VSU as applied for may be summarised as follows:
- 3.10.1 the physical incompatibility of certain parts of the works. This restricts the amount of development which could be included within any VTI scheme to the ultimate detriment not only of the public (by depriving them of the level of regeneration they can reasonably expect) but also of Land Securities in terms of the rate of return it can expect from a development on this major landholding;
- 3.10.2 as has been explained above the conversion of land-take powers in respect of certain key parcels, from a temporary acquisition and hand-back to a permanent acquisition, reduces the size of the remaining development site available to Land Securities both generally and in strategic locations and hence compromises the scale of development and the degree of regeneration which can be achieved from a VTI scheme;
- 3.10.3 the uncertainty created by the full extent of the "protective works" powers requested by LUL through powers in the draft Order is very significant indeed. The point has been made above that this uncertainty has a serious effect on Land Securities' ability prudently to let any contract relating to works for VTI. In addition any tenant or other occupier of premises over which protective powers are to be enjoyed faces great uncertainty as to whether those powers will ever be exercised, and consequently a significant part of Land Securities' estate would be blighted by the extent of protective works powers requested by LUL. The extent of this uncertainty is significantly greater than was expected from the details in the HoTs exchanged in March 2007, and will adversely affect Land Securities' ability to manage and deal with its landholding in the area;
- 3.10.4 considerable uncertainty and delay are attributable to the timing of a hand-back of any land that is not proposed to be taken on a permanent basis. Again, the timing of the hand-back has been delayed from 2013 to 2016; and
- 3.10.5 any delay to the delivery of a VTI scheme causes significant harm to the public interest by withholding much-needed regeneration. It also has a huge loss of opportunity cost for Land Securities by delaying the date at which commercial development on this flagship part of its London portfolio can come to market, and in delaying the realisation of consequential benefits to its other nearby developments such as Cardinal Place

Overall these consequences translate into a cost to Land Securities running into tens of millions of pounds. Furthermore the strategic significance for Land Securities in blighting a major part of its London portfolio is very significant, even for a company of its size and market capitalisation.

### ***Alternatives to VSU as comprised in the TWA0 Application***

- 3.11 Land Securities considers that there are alternatives to elements of the VSU scheme which would still achieve the principal objectives of LUL but without being so harmful to the implementation of a VTI scheme and to other interested parties.
- 3.12 One alternative would be for LUL to revert to the scheme for VSU which was in contemplation when the HoTs were exchanged in March 2007. In this context it is relevant to note that in a meeting between Land Securities and LUL on 19

November 2007 (three days before the VSU application was actually submitted) Peter Lynch of LUL admitted that LUL would at that stage still have been prepared to pursue VSU as it existed in March 2007. The agreed minutes of that meeting record, at paragraph 4.1, that:

*"PL [Peter Lynch of LUL] stated the TWAO had been delayed to assist LS [Land Securities]. NE [Nigel Earp of Land Securities] challenged this assertion and PL further stated that LUL were happy with the TWAO as of February 07 and had only moved the paid area subsequently to reduce risk"*

- 3.13 Moreover Land Securities will present evidence on two possible alternatives for the paid area link forming part of VSU, which would represent an appropriate balance to be struck between the public interest in the delivery of VSU and the public interest in not preventing the delivery of a VTI scheme.
- 3.14 Implementing VSU with one of the two paid area link alternatives would still deliver for LUL all of the main benefits of the scheme as currently applied for but would also be materially less prejudicial to the objectives of Land Securities and the public interest in delivering a VTI scheme. In particular an alternative route for the tunnels for the paid area link would sterilise less of Land Securities' above-ground development potential and would reduce the extent of accommodation works to be incorporated in a VTI scheme.
- 3.15 It is an established principle that a TWAO containing powers for the compulsory expropriation of third party land should only be made if the applicant for the Order makes out a compelling case in the public interest, and further that the making of the Order should not infringe Land Securities' human rights as guaranteed by Article 1 of the First Protocol to the European Convention on Human Rights. In considering whether a compelling case in the public interest exists it will be necessary for the Secretary of State to balance the public interest in delivering VSU against the public interest in not frustrating a scheme like VTI, because the development of a VTI scheme would deliver very significant regeneration benefits for the area which is itself greatly in the public interest. Land Securities will demonstrate that that balance is not achieved by VSU as currently applied for.
- 3.16 In addition to the fundamental objections to VSU as applied for Land Securities maintains a number of objections to the detail of the application, as follows:
- 3.16.1 they have asked for a copy of TfL's business case for VSU. This has been refused, notwithstanding the fact that it is referred to in open minutes of TfL's Board in June 2007. The business case is relevant to assess the viability (and therefore deliverability) of the proposed scheme having regard to the costs including the likely magnitude of compensation that will be sought by Land Securities;
- 3.16.2 the inadequacy of the Environmental Statement which accompanied the application, in particular its treatment of alternatives considered by LUL and the assessment of the cumulative effects of VSU with other development; and
- 3.16.3 (as noted above) the fact that the application appears to proceed from a mistaken assumption in relation to the legal ability to take certain land upon which a building has to be demolished on a temporary basis and then hand it back

A VTI2 scheme would still be seriously affected by reason of the above points.

#### **4 Grounds of Objection**

Land Securities' grounds of objection to the TWAO application can be summarised as follows:

4.1 ***Ground 1: That the application is premature because inadequate time was allowed by LUL for a consideration of how VSU and VTI could interface with one another before the application for the Order was made:***

4.1.1 As mentioned above, although it had been requested by Land Securities for some time a draft of the application for the TWAO was only made available to Land Securities on 16 October 2007 little more than a month before the application was due to be submitted.

4.1.2 In correspondence between the two parties Land Securities asked LUL to delay submission of the TWAO application until such time as the parties could have explored more productively the opportunities for a compromise between VSU and a VTI scheme. Notwithstanding this LUL insisted on 22 November 2007 as the date for submission of its application. The refusal of LUL to countenance a delay in the submission of the application for VSU is particularly unreasonable bearing in mind the four and a half years of discussions between Land Securities and LUL on the VSU and VTI schemes, the late disclosure to Land Securities of the draft application documentation, and what was a last minute significant change in its position by LUL with minimal warning to Land Securities, all contrary to the public interest as explained above.

4.1.3 Moreover, as has been noted above and by WCC in its own objection to VSU, the proposals are piecemeal given the absence of any permission or even an extant application for the corner site development. This compromises legitimate policy aspirations for a comprehensive redevelopment of the Victoria area.

4.1.4 The consequence of this is a scheme that is ill-thought out and ill-considered in respect of the aspects material to the present objection and to the public interest in securing overall the most effective, efficient and timely regeneration of the area.

4.2 ***Ground 2: That as a point of principle the compulsory acquisition of land which would be sanctioned by proposed powers within the Order is not justified in the public interest.***

4.2.1 Land Securities reiterates that it does not object to the principle of VSU, and indeed the principle is supported. However it is the manner of its implementation, in the form of the present scheme, that would result in harm to such an extent that it is not justified in the public interest. The parties have understood, and the HoT's record, that the development of VSU is a priority. However that cannot be so at all costs and ignoring the effect which it has on the public interest through the delivery of a VTI scheme.

4.2.2 A compelling case in the public interest will not be made out while the proposed TWAO fails to strike a fair balance between the benefits of VSU and its effect on a VTI scheme. In this context:

- (a) the regeneration of the area which would be achieved by delivery of a VTI scheme is critical. Moreover it has wide-ranging policy support from WCC (through the UDP and Victoria Area Planning Brief) and from the Greater London Authority as strategic planning authority (through the London Plan and its Further Alterations);



- (b) the VSU scheme as proposed also has a huge financial effect upon Land Securities which cannot be ignored;
- (c) the changes required by Land Securities, for example through the implementation of one of the alternative paid area link options, would still allow the main objectives of VSU to be achieved by LUL. LUL does not need to achieve all of the provisions in the TWAO in order to deliver the benefits of a VSU scheme. In contrast, in terms of the public interest the detrimental impact of the draft TWAO on the type of VTI scheme that could be delivered and the timing of its delivery far exceeds any implication for VSU of the changes which should be made to it. This is so whether or not it is a VTI or a VTI2 scheme which comes to be developed by Land Securities. It is also relevant in this context to note that shortly before submission of the application for VSU LUL conceded that the VSU scheme as at February 2007 could still be implemented; and
- (d) this is a particular opportunity to regenerate the wider Victoria area to the fullest extent possible. Implementation of an inferior scheme would be a missed opportunity. VSU should not be allowed to impede unnecessarily what VTI could deliver alongside it.

4.3 ***Ground 3: as a separate but related point to the above, there is no compelling need in the public interest for an acquisition of the full extent of what is asked for in the draft TWAO.***

- 4.3.1 The land-take plan attached to the March 2007 HoTs is all that LUL reasonably needs in order to deliver an acceptable VSU scheme.
- 4.3.2 Acquisition of the freehold interests in Land Securities' land on a permanent basis goes beyond what is required in order to deliver VSU, hence the absence of a compelling need in the public interest.
- 4.3.3 As a consequence of the above the making of the TWAO in its present form would constitute an infringement of Land Securities' human rights, contrary to Article 1. of the First Protocol to the European Convention on Human Rights.

4.4 ***Ground 4: it cannot be said that VSU is deliverable in its current form.***

- 4.4.1 The compensation which would be due to Land Securities from LUL if VSU were confirmed in its present form puts the deliverability of VSU in doubt having regard to what is known of LUL's business case.
- 4.4.2 The only financial details that have been made available publicly are the Estimate of Costs which accompanies the TWAO application. This estimates the costs of the acquisition of land and rights over land necessary to deliver VSU to be in the order of £66,791,000. The compensation that would be due to the Land Securities companies alone is very significantly in excess of this figure.
- 4.4.3 In the absence of any certainty about the ability to deliver a VSU scheme, in whatever form it may take shape, there will inevitably be further continuing blight of the beneficial regeneration of the wider Victoria area, to the public disbenefit.

5 **Conclusions**

In conclusion, Land Securities will submit that:

- 5.1 the application for the TWAO is premature in the light of (a) the complexity of the interface between VSU and the landowners in the surrounding area (of which Land Securities is the largest) and (b) the stage which detailed negotiations between LUL and Land Securities for an optimum solution had reached in November 2007 on the basis of the March 2007 HoTs;
- 5.2 the uncertainty created by the significant difference between the form of the TWAO when compared with what had previously been under discussion with Land Securities and the way in which this is still changing is having a detrimental effect upon the value of and the ability to deal with all Land Securities' land holdings in the wider Victoria area, affecting future regeneration of the area;
- 5.3 the TWAO should not be made in its current form because:-
  - 5.3.1 if the powers of compulsory acquisition under the Order were to be exercised it would result in a compensation liability in respect of Land Securities' land of such magnitude that it would make VSU undeliverable, bearing in mind in particular the estimate of expense that accompanied the TWAO, which grossly undervalues the cost of land acquisition;
  - 5.3.2 the Order does not strike a proper balance between the public interest in the benefits of VSU, the major and acknowledged public regeneration benefits that will be delivered by a VTI scheme and the private financial interests of Land Securities as the key landowner in the area and instigator of such regeneration;
  - 5.3.3 the amount of land that under the TWAO is identified as being (a) the subject of permanent acquisition, (b) necessary for use as work sites and/or for the diversion of utilities and (c) the subject of Protective Works powers is not necessary to deliver a viable VSU scheme, but does significantly damage the likelihood of regeneration and therefore should be scaled back to a level equivalent to that shown in the March 2007 HoTs;
  - 5.3.4 there is now proposed to be a longer delay in the hand-back of land which is to be taken temporarily. It was previously expected that this land would come back to Land Securities in 2013 but the likelihood now is that it will not come back until 2016. This increased delay has itself serious implications for Land Securities and its ability to bring forward a VTI scheme in a timely manner; and
  - 5.3.5 the paid area link element of the VSU scheme can properly be based upon one of the two alternatives that will be advocated by Land Securities, both of which would result in materially less damage to the VTI scheme and the potential for regeneration of the Victoria area that VTI would enable.

**Berwin Leighton Paisner LLP**

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**27 March 2008**

## **ANNEX**

### **List of Documents**

#### **VSU TWA Application Documents**

1. Various documents to be confirmed

#### **TfL and LUL VSU Background Documentation**

2. Extract Transport for London Board Minutes 27 June 2007
3. LUL Business Case for VSU (document requested but not received)

#### **VSU Correspondence**

4. Letter Bircham Dyson Bell ("BDB") to Berwin Leighton Paisner ("BLP") 16 October 2007  
+ encs
5. Letter BLP to BDB 19 October 2007
6. Letter BDB to BLP 24 October 2007
7. Letter BDB to BLP 22 November 2007
8. Letter LS to TfL 5 November 2007
9. Letter TfL to LS 14 November 2007

#### **VTI Documentation**

10. LS Planning Application for VTI
11. KPF Masterplan Statement
12. Moseley & Webb Planning Statement
13. WCC Report to Steering Committee – 6 December 2007
14. WCC Steering Committee Minutes – 6 December 2007
15. Letter TfL Transport Commissioner to WCC Chief Executive 31 July 2007
16. Letter from WCC Director of Planning and City Development to Land Securities on revised VTI dated 6 February 2008

#### **Planning Policy Documents**

17. WCC Report to planning committee on Victoria Area Planning Brief
18. WCC Victoria Area Planning Brief (adopted April 2006)
19. WCC Local Implementation Plan

#### **Corner Site Documents**

20. LS letter to WCC – 17 September 2007
21. WCC report to Steering Committee December 2007

#### **Others**

22. Plan showing LS landholdings superimposed on TWAO plans