

# CITY PLAN 2019 – 2040

**HOUSING DELIVERY  
TEST 2020  
ACTION PLAN**  
NOVEMBER 2021

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## 1. Purpose of this Action Plan

The government introduced the Housing Delivery Test (HDT) in November 2018 via the [National Planning Policy Framework](#) (NPPF) as a mechanism to monitor local housing delivery. The HDT is a percentage measurement that compares the number of net new homes delivered over the previous three years against the local planning authority's net housing requirement<sup>1</sup>, using national statistics and local authority data. Housing Delivery Test results for each local authority in England are published by the government every November.

To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. The planning policy consequences of not meeting the HDT are set out in the NPPF:

- Where the HDT indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an Action Plan in line with national [Planning Practice Guidance](#) (PPG), to assess the causes of under-delivery and identify actions to increase delivery in future years.
- Where housing delivery is below 85%, as well as producing an Action Plan, a 20% buffer must be applied to the authority's 5 Year Housing Land Supply.
- In circumstances where housing delivery falls below 75%, the above steps must be taken whilst a presumption in favour of sustainable development would be applied to planning applications for new housing.

The Housing Delivery Tests for 2020 were published in January 2021. Between 2017/18 and 2019/20, the housing requirement was for 3,114 new homes to be built in Westminster but only 2,859 were delivered (92%). By publishing this Housing Delivery Test 2020 Action Plan, Westminster City Council is therefore meeting the NPPF requirements. This Plan has been prepared in accordance with the PPG.

## 2. Summary of this Action Plan

As shown within the recent Housing Delivery Test results, between 2017/18 and 2019/20, Westminster has under-delivered on new housing achieving 92% of the new homes required over this period.

This Housing Delivery Test 2020 Action Plan assesses some of the key issues that have contributed to an under-delivery of new housing as well as the challenges facing future delivery. The Plan also identifies key actions that will be crucial in the immediate, medium and longer term to address identified delivery issues and boost housing supply across the city to ensure the council delivers the homes Westminster needs.

The Plan's effectiveness and progress will be monitored by assessment against future annual Housing Delivery Test results as well as data in the council's [Authority Monitoring Reports](#) (AMRs).

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<sup>1</sup> The method of calculating the HDT is set out in the [Housing Delivery Test Measurement rule book](#)

## 3. Policy context

### 3.1. National policy context

The National Planning Policy Framework (NPPF) seeks to significantly boost the supply of new homes and requires local planning authorities to have strategic planning policies that identify the minimum number of homes that are required over the plan period and that outline how the target will be met. Local Plans are also required to include a housing trajectory to illustrate the expected rate of housing delivery for each year across the plan period. In accordance with the NPPF, local planning authorities should also identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement as set out in their adopted Local Plan.

Through the Housing Delivery Test, the NPPF (see paragraph 76) requires local planning authorities to annually assess how many homes have been built against the number of homes required, as projected within the Local Plan housing trajectory and annual housing targets, considering the previous three financial year periods. If less than 95% of the homes required within the three years have been delivered, then the local planning authority must produce a Housing Delivery Action Plan. As outlined within Planning Practice Guidance, the aim of the Action Plan is to help local authorities identify early if under-delivery of housing is occurring so that the potential barriers and other likely causes can be identified, and actions put in place to address these challenges.

The Planning Advisory Service (PAS) has published guidance<sup>2</sup> to help support the preparation of effective Housing Delivery Test Action Plans. It explains that as a starting point it is important to look backwards to understand the issues that have affected housing supply over the last three years and to look forward to potential issues affecting future delivery. The guidance recommends authorities produce plans to look beyond planning and engage with stakeholders to understand how they can affect housing delivery and what issues or barriers they face when progressing with proposals for new housing development. For effective action planning, the guidance recommends that authorities consider both short-term and medium and longer-term remediation measures.

### 3.2. Regional and local policy context

Westminster's City Plan (November 2016) sought to optimise housing delivery by seeking to achieve and exceed the target of 1,068 new homes per year set out for Westminster by the London Plan (March 2016). The City Plan contained strategic policies that sought to protect existing housing and ensure new housing provided an appropriate mix in terms of unit size, type and tenure. To ensure affordable housing was provided, policies set out a requirement for a minimum of 30% of new homes to be affordable. The City Plan acknowledged the constraints to new housing delivery within Westminster, owing to its historical built environment that requires sensitive development as well as the lack of available land. Alongside City Plan policies, a number of housing policies within the saved Unitary Development Plan (UDP) (January 2007) sought to increase housing supply.

The City Plan, saved UDP policies and London Plan have now been superseded by Westminster's City Plan 2019-2040 (April 2021) and the London Plan 2021 (March 2021). These new plans represent a step-change with a greater onus on boosting housing supply and contain a range of strategic policies

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<sup>2</sup> Planning Advisory Service 'Housing Delivery Test Preparing Effective Action Plans' (June 2020)

to support delivery. The London Plan (March 2021) recognises that a lack of supply of the homes that Londoners need has played a significant role in London's housing crisis and that 66,000 new homes are needed each year over the next 20 years, with a significant amount of these as genuinely affordable housing. The London Plan (March 2021) establishes ten-year housing targets for each London borough alongside identified Opportunity Areas suitable for considerable numbers of new homes and housing intensification as well as policies to support the development of smaller sites. For the 2019/20 - 2028/29 period, the ten-year target for Westminster is 9,850 new homes. The London Plan (March 2021) also identifies Paddington, Victoria and Tottenham Court Road as Opportunity Areas with potential to deliver 2,300 new homes and 23,000 new jobs combined.

The annual housing target for Westminster set out in the London Plan (March 2021), at 985 new homes per annum, is slightly lower than within previous plans. This figure is based on the most recent Strategic Housing Land Availability Assessment used within the London Plan which takes a land capacity-based approach. However, the council has a strong ambition to exceed the target of 985 new homes each year to deliver the homes Westminster needs. Through Westminster's City Plan 2019-2040, the council has therefore set out an ambitious approach to housing delivery to ensure it increases the stock of high-quality housing and provides a variety of housing options in terms of the size, type and tenure. The City Plan 2019-2040 promotes mixed and inclusive communities with a clear focus on affordability and family homes to ensure that there are sufficient homes for people to live within Westminster.

In accordance with the London Plan 2021, the City Plan 2019-2040 sets out an ambitious target to deliver at least 20,685 new homes by 2040 and seeks to achieve this by optimising site densities, promoting development in the three identified Opportunity Areas and Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas, delivering a higher number of homes on small sites, permitting appropriate upwards extensions and planning positively for tall buildings in certain locations. The City Plan 2019-2040 also has a bespoke policy to limit the size of new homes to ensure they do not exceed 200sqm to support the optimisation of sites and avoid the creation of super-sized properties which fail to make the best use of scarce land.

Westminster's City Plan 2019-2040 seeks to ensure that affordable housing is a focus and that this is delivered on-site to create mixed communities. The Plan sets out a minimum requirement of 35% of new homes to be affordable in Westminster, higher than the superseded City Plan which was at 30%. In cases where it is demonstrated that affordable housing cannot be provided on site, policy allows for provision to be made off-site within the vicinity. A payment in lieu to the council's Affordable Housing Fund may be accepted as a last resort.

## **4. Housing Delivery Test 2020 results**

### **4.1. Government calculation**

The Housing Delivery Test (HDT) is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic planning policies for the areas covered by the HDT, over a rolling three-year period. The Housing Delivery Test is calculated using the following formula:

**Housing Delivery Test (%) =**

$$\frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

The Ministry of Housing, Communities and Local Government (MHCLG) published the [Housing Delivery Test results for 2020](#) in January 2021. The test period covers the previous three financial years in accordance with the NPPF and associated guidance. In the case of the 2020 measurement, the years covered are 2017/18, 2018/19 and 2019/20. Table 1 shows the Housing Delivery Test 2020 results published by MHCLG for Westminster:

**Table 1: Housing Delivery Test 2020 results for Westminster calculated by MHCLG**

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test 2020
2017-2018	2018-2019	2019-2020		2017-2018	2018-2019	2019-2020		
1,068	1,068	978	3,114	957	789	1,113	2,859	92%

In accordance with the "[Housing Delivery Test: 2020 Measurement Technical Note](#)" and the "[Housing Delivery Test Measurement Rule Book](#)":

- The number of homes required every year in Westminster is the one set out in the council's Local Plan for that period. MHCLG have used the target set out in Westminster's now superseded 2016 City Plan of 1,068 homes a year for 2017/18, 2018/19 and 2019/20.
- To take into account the disruptions created by the Covid-19 pandemic, MHCLG have adjusted the number of homes required in Westminster for 2019/20 using the target as set out in Westminster's City Plan<sup>3</sup> of 1,068 homes as the basis for this calculation. This has lowered the requirement to 978 homes.
- The number of homes delivered during a single year has been calculated by MHCLG using the following formula:

**Net Homes Delivered in a year = Net Additional Dwellings National Statistic**

$$\begin{aligned}
 &+ \\
 &\left( \frac{\text{net increase in bedrooms in student communal accommodation in Westminster}}{\text{average number of students in student only households in England}} \right) \\
 &+ \\
 &\left( \frac{\text{net increase in bedrooms in other communal accommodation in Westminster}}{\text{average number of adults in households in England}} \right)
 \end{aligned}$$

<sup>3</sup> Housing Delivery Test: 2020 Measurement Technical Note (Page 4): "For 2019/20, the number of homes requires has been adapted to take into account s to "reflect the temporary disruption caused by the first national lockdown announced on 23 March 2020", the period for measuring the homes required in 2019/20 has been reduced by 1 month. As 'homes required' data (detailed above) can be calculated by the day, the 19/20 'homes required' measurement period has been reduced by 31 days."

- The raw data used by MHCLG to calculate the net homes delivered in a year was derived from the data in the [London Development Database](#) (LDD)<sup>4</sup>. Although the data in the LDD is supplied by the boroughs, the information presented in the LDD (and therefore used by MHCLG) may be different from that found in the council's [Authority Monitoring Reports](#). This can be due to the timing of when the data is extracted or to differences in the way data is recorded.
- The average number of students in student only households in England is 2.5.
- The average number of adults in households in England is of 1.8.

#### **4.2. Council correction following adoption of City Plan 2019-2040**

The council believes the results published by the government for the Housing Delivery Test 2020 reflect housing delivery in Westminster over the period 2017/20.

The number of homes required every year in Westminster is the one set out in the council's Local Plan for that period. While the target of 1,068 homes a year for 2017/18 and 2018/19 used by MHCLG is the one set out in Westminster's now superseded 2016 City Plan for those years, as set out in Sections 3 and 7 of this report, the council adopted a new City Plan 2019-2040 in April 2021. The City Plan 2019-2040, in accordance with the London Plan 2021, sets out a new housing target for Westminster of 985 homes per year. As the new City Plan covers the period 2019-2040, this new target supersedes the one set out by the previous plan and should therefore be used for the year 2019-20 for the purpose of calculating the Housing Delivery Test 2020.

Although where a new housing requirement is adopted, a local planning authority can apply to MHCLG to have the Housing Delivery Test results recalculated using the new targets, this did not happen as the City Plan 2019-2040 was adopted in April 2021 - three months after the government published the Housing Delivery Test 2020 results. The City Plan 2019-2040 is however clear the target should be used for Westminster between 2019 and 2040 and this should be the target used in future calculations of the Housing Delivery Test from 2019 onwards.

When applying the government's adjustment for 2019/20 to take into account a slower delivery during the Covid-19 pandemic (see Section 4.1 of this report which explains that the target for 2019/20 should be reduced by 1 month), the number of homes required in Westminster for 2019/20 to be used when calculating the Housing Delivery Test 2020 is 903 (this equates to 11 months of the new target as set out in City Plan 2019-2040 for 2019/20). The total number of homes required between 2017 and 2020 is therefore 3,039 rather than 3,114. Table 2 shows the Housing Delivery Test 2020 results calculated by the council using the new housing target and applying the government's Covid-19 adjustment for 2019/20:

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<sup>4</sup> The London Development Database has now been replaced by the Planning London Datahub.

**Table 2: Housing Delivery Test 2020 results for Westminster calculated by Westminster City Council**

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test 2020
2017-2018	2018-2019	2019-2020		2017-2018	2018-2019	2019-2020		
1,068	1,068	903	3,039	957	789	1,113	2,859	94%

When taking into account the City Plan 2019-2040 target of 985 a year for 2019/20 (and adjusting it to take into account the effects of the pandemic), the Housing Delivery Test 2020 result for Westminster is 94%, two percentage points higher than that reported by MHCLG.

## 5. Housing supply & anticipated delivery

Because of its central location in London, Westminster relies on different sources of housing development to meet its housing requirements, including a high percentage of windfall. The robustness of Westminster's housing supply and the council's ability to meet housing needs during the plan period was tested during the Examination in Public (EiP) of the City Plan 2019-2040<sup>5</sup>.

Throughout the examination process and in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), the council confirmed and published a 5 Year Housing Land Supply for Westminster:

- [5 Year Housing Land Supply Statement 2020-2025 \(April 2021\)](#)

Before and during the EiP, the council published a number of housing evidence papers. These documents remain the most up to date evidence the council has recently produced to demonstrate anticipated delivery. Among others, the following documents can be found on the council's Examination Library:

- [EV H 001 - Housing topic paper](#)
- [EV H 013 - Housing Supply Topic Paper \(WCC, March 2020\)](#)
- [EV H 025 - Post Hearing Housing Supply Note](#)

### 5.1. Westminster's 5 Year Housing Land Supply

Westminster's 5 Year Housing Land Supply Statement 2020-2025 (April 2021) shows how the council has identified a supply of specific, deliverable sites for years 1-5 of the plan period to provide five years' worth of housing against the housing requirement. Table 3 shows the number of units by type the council identified in the 5 Year Housing Land Supply Statement 2020-2025:

<sup>5</sup> Information on the City Plan 2019-2040 can be found here: <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-policy/city-plan-2019-2040-previous-stages>

**Table 3: Number of units by type identified in the 5 Year Housing Land Supply Statement 2020-2025**

Sites by type	Number of units	Housing requirement
Know completions 2020/21	107	
Sites under/construction	4,551	
Sites with planning permission	847	
Sites with planning applications submitted pending decision	181	
<b>TOTAL</b>	<b>5,686<sup>6</sup></b>	

The sites included in the statement equate to the delivery of 5,686 homes over the five-year period 2020-2025 (compared to a 5,418 requirement).

The Planning Inspectors appointed to carry out the Examination of the City Plan 2019-2040 found the approach to be sound, realistic and based on robust evidence (see paragraph 62 of the [Inspector's report](#)). The Planning Inspectors also concluded that although most of the sites had non-implemented planning permission, there was no evidence that homes on these sites would not be delivered within five years. The same conclusion was reached in relation to the homes identified on sites with planning applications submitted and decisions pending as these were all council-owned sites, good progress had been made and the council has a clear commitment to bringing them forward for development within five years. When the 5 Year Housing Land Supply Statement 2020-2025 (April 2021) was published, many of these sites had subsequently been granted planning permission and the statement was updated accordingly.

## 5.2. Westminster's Housing Trajectory

During the EiP of the City Plan 2019-2040, the council did not only demonstrate how it would deliver on its housing target during the five first years of the plan period but also up to 2040. Evidence papers EV\_H001, EV\_H013 and EV\_H\_025 contain evidence showing how the housing target will be met during the plan period.

In accordance with the NPPF and the PPG, the City Plan 2019-2040 contains a new housing trajectory for Westminster (see Figure 1).

<sup>6</sup> This does not include any reliance on C2 accommodation.

<sup>7</sup> In accordance with the London Plan 2021 and the City Plan 2019-2040, Westminster's housing target is 985 homes per year. This gives a basic five-year requirement of 4,925 homes. However, as the council demonstrated a five year supply of deliverable sites through the Examination of its plan, a 10% buffer applies, as confirmed in the Planning Practice Guidance, which states that, where authorities are seeking to confirm their five-year supply through the Examination of Local Plan policies, local planning authorities should "apply a minimum 10% buffer to their housing requirement to account for potential fluctuations in the market over the year and ensure their 5 year land supply is sufficiently flexible and robust". The buffer increases the requirement to 5,418 homes.

**Figure 1: Westminster’s Housing Trajectory**



Evidence papers EV\_H001, EV\_H013 and EV\_H\_025 explain how the housing target will be met during the plan period. The papers also explain why housing delivery changes from year to year, sometimes being above and sometimes below the housing target but overall contributing to meeting the housing target during the plan period.

The Planning Inspectors carrying out the EiP of the City Plan concluded that “the City Plan will provide for an adequate supply of housing for 15 years from the likely point of adoption. Taking account of actual completions in 2019/20 (992 homes) and the reasonable expectation that delivery between 2035/36 and 2039/2040 will at least match requirements, the estimated supply of housing in the plan period overall is 21,685 homes. This would be sufficient to meet requirements with a degree of flexibility” (see paragraph 66 of the Inspector’s report). The Planning Inspectors also concluded that Westminster’s housing trajectory was adequate.

## 6. Key issues and challenges

Delivering new homes in Westminster is challenging. The factors determining housing delivery were explored in detail and subsequent considerations were taken into account when preparing policies in the new City Plan 2019-2040. This section provides a summary of the key issues affecting housing delivery in Westminster.

### 6.1. Availability of sites and sensitivity of Westminster’s historic built environment

Westminster is at the heart of London and has a rich and unique heritage with 11,000 listed buildings and conservation areas that cover 78% of the city which makes the city a desirable and attractive place for people to live, work and visit, however this can pose a challenge to housing delivery. The highly urbanised grain of the city and its wealth of historic buildings and townscapes that require conservation and sensitive development can in some cases limit the density of new development and the number of new homes that can be delivered on certain sites, particularly in terms of height.

Many other parts of London have a ready supply of surplus industrial land with a relatively low existing use value that can be redeveloped for housing and mixed use with a significantly higher value. Such sites make a significant contribution to meeting other boroughs housing targets. This is not typically

the case within Westminster where many sites already contain uses such as offices, shops and housing, with high existing use values. Development in Westminster is often about refurbishment, renewal of building stock and redevelopment of existing sites rather than significant land use change and so there is often little land available for significant new growth.

## 6.2. Competing land uses and high land values

Westminster is diverse in its functions as part of London as a world city and is home to key government departments, corporate headquarters as well as the agglomeration of the knowledge and creative industries, whilst it has an important national role being home to the Houses of Parliament and Buckingham Palace. The city is also a cultural and entertainment destination with world renowned areas such as Soho, Covent Garden, Theatreland and the wider West End with an abundance of arts, cultural and entertainment uses. Amongst this, the city has strong, diverse residential communities. All these uses make Westminster the diverse city it is, but this also results in competition for land. Given Westminster's position at the heart of London, there is high demand for land from both national and international investors. These factors, alongside the limited amount of available land for development, contributes to fuelling higher land values within Westminster.

Land in Westminster is amongst the most expensive in the United Kingdom. High land values can also mean that sometimes investors buy land, gain planning permission for development schemes and then sell it on at higher value, benefitting from an uplift in value from the benefit of planning permission. This phenomenon can delay the delivery of new housing and further drive-up land prices. High land values do not only pose a challenge to the delivery of new housing in general but particularly affordable housing, as it limits the council's ability to acquire additional land for housebuilding and challenges what developers themselves can achieve on a site. As identified within the council's [Authority Monitoring Reports](#), it is sometimes difficult to deliver affordable housing on-site with payments in lieu being received instead, and these funds used to support the council in providing affordable housing within the city directly through its Affordable Housing Fund. This can also pose a challenge for the council, as due to the lack of available land and high land values, the council often must compete with the private sector who seek to deliver more expensive, prime market housing in the same area.

In recent years, a significant proportion of new housing has been delivered through the change of use of office space to residential, particularly within the Central Activities Zone (CAZ), however it quickly became evident that this posed a threat to the strategic function of Westminster (and more widely London) as an office-based centre of national and international importance. Following changes to local planning policies, fewer housing sites may become available in the future through change of use of office uses to residential which means there will be more pressure for existing residential sites to deliver additional housing or for more major mixed-use redevelopment projects.

## 6.3. Optimisation of land

Given the constraints to land supply and to the height, massing and density of new development in some cases and contexts, the optimisation of land and the amount of new housing that can be delivered on sites can be challenging. Innovative ways to maximise the number of units on sites need to be considered.

Furthermore, Westminster attracts a considerable level of global investment in housing which often results in new housing being developed as high end, with super prime residential properties of

considerable sizes. The creation of overly large homes does not result in an efficient use of scarce land and fails to optimise the number of new homes that can be delivered. Similarly, amalgamation of existing homes can reduce overall housing supply.

#### 6.4. Larger sites & windfall sites

Given the highly developed nature of Westminster with existing, well-established uses and historic building stock, there are a limited number of larger sites that come forward for new housing and most development sites in Westminster are smaller sites of less than 0.25ha. Given this context, sites that have come forward in the past have often been in the form of unexpected windfall sites.

Although there are some larger scale development opportunities in the city, these tend to be relatively complicated to plan for and deliver homes, resulting in much longer lead in times and extended build-out programmes. As Westminster's housing trajectory (see Figure 1 in this report) shows, housing delivery is often inconsistent in Westminster. Data in the council's [Authority Monitoring Reports](#) also shows that the annualised target is missed in some years, and there is an oversupply in others. Land ownership can also be complex, and projects often require considerable early public engagement, especially when arrangements for the re-allocation of residents and businesses need to be considered; these are processes which often involve other actors and stakeholders outside of the remit of the planning process. Due to this complex process, this can result in longer timeframes for the progression and delivery of larger housing schemes, resulting in an inconsistent trajectory for housing delivery across years with peaks and troughs.

Historically, there has been a reliance on development coming forward as windfall, and as a result there has been a limited ability to forecast long-term housing delivery beyond that resulting from council owned schemes. Not explicitly identifying potential development sites through allocations in the Local Plan may have also reduced the council's ability to initiate valuable engagement with key stakeholders to clarify council expectations and improve chances of the earlier delivery of a site.

Considering the above and given the highly urbanised environment, sites that often come forward for housing development in Westminster are unplanned smaller sites which tend to involve the redevelopment of existing buildings and uses which is difficult to foresee, whilst the sensitivity of the historic environment can often add constraints to the nature and overall scale of new developments. Larger sites are also often unforeseen, however when they do come forward, they have the ability to deliver a large volume of new homes resulting in peaks in housing delivery, reflecting fluctuations in delivery in Westminster.

#### 6.5. Mixed-use city

Given the diverse range of uses within the city and its highly urbanised nature, many sites are either mixed use or uses are clustered close to one another with commercial and residential uses often alongside one another. This can pose a challenge to housing delivery. In accordance with the London Plan 'Agent of Change' principle, where new housing is proposed in proximity to entertainment uses or areas with high noise levels extra care must be taken at the design stage to ensure that new residential developments have design measures incorporated to ensure homes are insulated from undue noise disturbance and benefit from an adequate level of amenity, without detriment to the viability of existing noise-generating uses.

Given the highly developed nature of Westminster with existing stock this can also pose a challenge to housing delivery as construction often takes place directly alongside existing noise sensitive occupiers and uses, resulting in concerns from local businesses and residents around disturbance from construction of new housing whilst it can also pose challenges in terms of access and delivery of construction equipment and materials. This will require careful consideration of the construction impacts and associated mitigation measures from demolition to construction and end phases of development projects.

### 6.6. Covid-19 and Brexit uncertainty

The Covid-19 pandemic has been an unprecedented event which has likely affected delivery timeframes due to practical constraints such as staff availability, health and safety measures and issues around the availability and increasing cost of construction materials. The pandemic may have also halted some projects due to the uncertain economic climate and uncertainty around future demand, both linked to Covid-19 and Brexit.

Some housing development sites that have had pre-application discussions or have been recently granted planning permission have not yet been delivered and it is understood that this is more commonly seen within the central areas of Westminster which have the highest land values and most prime housing. This has also resulted in delays to the delivery of affordable housing units associated with extant permissions. Given many of these prime residential developments are led by investors and potential buyers within the global market, many are waiting for clarity following the blurring of market conditions as a result of the Covid-19 pandemic and Brexit, whilst it is not yet clear how the market will respond in the longer term.

Building material costs have also increased significantly whilst labour and construction materials shortages have been occurring within the construction industry, which has also contributed to a slow in the delivery and progression of some schemes whilst it has required some developers to re-evaluate delivery plans and costs.

## 7. Key actions and responses

Westminster's [City for All](#) strategy and the City Plan 2019-2040 set out the council's commitment to meeting its housing target. This section provides an overview of key council initiatives, policies and strategies that will help ensure Westminster delivers the homes it needs.

### 7.1. Affordable housing delivery

#### 7.1.1. Enabling delivery of 1,850 new affordable by 2023

Given the limited land availability and high land value constraints in Westminster, it is important for the council to carefully plan future use of land that is already in council ownership to maximise housing delivery. To deliver the homes Westminster needs, the council has set out an ambitious development programme to provide significant numbers of new social and intermediate homes through housebuilding and housing renewal programmes<sup>8</sup>.

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<sup>8</sup> [Housing renewal | Westminster City Council](#)

As part of City for All, the council has committed to a target of 1,850 new affordable homes to be delivered between 2017/18 and 2023. The council is on track to achieve this target and a future pipeline of approximately 1,500 new affordable homes has also been identified for the period 2024-2030.

Delivery of new affordable homes is achieved primarily through direct housebuilding by the council on council-owned land (including large estate regeneration), council infill development, and by third-party housebuilding. Delivery is being funded through various resources, including the use of the council's Affordable Housing Fund<sup>9</sup>, Capital Receipts, Greater London Authority Grant Funding and Housing Revenue Account borrowing.

### **7.1.2. Producing and maintaining a Housing Investment Plan and a 30-year HRA Business Plan**

Historically, the majority of new affordable homes delivered in Westminster has been by private developers as part of their S106 planning obligations, or through direct delivery by Registered Providers.

To support an increased housing delivery, the council has produced a Housing Investment Plan and a 30-year Housing Revenue Account (HRA) Business Plan, which sets out commitments to a series of capital investments over the years 2021/22 – 2025/26. The HRA Business Plan provides an increasing role for the council in the delivery of new affordable homes especially through Estate regeneration and the delivery of housing in infill sites. The HRA Business Plan clearly identifies a number of housing projects that will help deliver on the council's target including housing delivery in the Housing Renewal Areas but also in other areas of the city like Harrow Road or Edgware Road. The council's [Housing Renewal website](#)<sup>10</sup> contains information on the key projects being delivered.

The [latest Housing Revenue Account \(HRA\) Business Plan 2021/22 and 30-Year Housing Investment Plan](#) was approved by Cabinet on 15<sup>th</sup> February 2021 and discussed by Full Council on 3<sup>rd</sup> March 2021.

The council will continue to deliver on its Plan and monitor delivery against its commitments, as well as explore further opportunities to deliver new homes on council-owned land.

### **7.1.3. Developing and progressing Housing Renewal programmes in Church Street and Ebury Bridge Housing Renewal Areas**

A large proportion of new affordable homes are set to be delivered in the Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas (HRA). Both areas present opportunities to achieve a significant uplift in the number of homes, contributing to meeting strategic housing need, but also to deliver wider benefits for the community through regenerating these areas.

The City Plan 2019-2040 contains a specific policy that guides development in both areas (see Policy 6 Spatial Development Priorities: Church Street / Edgware Road and Ebury Bridge Estate Housing Renewal Areas). The council has also worked with communities and published the [Church Street](#)

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<sup>9</sup> Payments received in lieu of affordable housing from individual schemes are held in the council's Affordable Housing Fund. The council invests the moneys in the fund in affordable housing opportunity sites as and when these come forward throughout the city.

<sup>10</sup> <https://www.westminster.gov.uk/housing-renewal>

[Masterplan \(2017\)](#), which creates a framework for development in the area and is a material consideration when assessing any planning applications in the area.

The Housing Renewal Areas will be crucial in delivering additional housing within the city, however there are challenges in ensuring that existing communities are fully engaged and supportive of the process and help shape the future of their areas. To support this process, the council has opened Regeneration Hubs on-site where members of the public can visit anytime of the week to discuss proposals and seek updates. This close, visible and accessible form of presence and engagement through regeneration hubs is intended to help the smooth delivery of new housing on HRA sites by supporting the community through the considerable process of regeneration.

The council will continue to work with communities within identified HRAs to deliver homes that meet needs and create mixed communities while optimising the use of land in council ownership.

#### **7.1.4. Progressing the council's Infills Programme**

The council started work on an Infills Programme in 2017, which seeks to optimise the use of land within existing council owned Estates to provide new affordable homes on smaller sites and through additions to existing larger Estates.

The council has commenced delivery on a number of sites and are progressing to bring further sites forward in accordance with the programme.

#### **7.1.5. Enabling housing delivery through Westminster Builds**

The council has set up a wholly owned housing company, Westminster Builds<sup>11</sup>.

Westminster Builds supports housing delivery by increasing the council's capacity to build new affordable and market homes.

Westminster Builds also allows the council to hold intermediate and market rent homes, offering high quality rental homes to Westminster's residents. Ownership of different types of affordable housing allows the council to better allocate homes in a way that meets Westminster's housing needs.

So far, Westminster Builds has contributed to the delivery of new homes at Luton Street and Jubilee Sports Centre, as well as acquiring intermediate rent homes at Farm Street and West End Gate sites.

#### **7.1.6. Working with stakeholders and partners to deliver new homes**

In accordance with planning policies, the council achieves third party housebuilding through requiring the delivery of new affordable homes by developers. Delivery of new homes is secured via Section 106 legal agreements or is directly delivered by Registered Providers.

The council will continue to implement planning policies in the London Plan 2021 and City Plan 2019-2040 to ensure developers deliver the homes that are needed. The council will continue to work with stakeholders and partners to deliver affordable housing in Westminster.

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<sup>11</sup> <https://westminsterbuilds.com/>

## 7.2. Updating Westminster’s planning policy framework

Planning policy is one of the key tools local planning authorities can use to support housing delivery in their areas. In Westminster, a series of statutory documents make up Westminster’s Development Plan. These documents are statutory documents and must be considered when assessing planning applications in the city. Westminster’s Development Plan is also supported by a suite of national planning policies and other local planning documents that may be of material consideration when considering planning applications for new housing development in the city (see Figure 2). To be effective, policies need to be kept up to date and be based on local housing evidence.

**Figure 2: Westminster’s Development Plan and policy framework**



### 7.2.1. Developing and implementing Westminster’s Development Plan

#### 7.2.1.1. Implementing City Plan 2019-2040

Westminster City Plan 2019-2040 was adopted on the 21<sup>st</sup> of April 2021. The new City Plan for Westminster has a stronger focus on delivering more homes within the city than the previous framework. City Plan 2019-2040 contains a suite of spatial and strategic policies that support the increased delivery of new homes to meet our housing target of 985 new homes per year between 2019 and 2040. The implementation of the policies within City Plan 2019-2040 is key to delivering Westminster’s housing target and provides a framework for development projects to come forward, including in identified growth areas.

#### Spatial development priorities

The City Plan has spatial policies that seek to maximise and make the most efficient use of scarce land to ensure Westminster continues to grow and thrive by delivering at least 20,685 new homes with at least 35% of these as affordable homes over the Plan period. The City Plan’s spatial strategy sets out that this growth will be achieved through a series of measures. These include a number of spatial development priorities which identify specific areas with capacity to accommodate more growth and

are expected to significantly contribute to boosting housing supply through appropriate increased scale, massing and densification. This is the case for Westminster's three Opportunity Areas, Tottenham Court Road, Victoria and Paddington. At least 2,150 new homes will be delivered within the Opportunity Areas during the plan period. A further 2,750 new homes are expected to be delivered through the redevelopment of council owned Estates within the identified Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas. These specific policies in the City Plan 2019-2040 set a new framework to facilitate redevelopment and ensure that these areas are developed with delivery of homes in mind.

### **Optimising site densities and protecting existing housing**

One of the key challenges within Westminster is the scarce availability of land for new housing. Therefore, to meet the borough's housing targets it is crucial to ensure that land is used efficiently and the number of homes delivered on sites is maximised. To achieve this, City Plan 2019-2040 housing policies support the optimisation of site densities, permitting appropriate upwards extensions and planning positively for tall buildings in certain locations. Recognising Westminster's built-up nature and scarcity of land the plan also supports mixed use, commercial-led intensification of the CAZ, West End and Town Centre Hierarchy recognising that these areas can be optimised by including new housing as part of mixed-use development. The City Plan 2019-2040 also has policies to protect existing housing units and floorspace to maintain existing housing supply, but it also allows for some reconfiguration to recognise that in some instances, amalgamation of units may be justified if providing family sized housing or to meet affordable housing need.

Under the previous policy framework, some existing homes have been amalgamated to create excessively large super-prime residential properties whilst new homes have sometimes been of excessive size. Often properties of such sizes are larger than necessary for families and are designed for the super-prime international market. This fails to make effective use of land and reduces the supply of existing housing available within Westminster, whilst reducing the number of units delivered on sites. In response, City Plan 2019-2040 has a bespoke policy limiting new homes to a maximum of 200sq/m. This will help protect existing residential units within historic stock whilst it will optimise the use of land in redevelopment or new build sites to maximise the number of new homes that can be delivered on sites.

Housing policies in City Plan 2019-2040 also seek to ensure an appropriate mix of new homes in terms of type, unit sizes and tenure. To support this and ensure that sites are optimised to deliver the greatest amount of housing possible, whilst ensuring an appropriate mix, new City Plan policies specify that 25% of new homes should be family sized (3-5 bedrooms) and that no more than 10% of units should be studios. This will avoid extremes in delivery by developers seeking to maximise profit by either delivering a majority studio apartments or larger super-prime units by ensuring a range of unit sizes are delivered at high quality whilst maximising the number of units through efficient use of space and optimisation of sites.

### **Affordable housing**

The 2016 City Plan required 30% of new homes to be affordable. City Plan 2019-2040 requires at least 35% of new homes to be delivered as affordable housing with a stronger focus on on-site delivery. As a last resort and where it has been demonstrated provision on-site is unviable, the council may accept off-site delivery or a payment in lieu to the council's Affordable Housing Fund. The City Plan 2019-

2040 also sets out that where payments in lieu are accepted, they will be at a level of broadly equivalent value to actual provision so there is no financial benefit from providing a payment rather than delivery of actual units. The new approach to payments in lieu and its value will be set out in the forthcoming Planning Obligations and Affordable Housing Supplementary Planning Document. This policy approach will help ensure more affordable housing is delivered within the city, alongside market housing contributing to the boost of overall supply across the city and to meeting diverse housing needs.

### **Innovative housing delivery**

In line with the London Plan 2021, City Plan 2109-2040 seeks to support innovative methods of housing delivery such as Build to Rent and larger shared living proposals that can help boost housing supply and provide choice to meet different housing needs. City Plan 2019-2040 also supports schemes which may use new methods of construction when these methods help contribute to a quicker and more sustainable delivery of homes. Such housing models may have a significant contribution to increasing housing availability within the city, particularly for workers.

### **Amenity and construction impacts**

Often proposals for new housing development can be contentious and raise objections due to concerns over noise and construction impacts as well as amenity impacts upon light, privacy and sense of enclosure or overshadowing given the proximity of new developments to existing noise sensitive uses, including residents, due to the highly urbanised grain of Westminster.

City Plan 2019-2040 has a new policy which seeks to manage development for Westminster's people by requiring development to be neighbourly by protecting and, where appropriate, enhancing residential amenity by preventing unacceptable impacts in terms of loss of light, privacy or increase in overshadowing or sense of enclosure. A further policy within the City Plan seeks to specifically address and mitigate local environmental impacts to protect amenity and expects new developments to abide by the council's Code of Construction Practice.

This framework and requirements will help ensure that construction impacts are mitigated to help address resident concerns, reduce complaints and ensure construction can proceed smoothly, without delay or interruption and without undue harm to amenity of local communities. This will help speed up decision-making at planning application stage and help avoid complaints during the construction phase to ensure construction can progress without interruption to ensure new housing can be delivered at pace.

### **7.2.2. Developing a Site Allocations Plan**

In its latest [Local Development Scheme \(LDS\)\(March 2020\)](#), the council committed itself to the production of a Site Allocations Plan (SAP).

Contrary to Westminster's traditional approach of relying on windfall development to achieve growth, allocating sites is a way to take a proactive approach to housing delivery. The SAP is intended to allocate and provide detailed policies for development sites in Westminster that are expected to make a major contribution to the city's strategic growth targets to the period 2040, as identified in the City Plan. The SAP will focus on larger sites which are capable of delivering significant amounts of development and/or infrastructure improvements where more detailed policies are needed to ensure

that they are developed appropriately. Allocations for individual sites will set out the preferred use or mix of uses, provide more detailed guidance for site-specific issues that any proposal will need to respond to, and give an indication of likely development capacity and timeframe for development.

The SAP is a tool that enables the council to identify sites that can contribute to meeting housing targets and develop a set of key principles for each site through significant engagement with stakeholders to ensure the best chance of delivery, which provides a higher degree of certainty on future housing delivery in the city. In accordance with regulations, the preparation of a Site Allocations Plan needs to follow several statutory stages, including two rounds of consultation and an independent examination carried out by the Planning Inspectorate.

Once the Site Allocations Plan (SAP) is adopted, it will become part of Westminster's statutory Development Plan.

### **7.2.3. Neighbourhood Plans**

The council has four made Neighbourhood Plans: Mayfair Neighbourhood Plan, Knightsbridge Neighbourhood Plan, Fitzrovia West Neighbourhood Plan and the Soho Neighbourhood Plan.

A Neighbourhood Plan is a community-led framework for guiding the future development, regeneration and conservation of a designated Neighbourhood Area. It is prepared by a local Neighbourhood Forum (or, where in place, a Community Council) and it sets out planning policies for the area that are used to determine whether to approve planning applications. Neighbourhood Plans provide an opportunity to set out locally specific housing policies that address local issues that affect housing delivery. Neighbourhood Plans can also allocate sites for housing development.

For example, the Knightsbridge Neighbourhood Plan has a specific policy for Hyde Park Barracks (Policy KBR13), a site where "residential use (and elder persons' accommodation) is considered to be the only acceptable alternative use to a barracks use". The Soho Neighbourhood Plan has a policy on the type of homes needed to meet need (Policy 16 Residential Space Standards).

The council has a statutory requirement to provide support to Neighbourhood Forums preparing Neighbourhood Plans, and it is a tool that Westminster embraces by putting local communities at the centre of the planning system. The council will continue to provide Neighbourhood Forums with assistance and advice when preparing a Neighbourhood Plan.

When evidence-based and in accordance with the council's City Plan 2019-2040 and the London Plan 2021, the council will continue to support Neighbourhood Forums trying to address housing delivery in their respective Neighbourhood Areas.

### **7.3. Developing local policies and guidance that supports housing delivery**

As explained above (see Figure 2), in Westminster, a series of statutory documents make up Westminster's Development Plan. Westminster's Development Plan is supported by a suite of national planning policies and other local planning documents that may be of material consideration when considering planning applications for new housing development in the city. However, these are not statutory documents and carry less weight than documents in the Development Plan when determining planning applications.

### **7.3.1. Developing Supplementary Planning Documents (SPDs)**

In its latest [Local Development Scheme \(LDS\)\(March 2020\)](#), the council committed itself to the production of a number of Supplementary Planning Documents (SPDs) that will provide guidance on how policies in the City Plan 2019-2040 should be implemented. The publication of SPDs may also be accompanied by the publication of supplementary technical guidance.

Among others, the council has committed itself to the production of a Planning Obligations and Affordable Housing SPD. The SPD will provide information on how to implement housing policies in both the City Plan and the London Plan in Westminster. It will also provide further guidance on intermediate housing products, their acceptability, and indicative income levels for such housing, and the application of land use swaps. Where S106 contributions are to be sought, the SPD will set out how these will be calculated (including for affordable housing payments in lieu). The SPD on Planning Obligations and Affordable Housing is a key document that will provide clarity to applicants and developers building new homes in Westminster thus supporting housing delivery.

The council will publish a number of other SPDs that provide guidance to developers on how to implement policies in the London Plan 2021 and City Plan 2019-2040. New guidance will contribute to better designed schemes and a smoother process.

### **7.3.2. Developing Place Plans**

The council is developing a series of 'Place Plans' which establish holistic design strategies and proposals for specific areas of change in the city. These plans are non-statutory evolving programmes, bringing together residents, businesses and other key stakeholders to identify existing issues and priorities, establish a shared vision and key objectives for an identified area and enable the delivery of a range of projects which help achieve immediate and longer-term improvement. 'Place Plans' are also a tool that can help unlock development opportunities in a specific area through partnership and empower communities to affect change in their neighbourhood.

Areas of focus include Strand-Aldwych, Harrow Road, Pimlico and Paddington. The council will continue to work with partners and stakeholders on the production of Place Plans and their delivery.

### **7.3.3. Updating the Code of Construction Practice (CoCP)**

The council's [Code of Construction Practice \(2016\)](#) is the key document explaining how the council will monitor, control and manage construction impacts on construction sites across the city. The council requires developers to adhere to the Code when undertaking major construction projects.

During summer 2021, the council consulted on a revised Code of Construction Practice (CoCP) that covers a refreshed and more innovative way to mitigate construction impacts. The draft CoCP brings requirements up to date and will help ensure developers are aware of them before construction works commence. Ensuring construction impacts are appropriately mitigated and minimised will help address or overcome objections received on construction impacts in a greater number of cases thereby helping to speed up the delivery of new housing.

The council will adopt a revised Code of Construction Practice and will continue to work with developers to ensure new homes are built taking into account impacts on existing uses and communities.

## 7.4. Influencing regional and national policy

The council has a working relationship with a large number of stakeholders, including the Government and the Mayor of London. During the preparation of the City Plan 2019-2040 the council engaged with many of them and will continue to engage with its stakeholders and partners when producing new planning policy documents.

The council will also continue to influence regional and national policy to ensure it benefits Westminster and that positively contributing to the delivery of new homes remains a key priority. Recently, the council formally responded<sup>12</sup> to a series of consultations that will affect national and regional planning policy including:

- Government consultation on 'Supporting housing delivery and public service infrastructure' document (March 2021).
- Government consultation on a 'National Planning Policy Framework and National Model Design Code: consultation proposals' series of documents (March 2021).
- Government consultation on 'Planning for the Future White Paper' (October 2020).
- Government consultation on Changes to the Current Planning System (October 2020).

The council will continue to engage with stakeholders and partners, including the Government and the Mayor of London and work collaboratively, when producing planning policy documents that address housing delivery in Westminster.

## 7.5. Maintaining up to date housing evidence

To deliver homes and to ensure planning and other local policies are up to date, it is crucial that the council maintains and updates its housing evidence and monitors housing delivery on an ongoing and regular basis. It is also important to ensure that the information is in the public domain, so all actors involved in housing delivery in the city are aware of issues, challenges and opportunities. There are a number of documents the council regularly updates and publishes, as detailed below.

In its latest [Local Development Scheme \(LDS\)\(March 2020\)](#), and the 'Implementation and Monitoring' chapter of the City Plan 2019-2040, the council set out the arrangements for its local planning policies review. Although the City Plan is subject to a full review every five years after adoption, the findings of the [Authority Monitoring Report](#) (AMR), alongside other evidence, will inform if key policy objectives are succeeding or failing (e.g. housing delivery is lower than the annual target) which may indicate a review of the policy framework is required.

### 7.5.1. Publishing Authority Monitoring Reports

The Government requires the council to annually publish [Authority Monitoring Reports](#) (AMRs). The AMRs monitor and assess current planning policy; whether objectives have been achieved, and whether these objectives are still relevant. AMRs set out the council's findings during its monitoring of development in the city, using the Key Performance Indicators set out in the City Plan to determine whether policy goals are being achieved. They also give an update on council activities such as Local

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<sup>12</sup> <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-policy/emerging-policies-and-consultations/council-responses-planning-policy-consultations>

Plan development, progress against the Local Development Scheme, Neighbourhood Planning and meeting the council's statutory duty to co-operate with other authorities.

The council last published an [Authority Monitoring Report for 2018/29](#) in March 2020 and a new framework for these reports in line with the KPIs in the recently adopted City Plan 2019-2040 is now in development.

The council will continue to annually publish an [Authority Monitoring Report](#), including data on overall housing delivery and affordable housing (by tenure and type). The council will also share the data with the Mayor of London and feed into the Mayor's Monitoring Report. Findings reported in the AMR will inform any potential review of policies in Westminster's Development Plan.

### **7.5.2. Maintaining the Brownfield Register**

The Government requires the council to prepare and maintain a register of brownfield land suitable for residential development. The register provides potential developers with information about sites that may be available for housing development. Sites listed in the Brownfield Register may be identified through different evidence gathering exercises – maintaining a comprehensive, up to date and accessible register can help boost housing delivery by ensuring developers are aware of land available for housing development.

The Brownfield Register is subject to annual review. Each of its iterations is informed by council's housing land supply data, planning applications database, and housing renewal sites data. Most of the sites in Westminster's Brownfield Register may already have proposals or planning permission for development.

The council last updated its [Brownfield Register](#) in 2020.

The council will continue to annually update its Brownfield Register, including both private and publicly owned sites, to provide up-to-date and consistent information on sites that the council considers to be appropriate for residential development.

### **7.5.3. Publishing 5 Year Housing Land Supply Statements**

As explained in Section 5 of this report, the NPPF requires the council to identify a supply of specific, deliverable sites for years 1-5 of the new City Plan 2019-2040 to provide five years' worth of housing against the housing requirement. Throughout the Examination process and in accordance with the Planning Practice Guidance, the council confirmed and published a 5 Year Housing Land Supply for Westminster for 2020-2025.

The council last published a [5 Year Housing Land Supply Statement](#) in April 2021. The sites included in the statement equate to the delivery of 5,686 homes over the five-year period 2020-2025 (against a 5,418 requirement).

The council will continue to annually publish and confirm 5 Year Housing Land Supply Statements, including private and publicly owned sites, to provide up-to-date and consistent information on sites that the council considers deliverable. Forthcoming statements will help monitor anticipated delivery

against the required housing target and also provide clarity to developers about which sites in the city are being developed.

#### **7.5.4. Monitoring housing need**

The Mayor of London through the London Plan plans for the housing needs of all Londoners, treating London as a single housing market. In partnership with boroughs, including Westminster City Council, the Mayor undertook a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA) to identify needs and where homes could be delivered, subsequently establishing housing targets for every borough.

Although monitoring housing need in London is a strategic matter and therefore the prerogative of the London Plan, the council can also produce and update evidence on Westminster's specific housing needs to better help deliver Westminster's housing target. Although the council relies on the evidence used during the Examination of the new London Plan, it also published a number of housing need documents during the Examination of City Plan 2019-2040, These documents remain the most up to date evidence the council has recently produced on housing needs. The following documents can be found on the council's City Plan Examination Library:

- [Westminster housing needs analysis \(June 2019\)](#)
- [Westminster housing needs analysis – technical appendix \(June 2019\)](#)

The council will continue to work with stakeholders including the Mayor of London and Neighbourhood Forums when monitoring housing need in Westminster. If housing need changes, planning policies and housing requirements may be reviewed. Monitoring housing need is key to know how many homes and what type of homes need to be delivered in Westminster.

#### **Affordable Housing need**

The council annually publishes an Affordable Housing Statement setting out the preferred affordable housing tenure split, taking into account up to date affordable housing need.

The council last published an [Affordable Housing Statement for 2019](#) in 2019.

The council will continue to annually publish an Affordable Housing Statement, to ensure that new affordable homes in Westminster are of the right size to meet needs.

#### **7.5.5. Working with the Greater London Authority on data sharing**

Following the adoption of its new London Plan 2021, the Greater London Authority (GLA) launched a new project which key goal is to monitor how London changes, including monitoring housing delivery. The [Planning DataHub](#) project is being developed at the moment and, although led by the GLA, it is a collaborative project between the GLA and all the local planning authorities within London, including Westminster City Council.

The Planning DataHub replaces the [London Development Database](#) (LDD). The new interactive dataset is the result of all authorities contributing towards it. New more accessible and user-friendly dashboards are also being developed.

The council will continue to support the GLA in developing the Planning DataHub and will continue to provide data when requested to ensure it is in the public domain.

## **7.6. Engagement & decision making**

### **7.6.1. Updating the Statement of Community Involvement**

The council's [Statement of Community Involvement \(SCI\)\(2014\)](#) sets out a framework for how the council engages and consults with local communities throughout the planning policy-making process and during the determination of planning applications.

In its latest [Local Development Scheme \(LDS\)\(March 2020\)](#), the council committed itself to updating the SCI to reflect the increasing role of Neighbourhood Planning within the development framework as well as the increasing potential of digital tools and social media as a way of broadening meaningful and inclusive engagement.

The refreshed SCI will seek to clearly and concisely set out how people can become involved in plan-making directly at a local level through neighbourhood planning, as well as engaging with the production or update of policy documents and supplementary planning documents and on individual development proposals. The statement will also clearly outline when the council must consult with local communities and the engagement methods that will be used to ensure that at each stage of the planning process, local communities and stakeholders are able to shape development within Westminster.

By publishing a refreshed SCI, this should enable communities to shape the framework that guides housing development by influencing Westminster's Development Plan to ensure it addresses local issues whilst helping deliver the homes Westminster needs. This should also further support the delivery of housing supply by ensuring local communities are able to easily engage with individual development proposals from an early stage to shape development within their area. By facilitating early and meaningful engagement this should help foster local support for housing proposals to help assist with a more expedient decision-making process.

### **7.6.2. Engaging before a planning application is submitted**

In some cases, applications are submitted to the council as already defined proposals without significant engagement with local residents, stakeholders and statutory consultees before submission. Consequently, planning applications for new housing can experience delays in decision making due to a considerable number of objections from local residents and stakeholders on issues ranging from the impact of proposals upon amenity as well as the design of new buildings. This often results in a lengthier planning process as planning officers seek to address issues raised during the statutory planning application process, often through negotiation where necessary and appropriate, which results in delays to decision making and delivery of new housing. This can also result in the need for applications to be decided at planning committee, adding further delay. Actions outlined below seek to encourage early engagement between developers, communities, consultees and the council to address issues from an early design stage with the ambition of streamlining and speeding up the design and statutory planning processes to increase the speed of housing delivery.

### **7.6.2.1. Developing an Early Community Engagement Guidance Note - early engagement between developers & communities**

The council is currently drafting an 'Early Community Engagement Guidance' note addressed to developers that outlines methods for undertaking early, open, transparent, inclusive and responsive early engagement with local communities, stakeholders and councillors at the early design stage, so that local communities are involved in helping shape the vision and design of new developments, including those for new housing. The aspiration is that communities will help shape sustainable development with developers, so that when a formal planning application is submitted to the council, the number and severity of objections to new housing proposals may be reduced to assist the council in making more timely decisions and reduce delays within the planning process which could help speed up the delivery of new housing.

The council is preparing an 'Early Community Guidance' note and consulting on it, to ensure developers have meaningful early engagement with local communities at the initial vision and design stage of development proposals.

### **7.6.2.2. Providing advice at pre-application stage**

The council offers a pre-application service for developers whereby applicants can submit proposals and planning officers can offer advice on how policies will be applied to proposals, raise any issues that may arise and advise on the level of information that would be required as part of a formal planning application. This service can help avoid unacceptable proposals whilst advising on potential changes to schemes that may be required to address any initial concerns and to increase the likelihood of proposals being supported.

More information on the council's pre-application service can be found on the [website](#).

This process can help speed up the validation of applications and support timely decision-making by ensuring that the correct information required to consider proposals is provided from submission whilst it can aid in refining proposals towards schemes that may be considered more favourably. From the perspective of housing delivery, it also offers the planning service an early opportunity to advise on how sites may be optimised to deliver an appropriate number, mix and tenure of housing.

The aforementioned draft 'Early Community Engagement Guidance' note seeks to encourage developers to consult with communities prior to submission of pre-applications. The council's pre-application service in combination with the 'Early Community Guidance' note seeks to encourage early engagement and dialogue between local communities, developers and the council to ensure that proposals are both shaped by and have the support of local communities and to provide an early opportunity to raise any potential technical issues and advise applicants on how proposals can ensure they support the objectives and vision of Westminster's City Plan.

The council will continue to provide meaningful pre-application advice and promote early engagement, dialogue and advice to help iron out potential problems at an early stage to assist in a timely decision-making process when a formal planning application is submitted and to support the increased speed of delivery of new housing whilst also supporting the optimisation of sites.

### **7.6.2.3. Encouraging early engagement with statutory consultees**

A wide range of stakeholders may have an interest on an individual development proposal. The council encourages early consideration of infrastructure, utilities and heritage requirements. It provides advice on these issues and encourages early engagement with statutory consultees.

The council therefore supports the Mayor of London's Infrastructure Coordination Development Service (ICDS) which is a service that works with Transport for London, local boroughs, contractors and utilities companies providing applicants with advice on how new development schemes can link into existing local infrastructure and networks including utilities such as waste, water and electricity. Through the council's pre-application advice service, the council will encourage developers, particularly of larger schemes, to use this service as it is understood that in some cases the provision and coordination of infrastructure can add to delays to the progression and buildout of schemes.

Other statutory consultees who would formally comment on planning applications also offer their own pre-application services to offer more detailed and technical advice on certain issues affecting schemes, for example the Environment Agency has a service to offer early advice to developers on issues concerning flood risk and mitigation. Through the pre-application advice service, the council could flag issues that may arise and suggest statutory consultees that applicants may wish to seek early advice from when shaping proposals so that when statutory consultees are consulted at formal application stage, there are less likely for objections to be received.

The council will continue to encourage early consideration of issues that affect development and early engagement with statutory consultees so requirements are incorporated into the design of housing schemes from an early stage. This will avoid unforeseen delays to the progression of schemes and help speed up the delivery of new housing and associated infrastructure.

### **7.6.3. Determining planning applications**

#### **7.6.3.1. Updating the Planning Validation (Local Requirements) List**

Following adoption of City Plan 2019-2040, a number of changes are being proposed to the council's Planning Validation List to ensure that all information required for determination of a planning application is provided when an application is submitted. These changes are intended to provide clarity on the requirements at the planning application stage and to ensure planning officers have all the required information to enable them to make a full, informed assessment of proposals without delays.

The council has recently consulted on the proposed changes to the Planning Validation List. Following Cabinet's approval, the new Planning Validation List will be used when assessing planning applications.

#### **7.6.3.2. Committees & engagement with Members**

For development of strategic scale, the council enables developers to meet with the Cabinet Member for Business, Licensing and Planning and/or the Chairman of Planning. This process is in accordance with the [Localism Act 2011](#) and associated guidance, and the Local Government Association's "[Probity in Planning for Councillors and Officers](#)", which allow for and encourage early member engagement on potential planning applications prior to their submission. These meetings enable lead members, supported by officers, to provide an informal political steer to support developers in evaluating

political and policy expectations associated with emerging development sites/opportunities. This approach, allied to engagement with local communities (including Ward Councillors) and officers, which must occur first, helps to enhance developer confidence in bringing forward schemes. The criteria for lead member meetings is provided as part of the council's online [pre-application advice](#).

Reform of the council's planning committee format in the period since February 2019 has seen the introduction of public speaking, enabling developers and interested parties to address planning committees for the first time in Westminster. As well as better enabling those with concerns regarding development to articulate their views to the committee, this has enabled developers, their representatives and their supporters to more clearly articulate the planning benefits of their development proposals.

The council will continue to encourage engagement between developers, communities and elected Members in a way that helps housing schemes to come forward.

## **7.7. Staff and resourcing**

### **7.7.1. Place Shaping and Town Planning Service Review**

The council's Town Planning service has been restructured during 2021 to ensure it is more efficient, flexible and responsive to changes in application volumes and types over time. The changes made, which include the formation of a single Design, Conservation and Sustainability Team, will contribute to the ability of the council to continue to assess and determine planning and related applications quickly, whilst also delivering development of a high quality.

The new Design, Conservation and Sustainability Team will enable the introduction of new skill sets into the Town Planning service, such as those required to assess sustainability and energy performance, which are policy areas that have been significantly enhanced in the recently adopted City Plan 2019-2040.

The council will continue to develop officer skills through training and through the future recruitment of officers with appropriate specialist skills. This will ensure that the officer assessment of housing development will not be delayed by these recently introduced policy areas, which are critical to tackling the Climate Emergency.

### **7.7.2. Staff training & development opportunities**

The council, through its People Strategy – the 'Westminster Way' – supports officers' continuous learning. The Westminster Way is underpinned by three pillars:

- Personal development: Everyone has talent
- Value our people and diversity: Everyone is valued
- The Westminster Way of working: Everyone is a leader

In line with the 'Westminster Way' of working, the council will continue to facilitate development opportunities for its staff, to make the most of its officers and ensure they deliver world class public services. This may include sponsoring training opportunities or facilitating secondments.

The council will continue to implement the 'Westminster Way' and work with partners including Urban Design London, the Royal Town Planning Institute, Planning Advisory Service and New London Architecture to ensure its officers deliver the best service possible and contribute to deliver City for All commitments.

## **8. Next steps and monitoring the Housing Delivery Test 2020 Action Plan**

The council will continue to deliver on its commitments set out in City for All and the City Plan 2019-2040 and will make sure council policies and strategies are up to date and help boost housing delivery. The council will also continue to work with its key stakeholders and partners, including the Mayor of London, landowners, developers and Neighbourhood Forums to make sure high-quality homes are delivered across the city.

### **8.1. Forthcoming Housing Delivery Test Results**

The government is expected to publish the Housing Delivery Test results for 2021 in November 2021. If the council delivery falls below 95%, the council will follow the advice set out in the National Planning Policy Framework and the Planning Practice Guidance when deciding which next steps to take.

The Housing Delivery Test 2021 will be calculated using data relating to financial years 2018/19, 2019/20 and 2020/21. Westminster's 2016 City Plan target of 1,068 homes a year should be used for 2018/19 and the City Plan 2019-2040 target of 985 homes a year should be used for years 2019/20 and 2020/21. In a [Ministerial Statement](#) from the Ministry of Housing, Communities and Local Government made on 6 September 2021, the government has confirmed that in order to consider the disruption to local authority services and the construction sector caused by the first national lockdown in March 2020, the government will apply a four-month adjustment to the 2020/21 housing requirement.

### **8.2. Forthcoming Authority Monitoring Reports**

Notwithstanding the Housing Delivery Tests results for 2021, the council will continue to monitor housing delivery in Westminster in its forthcoming [Authority Monitoring Reports](#) (AMRs).

The council will also report on progress made against this Housing Delivery Test 2020 Action Plan in the forthcoming AMRs.

## Appendix 1: Derived actions and plan – summary table

Area of action/ issue	No.	Action	Timescale	Responsible team/ department
<b>Affordable housing delivery</b>	1	Enable delivery of 1,850 new homes on council owned sites.	By 2023	Development Team; Housing Team
	2	Producing and maintaining a Housing Investment Plan and a 30-year HRA Business Plan.	Ongoing, with regular reviews	Development Team; Corporate Property Team; Housing Team
	3	Developing and progressing Housing Renewal programmes in Church Street and Ebury Bridge Housing Renewal Areas.	Ongoing	Development Team; Regeneration Team
	4	Progressing the council's Infills Programme.	Ongoing	Development Team; Housing Team
	5	Enabling housing delivery through Westminster Builds.	Ongoing	Development Team; Housing Team
	6	Working with stakeholders and partners to deliver new homes.	Ongoing	Development Team; Town Planning Team; Place Shaping Team; S106 & CIL Team; City Planning Policy Team
<b>Updating Westminster's Development Plan</b>	7	Adoption and implementation of Westminster City Plan 2019-2040.	Adoption in Spring 2021, followed by implementation	City Planning Policy Team
	8	Preparation and adoption of a Site Allocations Plan.	2022 -2023	City Planning Policy Team
	9	Preparation and adoption of	Ongoing / As needed	Neighbourhood Forums & City

		Neighbourhood Plans.		Planning Policy Team
<b>Developing local policies and guidance that supports housing delivery</b>	10	Preparation and adoption of Supplementary Planning Documents.	2021 - 2022	City Planning Policy Team
	11	Preparation and adoption of Place Plans.	Ongoing / As needed	Place Shaping Team
	12	Updating the council's Code of Construction Practice.	Autumn 2021	Policy & Projects Team / Public Protection and Licensing
<b>Influencing regional and national policy</b>	13	Preparing responses to Government, Mayoral and other consultations on housing supply and delivery.	As needed	City Planning Policy Team / Policy & Projects Team
<b>Maintaining housing evidence up to date</b>	14	Publishing an Authority Monitoring Report.	Annually	City Planning Policy Team
	15	Publishing a Brownfield Register.	Annually	City Planning Policy Team
	16	Publishing a 5 Year Housing Land Supply Statement.	Annually	City Planning Policy Team
	17	Updating and publishing housing need evidence.	As needed	City Planning Policy Team / Policy & Projects Team
	18	Publishing an Annual Affordable Housing Statement.	Annually	City Planning Policy Team / Policy & Projects Team
	20	Working with the GLA on data sharing.	As needed	City Planning Policy Team / Strategy & Intelligence
<b>Engagement &amp; Decision Making</b>	21	Updating the Statement of Community Involvement.	Winter 2021/22	City Planning Policy Team

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	22	Producing an 'Early Community Engagement Guidance' note.	Autumn 2021	Town Planning Team
	23	Providing pre-application advice.	Ongoing	Town Planning Team
	24	Working with statutory consultees at pre-application stage.	Ongoing	Town Planning Team
	25	Updating the Planning Validation List (Requirements List).	Autumn 2021	Town Planning Team
	26	Maintain speed of decision making to ensure application processing delays are avoided.	Ongoing	Town Planning Team
<b>Resourcing and staff</b>	27	Restructure of Place Shaping and Town Planning to help make better use of resources.	Autumn 2021	Place Shaping / Town Planning Team
	28	Staff training	Ongoing	Across the council

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