

# **Broadway and Christchurch Gardens Conservation Area Audit**

## **Statutory Documents to Accompany SPD**

- 1. Statement of SPD Matters**
- 2. Consultation Statement**
- 3. Statement of representations Received**
- 4. Sustainability Appraisal**
- 5. Statement of Adoption**



# Broadway and Christchurch Gardens Conservation Area Audit SPD: Statement of SPD Matters

## Broadway and Christchurch Gardens Conservation Area: Notice of Supplementary Planning Document Matters

<b>Title</b> Broadway and Christchurch Gardens Conservation Area Audit SPD
<b>Purpose</b> To guide the protection, enhancement and management of the Broadway and Christchurch Gardens Conservation Area, by identifying those features of special historic and architectural interest which contribute to the local townscape and which the council will seek to protect. It will also identify negative features, opportunities for enhancement and management proposals to guide future change and development within the area.
<b>Content</b> This will include [a] Historical Development [b] Appraisal of character [c] Identification of Unlisted Buildings of Merit [d] Appraisal of roofscape and Identification of properties suitable for roof extension [e] Identification of townscape detail and landscape features which contribute to the character of the area [f].Identification of Features which detract from the character of the conservation Area (g) Management and Enhancement proposals
<b>Geographical coverage</b> Will apply to the Broadway and Christchurch Gardens Conservation Area.
<b>Consultation</b> The full public consultation will run from 1 December 2007-18 January 2008. During this time, the draft audit can be downloaded from the internet or inspected at One Stop Services, 62 Victoria Street, SW1 (Open 8.30am-7pm, Monday-Friday; 9am-1pm Saturday).
<b>Representations</b> Representations on the draft SPD must be submitted in writing by 18 January 2008. Written representations should be made by post to the following address: <b>Conservation Area Audits Team</b> <b>Department of Planning and City Development</b> <b>12<sup>th</sup> Floor (South)</b> <b>Westminster City Council</b> <b>City Hall</b> <b>64 Victoria Street</b> <b>SW1E 6QP</b>  Or by e-mail to: <a href="mailto:conservationareaaudits@westminster.gov.uk">conservationareaaudits@westminster.gov.uk</a>  Any representations may be accompanied by a request to be notified in future, at a specified address, of the adoption of the SPD.

# **Broadway and Christchurch Gardens Conservation Area Audit SPD: Statement of Consultation and Statement of Representations Received**

## **2 Statement of Consultation (Section 17 (B))**

Under Section 17(b) of the Town & Country Planning (Local Development) (England) Regulations 2004, Westminster City Council has a duty to prepare a consultation statement to accompany the draft Broadway and Christchurch Gardens Conservation Area Audit Supplementary Planning Document (SPD). Consultation on all SPD follow procedures set out in Westminster's adopted 'Statement of Community Involvement' (January 2007). Main steps undertaken are set out below.

### **Pre-drafting consultation**

A phase of pre-drafting consultation was undertaken prior to the initial drafting of the Conservation Area Audit. The Conservation Area Audit programme for 2007/8 was made available on council's website ([www.westminster.gov.uk](http://www.westminster.gov.uk)); officers also attended the Area Forums of May/June 2007 with details of the forthcoming programme. In addition, the Council sent letters advertising the Audit programme and inviting comments prior to drafting to local and national amenity societies, Westminster Property Owners' Association (WPOA), local housing associations, Greater London Authority and English Heritage. In addition, information on the forthcoming programme of conservation area audits was made available on the Westminster website and the programme of audits was publicised in a newspaper notice. Specific consultation letters on this area were sent to the Westminster Society and the Thorney Island Society.

A Scoping report on the Sustainability Appraisal was consulted on and copies of this sent to Natural England, the Environment Agency and English Heritage. Visits were also undertaken with the Parliamentary Estates directorate and internal consultation meetings held.

### **Consultation on Draft Conservation Area Audit**

Following feedback on the initial information provided, the document was formally adopted for full public consultation in November 2007. The main public consultation on both the audit and its sustainability appraisal took place from December 2007 to January 2008. Site notices were put up throughout the conservation area in December 2007 advising that the documents had been drafted and were available to view and comment upon. A press notice was also issued describing the SPD matters and all this information made available at One Stop Services.

The draft Audit document will now be made available on the council website, with full details of the public consultation process and links to a feedback form. The consultation draft will be sent out to consultation with letters to the following:

<b>Title</b>	<b>First Name</b>	<b>Surname</b>	<b>Job Title</b>	<b>Company</b>
Mr	Patrick	Bett	Regional Manager	National Trust
Mr	Paul	Houston		Westminster Property Owners Association
Ms	Angie	Bray		GLA
Mr	Mike	Ashworth	Design and heritage Manager	London Underground
			Land Use Planning Team	Transport for London
			Manager	Albert Public House
			Manager	Strutton Arms Public House
Ms	Susanne	Kingham		Post Office
				Rolls Royce PLC
			Central & West London Team	English Heritage
Ms	Kathryn	Ferry		Victorian Society
Ms	Josephine	Brown	Case Officer for Westminster	Georgian Group
Ms	Eva	Branscombe	Case Officer	Twentieth Century Society
Ms	Caroline	Welch	Case Work Advisor	Ancient Monument Society
			Manager	Jolly St Ermins Hotel
				Stanhope PLC
			Building Manger	Metropolitan Police
			Building Manger	Fire Brigade
Miss	June	Stubbs		The Thorney Island Society
Mr	Barry	Henderson		The Westminster Society
				Strutton Ground Street Traders Association
Ms	Elizabeth	Frimston	Chairman	CARG
Ms	Rowena	Wilson	Vice Chairman	CARG
Ms	Emmaline	Lambert		Artillery Mansions
Mr	Carl	Button		The Peabody Trust
Mr	John	McQuaid	Facilities Manager	The Peabody Trust
Ms	Collette	O'Shea		Land Securities
Ms	Alexandra	Brettel		Richard Coleman Consultancy
Mr	Nick	Dudman	Property Director	The Peabody Trust
Ms	Sue	Hannah		The South Westminster Community Network and
	Martin	Low		
Ms	Rebecca	Cloke	Parks Project Manager	WCC Parks
Cllr		Nicoll	c/o Members Dispatch	Ward Councillor
Cllr		Hyams	c/o Members Dispatch	Ward Councillor
Cllr		Mitchell	c/o Members Dispatch	Ward Councillor

A public meeting was held at Westminster City Hall on 12 December 2007 to discuss the draft audit. Eight people attended the meeting and support was expressed for the creation of the conservation area. The meeting was advertised on site notices, on Westminster's website and by writing to local organisations and individuals. A letter dated 1 December 2007 invited all interested parties to comment of the audit. Ward Councillors were also notified.

### **3 Statement of Representations Received (Regulation 18 (4) (b))**

Feedback from the public meeting was generally positive, with the production of the audit welcomed. Attendees expressed interest in the implementation of the audit and actions the Council would take to overcome negative features identified.

In addition to the meeting, two consultation responses were received from English Heritage and the Thorney Island Society. These expressed in principle support for the audit but provided detailed comments and suggestions for amendment, which have led to numerous changes to wording of the document.

**Regulation 18 (4) (b)** requires local authorities to set out how they have addressed representations. A summary of the main issues raised and how these have been addressed in the SPD is set out below. These were considered by the Cabinet Member for Built Environment and are also detailed in the Cabinet Member report published in the Directory appended to the Conservation Area Audit.

Consultee	Comments	Council Response
English Heritage	<ul style="list-style-type: none"> <li>Information appears clear and concise and generally follows best practice</li> </ul>	
	<ul style="list-style-type: none"> <li>Suggest consideration is given to a boundary change to include 12-24 Caxton Street. Burwood House, nos. 14-24 Caxton Street, is an attractive neo-Baroque building from the 1920s, by George Vernon; Alliance House, no. 14 Caxton Street, is a good inter-War Art Deco influenced composition. Both have good townscape value, are in accordance with the general character of the Conservation Area and would contribute positively to it. The proposed boundary could follow the line of the Underground line, as it does to the rear of the Caxton Hall / Foggos site.</li> </ul>	Agree. Boundary change recommended and subject of separate report.
	<ul style="list-style-type: none"> <li><b>Section 1</b> should make reference to both national legislation and advice when placing the audit in its policy context. It may also be useful to place the document in the context of the forthcoming LDF.</li> </ul>	Amended introduction to give further detail with regards to national legislation and guidance and reference to emerging LDF.
	<ul style="list-style-type: none"> <li><b>Paras 4.14-4.15</b> All the buildings that contribute to the conservation area are of load bearing brick or masonry construction, or appear as such.</li> </ul>	Reference added.
	<p><b>Para 4.2</b> should be redrafted to make clear the contribution of:</p> <ul style="list-style-type: none"> <li>Early-mid 20<sup>th</sup> century buildings</li> <li>Late 20<sup>th</sup> century buildings</li> </ul>	Sentence amended to clarify

	<p>Sentence at the moment could be misread to suggest that the character of the area to the north of Victoria Street is characterised by large late 20<sup>th</sup> century buildings, which could be used as further justification of buildings of this scale. No distinction is made between the positive impact of the mansion blocks and the negative impact of the large 20<sup>th</sup> century buildings.</p>	
	<p>Maps throughout the audit should have more, and more legible street names and numbers.</p>	<p>All maps amended to include street names and numbers</p>
	<p>Unlisted buildings of merit. Suggest the following amendments:</p> <ul style="list-style-type: none"> <li>• 9 Dacre Street – currently marked as neutral, should be of merit</li> <li>• 15 Strutton Ground – clarify status</li> <li>• Low rise modern buildings on Palmer Street – although lower than the two adjacent towers, these buildings are equally incongruous in terms of their form, materials etc and are a negative contributor to the area.</li> </ul>	<p>Amendments made with the exception of lower buildings around Palmer Street which have been retained as neutral</p>
	<p>Several minor corrections of fact and format as follows:</p> <p>Paragraph 4.66. The roofs to Strutton Ground are generally set behind and <i>below</i> straight parapets.</p> <p>Paragraph 4.67. Dormer windows and chimneys also contribute to the “more elaborate rooflines”.</p> <p>Paragraph 4.91. Are the shop-front of the other public houses within the Conservation Area worthy of mention (e.g. The Strutton Arms, The Sanctuary (albeit a former Bank))?</p> <p>Paragraphs 5.18-5.20. No mention is made within the text of roof terraces, or extensions.</p> <p>Paragraph 5.21. Street surfaces are of varying quality but are, on the whole, poor and capable of improvement.</p> <p>Paragraph 5.22-5.26. This does not</p>	<p>Document amended</p>

	cover all negative sites identified in figure 39.	
	Section 6 : Management proposals Development control and enforcement powers are two effective means of ensuring enhancement of conservation areas, but the Council also has the ability to affect improvements to street surfaces etc, to run grant schemes (eg improvements to the smaller shops to Strutton Ground) and to prepare planning briefs for major sites as they come forward for redevelopment. We would suggest that these are considered in this section.	Reference added to the importance of better management and potential improvement to shopfronts on Strutton Ground. A planning brief may be prepared for this area in the future but is not programmed for now.
<b>Thorney Island Society</b>	The audit is comprehensive and well-illustrated, giving a good insight into the contents and structure of the conservation area, seen in three parts. Unlike the boundaries of the Peabody conservation area, one wonders how the boundaries of the area were chosen, given the obviously diverse uses ad structure pattern. That however is a given and our comments relate to the three parts described in the document.	
	Steps need to be taken to improve the quality and legibility of Figure 42: Roof extensions map.	Agree. Amended to improve legibility
	The whole of the conservation area is typified by a mixture of materials, building forms and heights, uses and ages. There is an assemblage of buildings which none the less relate generally well together, and to the spaces around them - big and small streets or open areas. There are areas where there are similarities in height and bulk; but also where the mix is one which is quite different but acceptable as a diverse urban structure. And in the main the distances and proximities are well balanced, visually as well as physically, allowing sky views and sun penetration. In part this comes about from the free form of the underlying planning base.	The conservation area has been subdivided into three character areas to reflect the fact there are areas which have similarities in terms of scale, bulk and building form. The principal reason for designation of the area, however, is to protect this fragment of mostly late Victorian and early 20 <sup>th</sup> century buildings, which is different in character to the rest of Victoria Street. It is not therefore considered the area is a complete mix with no coherence to its character where any new development would be acceptable, as these comments seem to suggest.
	Given that the Audit is based on a former document, there is a substantial amount of welcome detail and information - and much which is factual. However there is a distinct	Audit not based on former document.  As stated above, the reason for designation and interest of the area

	<p>emphasis through the text which indicates a preference for the older development from say Victorian to pre World War 2, and that structures post that period are dismissed too lightly. Some of the Victorian/ Edwardian buildings which may possess a certain richness, cannot really be regarded as high grade of their kind, and it may be said that that is why there are so few listed.</p> <p>Against this the post war developments are all dismissed and described as "negative" partly due to their scale, detailed design or materials, considered to detract from the predominant character of the conservation area. Para 4.62. We find this an unacceptable part of the assessment of the character of the conservation area, and unrealistic when considering the time spread of the ages of the buildings and the variety of materials and styles. It suggests a pre-determinism that condemns outright and without proper consideration of the urban context; or the changing nature of architecture over the whole period of some 200 years, of the buildings within the area considered. This is not in the true interests of, or the interpretation of the character of the area. This aspect is further referred to below.</p>	<p>is primarily considered to be that it preserves a fragment showing the scale and character of Victoria Street from the late 19<sup>th</sup> and early-mid twentieth centuries before the radical redevelopment of Victoria Street, which characterises most of Victoria Street. This will be emphasised more clearly within the 'character' section.</p> <p>The audit clearly indicates the importance of the area's development and buildings of different ages within this. However, it is not considered that every building from every era makes a positive contribution to the area and the post war developments immediately adjacent to the conservation area have generally had a negative impact on the areas character.</p>
	<p>Character Area 2</p> <p>Strutton Ground (4.3) is one of the liveliest street markets in Westminster, and its position between housing and office workers, means that it serves all class types and ranges of spending power. Issues are raised under Section 5 "Negative Features and Enhancement" page 45. We would like to see a more specific intention or objective to improve the physical fabric of the whole, through an exercise to positively address fascias, shop fronts and possibly street lighting? Some boroughs have done this to great advantage, without detriment to the trades or shopkeepers, but rather to their advantage. There are several buildings as pointed out which</p>	<p>Agree. Shopfront and fascia improvements already covered in management proposals but reference has been added to the importance of maintaining and improving the vitality of Strutton ground market and retaining linkages between shops and market.</p>



	<p>could judiciously be improved. For example one of the oldest and with a good superstructure, is marred at ground floor level including fascia - 'Pronto Grill'. It could be transformed ! Fig 75 page 45.</p>	
	<p>Character Area 1 Christchurch Gardens While we recognise and agree that this is an important open space -the only green space in the area and on Victoria Street, it is sadly surprising that it is not sufficiently regarded by the powers that be, to maintain and or improve the planting, to a good standard. Even the illustration Figure 7 page 16, shows the 'miserable' specimen hedging, lacking either pruning to encourage lower growth, or under planting. This being the only green space in Victoria Street it is shameful in its neglected appearance. It is to be hoped that the Audit will raise the profile and remedy the situation. Perhaps policy DES1 and DES9 might be referred to as encouraging enhancement within the conservation area.</p>	<p>Although agree in principle to the comments about the hedge, it was pruned to remove the bottom growth as part of a police request for possible areas of concealment for bombs. To under plant will require consultation with the police, given the proximity to Scotland Yard. It is a possibility to use narcissus or a ground cover.</p> <p>There are no schemes in the pipeline for improvement works because we are so bound by the restrictions of the police, with New Scotland Yard across the road.</p>
	<p>Albert Pub A small but important text point is regarding the Albert Pub, one of the only 8 listed buildings, para 4.25 page 23 . The text fails to include the fact that it is listed, and is really too dismissive by describing it as "a typical mid-Victorian pub". It is rather better than that, being distinguished in it's elaborate design and it's stand alone position.</p>	<p>Agree. Added reference to the fact the building is listed.</p>
	<p>Windsor House As stated above, we regard the contextual mix of architectural styles, detailing, massing and urban design etc as a positive characteristic of the conservation area. We cannot support the notion that Windsor House is a "Negative Building", as shown on Map 39 page 30. Or further that in Management Proposals it could be described as "a negative feature which may present opportunities for change or enhancement", para 6.1. In our opinion the tower building is of quality, well designed and detailed, sited</p>	<p>Do not agree with this analysis. The building may be of some interest in terms of detailed design but its materials and scale does not relate well to those buildings immediately adjoining it and impinges on long views. The council would therefore seek to encourage more sensitively scaled development in future, which does not have an impact on long views from the parks and the world heritage site. The reason for identification as negative will be clarified within the negative features section.</p>

	<p>strategically at a pivotal point on Victoria Street where there is a slight change in direction. It may be said to add to Artillery Mansions by contrast, and giving extra meaning to the adjoining open space. The contrast between it and the Albert Pub is to mutual advantage; and in a way is a complementary contrast as was the original idiosyncratic building, which Windsor House replaced. This is a building which should be considered for listing: and when properly considered will be seen as 'positive'.</p>	
	<p>Buckingham Gate A similar disagreement with the Document's stated view concerning the less tall bronze tower on Buckingham Gate, coupled with its lower adjoining building. The form, quality of the design detail, and its relationship to the surrounding buildings provides a competent and satisfactory urban component. As intimated above we are drawn to the unfortunate conclusion that the only explanation for describing this building as "negative" is that it is not 'liked' because of its representation of a different style and period. The quality of the design detail and the overall quality of restrained curtain walling indicates care and excellence.</p> <p>One is at a loss to fathom how on the one hand, Westminster have approved of the overly complex and over scaled, poorly designed and badly detailed recent development of Cardinal Place; and at the same time fail to recognise the qualities of these two buildings by describing them as "negative". We urge a re-examination of the definition of 'negative'; and that these two buildings are accorded their proper appreciation as buildings themselves and the constructive part they play in the townscape.</p>	<p>This building is only marginally less tall and is of less refined design than the other tower. It is considered this has a negative impact on this part of Victoria Street. Reference to the reasons for its identification as negative will again be given within negative features. The lower adjoining building has been identified as neutral, although English Heritage have suggested the whole development should be identified as negative (see above).</p>
	<p>Post office and Telephone Exchange 5.23 The other building complex described as negative is said to be of the 50's. It is described as having "dominant scale which detracts form the character of the area". This is not</p>	<p>Do not agree. This building is over-scaled in relation to its surroundings as it occupies an extremely large plot with relatively blank elevations and little architectural detail, which serves to</p>

	<p>the real issue as it's height and mass, along with its setting around it, is no more dominant than many other buildings close by. It forms a light coloured backdrop to Christchurch Gardens, which if it were demolished would be replaced by a building to at least similar height, and probably taller. It would seem that the writer of the Audit is against post WW2 buildings first and foremost; and not appreciative of the historic significance of the architectural complex. These two buildings are greatly neglected and in a very poor state of repair which is very sad, and much refurbishment should be called for rather than their wholesale dismissal. The Post Office is an interesting building with its circular plan and high level fenestration. The building could be renovated and made to conform with current standards, and could then be both a serviceable utility and an historic asset.</p>	<p>emphasise its scale. There are no other similar buildings within the conservation area. Similar buildings close by, notably Scotland Yard, are outside the conservation area but are identified as having a negative impact on the setting of the area. Agree that it is also poorly maintained, which exacerbates the negative impact of the building on the area. Sympathetic alteration or redevelopment of this site would be an enhancement to the area.</p>
	<p>Character Area 3 The area is significant because of the relative uniformity of height of the buildings with the exception of Broadway, which is the tallest. It is described as a 'landmark building', and being listed is protected in the main from abuse. The Audit describes the constituent buildings well. It refers to the views out and the significance of the buildings outside the area but extending an influence on it. New Scotland Yard is one such which is referred to. No mention is made of the former Home Office building, recently refurbished and notably excluded from a Conservation Area. It has a powerful relationship with Broadway none the less.</p>	<p>Agree. Reference has also been added to the impact of the Home Office on the conservation area at Para. 3.24</p>
	<p>Management Proposals We would like to see some emphasis on the removal of and discouragement of unnecessary air conditioning plant, in line with the City Council policy to discourage air conditioning plant in small private homes and shops. Climate Change issues should make</p>	<p>Agree. Removal of plant is one of the management proposal topics. Emphasis on discouraging plant also added</p>

	<p>this a priority consideration. Page 51 summarises the general policies applied to Conservation Areas and development generally. However we have pointed out above our misgivings over what has been described as 'negative' in this context.</p>	
	<p>7 Glossary: This is welcome especially in a document which is to be used by the non professional as well as professional alike. It is helpful in understanding the nature and qualitative aspects of the townscape. We suggest changes to two items as follows</p> <p><i>Coade stone A form of cast artificial stone, developed in the 18th Century, with a matte finish, and usually cream in colour.</i></p> <p><i>York Stone A fine grained sandstone of the Carboniferous period, finely bedded which splits easily into 'flags' or paving stones; predominantly found in Yorkshire.</i></p>	<p>Some amendments made</p>

Once adopted, the Broadway and Christchurch Gardens Conservation Area Audit SPD (plus Statement of Adoption and Statement of Representations and Consultation) will be made available to download from the council website with hard copies available at OneStop Services and from the Conservation Area Audits Team. Notification will also be sent to consultees listed above.

# **Sustainability Appraisal Report**

**For the Broadway and Christchurch Gardens  
Conservation Area Audit SPD**

**December 2007**

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## Appendices

- Appendix 1: Consultees
- Appendix 2: List of Plans and Strategies
- Appendix 3: Sustainability Appraisal Objectives
- Appendix 4: Appraisal of Strategic Options
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# 1. Non Technical Summary

## Purpose and methodology

The purpose of Sustainability Appraisal (SA) is to promote sustainable development by considering social, economic and environmental when preparing planning policy documents. This SA considers implications of the Broadway and Christchurch Gardens Conservation Area Audit Supplementary Planning Document (SPD) from a social, economic and environmental perspective, by assessing different options and the draft SPD against available baseline data.

The preparation of the SA for the Broadway and Christchurch Gardens Conservation Area Audit has involved two key stages, namely:

1. The production of a Scoping Report, setting out what the scope of the Sustainability Appraisal would be, was prepared and consulted on in September 2007.
2. The production of the final Sustainability Appraisal Report, which follows this non-technical summary.

The Scoping Report identified the key sustainability issues for the Broadway and Christchurch Gardens Conservation Area Audits. These included:

- Increasing pressure on the natural and built environment;
- Need to promote sustainable building policies and practice
- Maintaining economic diversity and increasing local opportunity.

This led to 17 'Sustainability Objectives' being formulated, which were used to describe sustainability effects. These include issues such as improving health and well-being and reducing fear of crime and can be found in Section 4 of the main report.

## Appraisal of Options

Options (included in Section 5 of the main report) were formulated using the key sustainability issues, along with a careful assessment of issues raised by the public, stakeholders and in technical advice. The options assessed were:

**Option 1:** Prepare the Broadway and Christchurch Gardens Conservation Area Audit SPD

**Option 2:** Do Nothing

The key changes and the sustainability strengths and weaknesses of each option were identified and assessed against the 17 sustainability objectives. This concluded that the preferred option was to prepare the Conservation Area SPD for Broadway and Christchurch Gardens.

## **Statement of Significant Effects and Difference the Process has made**

The next stage of the SA attempts to predict the effects of the SPD. The SA process and the SPD have been initiated to build upon the policies in the Unitary Development Plan. Generally, the draft SPD performed well against sustainability objectives and the majority of effects identified were positive. However, certain minor negative issues were identified and proposals for mitigation have been identified and these recommendations have been incorporated into the draft SPD.

## **How to Comment on the Report**

Public consultation on the Sustainability Appraisal will run until **18 January 2007**. Comments can be posted, emailed or faxed to the address below:

<b>Conservation Area Audits Department of Planning and City Development Westminster City Hall 64 Victoria Street, London SW1E 6QP</b>	<b>Fax: 020 7641 2338</b> <b>Email:</b> <a href="mailto:conservationareaaudit@westminster.gov.uk"><u>conservationareaaudit@westminster.gov.uk</u></a>
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## 2 Appraisal Methodology Guidance and Limitations

In accordance with section 39 of the Planning and Compulsory Purchase Act 2004 and PPS 12 the Council has done a Sustainability Appraisal to assess the social, environmental and economic effects resulting from the Conservation Area Audits. The appraisal methodology is based on the approach set out in the Broadway and Christchurch Gardens Conservation Area Audit Scoping report, which was subject to consultation with the statutory consultation agencies in September 2007.

The Sustainability Appraisal Report has been compiled using a number of guidance documents including:

- Policy Planning Statement 12: Local Development Frameworks
- Sustainable Appraisals of Regional Spatial Strategies and Local Development Documents (ODPM, November 2005).

The Audit will be a Supplementary Planning Document and will be a part of the new Local Development Framework suite of documents. The process is set out in Table 1 below.

Table 1: Links between SEA/SA and SPD development

Plan Stage	SA/SEA Stage	Date Undertaken
Pre-production	<b>A. Setting the context and objectives, establishing the baseline and deciding on the scope</b> A1. Identify other relevant plans, programmes and sustainability objectives. A2. Collect baseline information A3. Identify sustainability issues A4. Develop the SA framework, consisting of sustainability objectives, indicators and targets A5. Test the SPD objectives against the SA framework A6. Consult on the scope of the SA	August-September 2007
Production	<b>B. Developing and refining options</b>  B1. Appraise issues and options	October-November 2007
	<b>C. Appraising the effects of the SPD</b> C1. Predict the effects of the SPD C2. Assess the effects of the SPD C3. Mitigate adverse effects and maximise beneficial effects C4. Develop proposals for monitoring C5. Prepare the SA report	

	<b>D. Consulting on the draft SPD and SA report</b> D1. Consult on the SA report D2. Appraise significant changes <b>D3. Decision making and provision of information</b>	<b>December 2007- January 2008</b>
<b>Monitoring</b>	<b>E. Monitor implementation of the plan</b> E1. Monitor the significant effects of the plan E2. Respond to adverse effects	

### **Timetable and Responsibility**

An SA Scoping Report was produced to set out the initial context and findings of the SA and the proposed approach to the rest of the appraisal. The aim was to ensure that the SA was comprehensive and addressed all issues and objectives by enabling input from key stakeholders and consultation bodies at an early stage of the process. The report also set out the proposed methodology for the SA, giving details of its proposed level of detail and scope.

The Scoping report set out an initial assessment of:

- The relationship between the SPD and other relevant plans and programmes
- Sustainability objectives established at the national, regional and local level.
- The current environmental, social and economic baseline and any trends
- The likely key sustainability issues

The information contained within the Scoping Report forms the backbone of this Sustainability Appraisal. The Sustainability Appraisal was carried out by officers within the Planning and City Development Department.

### **Who was consulted?**

Statutory bodies were consulted on the Scoping Report, with responses received from English Heritage and English Nature. These comments were primarily baseline indicator information and have been taken into account in re-drafting. A wide range of stakeholders were consulted at both pre-production and draft stages. A separate consultation statement summarising all representations received has been prepared.

## **3 Background**

### **Purpose of Sustainability Appraisal**

The Planning & Compulsory Purchase Act 2004 requires that Local Development Documents, including SPD, are subject to Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA).

The purpose of a Sustainability Appraisal is to assess the social, economic and environmental impacts of plans at a strategic level, in order to ensure that planning decisions are made that accord with the principles of sustainable development. This Sustainability Appraisal has been carried out according to the ODPM guidelines: "Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents."

## **Background To SPD**

Westminster City Council Department of Planning and City Development is preparing all its conservation area studies as Supplementary Planning Documents (SPD). The Broadway and Christchurch Gardens SPD provides guidance on the protection, enhancement and management of the Conservation Area. It identifies those features of special interest, which contribute to the local townscape and sets out the council's policies and guidance for the protection of the area. It also identifies negative features and opportunities for enhancement and change within the area, as well as management proposals to guide future change and development.

The SPD will act as a tool for the proactive management of the conservation area and to guide future change. As such, it will assist with the overall objective of conserving and enhancing the City's historic environment.

All the matters covered in the Broadway and Christchurch Gardens Conservation Area Audit relate to saved policies in the Westminster City Council Unitary Development Plan 2007. It therefore conforms with current Westminster planning policy, national policy and the London Plan.

Information on the timetable for preparation, consultation and production of these SPD is contained within the Local Development Scheme, which is available on the Westminster website at:

<http://www.westminster.gov.uk/environment/planning/ldf/local-development-scheme.cfm>

## **Compliance with the SEA Directive**

In accordance with the Government's draft guidance on Strategic Environmental Assessment (SEA), SAs of SPDs should also fully incorporate the requirements of the European Directive 2001/42/EC, known as the SEA directive. This directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004- the SEA Regulations. Whilst SEA and SA are distinct processes, the intention of this SPD is to adopt an approach to appraisal which also meets the requirements of the SEA directive.

## **4 Sustainability objectives, baseline and context**

**Identifying other relevant policies plans programmes & sustainability objectives.**

The purpose of reviewing other plans and programmes and sustainability objectives is to ensure that the relationship between this document and the draft SPD has been fully explored. This will, in turn, ensure that Westminster City Council is able to act on any identified inconsistencies between international, national and local objectives.

This SPD covers a small area and will only have impacts at a local level, therefore the other relevant plans and programmes will be confined to those which influence at this local level. Table 2 below shows a list of the plans and strategies that were reviewed as part of the SA. A full review of these which sets out the implications for the SPD is set out in the Scoping Report and at Appendix 2.

**Table 2:** List of plans and Strategies reviewed.

<b>National</b>
PPS 1 Delivering sustainable development
PPS 9 Biodiversity and Geographical conservation
PPS 12 Local Development Framework
PPS 22 Renewable energy
PPS23 Planning and pollution control
PPS25 Development and Flood Risk
PPG 3 Housing
PPG 4 Industrial, commercial development and small firms
PPG 8 Telecommunications
PPG 15 Planning and the Historic environment
PPG 16 Archaeology and planning
PPG17 Open Space, sports and recreation
PPG 24 Planning and noise
English Heritage Guidance on Conservation Area Appraisals and Conservation Area Management.
<b>Regional</b>
The London Plan (2004)
Mayor's London View Management Framework (2007)
Mayor's Energy Strategy (2004)
<b>Local</b>
Replacement Unitary Development Plan 2004
Westminster City Council's Community Plan – One City (draft)
'Air Quality Strategy & Action Plan' (2001) and 'Air Quality Strategy & Action Plan: Progress Report' (2005)
Open Space Strategy (draft)
Sustainable Buildings SPG
Economic Development Strategy
Nature Conservation Strategy (1997)
'Biodiversity Action Plan' (2000)
Design Matters in Westminster – Supplementary Planning Guidance on creating good City architecture
Development and Demolition in Conservation Areas
Railings In Westminster SPG
Roofs: A guide to Alterations and Extensions on Domestic Buildings
Shopfronts, Blinds and Signs
Westminster Way: A Public Realm Manual for the City
Inclusive access and Design SPG

## Baseline Information

The Sustainability Appraisal requires relevant current information to set out the characteristics of the plan area and the environmental features likely to be affected. The gathering of baseline information provides the basis for monitoring and predicting effects enabling sustainability issues to be identified and suggest potential mitigation measures, or ways of dealing with them.

A crucial part of the procedure is to ensure that where possible each of the SA objectives is supported with comprehensive and up to date baseline information. The collection of baseline data for the appraisal needs to be co-ordinated with the development of the information base for the plan itself. The task is also linked to the development of the SA Framework, which includes criteria and objectives.

Data was collated from a variety of sources, from very local to regional. Not all information was available, and certain datasets were too complex to translate into localised district or ward information practically in the time available. The Scoping Report again provides detailed information on the baseline data. The collection of baseline data for the SPD has helped to identify the key social economic and environmental issues that need to be addressed.

**Table 3:** Details the sustainability issues that exist for both the City of Westminster and Broadway and Christchurch Gardens Conservation Area.

Sustainability Issues	Characteristics and supporting data
<p>Increasing pressure on the natural and built environment including:</p> <ul style="list-style-type: none"> <li>• Immense pressure upon open space</li> <li>• General lack of open space in the residential areas in the north-west and south of the borough</li> <li>• The need to protect, enhance and increase biodiversity and Increase in habitats.</li> <li>• Problems caused by late night activities – noise, smells, rubbish</li> <li>• Need to protect and enhance the cultural heritage, both architectural and archaeological, particularly given the significance and high number of listed buildings and conservation areas.</li> <li>• Air pollution, the borough is a declared AQMA.</li> </ul>	<ul style="list-style-type: none"> <li>• 2.2 ha of public accessible open space / 1000 resident pop.</li> <li>• Common standard of 1.6 ha / 1000 pop. Initially open space provision does look acceptable. But the vast influx of daily tourists and visitors swells the daytime population to approx. 1 million people. Reduces this standard to .5 ha / 1000.</li> <li>• Westminster covers an area of 365 hectares and 17.1% is deemed deficient in biodiversity. When compared to the other inner London Borough's Westminster is slightly better than average. But the situation is by no means satisfactory</li> <li>• The pressures placed on wildlife are compounded by the sheer number of daily visitors that enter the borough.</li> <li>• River quality when compared to the rest of the country is not very good, for London as a whole.</li> <li>• Westminster has 38 theatres, 60 Cinemas, 17 Casino's, 3,000 + eating, drinking, nightlife establishments. 430 hotels (40% London's Hotel stock) Home national Ballet and Opera companies, museums and art galleries. All of which attract people to the C of W (City of Westminster) and contributes to increasing pressure on the environment as well as noise and rubbish issues.</li> <li>• The cleanliness of the public realm when compared to neighbouring borough's figures is not very good and when compared to the national average for authority type is not good at all. Is an issue when considered with the amount of visitors the city has and the importance it is as a tourist destination.</li> <li>• Protected vistas cross large parts of Westminster. This in turn will influence and shape spatial land use and building design. They therefore are significant when considering the impact upon sustainability.</li> <li>• Historic and listed buildings are an issue in Westminster because of their large number and level of importance. This will have an impact upon many spatial land use issues and decisions. There are over 11,000 listed buildings in Westminster, this represents 20% of Listed buildings in London. It also has 54 conservation areas, covering 76% of Westminster by area, as well as 1 World Heritage Site, 6 Royal Parks' 19 historic squares and gardens and 5 areas of special archaeological priority.</li> <li>• Broadway and Christchurch Gardens Conservation Area includes I Grade II* and 7 Grade II listed buildings.</li> <li>• The Broadway and Christchurch Gardens Conservation Area is affected by the Ludenwic and Thorney Island Special Archaeological Priority Area</li> <li>• Air pollution affects residents, daily commuters and visitors to the borough. The AQMA for the whole of Westminster declared in 1999 for NO2 and PM10. In 2004 PM10 and NOx are at levels that exceed European standards.</li> </ul>

<p>Noise and the impact upon human health and quality of life,</p> <ul style="list-style-type: none"> <li>• Ambient noise levels</li> <li>• Noise impact from licensed and commercial activities</li> <li>• Cooling / heating plant for buildings</li> <li>• Transport noise</li> </ul>	<ul style="list-style-type: none"> <li>• WHO state that to prevent serious annoyance during the day in outdoor living areas noise should not exceed 55db<sub>laeq</sub> for a steady continuous noise. Night noise levels at the outside façade of living space should not exceed 45db<sub>laeq</sub>. Note that the average hourly night time noise levels only drop below the WHO day time recommended values between 02:00-04:00.this data indicates that noise is a major issue in Westminster.</li> <li>• Westminster noise survey (June 2003) highlighted that traffic noise is the major issue in Westminster, particularly if the vehicle noise source is also included. Construction activities also have a relatively significant impact. Noting that this information does not indicate is the impact upon residents from entertainment and licensed premises.</li> <li>• A study of 17 London boroughs has shown that in 1999/2000 the number of Noise service request in Westminster was more than three times higher than the average and 45% higher than the figure for the next highest borough.</li> </ul>
<p>Waste and recycling,</p> <ul style="list-style-type: none"> <li>• No waste handling facility in Westminster recycling rates need to improve as population increases</li> <li>• Street cleansing important</li> </ul>	<ul style="list-style-type: none"> <li>• There is no waste handling facility within the City primarily due to the immense pressure upon land. All of Westminster's waste has to be handled outside of the borough.</li> <li>• Recycled waste is material separated from municipal waste to be processed into marketable products. WCC is average when compared to other by figures but there are grounds to make huge improvements. Noting that in 2001 the C of W was responsible for 2,000 tonnes of disposable nappies.</li> <li>• A high proportion of municipal waste from Westminster is incinerated. Much higher than the average.</li> <li>• Westminster is below the national average and below neighbouring boroughs in terms of the percentage of the population that is by kerbside collection or are within 1KM of a recycling centre.</li> </ul>
<p>Road transport and congestion are an issue The provision for pedestrians and cycling needs to be increased.,</p> <ul style="list-style-type: none"> <li>• Quality of the public realm is important</li> <li>• Pedestrianisation is an issue due to the number of people entering Westminster on a daily basis.</li> <li>• Further support for alternative modes of transport, specifically cycling and walking, including green travel plans.</li> </ul>	<ul style="list-style-type: none"> <li>• WCC has a daily influx of people that takes the borough's daily population to over 1 million (approx.).</li> <li>• In Westminster the underground is the predominant mode of public transport.</li> <li>• Walking in Westminster is also important. Despite this and the level of public transport access 13.2 % of residents still drive to work.</li> <li>• In Westminster there is increased reliance upon Public Transport for those with no access to car</li> <li>• The majority of the Borough has an excellent PTAL rating, level 6b(40.01+). The north west and south of the Borough has slightly less public transport access which does correlate with the more deprived areas in the borough.</li> <li>• Westminster has a very high level of road vehicle ownership. Particularly in comparison with the rest of London and England &amp; Wales.</li> <li>• Congestion around the CCZ has decreased with Westminster having an average % change when compared to other London Boroughs that surround the CCZ.</li> <li>• The borough has intense pedestrian activity. Managing this number of people is a major challenge. Particularly with all the other land use pressures experienced in the Borough.</li> <li>• Overall trend for KSI (Killed or Seriously Injured) figures are that they have progressively dropped since 1990. When compared to neighbouring Boroughs the situation is not good. National target is to reduce Killed and Seriously Injured on GB roads by 40% by 2010 compared with 94-98 averages. In Westminster this means a reduction from 302 to 181 between 2000 and 2010</li> <li>• WCC has good public transport links, which are reflected in the high proportion trips to school being made on these modal transport groups.</li> <li>• Cycling is an issue and advised by the Safe Routes to Schools officer this is manly down to lack of storage space. As well as possible safety issues.</li> <li>• Advised walking figures are relatively good and are help by the small catchment areas Westminster schools have.</li> </ul>
<p>Climate change, climate change adaptation and air quality,</p> <ul style="list-style-type: none"> <li>• Green house gas emissions and contribution to this global issue</li> <li>• Change in weather patterns</li> <li>• Increase in flood risk</li> <li>• Flash flooding and drainage issues.</li> </ul>	<ul style="list-style-type: none"> <li>• The proportion of carbon emissions from commercial activity is very high. C of W accounts for 11.8% of this sectors total for London.</li> <li>• C of W emits 6.8 %of the total carbon emissions for the whole of London, which is approximately 0.6% of the whole of the UK's total.</li> <li>• The main contributing factor would be the amount of electricity consumed within the borough by commercial activities (12.6% of total emissions from electricity used in commercial activities for the whole of London).</li> <li>• WCC is also responsible for 11.4 of total carbon emissions from gas used in commercial activity for the whole of London.</li> <li>• The C of W figure is far higher than the figure for London. The main reason is the high proportion of commercial activity. Future climate in London is predicted to be, warmer, wetter winters more intense downpours of rain</li> <li>• Hotter drier summers, with more frequent and extreme high temp. Reducing the impact upon climate change and adapting to the predicted changes are vital and need to be addressed. No specific figures for C of W found.</li> <li>• The Thames region accounts for 10% of land in the UK and nearly a quarter of the population with a below average annual rainfall. Water is a major issue in the SE, London and so Westminster.</li> <li>• Flooding is deemed low risk but is something that needs to be taken into account, particularly as the true impact of climate change is not yet fully known. Broadway and Christchurch Gardens Conservation Area is in a high risk flood zone.</li> </ul>

<p>Sustainable building policies need to be embraced in a far greater fashion,</p> <ul style="list-style-type: none"> <li>• Need to increase energy efficiency measures</li> <li>• Application of SUD's</li> <li>• Sustainability issues in historic and listed buildings as well as new developments</li> </ul>	<ul style="list-style-type: none"> <li>• Difficult from this data to fully ascertain the issues from C of W perspective. But the nature of the intensely developed urban environment is conducive to cumulatively impacting on these types of water pollution incidents.</li> <li>• UK trend is for more electricity being generated from renewable methods.</li> <li>• For the Thames region the average water consumption in litres/ person /day in 2000 – 01 was 163 by 2004 – 05 reduced slightly to 161 litres/day. Increase in water consumption with a greater amount used in the Thames (therefore C of W) region that the country as a whole. This is important when the steady increase in people living in the region is on the increase.</li> <li>• The application of sustainable design and construction standards are required to assist in improving the over all contribution to sustainable development BREEAM and eco-homes would seem that sort of approach that would allow this to happen.</li> <li>• Refitting buildings so they embrace sustainability may pose difficulties in Conservation Areas and lead to some policy clashes.</li> </ul>
<p>Supply of appropriate housing</p> <ul style="list-style-type: none"> <li>• Homelessness is a major issue</li> <li>• supply of affordable and intermediary home</li> <li>• over crowding and polarisation and lack of family units</li> </ul>	<ul style="list-style-type: none"> <li>• Little change in amount of homelessness in Westminster over the last 4 years. Although the number in London has dropped, a high proportion are in Westminster. Where as trend is falling in C of W is static.</li> <li>• Throughout the county and London number of houses completed has steadily increased. In Westminster this trend is very much the opposite. Except for social housing which has increased.</li> <li>• The number of dwellings in London is increasing on the same land size. This increase the pressure upon local services and infrastructure overcrowding and the density of people in C of W is a major issue being the third most crowded LA area in the country</li> <li>• No of council properties (2005) in Westminster was 12,407, this figure has consistently decreased over the last 11 years.</li> </ul>
<p>Major challenge is the creation of cohesive and inclusive communities, which are sustainable</p> <ul style="list-style-type: none"> <li>• Need to supply appropriate level of social and community facilities if sustainable communities are to be created and maintained</li> <li>• Mixed use pattern of land use creates conflicting issues</li> <li>• Remedy areas, which are recognised as deprived.</li> <li>• Health and well-being of all the community and Community cohesion and inclusion</li> </ul>	<ul style="list-style-type: none"> <li>• Westminster has seen a steady increase in population from 174,842 in 1991 to 181,286 in 2001, which is a similar rate to the national increase. London as a whole has seen a greater increase in the number of people / hectare the ninth densest local authority in the UK.</li> <li>• Adult pop is higher than average with the children and elderly proportion being lower.</li> <li>• Ethnicity is diverse in Westminster and is not only reflected in these statistics but also by the fact that there are 120 languages (City Futures, City of Westminster Profile) spoken by residents in the borough. It is vital then to have an inclusive society, which can maximise the potential of all residents.</li> <li>• Westminster is a diverse religious community with Christian biggest group followed by no religion followed by Islam.</li> <li>• By comparison Westminster has a higher than average senior management/ professional occupation. Although it does have a slightly less than average small employers and lower supervisory employment types.</li> <li>• Life expectancy in Westminster is above the London average as well as the average for England and Wales for both men and women</li> </ul>

<p>Maintain economic diversity and increase local opportunity</p> <ul style="list-style-type: none"> <li>• Land and office cost very high in Westminster</li> <li>• Careful is not a victim of its own success, very successful economic activity covering a wide number of areas. Needs to include all age groups in facility provision</li> <li>• Education and job creation and distribution of wealth to local communities</li> </ul>	<ul style="list-style-type: none"> <li>• 16,207 offices – 8.4 million m<sup>2</sup></li> <li>• 8,526 retail premises – 2.2 million m<sup>2</sup></li> <li>• GDP in 2005 was £16 billion</li> <li>• Number of business based in the borough is 47,000 (mar. 2005)</li> <li>• More business failing than starting up. With high % than for London and much high % for GB.</li> <li>• New business figures are similar to those for London and more than for GB as a whole</li> <li>• The supply of jobs far out strips the supply of residents and is far greater than the London and GB figures.</li> <li>• Westminster provides 14.1% of all employment in London (Economic Development Strategy, Mar.05)</li> <li>• Westminster has proportional more full-time jobs than rest of London and the country as a whole</li> <li>• Westminster more dependant on the service sector than the rest of London or GB. In particular finance, IT and business activities and tourism. Manufacturing is much lower than for GB. As is construction. The patterns are similar when compared to the rest of London.</li> <li>• Westminster has higher than average number of residents of working age</li> <li>• Huge disparity between average income male and female residents. Greater than for rest of London and the country.</li> <li>• Average pay is high than for the rest of London and the country as a whole</li> <li>• Westminster has less Job Seeker Allowance claimants (JSA) than London and slightly more than the GB average.</li> <li>• In all areas more men than women claiming JSA The trend is similar for all areas. With less younger people claiming JSA in Westminster. But more middle range claiming as with over 50's.</li> <li>• Westminster is a very deprived area on these indices. It is a borough of extremes with some of the wealthiest areas in the country next to some of the poorest. Church St and Queens Park are the two most deprived SOA in London and the UK – therefore the distribution of wealth across the Borough would appear to be a key issue.</li> <li>• When compared to the rest of London the education figures are not that different. Area where this is an issue is NVQ1 level which less than 5GCSE's is below the figures for London and GB. Over view at the very bottom of the scale and the top Westminster is above London and national figures. It is the middle of the scale where there are problems which is the school leavers type of education.</li> </ul>
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### Likely Future Trends

Identifying and predicting future trends is difficult with so many differing local, regional and global facts that interplay and impact on the City of Westminster and therefore the Broadway and Christchurch Gardens Conservation Area. The key factors, which have been identified and will have a future impact are:

- **Continuous redevelopment taking place with density of residential and commercial premises increasing. There are very few large sites available in the City.**
- **Current residential population is 230,000 and this is expected to increase to between 310,000 and 350,000 by 2016. This predicted rise in population will further increase pressure upon the social and community facilities as well as the local environment.**
- **Meeting the challenge of supplying affordable quality housing will always be an issue, due to the numbers of people living and wanting to live in the borough, as well as the ever-increasing pressure on land.**
- **Increasing availability of new technology to enhance and deliver services to all residents.**
- **The economy of the City of Westminster is important locally as well as nationally, with over half a million people employed and approximately 50,000 businesses located within the City. It will increasingly rely upon the service sector to provide jobs and business tourism is set to increase and will require improved services and facilities.**



- The Olympics in 2012 are predicted to have a major impact upon the City of Westminster through Olympic events themselves, tourism, entertainment, shopping and hotel usage (presently 40 % of all of London's hotels are located within the City of Westminster).
- The City of Westminster is a dynamic and ever changing area. The proposed Victoria area redevelopments may have an impact on the Broadway and Christchurch Gardens Conservation Area.

## **The Sustainability Appraisal Framework, including objectives targets and indicators**

The identification of sustainability issues allows the development of a set of sustainability objectives, which will be used to appraise and modify policies, to increase their sustainability credentials. It can be seen as *a methodological yardstick against which social, environmental and economic effects of a plan can be tested*.<sup>1</sup>

The sustainability objectives have been developed in the first instance by researching issues specific to the City of Westminster through detailed discussion with key officers in the Local Authority. These issues have then been used to guide and target the collection of baseline information, which in turn has provided the evidence base to form an initial set of sustainability objectives. These have subsequently undergone an extensive internal consultation process resulting in the sustainability objectives, which are set out below in Table 6. Objectives have been reviewed and adjusted to create the 17 sustainability objectives (see appendix 1 for objectives, sub-objectives and indicators), which have been used to assess the sustainability aspects of the draft Conservation Area audits and are listed below in table 4.

These sustainability objectives have also been formulated having regard to the need to be consistent with those in the London Plan, the higher tier regional spatial plan.

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<sup>1</sup> ODPM Guidance

**Table 4** SA objectives and their support of the three key pillars of sustainable development.

	Sustainability Objectives	Social	Environ	Economic
1	To create cohesive, inclusive and safe communities with appropriate levels of social and community facilities.	✓		
2	To reduce the fear of crime and actual crime.	✓		✓
3	To ensure the provision of appropriate housing types to meet homeless, affordable, intermediary, over crowding and family unit demands.	✓		
4	To promote and improve health and well-being.	✓		
5	To reduce greenhouse gas emissions and support climate change adaptation	✓	✓	✓
6	To require the application of sustainable design and construction in all new developments and refurbishment of existing buildings.		✓	✓
7	To minimise flood risk, promote sustainable urban drainage and protect surface and ground water quality.		✓	
8	To protect, enhance and create environments that encourages and support biodiversity.		✓	
9	To improve air quality.	✓	✓	
10	To reduce the impact of noise.	✓	✓	✓
11	To reduce the need to travel and use of private motorised vehicular transport as well as encouraging walking, cycling and the use of public transport.	✓	✓	✓
12	To reduce waste production and increase recycling and recovery of all waste.		✓	
13	To protect and enhance the historic environment and architectural, archaeological and cultural heritage.	✓	✓	✓
14	To enhance the public realm and street environment.	✓	✓	✓
15	To protect, enhance and seek opportunities to increase open space throughout the borough.	✓	✓	
16	To ensure equality of opportunity and improve opportunities for education, training and employment.	✓		✓
17	To maintain economic diversity, increase local opportunity and support sustainable economic growth.	✓		✓

The sustainability objectives have also been derived so that they meet the environmental protection objectives set out in the SEA Directive. This is demonstrated in Table 5, which demonstrates how the sustainability objectives support and meet the SEA Directives key environmental protection issues.

**Table 5** listing SA/SEA objective and their link to SEA Directive protection objectives

Environmental protection objectives (part f, Annex 1, Directive 2001/42/EC)	Sustainability Objectives
Biodiversity	7, 8, 9, 14, 15
Population (this term is not clearly defined in the Directive)	1, 2, 3, 4, 5,
Human Health	1, 2, 3, 4,
Fauna	5, 8, 15
Flora	5, 8, 15
Soil	7, 13
Water	5, 6, 7,
Air	5, 9, 11,
Climatic Factors	5, 6, 7, 11, 12,

Material Assets (this term is not clearly defined in the Directive)	3, 5, 6, 7, 14
Cultural heritage – Architectural, archaeological,	13, 14, 15
Landscape	5, 7, 13, 14, 15

### Sustainability Objectives Framework

The Sustainability Objectives have been assessed for their compatibility with each other to identify any potential conflict between the individual objectives. For this assessment each objective had the same weight and equal importance. The resulting matrix set out in Figure 1 identifies where potential clashes between individual objectives may exist.

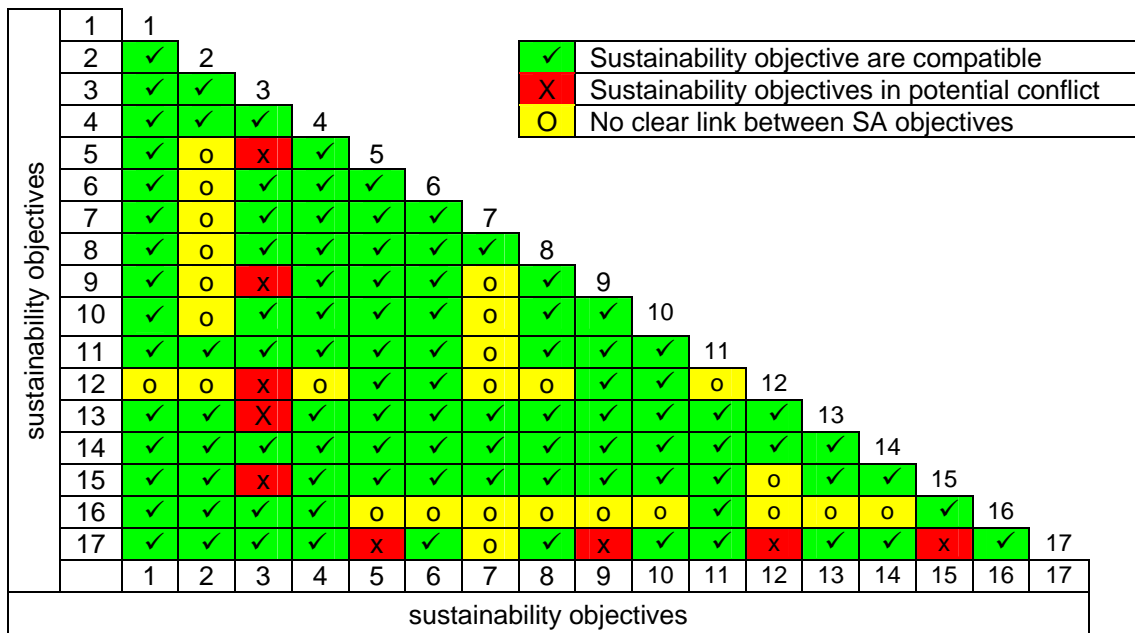


Figure 1. Assessment of the compatibility between the sustainability objectives.

It demonstrates that the majority of the objectives are compatible with each other or that there is no clear link and therefore no predicted conflict. There are a number of exceptions where possible conflict between two sustainability objectives may exist.

Objective 3 (appropriate housing units) and 17 (sustainable economic growth) are predicted to be in conflict with other sustainability objectives. This is because they both require the potential increase in activities, which could contribute to increasing pressure upon the local environment. This includes increasing carbon emissions, contributing to local air pollution, producing more waste; and placing further pressure upon green space and the historic environment.

The assumptions or justification for the conflicting objectives are presented below in Table 6 accompanied by considerations that will assist in mitigating the predicted issues.

Conflicting objectives	Comments / Justification / Assumption	Mitigation / Resolution / Consideration
3 and 5	With an increase in residential units there will be an increase in space heating / cooling, which along with associated transport demands is likely to increase greenhouse gas emissions.	Climate change consideration will need to be taken in to account when forming policies relating to residential unit construction, conversion or refurbishing

3 and 9	An increase in the number of housing units will mean an increase in space heating from boilers and increasing demands on transport usage, including private road vehicles, all of which will impact upon air quality	Air quality consideration will need to be taken into account when form policies. Will also reflect other plan objectives – WCC AQAP, The Mayors AQAP and national AQAP.
3 and 12	Increase in residential units will increase the amount of municipal waste that will need to be collected and recycled.	Waste and recycled material storage space need to be supplied in residential developments and services need to be able to cope with potential increases in waste and recycled material.
3 and 13	Pressure to supply more residential units could impinge on historic environment as the demand for housing is satisfied.	Careful consideration for the historic environment needs to take place to prevent this happening; difficult as pressures on land constantly increase.
3 and 15	More residential units are likely to increase pressure on open space by actual land take and increase in numbers using the open spaces.	Land pressure in very difficult to resolve. Have green space is vital for social well being and community cohesion.
17 and 5	Any increase in economic activity is likely to have a negative impact upon greenhouse gas emissions because of the increase in buildings and subsequent heating / cooling demands and transport requirements.	Climate change consideration will need to be taken in to account when forming policies relating to commercial unit construction, conversion or refurbishing
17 and 9	Increasing economic activity will require more commercial buildings requiring space heating / cooling which, will contribute to levels of air pollution. Also, more people travelling to work in the City will increase demands on transport again will contribute to air pollution.	Air quality consideration will need to be taken into account when form policies. Will also reflect other plan objectives – WCC AQAP, The Mayors AQAP and national AQAP.
17 and 12	An increase in economic activity is directly and indirectly likely to increase waste production.	Recycling within commercial organisations needs to be encourage and so reduce the conflict between these two objectives
17 and 15	Increase in economic activity may increase pressure on open space as more people use then for recreational purposes	The increase in pressure upon open space is inevitable if more people work in Westminster.

**Table 6.** Identification and explanation for conflicting objectives.

The potential for conflict between sustainability objectives are not insurmountable and through the development of policies these can be minimised. The identification of these potential conflicts now means that this information can guide and inform future policy decisions.

## 5 SPD Options Appraisal

### Main options and how they were identified

One of the key requirements of SA is to consider reasonable alternatives as part of the assessment process. The aim of options appraisal is to assess the preferred option alongside others previously considered, against the sustainability framework.

This process enables comparison between options, highlighting any potential implications on sustainability. The appraisal of options also enables recommendations for mitigation of negative impacts and suggestions for modifications to the preferred option as presented in the draft SPD.

The options have been appraised against the Sustainability Objectives, in environmental, social and economic dimensions. A scoring system was used for every objective, for the short, medium and long term and a summary of the option against each of the dimensions were reached. A conclusion sums up the general impact the option would have and makes comments on the sustainability of this option.

The main options identified for the Broadway and Christchurch Gardens Conservation Area Audits can be described as a “Do Nothing” and a “Best Practice” approach.

**Option 1:** The “Do Nothing” option consists of the current situation, with the conservation area in place but with no formal guidance as to how the character of the area will be interpreted.

**Option 2** The “Best Practice” option consists of the conservation area supported by guidance in the form of the draft Broadway and Christchurch Gardens Conservation Area Audit.

A table showing appraisal of options can be found at Appendix 4.

#### **Option 1 –**

This option does not have dramatic effects against the sustainability objectives and, for majority of them, the effect would be neutral. However, environmentally this option would minimise the opportunities to enhance certain aspects of the physical environment. Against the social objectives, evidence elsewhere suggests that the historic built environment can have positive knock on effects and by utilising this option these perceived benefits will not materialise, such as education and involvement of the community through consultation which helps to promote social cohesion. Economically this option may be considered to have a minor negative effect. The conservation of the historic built environment has the potential to give economic confidence (e.g. via promoting a positive image) and stimulate economic growth and actively aid in regeneration. Westminster’s historic built

environment forms the focus of tourism, which brings substantial economic benefits.

With regards to **Option 2**, the Council recognises the important role of the historic environment to the character of Westminster, with associated environmental, social and economic benefits. Whilst it is evident that development within the historic environment can rarely occur without some form of compromise, it is unlikely that the adoption of the SPD would have any notable negative impacts and this should provide clarity for developers. Conservation area audits also help to formulate proposals to enhance the historic environment having long lasting impacts and helping to preserve local distinctiveness. Socially, although in some instances the links are rather limited or neutral, this option can, if adequately consulted on, help to generate a sense of local ownership to the area. Furthermore this can help towards other social issues such as crime by encouraging people to value their surroundings, which should have a cumulative effect of improving and the physical environment of locations. Economically again this option should have an overall positive impact especially in relation to tourism and sustainable growth, benefiting businesses by enhancing areas.

The preferred option is thus to prepare a conservation area audit for the Broadway and Christchurch Gardens Conservation Area.

## **6 Appraisal of Plan's Effects**

This section provides a record of the prediction and assessment of the potential effects of the draft SPD. The appraisal process has used an appraisal framework. The analysis is presented in Appendix 5 and includes each of the plan objectives. The plan objectives are appraised in turn for their potential impact on each of the sustainability objectives. Scores are recorded on a five-point scale (major negative impact; minor negative impact; neutral impact; minor positive effect; major positive effect; impact uncertain).

The appraisal process has considered the following issues:

- Direction of effect: is the policy moving towards or away from sustainability?
- Severity of effect: will the effect be marginal or significant?
- Cumulative and synergistic effects: are there potentially significant effects resulting from a combination of activities, which may be insignificant individually?
- Trans-boundary effects: does the effect impact on adjoining boroughs?
- Timing of Effect: does the effect occur immediately or later, does it last indefinitely or only temporarily?

The plan's objectives appraised in this way are as follows:

- Expand upon the UDP Policy DES 9: Conservation Area by providing a detailed appraisal of the historical interest, architectural qualities, street patterns and spaces, trees, townscape detail and negative features,

comprising the Broadway and Christchurch Gardens Conservation Area Audit.

- Provide a fair and effective and transparent mechanism for reviewing the design and appearance of proposed development in the Broadway and Christchurch Gardens Conservation Area
- Identify potential enhancements and proposals for the future management of the conservation area.

### **Potential overall effects of the draft SPD**

The matrix shows that the majority of the sustainability objectives are affected either positively or very positively by the implementation of the SPD. The negative impacts of the SPD on sustainable development are.

- **Improve affordability of housing**
- **Encourage and facilitate the use of low emission technology and fuels**
- **Make land and property available for business development**

However, these effects are uncertain and will be monitored.

### **Time scale and reversibility**

Each action has been assessed for its potential impact over time and, if negative whether it is reversible. The main findings of this assessment are:

- Almost all time scales for implementation and resulting impacts is for the medium and long term. This is mainly because of the lead in times for the actions, the actual nature of the actions and what they set out to achieve.
- All impacts, both positive and negative, are perceived to be reversible

## **IMPLEMENTATION AND MONITORING**

The significant sustainability effects of implementing the draft SPD will be monitored to help identify unforeseen adverse effects and to enable remedial action to be taken. The Council is required to prepare Annual Monitoring Reports to assess the implementation of the Local Development Scheme and the extent to which policies in the Local Development Documents are being achieved. The SPD will be included in this process .

### **Key next steps**

1. Appraisal of any significant changes proposed to the draft SPD not already considered.
2. Publishing a statement following adoption of the SPD setting out any changes to the SPD in response to the SA process
3. Monitoring the significant effects.

## **Conclusion**

The Sustainability Appraisal process has enabled assessment to be made of the social, environmental and economic impacts of the Conservation Area both with and without the Audit. Planning decisions should not be affected by the guidelines which give clarity to applicants on the changes that will require permission and which changes are likely to be acceptable.

The main benefit of the SA process is that it has enabled the development of mitigation measures and monitoring which will ensure that any adverse impacts can be minimised.

The SA process has also documented the current status of social, environmental and economic aspects of the area in the form of baseline data, which will act as a check to determine whether any unintended consequences are resulting from the audits.

The conclusion of the SA process is that the option with the Conservation Area Audit in place is the most sustainable since it lends clarity to the planning process. A number of issues have been highlighted by this appraisal, which are being taken into account in amending the SPD before Westminster City Council formally adopts it.

The significant sustainability effects of implementing the draft SPD will be monitored to help identify unforeseen effects and to enable remedial action to be taken. This will mean the Conservation Area Audit will be a more sustainable document and will thereby embrace social responsibility, economic development and environmental protection.



## Appendices

## **Appendix One**

### **Consultees on the Scoping Report SEA Consultation bodies**

English Heritage  
Environment Agency  
Natural England

**Appendix 2: List of Plans and strategies reviewed**

**Relevant Plans, Programmes, Policies & Strategies**

**National and International**

**PPS 1 Delivering Sustainable Development**, ODPM 2005  
<http://www.communities.gov.UK/index.asp?id=1143805>

**Requirement or objectives**

Facilitate and promote sustainable patterns of urban development by:

- Making suitable land available for development in line with economic, social and environmental objectives to improve the quality of life.
- Contributing to sustainable economic growth.
- Protecting and where possible enhancing the natural and historic environment and the quality and character of the countryside, and existing successful communities.
- Ensuring high quality development through good design.
- Ensuring that development supports existing communities and contributes to the creation of safe, accessible, sustainable communities.

**Requirements and objectives to be integrated into the Plan**

SPD documents need to take objectives in to account and these should be integrated into policies.

**Implications for the SA**

These themes should underpin the sustainability appraisal.

**PPG 3 Housing, 1990**

<http://www.communities.gov.UK/index.asp?id=1143941>

**Requirement or objectives**

- Plan to meet housing requirements for whole community.
- Provide wider choice, mix, size, type, location and mixed communities.
- Make more efficient use of land and under utilised buildings.
- Reduce car dependency in residential development.

**Requirements and objectives to be integrated into the Plan**

SPD should not conflict with the objective of meeting the housing needs of the whole residential community.

**Implications for the SA**

SA will identify the social, environmental and economic implications of different housing types and identify the best from a sustainability perspective and any conflict with conservation policies.

**PPG 4 industrial, commercial development and small firms**

<http://www.communities.gov.UK/index.asp?id=1143926>

**Requirement or objectives**

- Encourage economic growth which is compatible with environmental objectives
- Give greater certainty as to types of development allowed in specific locations
- Commercial activity located where transport is most efficient and road traffic reduced
- Mixed use is acceptable and encouraged unless specific environmental adverse effects are likely. Optimum use should be made potential sites and existing premises.

**Requirements and objectives to be integrated into the Plan**

The needs of business and economic development need to be taken into account and considered along with environmental and social implications.

**Implications for the SA**

The SA will assist in identifying potential conflict between economic policies, the environment and social considerations.

<b>PPG 8 Telecommunications</b> <a href="http://www.communities.gov.UK/index.asp?id=1143926">http://www.communities.gov.UK/index.asp?id=1143926</a>		
<b>Requirement or objectives</b> <ul style="list-style-type: none"> <li>Facilitates the growth of telecommunication systems while keeping environmental impacts to a minimum, with particular concern for impacts upon buildings of architectural or historic importance.</li> <li>Take into account cumulative impact of multiple masts</li> <li>Location of mast relative to sensitive receptors</li> </ul>	<b>Requirements and objectives to be integrated into the Plan</b> The improvement of telecommunications should be balanced against the protection of the environment and society.	<b>Implications for the SA</b> Infrastructure provision needs to be taken into account from the impacts upon the environment, society and economic perspective.
<b>PPG 13 Transport</b> <a href="http://www.communities.gov.UK/index.asp?id=1144016#P13_304">http://www.communities.gov.UK/index.asp?id=1144016#P13_304</a>		
<b>Requirement or objectives</b> The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to: <ol style="list-style-type: none"> <li>promote more sustainable transport choices for both people and for moving freight;</li> <li>promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and</li> <li>reduce the need to travel, especially by car.</li> </ol>	<b>Requirements and objectives to be integrated into the Plan</b> The improvement of public transport, cycling and pedestrian provision needs to be taken into account when forming the SPD policies.	<b>Implications for the SA</b> Sustainable transport is vital for sustainable development and needs to be taken in to account and
<b>PPG 15 Planning and the Historic Environment</b> DoE and Department of National Heritage, 1994 Link: <a href="http://www.communities.gov.UK/index.asp?id=1144041">http://www.communities.gov.UK/index.asp?id=1144041</a>		
<b>Requirement or objectives</b> <ul style="list-style-type: none"> <li>Should be effective protection for all aspects of the historic environment</li> <li>The physical survival of our past is to be valued and protected as a central part of our cultural heritage.</li> </ul>	<b>Requirements and objectives to be integrated into the Plan</b> Need to protect historic buildings and especially to preserve or enhance the character or appearance of the conservation area underpins the SPD.	<b>Implications for the SA</b> Identify the most appropriate options for protection to conservation area whilst meeting social and economic needs
<b>PPG 16 Archaeology and Planning</b> DoE and Department of National Heritage, 1990 Link: <a href="http://www.communities.gov.UK/index.asp?id=1144057">http://www.communities.gov.UK/index.asp?id=1144057</a>		
<b>Requirement or objectives</b> <ul style="list-style-type: none"> <li>Archaeological remains are irreplaceable; they are vital evidence of past development of our civilisation.</li> <li>In particular care must be taken to ensure that archaeological remains are not needlessly or thoughtlessly destroyed.</li> </ul>	<b>Requirements and objectives to be integrated into the Plan</b> Need to meet the balance between protection and preservation off archaeological sites with the need to meet social and economic needs of an area.	<b>Implications for the SA</b> Identify the most appropriate options that protect archaeological sites while meeting social and economic needs.
<b>PPG17 Open space, sports and recreation</b> <a href="http://www.communities.gov.UK/index.asp?id=1143926">http://www.communities.gov.UK/index.asp?id=1143926</a>		
<b>Requirement or objectives</b> <ul style="list-style-type: none"> <li>Setting local standards for open space and identify extra provision requirements as well as improving access and existing facilities.</li> <li>Maintain an adequate supply of Open Space by protecting existing facilities (including playing fields), using development opportunities to</li> </ul>	<b>Requirements and objectives to be integrated into the Plan</b> SPD should be consistent with the objective of protection of open space as pressures on land increase across the City.	<b>Implications for the SA</b> Protection and enhancement of open space is important economically, socially as well as environmentally.

<p>improve open space and associated facilities, prevent the erosion of quality of open space, better management of open space.</p> <ul style="list-style-type: none"> <li>• New open space should taken in to account; accessibility, contribute to town centre vitality, improve the quality of public realm, provision of open space in commercial areas, safety, meet regeneration needs, social inclusion and needs of tourists</li> <li>• Use planning obligations to alleviate local deficiencies. Particularly where quality and/or quantity is threatened and local needs are increased.</li> </ul>		
<p><b>PPG 24 Planning and Noise</b>  <a href="http://www.communities.gov.UK/index.asp?id=1143926">http://www.communities.gov.UK/index.asp?id=1143926</a></p>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
<ul style="list-style-type: none"> <li>• Noise can have a significant effect on the environment and on the quality of life.</li> <li>• Development of specific land uses should be guided to appropriate locations.</li> <li>• Development plans should give developer and the community a degree of certainty about areas where particular types of development will be acceptable</li> </ul>	<p>Policies should take into account the impact of noise across the City. With particular focus on preventing noise generating land use being located near to noise sensitive land uses.</p>	<p>Need to ensure focus on minimising the impact of noise upon the local environment and community.</p>
<p><b>PPS 9 Biodiversity and Geographical conservation</b>  <a href="http://www.communities.gov.UK/index.asp?id=1143803">http://www.communities.gov.UK/index.asp?id=1143803</a></p>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
<ul style="list-style-type: none"> <li>• Sustain, maintain, restore and enhance biodiversity and environmental resources</li> <li>• Ensure appropriate significance in made to protected sites of biological importance</li> <li>• To accommodate biodiversity within new development, +recognising the link between nature conservation and a sense of well-being in the community.</li> <li>• This corresponds with biodiversities role in supporting economic diversification.</li> </ul>	<p>Policies need to take into account the need to protect and enhance biodiversity.</p>	<p>Identify which policy options will have the most positive effect on biodiversity.</p>
<p><b>PPS12 Local Development Framework ODPM 2004</b>  Link: <a href="http://www.communities.gov.UK/index.asp?id=1143847">http://www.communities.gov.UK/index.asp?id=1143847</a></p>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
<ul style="list-style-type: none"> <li>• Establishes the format and methodology to be employed to implement the new planning system documents.</li> </ul>	<p>Is a guiding PPS on the whole process so influence is paramount.</p>	<p>SA must comply with procedures as set out in this planning policy statement.</p>
<p><b>PPS 22 Renewable energy</b>  <a href="http://www.communities.gov.UK/index.asp?id=1143803">http://www.communities.gov.UK/index.asp?id=1143803</a></p>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>

<ul style="list-style-type: none"> <li>Statement of government policy concerning planning and development control of renewable energy developments.</li> <li>UK target to generate 10% of electricity from renewable sources by 2010, and 20% by 2020.</li> </ul>	Establishes targets for renewables. Endorses policies that actively encourage the inclusion of renewable energy in the energy mix. This needs to be balanced against the protection of the historic environment.	Policies need to employ the best option for promoting the uptake of renewable energy in new and existing buildings.
<b>PPS23 Planning and pollution control</b> <a href="http://www.communities.gov.UK/index.asp?id=1143803">http://www.communities.gov.UK/index.asp?id=1143803</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
<ul style="list-style-type: none"> <li>Consideration should be made to the quality of land, air and water and potential impacts from development</li> <li>Potential sensitivity to pollution – landscape, soil, air, water nature conservation.</li> <li>Reduce land use conflict caused by mixed use developments</li> <li>Compliance with statutory environmental quality standards</li> <li>Limit GHG emissions and take into account potential effects of Climate Change (including drainage)</li> <li>Cumulative impacts to be considered</li> </ul>	Impacts of existing pollution are minimised and that any new development does not increase pollution levels in general.	SA will identify options that allow development which minimise cause of environmental pollution
<b>Guidance on Conservation Area Appraisals and Guidance on the Management of Conservation Areas</b> English Heritage, 2005 Link: <a href="http://www.english-heritage.org.UK/server/show/nav.00100200800q005">http://www.english-heritage.org.UK/server/show/nav.00100200800q005</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
Sets out guidance for the preparation of conservation area appraisals and management of conservation areas	The format of the conservation area appraisal should be in conformity with this guidance.	
<b>Regional</b>		
<b>The London Plan</b> GLA 2001 Link: <a href="http://www.gov.UK/mayor/strategies/sds/plan_download.jsp">http://www.gov.UK/mayor/strategies/sds/plan_download.jsp</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
The Key Themes of the Plan are: <ol style="list-style-type: none"> <li>health of Londoner's</li> <li>equality of opportunity</li> <li>Contribute to sustainable development.</li> </ol> And six key objectives which are; <ol style="list-style-type: none"> <li>To accommodate 's growth within its boundaries without encroaching on open spaces.</li> <li>To make London a better city for people to live in.</li> <li>To make London a more prosperous city with strong and diverse economic growth.</li> <li>To promote social inclusion and tackle deprivation and discrimination.</li> <li>To improve accessibility.</li> <li>To make a more attractive, well-designed and green city.</li> </ol>	Conservation Area Audit should be in general conformity with the London Plan.	The London Plan has had a sustainability Appraisal carried out on it therefore policies that directly refer to it should be as sustainable as is practically possible.
<b>Mayor's Biodiversity Action Plan</b>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>

The Mayor's Biodiversity Strategy aims to protect and enhance the natural habitats of London together with their variety of species. The Strategy sets out the Mayor's vision for the future, identifying the key issues and providing innovative solutions. It demonstrates how biodiversity can be maintained as a crucial part of a sustainable world city.	Biodiversity needs to be taken into account by the Conservation Area Audit	Need to make sure biodiversity considerations have included in all the conservation areas policies
<b>The Draft View Management Framework GLA 2005</b> Link: <a href="http://www.gov.uk/mayor/strategies/sds/spg-views.jsp">http://www.gov.uk/mayor/strategies/sds/spg-views.jsp</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
Provides guidance and policies on the protection of London views.	Conservation Area Audits identify local views using criteria suggested in the guidance	Sustainability Objectives must identify the most appropriate options for the protection of views whilst allowing for social and economic development.
<b>Local</b>		
<b>Unitary Development Plan</b> Westminster City Council , 1997 and 2004 (RUDP) <a href="http://www.Westminster.gov.uk/environment/planning/unitarydevelopmentplan/">http://www.Westminster.gov.uk/environment/planning/unitarydevelopmentplan/</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
The UDP sets out planning policies for developing land, improving transport and protecting the environment for the next 10 – 15 years. It advises people on the types of development likely to get planning permission. It gives guidance for planners when deciding on planning applications and the basis by which planning decisions are defended at public enquiry	Until the adoption of the LDF, the RUDP policies will set the foundation or stating point for the policies that are included within the conservation area audit. There consideration is obviously imperative	Monitoring of UDP policies provides much of the evidence base and baseline for the SA
<b>Westminster City Council's Community Strategy – The City Plan 2006-16 (draft)</b> <a href="http://www.Westminster.gov.uk/councilgovernmentanddemocracy/councils/partnerships/upload/CityPlanFinal.pdf">http://www.Westminster.gov.uk/councilgovernmentanddemocracy/councils/partnerships/upload/CityPlanFinal.pdf</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
The City Plan sets a vision for the future and outlines key aims and priorities to achieve this vision over the next ten years. It does this by establishing the four key goals, with the priorities to achieve these goals which are: 1.An Improving City Environment • A safer city • A more sustainable, cleaner and greener city • A well-designed and distinctive city 2.Better Life Chances for All Our Citizens • A better city for children and young people • A city of opportunity meeting the aspirations of all our citizens • A strong and economically thriving city built in partnership with business 3.Cohesive communities and engaged citizens • A more united city • A stronger voice for local people 4.Customer Tailored Services. • Accessible services • Locally-focused services	The Community Strategy identifies the policy options to which all other policy documents should contribute. Conservation Area Audits must therefore align with these.	As the City Plan is designed to encourage economic, social and environmental well being of the city the policies it affects should be sustainable.



<b>Sustainable Buildings SPG</b> <a href="http://www.Westminster.gov.UK/environment/planning/sitesandprojectspolicies/spg.cfm">http://www.Westminster.gov.UK/environment/planning/sitesandprojectspolicies/spg.cfm</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
Advises on the life cycle of building projects, including the basic principles of sustainable construction. Key goal is to enable the environmental performance and quality of design of buildings in the city to be improved.	The objectives of the SPD should be embraced within the Conservation Area Audits, so that the impact upon the environment from new development is reduced and social as well as economic consideration are taken into account.	The SPD objectives will be supported by the SA as it assists in policy selection that contribute to sustainable development.
<b>Design Matters in Westminster City Council</b> <a href="http://www3.Westminster.gov.UK/planningpublications/cf-results.cfm">http://www3.Westminster.gov.UK/planningpublications/cf-results.cfm</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
Sets out the councils policies with regards to design of new buildings in Westminster, including accessibility, sustainability and context.	Need to promote high quality design and materials, sensitive to the local context	SA objectives should incorporate these themes
<b>Development and Demolition in Conservation Areas SPG Westminster City Council</b> <a href="http://www3.Westminster.gov.UK/planningpublications/cf-results.cfm">http://www3.Westminster.gov.UK/planningpublications/cf-results.cfm</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
Sets out the city council's policies and guidance with regards to development and demolition in conservation areas.	Retention of unlisted buildings of merit, original architectural detail and features which contribute to the character of the conservation area.	SA objectives must incorporate these themes.
<b>Roofs – A Guide to Alterations and Extensions on Domestic Buildings Westminster City Council</b> <a href="http://www3.Westminster.gov.UK/planningpublications/cf-results.cfm">http://www3.Westminster.gov.UK/planningpublications/cf-results.cfm</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
Sets out the city council's policy with regards to alteration and extension of roofs.	Original historic roof forms shall be retained where appropriate and new design sensitive to historic context	SA objectives must incorporate these themes.
<b>Shopfronts, Blinds and Signs, Westminster City Council</b> <a href="http://www3.Westminster.gov.UK/planningpublications/cf-results.cfm">http://www3.Westminster.gov.UK/planningpublications/cf-results.cfm</a>		
<b>Requirement or objectives</b>	<b>Requirements and objectives to be integrated into the Plan</b>	<b>Implications for the SA</b>
Sets out the city council's policy with regards to alterations to shopfronts.	Shop front and signs should be designed with respect to the architecture and character of the area. The shop front must be seen as an integral part of the building. Seek to prevent loss of traditional shopfronts, reinstate features where missing in any scheme for a new shop front. T	Need to balance economic and environmental objectives.
<b>Westminster Biodiversity Action plan, Westminster City Council, 2000</b> <a href="http://www3.Westminster.gov.UK/publications/publications_detail.cfm?ID=691">http://www3.Westminster.gov.UK/publications/publications_detail.cfm?ID=691</a>		

Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
Identifies priority Species and Habitats For Protection In Westminster - Sets out a series of Action Plans covering this.	Protection of priority species and habitats	Assess the effectiveness of audit in combining aims of built environment and nature conservation.
<b>Westminster Way- A Public Realm Manual for the City, Westminster City Council, 2004</b> <a href="http://www3.Westminster.gov.UK/publications/publications_detail.cfm?ID=1114">http://www3.Westminster.gov.UK/publications/publications_detail.cfm?ID=1114</a>		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
A manual for design of public realm in Westminster	Use of high quality materials and high standard of design contributing to an accessible, sustainable and attractive public realm, in keeping with the character of the conservation area.	Need to assess sustainability of materials and contribution of high quality public realm to economic and social as well as environmental objectives
<b>Air Quality Strategy for Westminster</b> <a href="http://www.Westminster.gov.UK/environment/pollution/airpollution/airqualityinfo.cfm">http://www.Westminster.gov.UK/environment/pollution/airpollution/airqualityinfo.cfm</a>		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> <li>• To reduce emissions from the most polluting vehicles by working with the Mayor and London boroughs to implement a low emission zone</li> <li>• To reduce traffic and discourage unnecessary car journeys through traffic control and restraint based parking policies</li> <li>• To promote the use of alternative road fuels such as gas, fuel cells and electricity in general, but especially in council vehicles, contractors vehicles, buses, taxis, light vans.</li> <li>• To promote the development of a refuelling infrastructure for alternative fuels in Westminster and central London</li> <li>• To enforce emissions standards through: the roadside emissions testing programme, and the stationary vehicles offence - working with other London local authorities.</li> <li>• To promote alternative modes of transport to the private car including walking, cycling and public transport</li> <li>• To reduce the impact of development on traffic emissions</li> <li>• To minimise emissions caused by building activities</li> <li>• To minimise emissions caused by the use of buildings</li> <li>• To monitor air quality</li> <li>• To raise public awareness</li> <li>• To work in partnership with others</li> </ul>	The objectives need to be integrated and supported by the plan so that new development has a minimal impact upon air pollution.	Policies that minimise the impact upon air quality need to be identified by the SA.
<b>Economic Development Strategy</b> <a href="http://www.Westminster.gov.UK/Business/economicdevelopment/upload/EDS%20final.pdf">http://www.Westminster.gov.UK/Business/economicdevelopment/upload/EDS%20final.pdf</a>		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA

Has three key objectives; 1. Supporting Business and Enterprise 2. Business friendly City Management 3. Promoting Employability.	<ul style="list-style-type: none"> <li>A clean and safe environment creating the right conditions for businesses to succeed and thrive.</li> <li>Provide businesses and employers with the skills that they need on their doorstep.</li> </ul>	SA needs to select options that support environmental protection, are socially responsible as well as allowing economic development.
<b>Open Space SPG</b> <a href="http://www.Westminster.gov.UK/environment/planning/ldf/documents/oss.cfm">http://www.Westminster.gov.UK/environment/planning/ldf/documents/oss.cfm</a>		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>The key objectives of the Open Space Strategy are to improve the quality, management, accessibility and usage of parks and other open spaces in the City.</p> <p>Provide new facilities where there are deficits in provision and also provide well maintained, quality open spaces which are safe and attractive to all</p>	Open space is important and needs protection as the pressures on land increase through out the city.	The objectives and actions of the open Space Strategy therefore need to be taken into account.
<b>Nature Conservation Strategy (1997)</b> <a href="http://www.Westminster.gov.UK/environment/landandpremises/conservation/index.cfm">http://www.Westminster.gov.UK/environment/landandpremises/conservation/index.cfm</a>		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>Strategy developed to ensure that valuable resource protected for the benefit of everyone in the city.</p> <p>Key aims are</p> <ol style="list-style-type: none"> <li>Protect existing habitats and create new opportunities for wildlife.</li> <li>Encourage wildlife through the sympathetic management of green spaces.</li> <li>Improve public access to and understanding of nature in the city.</li> <li>Monitor progress.</li> </ol>	Policies need to safe guard and protect and enhance important habitats and biodiversity	Sustainability appraisal must highlight any policies that would have a detrimental impact on biodiversity measures
<b>Emerging Supplementary Planning Guidance on Inclusive Access and Design, Westminster City Council (2006)</b>		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
Encourage provision of access for all as part of new development and refurbishment schemes	Policies need to safeguard the environment with	Need to balance safeguarding the environment with social considerations and providing inclusive access for all

**Appendix 3: Sustainability Appraisal Objectives**

## Appendix 2 Sustainability Appraisal Objectives

Number	Sustainability Objective	Sub-objective	Indicators
1	Reduce poverty and social exclusion	<ul style="list-style-type: none"> <li>• Improve the economic opportunities for excluded people and communities</li> <li>• Reduce poverty and social exclusion in those areas most affected</li> <li>• Improve affordability to essential services to the home</li> <li>• Improve affordability of housing</li> </ul>	<ul style="list-style-type: none"> <li>• Census levels of deprivation</li> <li>• Proportion of the population living in deprived areas</li> <li>• Proportion of children in low income families</li> <li>• Proportion of people claiming benefits</li> <li>• Proportion of the population of working age in full-time employment</li> <li>• Levels of fuel poverty</li> </ul>
2	Improve health and well-being	<ul style="list-style-type: none"> <li>• Improve the health and well-being of the population</li> <li>• Provide, protect and improve health facilities</li> <li>• Reduce health inequalities</li> <li>• Encourage healthy lifestyles</li> <li>• Maximise the safety of streets for pedestrians, cyclists &amp; motorists</li> <li>• Provide facilities for sport and recreation</li> <li>• Provide and ensure access to open space</li> </ul>	<ul style="list-style-type: none"> <li>• Average life expectancy of population</li> <li>• Mortality rates by cause</li> <li>• Working days lost through illness</li> <li>• NHS hospital waiting lists</li> <li>• Access to a GP</li> <li>• Access to a hospital</li> <li>• Levels of health inequalities</li> <li>• Levels of participation in sport and cultural activities</li> <li>• Proportion of journeys on foot or by bicycle</li> <li>• Proportion of school children travelling to school, by mode of transport</li> <li>• Access to green space</li> <li>• Number of pedestrian, cyclists and motorist accidents</li> <li>• Percentage of resident population describing their health as 'not good'</li> </ul>
3	Improve availability of decent homes	<ul style="list-style-type: none"> <li>• Reduce homelessness</li> <li>• Increase the range of housing and increase housing choice for all</li> <li>• Increase the affordability of housing for all</li> <li>• Improve the quality of housing</li> </ul>	<ul style="list-style-type: none"> <li>• Levels of homelessness</li> <li>• Proportion of the population living in temporary accommodation</li> <li>• Affordability of housing in comparison to earnings</li> <li>• Levels of availability of good quality housing for all social groups</li> <li>• Housing completion figures</li> <li>• Affordable housing completion figures</li> <li>• Proportion of homes judged unfit to live in</li> </ul>
4	Reduce anti-social activity and remove the fear of crime	<ul style="list-style-type: none"> <li>• Improve community safety and establish conditions that discourage crime</li> <li>• Encourage safer environments through</li> <li>• Reduce actual crime levels and fear of crime design</li> <li>• Reduce actual noise levels and noise concerns resulting from anti-social behaviour</li> <li>• Reduce the impact of anti-social behaviour on the environment</li> </ul>	<ul style="list-style-type: none"> <li>• Crime levels</li> <li>• Fear of crime amongst the local and visiting populations</li> <li>• Noise levels and complaints</li> <li>• Litter levels</li> <li>• Number of Anti-social Behaviour Orders (ASBOs) issued</li> <li>• Level of race-related crime</li> </ul>
5	Improve sense of community identity and welfare and the quality of where people live	<ul style="list-style-type: none"> <li>• Encourage a sense of community and place, and embrace diversity</li> <li>• Provide, protect and improve religious facilities</li> <li>• Encourage development of and participation in cultural, creative and sporting activity</li> <li>• Support local activities and crafts</li> <li>• Protect, provide and improve community meeting places</li> <li>• Protect and improve sports, play and recreation facilities</li> <li>• Encourage active involvement in local decision making and voluntary activities</li> <li>• Support cross-cultural integration</li> <li>• Improve resident and visitor satisfaction with where they live</li> <li>• Improve the legibility of streets for all pedestrians</li> <li>• Ensure a mix of land uses</li> <li>• Protect and improve cultural provision</li> <li>• Protect and improve provision and quality of open spa</li> <li>• Provide, protect and improve childcare facilities and access to open spaces</li> <li>• Protect and improve provision of wildlife, and improve access to it where appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Levels of engagement in community activities</li> <li>• Levels of engagement in voluntary activities</li> <li>• Levels of resident satisfaction, participation and sense of well-being</li> <li>• Proportion of the population that are or feel they can be involved in local decision making</li> <li>• Proportion of the population who feel their local area is a place where people from different backgrounds and communities can live together harmoniously</li> <li>• Proportion of residents who are satisfied with their neighbourhood as a place to live</li> <li>• Mix of appropriate land uses</li> <li>• Number of cultural events held</li> <li>• Number and type of cultural facilities available;</li> <li>• Additions and improvements made to open spaces</li> <li>• Number, accessibility and affordability of child care facilities;</li> <li>• Levels of biodiversity</li> <li>• Areas of wildlife protected</li> </ul>

6	Reduce unemployment and Improve education and skills	<ul style="list-style-type: none"> <li>• Reduce unemployment both short and long-term</li> <li>• Facilitate the creation and sustaining of employment, particularly where appropriate for the local population</li> <li>• Provide opportunities for those most in need of employment</li> <li>• Help improve work/life balance</li> <li>• Help improve earnings</li> <li>• Increase opportunity for rewarding and satisfying employment</li> <li>• Provide, protect and improve education facilities</li> <li>• Facilitate development of local skills</li> <li>• Develop and improve opportunities for lifelong learning</li> </ul>	<ul style="list-style-type: none"> <li>• Overall levels of unemployment</li> <li>• Proportion of people of working age who are in work</li> <li>• Proportion of people of working age who are unemployed</li> <li>• Proportion of lone parents, long-term ill and disabled people who are economically active and claiming benefits</li> <li>• Proportion of ethnic minorities in full-time employment</li> <li>• Average hours worked by people in employment</li> <li>• Average earning for full-time employees</li> <li>• Qualifications achieved by the population</li> <li>• Proportion of the population with no qualifications</li> <li>• Proportion of the adult population participating in learning</li> </ul>
7	Increase accessibility to essential services and community facilities	<ul style="list-style-type: none"> <li>• Improve access to buildings and ease of movement for all</li> <li>• Improve interchanges between streets and buildings, with regard to levels, widths and obstructions</li> <li>• Encourage developments that improve the quality of the spaces between buildings</li> <li>• Improve access between housing, jobs, services and amenities</li> <li>• Improve provision of public transport</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of residents within walking distance (500m/15mins) of key local services (post office, food shop, GP, primary school)</li> <li>• Childcare spaces available per 1,000 population</li> <li>• Levels of new retail floorspace</li> <li>• Availability of public transport</li> </ul>
8	Improve air quality	<ul style="list-style-type: none"> <li>• Reduce direct emissions of local air</li> <li>• Reduce combustion of natural resources pollutants</li> <li>• Encourage and facilitate the use of low emission technology and fuels</li> </ul>	<ul style="list-style-type: none"> <li>• Number of days per year of air pollution</li> <li>• Levels and concentrations of pollutants in the air</li> <li>• Levels and concentrations of emissions</li> <li>• Levels of use of low emission technology and fuels</li> <li>• Planning permissions granted for solar panels and alternative energy sources</li> </ul>
9	Reduce contributions to climate change and vulnerability to impacts, including flooding	<ul style="list-style-type: none"> <li>• Reduce direct emissions of greenhouse gases</li> <li>• Reduce emissions of ozone depleting substances</li> <li>• Encourage use of renewable energy to minimise use of finite resources</li> <li>• Minimise non-renewable energy consumption</li> <li>• Protect against storm damage</li> <li>• Protect against potential river flooding and flash flooding</li> <li>• Reduce the risk of subsidence</li> <li>• Protect the microclimate</li> </ul>	<ul style="list-style-type: none"> <li>• Levels of CO2 emissions</li> <li>• Levels of renewable and non-renewable energy use</li> <li>• Thermal efficiency of the building stock</li> <li>• Energy efficiency of road passenger travel</li> <li>• Energy efficiency of rail passenger travel</li> <li>• Energy efficiency of freight distribution</li> <li>• Depletion of fossil fuels</li> <li>• Depletion of ozone</li> <li>• Sale/use of ozone depleting substances</li> <li>• Frequency of fluvial flood events</li> <li>• Development in the floodplain</li> <li>• Amount of land affected by subsidence</li> <li>• Works undertaken for flood prevention</li> <li>• Works undertaken to protect from storm damage</li> <li>• Amount of fossil fuels used</li> </ul>
10	Protected and enhance open space and conserve soil resources and quality	<ul style="list-style-type: none"> <li>• Reduce use of minerals, materials and resources</li> <li>• Use minerals, materials and resources more efficiently</li> <li>• Ensure that contamination of land is prevented or remedied</li> </ul>	<ul style="list-style-type: none"> <li>• Levels of minerals, materials and resources</li> <li>• Levels of contaminated land</li> <li>• Net loss of soils to development</li> <li>• Levels of soil quality</li> <li>• Amount of contaminated land remediated</li> </ul>
11	Minimise production and harmful effects of waste	<ul style="list-style-type: none"> <li>• Minimise use of resources and materials</li> <li>• Conserve manufactured resources</li> <li>• Reduce waste generation</li> <li>• Reduce hazardous waste</li> <li>• Encourage more efficient use of resources</li> <li>• Encourage use of renewable materials and resources</li> <li>• Encourage use of once-used and recycled materials</li> <li>• Enable recovery of energy from waste</li> <li>• Ensure careful and efficient collection and storage of waste</li> <li>• Enable collection of used resources and materials so they can be recycled</li> <li>• Enable environmentally satisfactory disposal of waste</li> </ul>	<ul style="list-style-type: none"> <li>• Levels of materials consumption per person</li> <li>• Levels of waste generated in total and per household</li> <li>• Levels of material recycling in total and per household</li> <li>• Destination of all waste and that just from households i.e. recycling, composting, used to recover energy, landfill</li> <li>• Source of materials used in total and just within households i.e. recycled, re-used</li> <li>• Levels of hazardous waste</li> <li>• Compliance with EU Landfill Directive</li> </ul>

12	Protect, maintain and enhance biodiversity, flora and fauna and improve water quality	<ul style="list-style-type: none"> <li>• Protect designated nature conservation sites of national, metropolitan and local significance</li> <li>• Protect and enhance habitats and buildings that benefit wildlife, such as gardens, trees, rivers, water bodies and wild spaces</li> <li>• Protect and provide priority habitats</li> <li>• Protect and provide for priority species</li> <li>• Protect and enhance open spaces</li> <li>• Prevent pollution of water bodies and courses</li> <li>• Improve the quality of water bodies and courses</li> </ul>	<ul style="list-style-type: none"> <li>• Achievement of Biodiversity and Species Action Plan targets at National and Westminster levels</li> <li>• Changes in priority habitats</li> <li>• Changes in populations of priority animal species</li> <li>• Trends in plant biodiversity</li> <li>• Population of wild birds</li> <li>• Number of habitat enhancement projects in open spaces</li> <li>• Levels of marine life in water bodies and water courses</li> <li>• Levels of dangerous substances found in water</li> <li>• Levels of nutrients found in water</li> <li>• Levels of pathogens in water</li> <li>• Amount of dissolved oxygen in water</li> <li>• Number of significant pollution events in the river Thames</li> <li>• Number of incidents of accidental/deliberate release of pollutants into water bodies</li> </ul>
13	Conserve and enhance the historic environment and the quality of landscapes and townscapes	<ul style="list-style-type: none"> <li>• Encourage repair, maintenance and protection of historic buildings and structures</li> <li>• Protect public art, monuments, statues and their settings</li> <li>• Protect and enhance sites, features and areas of cultural value</li> <li>• Preserve and enhance historic parks and gardens</li> <li>• Protect and conserve the archaeological resources</li> <li>• Improve the legibility of streets for all</li> <li>• Improve ease of movement for all</li> <li>• Ensure high quality visual streetscape and buildings</li> <li>• Preserve and enhance the character and fabric of conservation areas</li> <li>• Reduce street clutter</li> <li>• Ensure clean streets</li> </ul>	<ul style="list-style-type: none"> <li>• Loss or damage to listed buildings and their settings</li> <li>• Loss or damage to scheduled ancient monuments and their settings</li> <li>• Loss or damage to historic parks and gardens and their settings</li> <li>• Loss or damage to historic landscapes and their settings</li> <li>• Percentage of conservation area demolished or otherwise lost</li> <li>• Loss or damage to historic view lines/strategic views and vistas</li> <li>• Levels of loss or damage to public art, monuments, statues and their settings</li> <li>• Measures in place to protect and conserve archaeological resources</li> <li>• Measures to protect historic view lines/strategic views and vistas</li> <li>• Level of street legibility</li> <li>• Quality of visual streetscape</li> <li>• Changes in character of the conservation areas</li> <li>• Proportion of new homes built on previously developed land</li> <li>• Proportion of vacant land and properties</li> <li>• Proportion of streets that are clean/litter free</li> <li>• Improvements to the number/types of street furniture and signage</li> <li>• Number of street obstructions/obstacles</li> </ul>
14	Reduce the need to travel and the use of the car.	<ul style="list-style-type: none"> <li>• Encourage a reduction in travel and use of alternatives to powered transport</li> <li>• Encourage use of energy efficient transport modes</li> <li>• Reduce the need to travel, especially by private car</li> <li>• Encourage walking and cycling and other forms of sustainable travel</li> <li>• Integrate new development schemes with public transport</li> <li>• Provide infrastructure to enable efficient, optimal use of public transport, accessible to all</li> <li>• Reduce the impact of service and delivery vehicles on congestion and levels of pollution</li> <li>• Reduce congestion and minimise the intrusion of all vehicles in working and residential areas</li> <li>• Reduce traffic noise</li> <li>• Encourage use of sustainable river transport facilities</li> <li>• Optimise access for emergency vehicles on all routes</li> <li>• Encourage greater use of renewable cleaner fuels</li> <li>• Reduce the impact of passenger vehicles on congestion and levels of pollution</li> </ul>	<ul style="list-style-type: none"> <li>• Volume of traffic on all roads</li> <li>• Volume of traffic on principle roads</li> <li>• Volume of heavy goods vehicles</li> <li>• Level of congestion</li> <li>• Level of traffic noise</li> <li>• Passenger travel by modes</li> <li>• Reasons for travel mode choices</li> <li>• Level of integration of new development schemes with public transport</li> <li>• Leisure trips by mode of transport</li> <li>• Proportion of trips made using alternative powered transport</li> <li>• Proportion of trips made using energy efficient transport modes</li> <li>• Level of investment in and use of sustainable water transport facilities</li> <li>• Levels of CO2 emissions</li> <li>• Levels of renewable and non-renewable energy use</li> <li>• Energy efficiency of road passenger travel</li> <li>• Energy efficiency of rail passenger travel</li> <li>• Energy efficiency of freight distribution</li> <li>• Depletion of fossil fuels</li> <li>• Amount of fossil fuels used</li> <li>• Number of Section 106 agreements for contributions to, or infrastructure provided for improving public transport</li> </ul>
15	Require energy efficient buildings and provide for sustainable sources of water supply	<ul style="list-style-type: none"> <li>• Ensure design of buildings and structures are resource efficient</li> <li>• Ensure buildings and structures are designed to be energy efficient</li> <li>• Ensure buildings and structures adaptable for re-use</li> </ul>	<ul style="list-style-type: none"> <li>• Proportion of new buildings considered to be energy efficient</li> <li>• Proportion of building stock adaptable for re-use</li> <li>• Proportion of building stock safe-guarded for re-use</li> </ul>
16	Encourage sustainable economic growth	<ul style="list-style-type: none"> <li>• Ensure that the strength of the economy is maintained and further sustainable growth is enabled and accommodated</li> <li>• Assist business development</li> </ul>	<ul style="list-style-type: none"> <li>• Change in the number of businesses in the area</li> <li>• Levels of productivity</li> <li>• Indicators of competitiveness</li> </ul>

		<ul style="list-style-type: none"> <li>• Enhance competitiveness</li> <li>• Promote growth in key sectors</li> <li>• Promote tourism</li> <li>• Encourage indigenous business</li> <li>• Encourage inward investment</li> <li>• Make land and property available for business development</li> <li>• Promote innovation and enterprise</li> </ul>	<ul style="list-style-type: none"> <li>• Survival rates of new and established businesses</li> <li>• Diversity of economic sectors</li> <li>• Relative employment/output growth in different economic sectors</li> <li>• Long term economic growth of GDP (gross domestic product)</li> <li>• Number of new businesses opening and existing ones closing</li> <li>• Growth of local business by number of employees and turnover</li> <li>• Investment levels from UK owned companies</li> <li>• Investment levels from overseas owned companies</li> <li>• Amount of employment land available</li> <li>• Number of business applications granted planning consent</li> <li>• Image indices derived from consultation with businesses and the public</li> <li>• Volume of new investment</li> </ul>
17	Reduce impacts from noise	<ul style="list-style-type: none"> <li>• Reduce generation of noise from all activities</li> <li>• Reduce generation of noise from all premises</li> <li>• Reduce emissions of noise from transport related activities</li> <li>• Reduce emissions of noise into properties</li> </ul>	<ul style="list-style-type: none"> <li>• Levels of noise generated from commercial premises and activities</li> <li>• Levels of noise generated from residential premises</li> <li>• Levels of noise emitted from transport related activities</li> <li>• Levels of noise imitated into properties</li> <li>• The number of noise complaints received</li> </ul>
18	To ensure the plan does not negatively effect existing Westminster residents		



#### Appendix 4: Appraisal of strategic Options

Sustainability objectives	Option 2	Option 1	Comments and time-frame of effects
To create cohesive, inclusive and safe communities, with appropriate levels of social and community facilities.	?	0	By taking positive action to record and highlight the local environment and encourage local communities in the process, this may have minor positive impacts in terms of strengthening community identification with and pride in the local area, which may contribute to more cohesive communities.
To reduce the fear of crime and actual crime.	+	0	The document will take positive action in promoting a well-designed and attractive environment which will have minor positive benefits in the medium term in terms of enhancing the image of the area and the community's sense of identity and reducing fear of crime
To ensure the provision of appropriate housing types to meet homeless, affordable, intermediary, over crowding and family unit demands.	0	0	The recording of special architectural and historic interest of the areas will not have any impacts on housing provision.
To promote and improve health and well-being.	+	0	The document will take positive action in promoting a well-designed and attractive environment which will have minor positive benefits in the medium and long term on the quality of the environment which contributes to a sense of well-being.
To reduce greenhouse gas emissions and support climate change adaptation	0	0	The recording of special architectural and historic interest of the areas will not have any impacts on greenhouse gas emissions.
To require the application of sustainable design and construction in all new developments and refurbishment of existing buildings.	0	0	The recording of special architectural and historic interest of the areas will not have any impacts on sustainable design and construction.

<b>To minimise flood risk, promote sustainable urban drainage and protect surface and ground water quality.</b>	<b>0</b>	<b>0</b>	The recording of special architectural and historic interest of the area will not have any impacts on flooding.
<b>To protect, enhance and create environments that encourages and support biodiversity.</b>	<b>+</b>	<b>0</b>	The recording of special architectural and historic interest of the area will not have significant impacts on biodiversity, although the protection of trees may have minor positive benefits in the medium term.
<b>To improve air quality.</b>	<b>0</b>	<b>0</b>	The recording of special architectural and historic interest of the area will not have any impacts on air quality.
<b>To reduce the impact of noise.</b>	<b>0</b>	<b>0</b>	The recording of special architectural and historic interest of the area will not have any impacts on noise
<b>To reduce the need to travel and use of private motorised vehicular transport as well as encouraging walking, cycling and the use of public transport.</b>	<b>0</b>	<b>0</b>	The recording of special architectural and historic interest of the area will not have any impacts on reducing the need to travel.
<b>To reduce waste production and increase recycling and recovery of all waste.</b>	<b>0</b>	<b>0</b>	The recording of special architectural and historic interest of the area will not have any impacts on waste production, recycling and recovery of waste
<b>To protect and enhance the historic environment and architectural, archaeological and cultural heritage.</b>	<b>++</b>	<b>0</b>	Guidance on the architectural and historic character of the conservation area will have a major positive impact in the medium term on the ability to conserve and enhance the character of the conservation area.
<b>To enhance the public realm and street environment.</b>	<b>++</b>	<b>0</b>	Guidance on the architectural and historic character will promote the protection of features of interest in the public realm as well as public realm enhancements and will have a positive impact in the medium term.

<b>To protect, enhance and seek opportunities to increase open space throughout the borough.</b>	<b>+</b>	<b>0</b>	The guidance will have a positive impact in the medium term on protection of existing areas of historic open space, although it will not increase open space.
<b>To ensure equality of opportunity and improve opportunities for education, training and employment.</b>	<b>0</b>	<b>0</b>	The recording of special architectural and historic interest of the area will not have any impacts on equality of opportunity and training.
<b>To maintain economic diversity, increase local opportunity and support sustainable economic growth.</b>	<b>+</b>	<b>0</b>	By recording and highlighting the architectural and historic interest of the conservation area there is likely to a minor positive effect in the long term on the enhancement of the area's image for business and tourism.

## Appendix 5: Summary of the impacts of the draft SPD

SA Objectives	Criteria for appraisal	Score	Comment / observation: effects and mitigation
<b>1. To create cohesive, inclusive and safe communities with appropriate levels of social and community facilities</b>	Improve the economic opportunities for excluded people and communities	0	Westminster's conservation policies, as set out in the Broadway and Christchurch Gardens Audit, make a positive contribution to Westminster's economic performance in general, by creating an attractive, desirable place in which to live, visit and do business. It is likely, though not proven, that this improvement to economic performance extends beyond the boundaries of the conservation area, and is of benefit to excluded people throughout Westminster
	Reduce poverty and social exclusion in those areas most affected	0	There standard of living is high in the vicinity of the Broadway and Christchurch Gardens Conservation Area. IMD scores are low, ranging from 11 – 15 across the area. It is not anticipated the audit will affect this situation.
	Improve affordability of essential services to the home	0	The conservation area audits are unlikely to have an impact on affordability of essential services
	Improve affordability of housing	—?	There is little opportunity for the conservation area audit to influence the availability of affordable housing. Conservation measures may well serve to maintain or increase property prices.
<b>2. To promote and improve health and well-being</b>	Improve the health and well-being of the population	+	A quality environment, such as that promoted by the conservation area audit, has a positive effect on health and wellbeing.
	Provide, protect and improve health facilities	0	No impact.
	Reduce health inequalities	0	Encouraging protection and enhancement of the conservation area is unlikely to have an impact on health inequalities
	Encourage healthy lifestyles	0	It is not anticipated that the audit will have any impact on encouraging healthy lifestyles
	Maximise the safety of streets for	0	Whilst the audit encourages reduction in street clutter which may increase accessibility for pedestrians, it will have little impact on

	pedestrians, cyclists & motorists		cyclists and motorists, and overall is considered to have a neutral impact.
	Provide facilities for sport and recreation	0	It is not anticipated that the audit will have any impact on provision of leisure facilities
	Provide and ensure access to open space	+	The audit recognises the importance of open space to the character of the area.
<b>3. To ensure the provision of appropriate housing types to meet homeless, affordable, intermediary, over crowding and family unit demands</b>	Reduce homelessness	0	The audit will have no impact, either positive or negative, on homelessness.
	Increase the range of housing and increase housing choice for all	0	The audit, in identifying the majority of pre-war properties as unsuitable for demolition helps to maintain the historic mix of building types. However, it is not considered the audit will have any significant impact on housing choice.
	Improve the quality of housing	++	Ensuring high design quality of both new and existing buildings is a primary function of the Audit. New buildings in the conservation area should be designed to the highest standard, and should sit happily in their context. Works to existing buildings should always maintain or enhance the quality of those buildings.
<b>4. To reduce both the fear of crime and actual crime</b>	Improve community safety and establish conditions that discourage crime	+	A high quality, well designed and maintained environment is less likely to be the location for crime. A good mix of residential and employment uses ensure that surveillance of the area is constant.
	Encourage safer environments through good design	+	The audit seeks to promote the highest standards of design within the conservation area and as such should also contribute to safer environments.
	Reduce actual crime levels and fear of	+	The conservation audit discourages overly obtrusive security measures which serve to foster fear of crime. Solid roller shutters,

	crime		high boundary walls, security fencing and cctv cameras can all contribute to an exaggerated perception of the risk of crime. These environmental approaches to crime reduction are discouraged in the Audit. A well-designed environment should help to reduce fear of crime.
	Reduce actual noise levels and noise concerns resulting from anti-social behaviour	0	The audit is not likely to have significant effects in this area. Improving the quality of places can help to reduce anti social behaviour, however.
	Reduce the impact of anti-social behaviour on the environment	+	High quality environments discourage anti social behaviour. Environmental improvement resulting from policies in the audit will encourage people to value their surroundings.
<b>5. To reduce greenhouse gas emissions and support climate change adaptation</b>		0	No significant effects are anticipated as a result of the Broadway and Christchurch Gardens Audits. As noted below, the preference for architecturally appropriate timber or steel windows can lead to suboptimal thermal performance. This can be mitigated in numerous ways – by the use of double glazed units where possible, or by the use of secondary glazing and other insulation measures.
<b>6. To ensure equality of opportunity and improve opportunities for education, training and employment</b>	Facilitate the creation of sustainable employment particularly where matched to the needs of the local population	0	The economic benefits of a well maintained historic district could include encouraging investment. This is not proven.
	Provide opportunities for those most in need of employment	0	Whilst the conservation policies contained in the Audits may encourage inward investment and other economic benefits, this is unlikely to have specific impacts on those most in need.
	Help improve	+	The land use section of the audit encourages the current mix of

	work/life balance		uses, with an emphasis on the residential character of the area. City centre living contributes to a better work life balance by reducing travel time between home and work.
	Help improve earnings	0	The audits are unlikely to have any impact on earnings.
	Increase opportunity for rewarding and satisfying employment	0	The audits are unlikely to have any impact on local employment
	Provide, protect and improve education facilities	0	The audits are unlikely to have any impacts on educational facilities
	Facilitate development of local skills	0	The audits are unlikely to have any impacts on local skills, though the national conservation agenda, of which conservation area appraisals such as the Broadway and Christchurch Gardens audits form a part, is driving a resurgence in craft skills.
	Develop and improve opportunities for lifelong learning	+	Whilst not intended as an educational document, the Broadway and Christchurch Gardens Conservation Area Audits can and does function as such. It contains historical information, numerous photographs and a useful glossary. The document is useful to those pursuing local studies, as well as planning and conservation students.
<b>7. To enhance the public realm and street environment</b>		++	The conservation area audits have dedication sections relating to the preservation and enhancement of the historic public realm, including specifically historic street furniture and historic street surfaces. Both of these, together with a co-ordinated approach to street furniture serve to improve the public realm. Other improvements to the public realm are promoted in the audit, including reduction of street clutter and preservation of important street trees
<b>8. To improve air quality</b>	Reduce direct	0	The conservation area audit is unlikely to have an effect on

	emissions		emissions
	Reduce combustion of natural resources pollutants	0	
	Encourage and facilitate the use of low emission technology and fuels	-	By encouraging the protection and enhancement of the historic environment, the Broadway and Christchurch Gardens Conservation Area Audits may prevent certain visually intrusive forms of technology such as the installation of on site micro generation. Rooftop plant is discouraged, as is the visual clutter caused by pipes, wires and flues. Intrusive elements at roof level or on facades are also discouraged. These measures could be a bar to the installation of wind turbines and solar cells and biomass boiler flues. However, with careful siting it may often be possible to install low emission technology. An appendix to the SPD could provide information on sustainable technologies that would not have an impact on the appearance of conservation area and effects of this will be monitored.
<b>9. To protect, enhance and seek opportunities to increase open space throughout the borough</b>	Protect and enhance open space	+	The audit specifically encourage the protection and enhancement of historic open space of Christchurch gardens within the conservation area. Effects should therefore be positive.
	Use minerals, materials and resources more efficiently	0	No impacts are anticipated
	Ensure that contamination of land is prevented or remedied	0	No impacts are anticipated
<b>10. To reduce waste production and increase recycling and</b>	Minimise use of resources and materials	+	The conservation policies in the Audit, specifically, the identification of unlisted buildings of merit make a positive contribution to the use of resources. Retention and re-use of historic buildings has



<b>recovery of all waste.</b>			significant resource savings from both the embodied energy in existing buildings, and the existing fabric.
	Conserve manufactured resources	0	No impacts are anticipated
	Reduce waste generation	0	The audit will have no impact on waste generation
	Reduce hazardous waste	0	The audit will have no impact on hazardous waste
	Encourage use of renewable materials and resources	+	The conservation area audit encourages the retention of existing windows and doors or the use, where appropriate, of timber windows and doors. The use of PVC and aluminium for these purposes is considerably less sustainable, due to the high energy costs of their manufacture, and to waste issues arising from disposal.
	Encourage use of once-used and recycled materials	0	To a certain extent, the continuing reuse of historic building stock supports the reuse of building materials. Brick, slate, doors and other architectural detail can all be reused.
	Enable recovery of energy from waste	0	No impacts are anticipated
	Ensure careful and efficient collection and storage of waste	0	No impacts are anticipated
	Enable collection of used resources and materials so they can be recycled	0	No impacts are anticipated
	Enable	0	No impacts are anticipated

	environmentally satisfactory disposal of waste		
<b>11. To protect, enhance and create environments that encourage and support biodiversity</b>	Protect designated nature conservation sites of national, metropolitan and local significance	0	There are no sites of national, metropolitan or local importance in the Broadway and Christchurch Gardens Street Conservation Area audits.
	Protect and enhance habitats and buildings that benefit wildlife, such as gardens, trees, rivers, water bodies and wild spaces	+	The Conservation Area Audit encourages the protection of gardens from development, where they exist, and the protection of both street trees and private trees.
	Protect and provide priority habitats	0	No impacts are anticipated
	Protect and provide for priority species	0	No impacts are anticipated
	Protect and enhance open spaces	+	The Conservation Area Audit identifies the value of open space to the character of the area.
<b>12. To protect and enhance the historic environment and architectural, archaeological and cultural heritage</b>	Encourage repair, maintenance and protection of historic buildings and structures	++	The audit emphasises the importance of good maintenance of historic buildings and structures as a principal plank of historic conservation

	Protect and enhance public art, monuments, statues and their settings and sites	++	A dedicated chapter identifies significant public art in the area, and should ensure its careful custodianship.
	Preserve and enhance historic parks and gardens	0	There are no registered historic parks or gardens in the Broadway and Christchurch gardens Conservation Area
	Protect and conserve the archaeological resources	+	The incorporation into the Audit of information regarding areas of archaeological priority make the audit a useful resource for those planning below ground works. The history section provides useful background information.
	Improve the legibility of streets for all	++	The audits identify and seek to protect important views and landmarks, which contribute to the legibility of streets and spaces.
	Improve ease of movement for all	+	The audit recommends a unified approach to street surfaces, which will make a positive contribution to ease of movement.
	Ensure high quality streetscape and buildings	++	The identification of the special character of existing buildings in the conservation area will enable high quality, sensitive design of any new development. The protection of existing buildings of townscape merit will clearly be of great importance in ensuring the overall high quality of the streetscape.
	Preserve and enhance the character and fabric of conservation areas	++	The primary function of the Conservation Area Audits is to help preserve and enhance the special character of conservation area.
	Reduce street clutter	+	The audit identifies street clutter as a negative feature of parts of the conservation area, and will help to support planning appeals on the

			erection of new items contributing to this problem
<b>13. To reduce the need to travel and use of private motorised vehicular transport as well as encouraging walking, cycling and the use of public transport</b>	Encourage a reduction in travel and use of alternatives to powered transport	0	By identifying residential use as an important component of the character of the area, the audit encourages city centre living, and thus may lead to a reduction in travel times. However any such effects will be slight, and the overall impact of the audits on travel is considered to be neutral
	Encourage use of energy efficient transport modes	0	The Audits will have no impact on efficient transport modes
	Reduce the need to travel, especially by private car	0	No significant impacts are anticipated
	Encourage walking and cycling and other forms of sustainable travel	0	No significant impacts on sustainable travel are anticipated
	Integrate new development schemes with public transport	0	No impact
	Provide infrastructure to enable efficient, optimal use of public transport, accessible to all	0	No significant impacts on public transport infrastructure are anticipated
	Reduce the impact of service and delivery vehicles on	0	No significant impacts on service and delivery vehicles are anticipated

	congestion and levels of pollution		
	Reduce congestion and minimise the intrusion of all vehicles in working and residential areas	0	No significant impacts on congestion are anticipated
	Reduce traffic noise	0	The audit has no impact on traffic noise
	Encourage use of sustainable river transport facilities	0	The audit has no impact on sustainable river transport
	Optimise access for emergency vehicles on all routes	0	The audit has no impact on access for emergency vehicles
	Encourage greater use of renewable cleaner fuels	0	The audit has no impact on renewable cleaner fuels
	Reduce the impact of passenger vehicles on congestion and levels of pollution	0	The audit has no impact on passenger vehicles
<b>14. To minimise flood risk, promote sustainable urban drainage and protect surface and ground water quality</b>	Protect against storm damage	0	The audit has no impact on storm damage
	Protect against potential river flooding and flash flooding	0	The audit has no impact on river flooding or flash flooding
	Reduce the risk of	0	The audit has no impact on the risk of subsidence

	subsidence		
	Prevent pollution of water bodies and courses	0	The audit has no impact on pollution of water bodies and courses
	Improve the quality of water bodies and courses	0	The audit has no impact on the quality of water bodies and courses
<b>15. To maintain economic diversity, increase local opportunity and support sustainable economic growth</b>	Ensure that the strength of the economy is maintained and further sustainable growth is enabled and accommodated	?	Protection and enhancement of the special qualities of the conservation area may have a positive impact on the local economy, encouraging future investment.
	Assist business development	0	Improvements in the special character of an area, and in local distinctiveness may assist businesses in marketing.
	Enhance competitiveness	0	The audit has no major impact on competitiveness
	Promote growth in key sectors	0	Improvements resulting from conservation policy may help to promote growth in tourism – see below.
	Promote tourism	+	The historic environment is one of Westminster's most valuable tourist assets. The maintenance of this environment in good order, and protection of buildings from demolition make a key contribution to the economic life of Westminster

	Encourage indigenous business	0	The audit has no impact on indigenous business
	Encourage inward investment	+	An attractive and high quality environment may well help to encourage inward investment.
	Make land and property available for business development	?	The emphasis of the audit on conservation of existing heritage assets means that it may have a minor negative effect on property available for development. However, the audits encourage adaptive re-use of existing building stock.
	Promote innovation and enterprise	0	The audit has no impact on innovation and enterprise
<b>16. To reduce the impact of noise</b>	Reduce generation of noise from all activities	0	The audit will have no impact on emissions of noise.
	Reduce generation of noise from all premises	0	The audit, in common with other Westminster policies advises against external plant, which is often the source of background noise
	Reduce emissions of noise from transport related activities	0	The audit will have no impact on emissions of noise from transport related activities
	Reduce emissions of noise into properties	0	Advice in the audit against the installation of PVC and aluminium double glazing may prevent effective sound insulation inside properties. However, the possibility of the use of double glazed timber sash windows where appropriate, the use of secondary glazing means that this impact need not be negative. Reference to guidance on this issue will be added.
<b>17. To require the application of sustainable design and construction in all new developments and</b>	Ensure design of buildings and structures are resource efficient	0	Re use of existing buildings, and of materials for works to existing buildings are both resource efficient, and promoted by the building conservation policies in the Audit.

<b>refurbishment of existing buildings</b>			
	Ensure buildings and structures are designed to be energy efficient	0	The Conservation Area Audits discourage the use of windows such as uPVC, which can have a beneficial effect on energy efficiency of buildings. Mitigating strategies are the use of double glazed timber sash windows where appropriate, the use of secondary glazing, the maintenance / refurbishment of existing windows to ensure maximum thermal performance, and other non-visually intrusive energy efficiency measures such as roof insulation.
	Ensure buildings and structures adaptable for re-use	+	The Conservation Area Audits encourage the reuse of existing buildings.



# Statement of Adoption