

CITY PLAN 2019 - 2040

Integrated Impact Assessment

Regulation 19 Consultation

March 2024

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1 Non-technical summary

1.1 Introduction

Westminster City Council is preparing a partial review of its adopted Local Plan (the City Plan 2019-2040). The revised City Plan will amend the adopted affordable housing policy (Policy 9) and introduce new policies that prioritise retrofit-first development and site allocations. The revised and new policies will together, contribute to the vision for making Westminster a fairer and more inclusive city.

This report presents the findings of the Integrated Impact Assessment (IIA) for the draft City Plan partial review and has influenced the drafting of policies being considered as part of this review. This report covers assessments and appraisals that help optimise the policies and proposals in the City Plan and will help the council meet statutory requirements. It covers:

- *Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)* – considering all likely significant effects on the environment, economic and social factors in line with European and National legislation.
- *Equalities Impact Assessment (EqIA)* – considering equality impacts, having regard to the protected characteristics in the Equalities Act 2010.
- *Health Impact Assessment (HIA)* – seeking to maximise positive health impacts.
- *Community Safety Assessment* – seeking to prevent crime and disorder in line with the Crime and Disorder Act 1998.

Consultation on the scoping report was undertaken as part of the Regulation 18 consultation on the partial review of the City Plan in October-November 2022. This consultation considered the suitability of re-using the majority of objectives from the IIA Scoping Report for the adopted 2021 City Plan. One response was received and the necessary changes to the IIA Framework and the baseline data have been updated accordingly.

The IIA Framework sets out the objectives and sub-criteria that will be used to assess the likely significant effects of the relevant policies subject to the partial City Plan review. Themes covered by this framework are:

- | | |
|-------------------------------|------------------------------|
| 1. Communities | 10. Noise |
| 2. Crime reduction | 11. Transport |
| 3. Housing | 12. Waste |
| 4. Health & wellbeing | 13. Heritage |
| 5. Climate change | 14. Public realm & townscape |
| 6. Natural resources | 15. Open space |
| 7. Flood risk & water quality | 16. Employment opportunities |
| 8. Biodiversity | 17. Economy |
| 9. Air quality | |

IIA in the plan making process

The IIA has been used during the plan making process to optimise the overall strategy of the City Plan partial review and to optimise the performance of revised and new planning policies.

An important element in optimising the strategy was the assessment of reasonable alternatives. This document forms an appraisal of the reasonable alternatives to the policies being proposed in the City Plan partial review.

The assessment of draft planning policies of the revised City Plan has led to recommendations to further improve policies, which have been incorporated in the publication version of the revised City Plan.

Findings of the Westminster City Plan appraisal

The policies for the City Plan revision were assessed against the IIA Framework, followed by a consideration of the plan as a whole and the consideration of the City Plan alongside other plans, policies and proposals. The appraisal found the policies in the partial City Plan review to be performing well against all objectives, identifying significant positive effects under each of the objectives.

Next steps

The IIA Report is subject to consultation between 14 March 2024 and 25 April 2024. Consultation responses to the IIA will inform the City Plan Partial Review prior to submission to the Secretary of State and will be considered by the Inspector at Examination. At adoption of the City Plan Partial Review, an IIA Statement will be published setting out the monitoring approach.

2 Introduction

2.1 Westminster's City Plan

Westminster City Council is preparing a partial review of its adopted Local Plan (the City Plan 2019-2040). The revised City Plan will amend the adopted affordable housing policy (Policy 9) and introduce new policies that prioritise retrofit-first development and site allocations. The revised and new policies will together, contribute to the vision for making Westminster a fairer and more inclusive city.

The revised City Plan will cover the whole area of the City of Westminster and covers a timeframe up to 2040. Once adopted, it will be the Local Plan for the city, which together with the London Plan as the Spatial Strategy for London and any 'made' Neighbourhood Plans will make the statutory development plan Westminster.

City Plan vision

City Plan 2019-2040 is Westminster's strategy for growth in the city. It provides a vision for how Westminster's needs can be met, focussing on the need for new homes, creating space for thriving businesses, as well as protecting and enhancing parks and green spaces.

The City Plan vision is structured along three main themes:

- A vision for "Growth",
- A vision for "Homes and Communities" and
- A "Heathier and Greener" vision.

City Plan objectives

All the objectives detailed in the City Plan contribute to the council's commitment to improve the health and wellbeing of the city's residents and workers. All the objectives contribute to the delivery of the three key themes in the council's vision to make Westminster a **fairer City**.

The objectives for Westminster 2040 are to:

1. *Ensure neighbourhoods are supported by sufficient facilities and infrastructure necessary to build successful communities.*
2. *Improve quality of life, climate resilience and tackle environmental challenges by protecting, enhancing, expanding our valuable network of natural spaces.*
3. *Promote quality in the design of buildings and public spaces, ensuring that Westminster is attractive and welcoming.*
4. *Enhance the West End as London's primary retail, leisure, and visitor destinations, and ensure our town centres and high streets can adapt to the challenges they face.*
5. *Enhance connections by improving active travel options, with pedestrian movement prioritised, improve interchange between transport modes, and incorporate innovative solutions to manage the highway network.*
6. *Enable job growth across a range of sectors vital to the UK economy, and ensure those from disadvantaged backgrounds benefit from the opportunities this presents.*
7. *Increase the stock of high-quality housing and provide variety in terms of size, type and tenure to meet need and promote mixed and inclusive communities, with a clear focus on affordability and family sizes.*

8. *Broaden the city's cultural offer, while managing the impacts of clusters of uses, and of the evening and night time economies on existing residential communities.*
9. *Improve air quality, minimise noise and other polluting impacts, and reduce carbon and water demands by minimising detrimental impacts from development.*
10. *Make the most of our unique heritage and historic environment while encouraging innovation in building technology and improving sense of place.*

2.2 Requirements for IIA

This Integrated Impact Assessment (IIA) combines a number of assessments and appraisals that are either statutory requirements or are good practice to be prepared alongside a Local Plan, and presents them in an integrated way. The IIA for the City Plan revision was carried out ‘in-house’ over 2023 and early 2024 concurrent with the preparation of the City Plan.

Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)

Under the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) including a Strategic Environmental Assessment (SEA), prepared in accordance with the Strategic Environmental Assessment Directive EC/2001/42 is required for all Development Plan Documents.

Paragraph 32 of the NPPF (2018) states that:

Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).

Appendix VII demonstrates how the IIA Report complies with the SEA Directive.

Equalities Impact Assessment (EqIA)

The council has a statutory duty to have regard to the equality impacts of its decisions. The public sector Equalities Duty (section 149 of the Equality Act 2010) came into force on 5 April 2011 which extended the previous duties to cover the following protected characteristics:

- Age
- Gender
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race or ethnicity
- Religion or belief
- Sex
- Sexual orientation
- People on low incomes

Health Impact Assessment (HIA)

While there is no statutory requirement to undertake a Health Impact Assessment (HIA), the council is committed to integrating public health into planning policy and strategies. Additionally, the government has clearly expressed a commitment to promoting HIAs at a policy level in a variety of policy documents and they are increasingly being seen as best practice. Their overarching aim is to ensure plans and policies minimise negative impacts and maximise positive health impacts.

Community Safety Assessment

Section 17 of the Crime and Disorder Act 1998 places a responsibility on local authorities to exercise their various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder.

2.3 IIA Scoping

As part of the Regulation 18 consultation, the council consulted on the suitability of re-using the majority of objectives from the IIA Scoping Report for the 2021 City Plan. The exception to this was objective 8 related to biodiversity which amended to reflect the NPPF's increased emphasis. The consultation ran for a 6 week period from 7th October to 18th November 2022. All contacts on the council's consultation Planning Policy database (2,254 individuals and organisations) were consulted, including ward councillors, neighbouring boroughs, the Mayor of London, and other statutory consultees including Natural England, Historic England and the Environment Agency.

One respondent provided comments to the council's intention to use the 2021 IIA Scoping Report. Appendix II provides an overview of all comments received and how these have been considered.

The consultation response has led to changes to the IIA Framework, the baseline data and the relevant plans and programmes specifically the health and wellbeing data and impact of the Covid-19 pandemic. Updated baseline data can be found in Appendix III.

2.4 IIA Framework

The likely impacts of the City Plan are being assessed using a set of objectives that reflect the current social, economic and environmental issues affecting the borough. These objectives are presented in the IIA Framework in Table 1. Detailed appraisal questions have been developed for each objective to help the assessment.

The IIA Framework was consulted upon as part of the Scoping Report consultation. The IIA Framework has been updated and refined in light of comments received, including the objectives and appraisal questions. The objectives have been placed under an overarching theme to help identify the respective objectives, and help present the framework in a more user-friendly format.

The IIA Framework takes account of specific priority objectives from the council's Equality Objectives¹ and potential impacts on persons sharing one or more of the protected characteristics. The questions that relate to equalities issues are highlighted in red in the IIA Framework.

The long term goals set out in Westminster's Joint Health and Wellbeing Strategy (2023-2033) and the built environment factors that are most likely to influence health in Westminster have also been taken into account, and are highlighted in blue in the IIA Framework.

The impact of reduction in crime and disorder in accordance with Section 17 of the Crime and Disorder Act 1998 has been taken into account through an assessment against Objective 2 'Crime reduction'. This has been informed by the council's strategic priorities to make Westminster safer as set out in the Safer Westminster Partnership Strategy 2017-2020.

Appendix V provides additional background to the IIA objectives.

Fairer Westminster

The council's corporate ambitions are set out in Creating a Fairer Westminster Delivery Plan (April 2023 – March 2024)²: The council believes in building a Fairer Westminster that supports and celebrates all of its communities; a council combining social justice with efficient services; and where residents are at the heart of decision making. To achieve this the council has set five key ambitions:

- Fairer Communities
- Fairer Housing
- Fairer Economy
- Fairer Environment
- Fairer Council

Appendix VI sets out how these five programmes are linked to the IIA objectives.

¹ [Equality duties | Westminster City Council](#)

² <https://www.westminster.gov.uk/media/document/fairer-westminster-delivery-plan-2023-24>

Table 1: Integrated Impact Assessment Framework

	IIA Objective	Appraisal questions (EQIA/HIA)
1. Communities	To create cohesive and inclusive communities, supported by the delivery of physical and social infrastructure.	<p>Will it improve access to local services, shops and community facilities?*</p> <p>Will it increase ability to influence decision-making (neighbourhoods)? *</p> <p>Will it foster an inclusive Westminster community?</p> <p>Will it encourage engagement in community activity?</p>
2. Crime reduction	To reduce crime and the fear of crime (including disorder and antisocial behaviour).	<p>Will it reduce crime, disorder and antisocial behaviour? **</p> <p>Will it reduce fear of crime, disorder and antisocial behaviour? **</p> <p>Will it reduce other behaviour adversely affecting the local environment? **</p>
3. Housing	To boost the supply of high quality housing of all types and tenures including affordable and specialist housing to address a range of needs.	<p>Will it create high quality homes? **</p> <p>Will it increase range of affordable housing? **</p> <p>Will it reduce homelessness? **</p> <p>Will it provide housing that can help people stay independent for longer?</p> <p>Will it reduce number of unfit homes? **</p> <p>Will it provide a range of housing types and sizes?</p>
4. Health & wellbeing	To promote and improve quality of life and health and wellbeing of residents.	<p>Will it help improve health inequalities? **</p> <p>Will it contribute to a reduction in death rates?*</p> <p>Will it improve access/movement?*</p> <p>Will it encourage healthy lifestyles through increased participation in sport and physical activity? **</p> <p>Will it improve cultural wellbeing?*</p> <p>Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people?*</p> <p>Will it provide access to a healthy diet?</p> <p>Will it create healthy homes and workplaces?</p> <p>Will it increase healthy years life expectancy? **</p> <p>Will it improve mental health and wellbeing?*</p> <p>Will it improve facilities and accessibility for people with disabilities? **</p>
5. Climate change	To reduce greenhouse gas emissions and support climate change adaptation.	<p>Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? *</p> <p>Will it reduce ozone depleting emissions?*</p> <p>Will it reduce emissions through retrofitting new technology?*</p>

		<p>Will it reduce heat island effects on people and property?*</p> <p>Will it increase resilience to climate change?*</p>
6. Natural resources	To reduce the use of limited natural resources and make efficient use of land	<p>Will it reduce water consumption and improve water efficiency?</p> <p>Will it reduce consumption of fossil fuels *</p> <p>Will use of other natural resources (e.g. quarried materials, wood) be minimised?</p> <p>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</p> <p>Will it make efficient use of land?</p>
7. Flood risk & water quality	To reduce flood risk, promote SUDs, protect surface and groundwater quality	<p>Will it minimise flood risk from all sources of flooding? *</p> <p>Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?*</p> <p>Will it reduce combined sewer overflow events?*</p> <p>Will it protect water quality?*</p>
8. Biodiversity	To protect, enhance and create environments that secure and support a net increase in biodiversity	<p>Will it protect, enhance and increase biodiversity and protect habitats?</p> <p>Will it preserve Sites of Importance for Nature Conservation?</p> <p>Will it improve access to and promote educational value of sites of biodiversity interest?*</p> <p>Will it conserve and enhance species and habitats?</p>
9. Air quality	To improve air quality	<p>Will it improve air quality? *</p> <p>Will it reduce emissions of key pollutants?*</p>
10. Noise	To reduce noise and the impact of noise.	<p>Will it reduce noise concerns and noise complaints?</p> <p>Will it reduce noise levels? *</p>
11. Transport	To encourage sustainable transport and major public transport improvements.	<p>Will it reduce volumes of traffic?*</p> <p>Will it encourage walking and cycling?*</p> <p>Will it increase proportion of journeys using modes other than the car?*</p> <p>Will it improve public transport accessibility?*</p>
12. Waste	To reduce waste production and increase recycling, recovery and re-use of waste	<p>Will it reduce consumption of materials and resources?</p> <p>Will it reduce household waste?</p> <p>Will it increase recycling, recovery and re-use?</p> <p>Will it reduce construction waste?</p>
13. Heritage	To conserve and enhance the significance of heritage assets and their settings	<p>Will it conserve or enhance heritage sites and cultural value?</p> <p>Will it protect strategic views?</p>

		<p>Will it conserve or enhance heritage assets and their settings?</p> <p>Will it help preserve, enhance and record archaeological features and their settings?</p> <p>Will it protect and enhance the setting of the Westminster World Heritage Site?</p>
14. Public realm & townscape	To enhance public realm and townscape.	<p>Will it enhance townscape?</p> <p>Will it encourage exemplary design standards?</p> <p>Will it reduce litter?</p> <p>Will it enhance the quality of public realm?</p> <p>Will it improve access and mobility for all equality group strands? **</p>
15. Open space	To protect Westminster's world class open and civic spaces, the Thames and other waterways and seek opportunities to increase open space and further greening.	<p>Will it enhance the quality of open space?*</p> <p>Will it improve landscape character?</p> <p>Will it improve access to open space? **</p> <p>Will it enhance the green infrastructure network? **</p>
16. Employment opportunities	To ensure equality of opportunities, improve local opportunities and support sustainable economic growth throughout Westminster.	<p>Will it improve qualifications, skills or training? **</p> <p>Will it create new jobs and reduce unemployment?*</p> <p>Will it provide jobs for those most in need? *</p> <p>Will it improve earnings?</p> <p>Will it promote equality of opportunity across the city by tackling barriers to employment?</p>
17. Economy	To meet Westminster's need for workspace, shops, cultural facilities and other uses of local, London-wide and national importance to maintain economic diversity and support sustainable economic growth.	<p>Will it improve business development and environment?</p> <p>Will it improve business resilience and economy?</p> <p>Will it encourage new business start-ups, small businesses and opportunities for local people?*</p> <p>Will it promote business in key sectors?</p> <p>Will it promote regeneration? **</p>

2.5 Appraisal method

Professional judgement will be used to identify causal links between the options/ policies of the City Plan Partial Review and the IIA objectives, informed by the baseline information and wider evidence base. The criteria in Schedule 1 of the SEA regulations will be considered as part of the appraisal.

Due to the strategic nature of the City Plan Partial Review including its options, it will be challenging to predict effects precisely. Therefore, a cautious approach will be followed when identifying significant effects. Sometimes it will not be possible to predict significant effects, and it will therefore be necessary to comment on the options or policies in more general terms.

The questions in the IIA Framework will be used to assess the contribution of a policy to the objective, following the format of the rating system in Table 2.

Table 2: IIA Assessment ratings

Scale of effect		Definition
++	Major positive effect	The proposed option/policy contributes significantly to the achievement of the objective.
+	Minor positive effect	The proposed option/policy contributes to the achievement of the objective but less significantly.
0	Neutral or no effect	The proposed option/policy does not have any effect on the achievement of the objective.
-	Minor negative effect	The proposed option/policy detracts from the achievement of the objective but less significantly.
--	Major negative effect	The proposed option/policy detracts significantly from the achievement of the objective.
?	Uncertain	The proposed option/policy as an uncertain relationship with the objective or the relationship is dependent in a way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

3 Reasonable Alternatives

3.1 Introduction

This chapter sets out how the IIA process has been used during the plan making stage to influence strategy and policies in the revised City Plan Partial Review. This includes the consideration of reasonable alternatives including the preferred option, which has been assessed against the baseline information.

More detailed assessments of the appraisals undertaken as part of the consideration of reasonable alternatives are contained in Appendix VIII.

3.2 Policy 9 – Affordable Housing Reasonable Alternatives

In 2021, the City Plan was adopted as part of a wider long-term plan for housing, commercial and infrastructure growth to be delivered in Westminster. Policy 9 of the plan sought to maximise affordable housing on sites in Westminster through the delivery of either on-site, off-site or payment in lieu provisions. The existing policy also requires 60% affordable units to be ‘intermediate’ affordable housing and 40% to be for social rent, as part of the tenure split.

As part of the City Plan Partial Review, this policy is now being reviewed and amended in order to maximise the provision of genuinely affordable housing for those most in housing need. The IIA process has been used to assess four alternative policy recommendations to strengthen this policy. A summary of the policy recommendations assessed, as well as a summary of the findings are outlined below.

- a) Retain City Plan policy 9 as adopted (2021);
- b) Seek affordable housing contributions from small-scale residential developments in a revised Policy 9;
- c) Amend the tenure split to prioritise social housing in a revised Policy 9;
- d) Proposed Allocation- Amend existing policy 9 to seek both affordable housing contributions from small-scale residential developments and prioritise social housing.

Table 3: Summary of potential sustainability effects of Policy 9 Alternative Options

Reasonable Alternatives	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Option A	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
Option B	+	0	+	++	0	0	0	0	0	0	0	0	0	0	0	0	0
Option C	++	0	++	+	0	0	0	0	0	0	0	0	0	0	0	0	0
Option D	++	0	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0

As a result of the scoring above only identifying impacts for 3 of the IIA objectives, the summary below provides an in-depth analysis of the performance of the reasonable alternatives against each of the affected objectives.

Objective 1 – Communities

IIA Objective 1: To create cohesive and inclusive communities, supported by the delivery of physical and social infrastructure.

Re-appraising the existing policy has identified that the current tenure split will foster more inclusive communities. The impact on inclusive communities is likely to be improved by proposed option (c) which would increase the amount of social homes in the city, which would make housing across Westminster more inclusive. Option (c) therefore is considered to make a greater contribution to objective 1. Communities. Option (b) would increase the amount of affordable homes or funding available for affordable housing across the city by seeking affordable housing from small-scale residential developments, which would likely have a greater impact than option (a). It is unlikely that option (d) would have any conflicting impacts, as small-scale residential developments would not be required to provide on-site affordable housing, but the combined options would have a greater improvement on inclusivity as they would both increase the volume of socially rented homes, and other affordable housing, across the city.

Objective 3 – Housing

IIA Objective 3: To boost the supply of high quality housing of all types and tenures including affordable and specialist housing to address a range of needs.

Re-appraising the existing Policy 9 (a) re-affirms that it is likely to contribute towards all aspects of the housing objectives, however the appraisal process has identified that its impact is limited due to the current tenure split prioritising intermediate housing over social housing. Option (b) is likely to have a positive impact on most aspects of the housing objectives, however there is a risk that it could affect the delivery of high-quality homes through increased costs for the development of small-scale residential developments. Requiring small-scale residential developments to contribute towards affordable housing delivery could have an improved impact on the amount of high-quality affordable homes being built, which would off-set this. Option (c) is likely to have a positive impact on most of the housing objectives. The tenure split is unlikely to have any negative impact on housing delivery. Option (d) is likely to have a significant positive impact on most aspects of the housing objectives, however there is a risk that it could affect the delivery of high-quality homes through increased costs for the development of small-scale residential developments. Requiring small-scale residential developments to contribute towards affordable housing delivery could have an improved impact on the amount of high-quality affordable homes being built, which would off-set this. Several options exist to amend options (b) and (d) which could off-set some of the negative impacts: making clear contributions are subject to viability; or ensuring that it is set at a level that is unlikely to affect the viability of small-scale residential developments. Taken together, it is unlikely that any of options (b) – (d) would have a detrimental impact on each other. The combination of these options may be the most beneficial option.

Objective 4 – Health & wellbeing

IIA Objective 4: To promote and improve quality of life and health and wellbeing of residents.

Re-appraising the existing Policy 9 (a) re-affirms that it is likely to contribute towards most aspects of the health and wellbeing objectives, however, the appraisal process has identified that there is a negative impact prioritising intermediate homes and reducing health inequalities for those in need of social housing. Option (b) is likely to have a positive impact on all aspects of the health and wellbeing objectives

by delivering more affordable homes and improving the health and wellbeing of those most in need. Option **(c)** is likely to have a positive impact on all of the health and wellbeing objectives. The tenure split is likely to prevent those in need becoming homeless or in temporary accommodation thus, improving health inequalities and maximising independence. Option **(d)** is likely to have a significant positive impact on all aspects of the health and wellbeing objectives, and presents as the most beneficial option as a combination of options **(b)** and **(c)**.

No impacts have been identified for this chapter with regards to objectives 2 'Crime reduction' 5 'Climate change', 6 'Natural resources', 7 'Flood risk and water quality', 8 'Biodiversity', 9 'Air quality', 10 'Noise', 11 'Transport', 12 'Waste', 13 'Heritage', 14 'Public realm and townscape', 15 'Open Space', 16 'Employment opportunities' and 17 'Economy'.

Conclusion/Recommendation

Option **(a)** to retain the existing City Plan policy delivers the least benefits when assessed against the objectives of the sustainability appraisal compared to the other options. A combination of options **(b)** and **(c)** scores highest against the objectives, and they do not appear to cause any conflicts when taken together. The cumulation of these options would result in option **(d)** as the preferred option for the direction of the policy. Some mitigations could be adopted to option **(d)** which may limit any impact on the overall delivery of new homes:

- making clear affordable housing delivery is subject to viability;
- ensuring that affordable housing delivery is set at a level that is unlikely to affect the viability of small-scale residential developments.

3.3 Retrofit-First Reasonable Alternatives

A new retrofit-first policy to prioritise retrofit and refurbishment of existing buildings over unnecessary demolition and redevelopment to reduce the impact of development on climate change has been included as part of the City Plan Partial Review. Five alternative policy recommendations were assessed through the IIA process and summarised, as followed:

- a) No retrofit-first policy;
- b) Proposed Allocation- Setting embodied carbon targets for all proposals involving total demolition, and all major schemes, with a favourable view of extensions which enable retrofit.
- c) Reasonable Alternative 1- Setting embodied carbon budgets for all proposals involving total demolition and all major schemes but without a favourable view of extensions which enable retrofit;
- d) Reasonable Alternative 2- Setting embodied carbon budgets for all proposals;
- e) Reasonable Alternative 3- Require all applications to submit Whole Life Carbon assessment comparing retrofit to redevelopment and assess whether retrofitting is a viable option.

Table 4: Summary of potential sustainability effects of new Retrofit-First Policy Alternative Options

Reasonable Alternatives	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Option A	0	0	+	0	--	--	0	0	-	-	0	--	+	0	+	+	+
Option B	0	0	+	+	++	++	++	0	++	++	0	++	+	0	0	++	++
Option C	0	0	+	+	++	++	++	0	++	++	0	++	+	0	0	++	+
Option D	0	0	+	+	++	++	++	0	++	++	0	++	+	0	0	++	+
Option E	0	0	+	0	+	+	+	0	+	+	0	+	+	0	+	+	+

Assessment of Option A:

The existing City Plan policies do currently promote development, which is low carbon, although this is not explicit on embodied carbon and the approach to demolition across the city. Existing London Plan policies on embodied carbon also exist, albeit the range of schemes that these benchmarks apply to is limited. This means that the ability of existing policies to achieve the best possible outcomes in relation to Climate change, Natural resources and Waste are limited (**objectives 5, 6 and 7**). Impacts of the current levels of demolition were also identified to have negative impacts upon Air Quality and Noise (**objectives 9**

and 10). Conversely, current policies were identified to have a positive impact on the delivery of Housing, Heritage, Open space, Employment opportunities and Economy (**objectives 3, 13, 15, 16 and 17**). However, existing practices were identified to have a negligible impact upon Communities, Crime reduction, Flood risk & water quality, Biodiversity, Transport and Public realm & townscape (**objectives 1, 2, 4, 7, 8, 11 and 14**).

Assessment of Option B – Proposed Allocation:

A policy approach which set embodied carbon targets for all proposals involving total demolition and major schemes, along with a favourable view of extensions that enable retrofit would deliver more sustainability benefits than existing policies. By taking a selective approach to demolition and prioritising low carbon developments across schemes which will have the greatest impact on carbon emissions, significant positive benefits were identified in relation to Climate change, Natural resources, Flood risk & water quality, Air quality, Noise, Waste, Employment opportunities and Economy (**objectives 5, 6, 7, 9, 10, 12, 16, 17**). This is namely due to the environmental benefits of the policy, alongside the support for extensions which may further enhance the viability and take-up of retrofitting options across the city, keeping investment in Westminster and offering an option to continue to promote the growth of commercial and residential floorspace across the city. Further positive benefits were also identified with relation to Housing, Health & wellbeing, and Heritage (**objectives 3, 4 and 13**). These effects were namely due to the policy approach to restrict demolition, which would decrease harmful particulates in the air and decrease vehicle movements during construction periods, whilst also encouraging the delivery of housing and the protection of heritage. Neutral impacts were identified in relation to Communities, Crime reduction, Biodiversity, Transport, Public realm & townscape and Open space (**objectives 1, 2, 8, 14 and 15**).

Assessment of Option C:

A policy approach which set embodied carbon targets for all proposals involving total demolition and major schemes, but without a favourable view of extensions that enable retrofit would deliver more sustainability benefits than existing policies. By taking a selective approach to demolition and prioritising low carbon developments across schemes which will have the greatest impact on carbon emissions, significant positive benefits were identified in relation to Climate change, Natural resources, Flood risk & water quality, Air quality, Noise, Waste and Employment opportunities (**objectives 5, 6, 7, 9, 10, 12, and 16**). This is namely due to the environmental benefits of the policy. Further positive benefits were also identified with relation to Housing, Health & wellbeing, Heritage and Economy (**objectives 3, 4, 13 and 17**). These effects were namely due to the policy approach to restrict demolition, which would decrease harmful particulates in the air and also decrease vehicle movements during construction periods. Furthermore, the construction phases of retrofits would be reduced in some instances which when cumulatively applied across the city would have a positive impact. With regards to Economy, a number of benefits of the were identified, however as this option did not readily encourage extensions (as was the case for option (b)), this had a reduced impact on the delivery of economic benefits such as regeneration. As was the case with option (b) however, benefits were also identified for the delivery of housing and the protection of heritage. Neutral impacts were identified in relation to Communities, Crime reduction, Biodiversity, Transport, Public realm & townscape and Open space (**objectives 1, 2, 8, 11, 14 and 15**).

Assessment of Option D:

A policy approach which set embodied carbon targets for all proposals would deliver more sustainability benefits than existing policies. By prioritising low carbon developments across all schemes, significant positive benefits were identified in relation to Climate change, Natural resources, Flood risk & water quality, Air quality, Noise, Waste and Employment opportunities (**objectives 5, 6, 7, 9, 10, 12, and 16**). This is namely due to the environmental benefits of the policy. Further positive benefits were also identified

with relation to Housing, Health & wellbeing, Heritage and Economy (**objectives 3, 4, 13 and 17**). These effects were namely due to the policy approach to restrict demolition, which would decrease harmful particulates in the air and also decrease vehicle movements during construction periods. Furthermore, the construction phases of retrofits would be reduced in some instances which when cumulatively applied across the city would have a positive impact. With regards to Economy, a number of benefits of the were identified, however as this option would set embodied carbon budgets for all proposals, this might slightly restrict some types of commercial development and therefore economic growth outcomes may not be as great. As was the case with options (b) and (c) however, benefits were also identified for the delivery of housing and the protection of heritage. Neutral impacts were identified in relation to Communities, Crime reduction, Biodiversity, Transport, Public realm & townscape and Open space (**objectives 1, 2, 8, 11, 14 and 15**).

Assessment of Option E:

A policy approach which requires all applications to submit Whole Life Carbon assessment comparing retrofit to redevelopment and assess whether retrofitting is a viable option would deliver more sustainability benefits than existing policies. By requiring applicants to submit Whole Life Carbon assessments for all applications, minor positive benefits were identified for the majority of objectives including Housing, Climate change, Natural resources, Flood risk & water quality, Air quality, Noise, Waste, Heritage, Open space, Employment opportunities and Economy (**objectives 3, 5, 6,7, 9, 10, 12, 13, 15, 16 and 17**). For the environmental impacts of the policy, this scored less than options (b), (c) and (d) due to the Whole Life Carbon assessments essentially being an exercise to consider lower carbon options, rather than adhere to specific embodied carbon benchmarks. Neutral impacts were identified in relation to Communities, Crime reduction, Health & wellbeing, Biodiversity, Transport and Public realm & townscape (**objectives 1, 2, 4, 8, 11 and 14**).

Conclusion:

Option **(b)** performed the best of all policies assessed, with the greatest number of major positive effects on sustainability objectives, and with no negative scorings. Options **(c)** and **(d)** scored the same and had a similar number of positive effects towards most sustainability objectives. However, the preferred option is considered to be option **(b)** as a policy approach which sets embodied carbon targets for all proposals involving total demolition and major schemes, along with a favourable view of extensions that enable retrofit, as this scored slightly better than options **(c)** and **(d)**. Option **(e)** would also see positive effects towards most objectives, but these would be minor in comparison to options **(b)-(d)**. All options scored comparatively better and would deliver positive sustainable effects compared to the business-as-usual approach assessed as option **(a)**.

3.4 Site Allocations Reasonable Alternatives

Four site allocations are now being incorporated into the Partial Review of the City Plan which will provide policy requirements to help unlock complex sites and influence the design of any new developments. As part of the IIA process, reasonable alternative options in terms of land uses to be incorporated on site have been assessed against the sustainability objectives. A summary of the reasonable alternative options and the appraisal undertaken are set out below.

SA1: Grosvenor Sidings

The principal area of the site is a railway sidings/depot for the Chatham and Brighton main line (now surplus to operational requirements), as well as some ancillary structures located in the south-western corner of the site. These ancillary structures include a Grade II listed building known as 123A Grosvenor Road, SW1.

The site extends north over the main line tracks to the south of Ebury Bridge and lies west to the tracks incorporating Pugs Hole sidings and including the currently occupied British Transport Police site.

Three alternative policy recommendations were assessed through the IIA process and summarised, as followed:

- a) Existing use- Site consisting of Grosvenor Sidings and Pugs Hole Sidings (depot for trains), active operational railway tracks, British Transport Police site and ancillary structures, including Grade II listed building, 123A Grosvenor Road.
- b) Proposed allocation- Residential-led development with provision of commercial floorspace, community floorspace, retention of Grade II listed building, public realm improvements, open and play spaces and increased permeability.
- c) Reasonable alternative 1- Wholly residential development, retention of Grade II listed building, public realm improvements, open and play spaces and increased permeability.
- d) Reasonable alternative 2- Commercial-led scheme with some provision of community floorspace and residential units. Retention of Grade II listed building, public realm improvements, open and play spaces and increased permeability.

Table 5: Summary of potential sustainability effects of SA1 Alternative Options

Reasonable Alternatives	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Option A	--	+	0	-	-	-	--	--	--	--	-	-	+	-	--	-	-
Option B	++	++	++	++	+	+	+	++	0	-	++	0	+	++	++	+	+
Option C	+	++	++	++	+	+	+	++	0	0	++	0	+	++	++	0	-
Option D	+	+	+	++	+	+	+	++	0	-	++	0	+	+	++	++	++

Assessment of proposed allocation

Option (b) aims to optimise the use of the land through intensifying use of the site, delivering significant housing provision and some commercial/community space (meeting **objectives 1 and 3**). The provision of commercial space will also provide much needed local employment opportunities supporting economic growth (meeting **objectives 16 and 17**).

Option (b) would deliver significant Public realm, Open space, Biodiversity and Flood risk & water quality improvements by addressing the area's deficiency in green, open space, its low biodiversity value and lack of flood mitigation measures. Option (b) supports the provision of new open and play space (creating more permeable surfaces), enhancing green infrastructure (particularly SuDS) and incorporating flood mitigation techniques in accordance with the council's Level 2 Strategic Flood Risk Assessment (meeting **objectives 7, 8, 14 and 15**). The improvements would also positively contribute to health and wellbeing and supporting communities, by providing outdoor opportunities for shared leisure and recreation (meeting **objectives 1 and 4**).

Option (b) also enhances climate resilience through the promotion of low carbon and retrofit technologies (meeting **objectives 5 and 6**). However, subsequent planning applications will need to consider air quality, noise pollution and waste management (**objectives 9, 10 and 12**). As the trainlines on site will remain active, there is a risk to impact on residential amenity if new homes are placed near the trains and a risk of compounding noise pollution if commercial uses drastically intensify. Furthermore, construction of large-scale new development will greatly increase air pollutants, which will also be exacerbated by the continued use of diesel trains on the nearby train tracks and busy main roads. Therefore, great attention will need to be paid to pollution mitigation and resource management to ensure potential schemes are sustainable in planning terms.

Improved public realm will also mean better permeability and connectivity to and around the site. This will ameliorate poor existing access to London Victoria Station south to north, increasing mobility in and around the CAZ and alleviating local traffic (meeting **objectives 11 and 14**). Furthermore, the site will maintain its use as railway lines whilst providing new and improved pedestrianised pathways and cycle ways, which should encourage increased modal shift to active forms of transport (meeting **objectives 4 and 11**).

Comprehensive redevelopment of the site will mean benefits in terms of crime prevention (better lighting and anti-crime design) (**objective 2**). The allocation also presents opportunities to enhance the historical character of the site. It is likely high-quality design and layout will be needed due to the proximity to neighbouring conservation areas, the Grade II listed building on site and the number of unlisted buildings of merit near the site boundary (meeting **objectives 13 and 14**).

Assessment of reasonable alternatives

Four options for land use were explored: (a) the existing land use, (b) a residential-led scheme with some commercial and community floorspace, (c) a completely residential scheme and (d) a commercial-led, mixed use scheme with some community and residential uses. Option (c) was identified as a reasonable alternative due to the significant housing contribution which is in keeping with the context of surrounding

land uses and aligns with spatial priorities for nearby regeneration schemes such as the Ebury Estate Regeneration Project. Option **(d)** was identified as it prioritised commercial and community uses suitable for the CAZ, the policy for which aims to intensify office and retail uses.

Option **(a)** detracted from the achievement of most of the sustainability objectives. The existing use does not provide new community space or support community activity, does not provide any residential units, provide public realm or accessible open space (reducing scorings for **objectives 1, 3, 4, 14 and 15**). The site also creates a disconnect between local active transport routes, discouraging walking/cycling in the area (reducing scoring for **objective 11**). The site currently does very little to contribute to ameliorating the environment or mitigating the impacts of climate change. This is because the site lacks urban greenery, there is limited opportunity for the use of renewable resources and the land is mostly impermeable increasing flood risk (reducing scoring for **objectives 5, 6, 7, 8 and 12**). Furthermore, the current uses have a negative impact on air and noise pollution and provide very little opportunity for economic development (reducing scoring for **objectives 9, 10, 16 and 17**). The only positive scorings were for Crime reduction and Heritage (**objectives 2 and 13**). The presence of the British Transport Police has a positive impact on reducing crime and anti-social behaviour and is critical for providing security for the railway. Concerning heritage, as the site is heavily underutilised, there is no negative impact on strategic views, on the neighbouring conservation area or on nearby listed buildings. This means the heritage setting is somewhat protected.

As shown in the scoring matrix, all alternative options would contribute to Communities, Crime reduction, Housing and Health and wellbeing (**objectives 1, 2, 3 and 4**). Positive impacts on Flood risk & water quality, Biodiversity, Open space, Transport and Public realm & townscape (**objectives 7, 8, 11, 14 and 15**) were also identified across all options. Cumulatively, most environmental and community objectives would see positive benefit as the site is currently deprived of green space, has little ecological value and is non-accessible to the public so has no community infrastructure provision. Furthermore, the site is an area of high flood risk (flood zone 3) and has mostly impermeable surfaces, so there is a great opportunity to enhance flood mitigation through redevelopment.

Option **(c)** scored very highly in Housing (meeting **objective 2**), however due to the limited employment opportunities and community spaces (reducing scoring to meet **objectives 16 and 17**), it was concluded that this alternative was not suitable. Furthermore, completely residential uses, as proposed in **option (c)**, would require greater density which would result in higher greenhouse emissions (reducing scorings for **objective 5**).

In comparison, **option (b)** will contribute to housing objectives whilst still supporting economic sustainability and better aligning with spatial priorities for Westminster. **Option (b)** aligns closer with the spatial strategy for the CAZ and complements nearby policy objectives (Victoria Opportunity Area and Ebury Bridge Estate Housing Renewal Area), which supports improved access to local services, enhancement of community facilities and improving the business environment.

Option (d) brought forward more commercial uses and scored highly in employment opportunities and economy objectives (**objectives 16 and 17**). This meets the strategic priorities of the CAZ however, the proposed option scored quite negatively on noise. This is mainly due to the increase in commercial uses which may result in further noise concerns from nearby residents, as this would exacerbate existing noise concerns coming from the active railway and busy main roads (reducing scoring for **objective 10**). Furthermore, it will not deliver a range of housing and thus did not support an inclusive Westminster as well as other options (reducing scoring for **objective 3**). Eventhough **option (d)** sees a greater amount of economic benefit, in comparison, the preferred option was still able to contribute towards economic objectives, whilst providing a range of housing and causing less risk of harming heritage assets and local conservation areas.

As aforementioned, across all options, scoring for Air quality, Noise and Waste was low, indicating these negative impacts will need to be explored in planning applications to ensure the development is sustainable (**objectives 9, 10 and 12**).

Conclusion

In conclusion, the three alternative options (**options (b), (c) and (d)**) will make efficient use of the site and will contribute greatly to the sustainability objectives when compared to the existing use.

Option (b) is the residential-led, mixed-use scheme with some provision of commercial/community uses and public realm and open space improvements. This has been chosen because on balance, the scheme contributes considerably to the majority of sustainability objectives and brings forward these benefits with the least compromise on other sustainability objectives (such as noise and heritage). This option also meets the spatial strategy priorities for the CAZ and complements nearby policy objectives (Victoria Opportunity Area and Ebury Bridge Estate Housing Renewal Area).

Although **option (c)** will provide significant housing contribution, the potential negative impact on climate change and resource consumption is greater. Furthermore, it fails to positively contribute to the enhancement of the local economy. In addition, although **option (d)** provides significant economic contributions, there is a risk to residential amenity and local heritage setting due to the intensification of certain types of uses. Furthermore, less housing will be delivered resulting in a restricted mix of housing types and tenures.

Consequently, **option (b)** of a residential-led, mixed used scheme (with public realm, open space, community and commercial uses) is regarded as the preferred choice for meeting the sustainability objectives.

SA2: Land adjacent to Royal Oak

The site is currently vacant land previously used for Crossrail works, access and parking. Royal Oak Underground Station forms part of the site which supports Hammersmith & City, Circle lines and Great Western main line. A number of bridges cross the site including, Ranelagh Bridge, Lord Hill Bridge immediately outside the site boundary and the Grade II listed Westbourne Bridge. The site has limited urban greenery on-site with green space and a few trees which is not publicly accessible.

Two alternative policy recommendations were assessed through the IIA process and summarised, as followed:

- a) Existing use- Railway station and vacant land previously used for Crossrail works and access.
- b) Proposed allocation- Mixed- use commercial-led scheme with some provision of residential units, limited public realm improvements and green space etc.
- c) Reasonable alternative 1 – Residential-led scheme with some commercial floorspace, more extensive public realm improvements and green space etc.

Table 6: Summary of potential sustainability effects of SA2 Alternative Options

	IIA Objectives
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Reasonable Alternatives	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Option A	--	--	0	-	-	-	+	+	-	0	-	0	-	--	--	0	0
Option B	++	++	+	++	+	+	+	++	+	-	++	-	++	++	+	++	+
Option C	++	++	+	+	-	-	+	++	-	-	+	-	-	+	+	+	+

Assessment of proposed allocation

Option (b) aims to optimise the use of land through intensifying the use of the site. It aims to deliver a commercially-led scheme, contributing to economic growth in the area and improving public realm to address severance issues caused by the Westway, its tributaries, and the railway tracks (meeting **objectives 11, 14, 16 and 17**). It also aims to deliver a range of residential dwellings (such as live/workspaces or non-conventional housing (e.g. student accommodation), in order to diversify the range of tenures (meeting **objective 3**).

Option (b) also brings benefits such as increased quality of publicly accessible local green space. This will increase access to local green space, add to the green infrastructure network and increase climate change resilience by using SUDs and other surface water flooding mitigation techniques (meeting **objectives 5, 7, 8 and 15**).

Comprehensive redevelopment of the site could also improve crime prevention (through better lighting and anti-crime design) and better the conservation/celebration of local heritage assets. Furthermore, the scheme may provide notable positive benefits for local communities by enhancing public realm areas that could support community activity/interaction (meeting **objectives 1, 2 and 13**).

As shown in the scoring matrix, (across both options (b) and (c)), option (b) would deliver significant benefits for Communities, Crime reduction, Housing, Health and wellbeing, Biodiversity, Transport and Public realm and townscape (**objectives 1, 2, 3, 4, 8, 11 and 14**). Cumulatively, most environmental objectives would see a positive benefit, as the site is currently severely underused, however it is recognised that greater attention is needed at the planning application stage on air quality, noise pollution and waste management (**objectives 9, 10 and 12**) to ensure the development is environmentally sustainable and does not cause harm in this regard.

Option (b) will need to consider Climate change and Natural resources objectives (**objectives 5 and 6**). Although, option (b) will deliver benefits (such as improved biodiversity, the use of renewable materials and efficient use of land), the scheme will require substantial construction works on the foundations to ensure the development is sound. This will result in high greenhouse gas emissions and further climate change implications; however significant economic and social benefits will outweigh these negative impacts.

Option (b) also includes the potential expanded transport infrastructure. This could accommodate the relocation of transport infrastructure from another site, as due to constraints there is limited

development opportunity on site. This would continue to support the public transport network in the area whilst unlocking development at a different site (meeting **objective 11**).

Assessment of reasonable alternatives

Three options for land use were explored for the site: **(a)** the existing land use, **(b)** a commercial-led scheme with some provision of residential development (the preferred option) and **(c)** a residential-led scheme with the provision of some commercial floorspace and more extensive public realm improvements. The residential-led scheme (option **(c)**) was chosen as a reasonable alternative due to viability and potential public realm improvements however, it was concluded it was not the preferred option. This is because a residential-led scheme would require greater density and size (compared to a commercial-led scheme), this potentially will bring a significant increase in carbon emissions which could harm future residential amenity due to the noise pollution and air quality.

Option **(a)** detracted from the achievement of most sustainability objectives. Option **(a)** does not provide community space or support community activity, it does not actively contribute to reducing crime, provide any residential units, or provide public realm/accessible open space (reducing scorings for **objectives 1, 2, 3, 4, 14 and 15**). The site also creates a disconnect between local active transport routes, discouraging walking/cycling in the area (reducing scoring for **objective 11**). Option **(a)** does support some environmental objectives as there is a small amount of unused, green, permeable space which mitigates against surface flooding and provides some biodiversity (meeting **objectives 7 and 8**). Despite the benefits of this green space, overall, the extant predominant uses of the polluting vehicles (trucks/cars etc.) that uses Ranelagh Bridge and Westbourne Bridge and the lack of active transport options reduce the scoring for **objectives 5 and 9**. There is also limited opportunity for the use of renewable resources or reusing materials and the site is still an inefficient use of land (reducing scoring for **objective 6**). Furthermore, the current uses do not reduce noise pollution or provide opportunity for economic development (reducing scoring for **objectives 10, 16 and 17**). Concerning **objective 13**, Heritage, the site is heavily underutilised so there is no negative impact on strategic views, however the local heritage assets are not actively enhanced or protected (reducing scoring for this objective).

Option **(c)** did score highly in Communities, Crime reduction, Housing, Health and wellbeing, Biodiversity and Public realm & townscape (**objectives 1, 2, 3, 4, 8 and 14**). It brings forward a considerable number of residential homes (assuming they are delivered on-site) and encompasses significant improvements to public realm and urban greening. However, when compared to the preferred option, the preferred option was able to contribute positively to these objectives without detriment to local heritage and with less negative impact on noise, waste and air quality.

Regarding option **(c)**, the size of the potential buildings in schemes could be detrimental to the local townscape. They may cause harm to the historical townscape and local heritage asset (Westbourne Bridge) due to potential size and massing which may not complement the Maida Vale, Westbourne or Bayswater Conservation Area. This would have a negative impact on local heritage and the existing urban character (modest terraced Victorian homes) (reducing scoring to meet **objective 13**). Option **(c)** also has minor to major negative effects on Air quality, Natural resources and some elements of Climate change. This is because a large housing led scheme would probably require more extensive structural works. This means potential schemes are expected to bring a significant increase in the use of resources and in carbon emissions (reducing scoring to meet **objectives 5, 6 and 9**).

Option **(b)**, (the commercial-led scheme) delivers commercial and flexible workspace, which aligns with the spatial strategy for adopted Policy 5 in relation to the North West Economic Development Area (NWEDA), within which the site is located. This delivers benefits in terms of Employment opportunities and Economy objectives (meeting **objectives 16 and 17**). Regarding **objective 2**, Housing, eventhough option **(b)** would provide less housing that option **(c)**, it still would have a minor positive impact on this

objective as it would contribute to reducing the number of unfit homes, providing a range of affordable housing for specific purposes, which is a benefit. Furthermore, these homes could potentially be of better quality. This is because the anticipated high quantity of housing and site constraints costs, may make achieving high-quality housing more difficult for option (c).

As aforementioned, with both option (b) and option (c), further mitigation in terms of Natural resources, Air quality, Noise and Waste (objectives 6, 9, 10 and 12) will need to be explored in forthcoming applications to ensure development is sustainable and acceptable in planning terms.

Conclusion

To conclude, both option (b) and option (c) will make effective use of the site and overall will contribute greatly to the sustainability objectives, when compared to option (a).

Option (b) is the commercial-led scheme with some provision of non-conventional residential development. This has been chosen because on balance, the scheme contributes considerably to the majority of the sustainability objectives and brings forward these benefits without compromising other sustainability objectives (harming heritage, townscape, or local character or climate change as much as option (c)).

Although option (c) will provide more housing, option (b) will cater better to the local townscape and will provide greater contribution towards employment opportunities and economy objectives, by delivering more flexible workspace/commercial workspace- a key policy objective for the NWEDA. Option (b) will also still contribute positively to increasing the range of housing types and providing homes fit for purpose. Consequently, option (b) for a commercial-led scheme with some non-conventional residential development is regarded as the favoured choice for fulfilling the sustainability objectives.

SA3: St Mary's Hospital

The majority of the site is currently used for healthcare purposes by St Mary's Hospital. The hospital is the only acute inpatient hospital in Westminster, London's busiest trauma centre, a world-renowned teaching and research hospital and the major acute hospital for north-west London, serving a population of 2.4 million people. St Mary's is one of four major trauma centres in London and includes a 24/7 A & E Department. A small portion of the site (bounded by South Wharf Road, Norfolk Mews and Praed Street) is in current use by Imperial College London.

Two alternative policy recommendations were assessed through the IIA process and summarised, as followed:

- a) Existing use- NHS Hospital along with educational facility used by Imperial College London Medical School
- b) Proposed allocation – Consolidation of existing hospital to modernise the healthcare offering and to release surplus land for a commercial-led scheme with some provision of residential and community floorspace, open and green space etc.
- c) Reasonable alternative 1- Consolidation of existing hospital to modernise the healthcare offering and to release surplus land for a commercial-led scheme with some provision of community floorspace, open and green space etc.

Table 7: Summary of potential sustainability effects of SA3 Alternative Options

Reasonable Alternatives	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Option A	+	+	0	+	--	--	--	--	--	-	0	-	+	--	--	+	-
Option B	++	++	++	++	++	++	+	++	+	+	++	+	0	++	++	+	++
Option C	+	+	0	++	++	++	+	++	+	+	++	+	0	++	++	++	++

Assessment of proposed allocation

Option (b) aims to optimise the use of land through consolidating the existing hospital to modernise the healthcare offering and associated facilities to help release surplus land for alternative uses that could contribute to meeting housing need and economic growth in the area (meeting **objectives 3 and 17**). Comprehensive redevelopment of the site could also have benefits in terms of increased delivery of open and green spaces, permeability, and connectivity along with increasing provision of permeable surfaces to address the risk of surface water flooding (**meeting objectives 7, 14 and 15**).

Option (b) is for a mixed-use scheme which will provide a modern hospital building, alongside new commercial and community floorspace and some provision of residential units. As outlined in the scoring matrix above, option (b) would see significant positive benefits for Communities, Crime reduction, Housing, Health and wellbeing, Climate change, Natural resources, Biodiversity, Transport, Public realm and townscape, Open space and Economy (**meeting objectives 1, 2, 3, 4, 5, 6, 8, 11, 14, 15 and 17**). Whilst overall, most sustainability objectives as assessed above would see positive benefits, it is recognised that further measures may need to be demonstrated as part of future planning applications with regards to the assessment criteria for Flood risk and water quality, Air quality, Noise, Waste and Heritage (**objectives, 7, 9, 10, 12 and 13**) to further maximise positive sustainability outcomes.

Assessment of reasonable alternatives

A mixed-use scheme without residential units on site was considered as a reasonable alternative option for this site (option (c)) due to the sites' proximity to an active hospital and the impact this would have on residential amenity. As a result, a scheme that provided the same uses but prioritised commercial floorspace over residential units was considered as a more reasonable alternative.

In comparison to option (b), option (c) did not provide any residential which saw a reduced score for Housing (**objective 3**) as the scheme would not be contributing to meeting any housing demands of those most in need in the community. A commercial-led scheme however, would maximise and contribute significant positive effects to Employment opportunities (**objective 16**) without a reduction of commercial floorspace being allocated for housing. Whilst overall, most sustainability objectives as assessed above would see positive benefits, it is recognised that further measures may need to be demonstrated as part of future planning applications with regards to the assessment criteria for Flood risk and water quality, Air quality, Noise, Waste and Heritage (**objectives, 7, 9, 10, 12 and 13**) to further maximise positive sustainability outcomes.

Conclusion

Whilst both option (b) and (c) scored similarly in terms of positive effects towards most objectives, the preferred option is considered to be option (b) of a hospital-led mixed-use scheme which will provide a modern hospital building, alongside new commercial and community floorspace and some provision of residential units. A mixed-use scheme without provision of residential units (option (c)) would not be sufficient in providing a range of housing types and tenures to help meet housing demands of those most in need in the community. As a result, option (b) of a scheme incorporating residential units is considered to be the preferred option to meeting the majority of key sustainability objectives.

SA4: Westbourne Park Bus Garage

The majority of the site is currently used as a bus garage with ancillary uses. The northern part of the site accommodates a building with offices for the garage operational and head office function, including maintenance and welfare facilities. Part of the site, by the canal, is used as parking for staff. A small portion of the Grand Union Canal towpath (Paddington Arm) and some neglected public open space also falls within the site boundary. The site also includes existing telecommunications infrastructure assets which are currently in use.

Two alternative policy recommendations were assessed through the IIA process and summarised, as followed:

- a) Existing use- Bus garage with ancillary uses accommodating offices, operational, maintenance, welfare facilities and neglected public realm.
- b) Proposed allocation- Redevelopment of the bus garage (south of the site) to release surplus land north of the site to provide a residential-led scheme with some provision of commercial/leisure/community floorspace, open and green space etc.
- c) Reasonable alternative 1- Redevelopment of the bus garage (south of the site) to release surplus land north of the site to provide a commercial-led scheme with some provision of homes, open and green space etc.

At the time of writing this report, the council has not seen any evidence that the relocation of the bus garage can be feasible. Further evidence would need to be provided by the bus garage operators and Transport for London (TfL) to demonstrate how the bus garage could be relocated in a manner which would not adversely impact on the delivery of transport services across Westminster and London. In discussions with TfL as part of the consultation process for the site allocations, it became evident that a potential relocation of the bus garage has not explored in detail and as such, the relocation of the bus garage cannot currently be supported by the council. The relocation of the bus garage is therefore not considered a reasonable alternative at this point in time and has not been assessed for the purposes of this report.

Table 8: Summary of potential sustainability effects of SA4 Alternative Options

	IIA Objectives
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Reasonable Alternatives	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Option A	-	--	0	0	-	--	--	--	--	-	-	0	0	--	--	+	-
Option B	++	++	++	++	++	++	++	++	0	-	++	-	+	++	++	++	++
Option C	+	++	+	+	++	++	++	++	0	-	++	-	+	++	++	++	++

Assessment of proposed allocation

Option (b) aims to optimise the use of land through the redevelopment of the existing bus garage (south of the site) to help release surplus land for alternative uses to the north of the site that could contribute to meeting housing need and economic growth in the area (meeting objectives 3, 16 and 17).

Comprehensive redevelopment of the site could also have benefits in terms of increased delivery of open and green spaces, permeability, and connectivity along with increasing provision of permeable surfaces to address the risk of surface water flooding (meeting objectives 7, 14 and 15).

Option (b) is for a residential-led mixed use scheme to the north of the site which will also provide commercial/leisure/community floorspace. As outlined in the scoring matrix above, option (b) would see significant positive benefits for Communities, Crime reduction, Housing, Health and wellbeing, Climate change, Natural resources, Flood risk and water quality, Biodiversity, Transport, Public realm and townscape, Open space, Employment opportunities and Economy (meeting objectives 1, 2, 3, 4, 5, 6, 7, 8, 11, 14, 15, 16 and 17). Whilst overall, most sustainability objectives would see positive benefits, any development proposals will need to clearly demonstrate how different measures considered with regards to the assessment criteria for Air quality, Noise and Waste (objectives, 9, 10 and 12) will help further maximise sustainability outcomes.

Assessment of reasonable alternatives

A commercial-led mixed-use scheme to the north of the site was considered as a reasonable alternative option for this site (option (c)). Due to the sites' proximity to key transport-related uses, the impact on residential amenity and air quality for a residential-led scheme a scheme that provided the same uses but prioritised commercial floorspace over residential was considered as a reasonable alternative.

In comparison to option (b), option (c) scored similarly across Crime reduction, Climate change, Natural resources, Flood risk & water quality, Biodiversity, Transport, Public realm & townscape, Open space, Employment opportunities and Economy objectives (objectives 2, 5, 6, 7, 8, 11, 14, 15, 16 and 17). However, prioritising commercial floorspace over residential saw a reduced score for Communities, Housing, and Health and wellbeing (objectives 1, 3, and 4) as although the scheme would provide some housing, the amount would not be sufficient in providing a range of housing types and tenures to help encourage engagement amongst the community and in creating optimal health outcomes. As with option (b), it is recognised that further options for mitigation in terms of Air quality, Noise and Waste (objectives,

9, 10 and 12) will need to be explored in order to ensure any development has at least a neutral impact with regards to these sustainability objectives.

Conclusion

Whilst both option **(b)** and **(c)** scored similarly in terms of positive effects towards most objectives, the preferred option is considered to be option **(b)** of a residential-led mixed-use scheme which will provide a redeveloped bus garage to the south of the site, alongside new residential-led with some commercial, community and leisure floorspace to the north of the site. A commercial-led scheme with some provision of residential units (option **(c)**) would not be sufficient in providing a range of housing types and tenures to help meet housing demands of those most in need in the community. As a result, option **(b)** of a residential-led scheme is considered to be the preferred option to meeting the majority of key sustainability objectives.

4 Findings of the Westminster City Plan appraisal

4.1 Introduction

This chapter presents the findings of the pre-submission version of Westminster’s City Plan Partial Review. The final wording of the revised and new policies in the plan have been assessed using the criteria assessed as part of the reasonable alternative options. Only the IIA themes on which an impact has been identified will be discussed. More detailed assessments of the appraisals undertaken as part of the consideration of reasonable alternatives are contained in Appendix IX.

An overview of the cumulative effects of policies and the plan as a whole is presented in section 4.5. This is followed by section 4.6, which sets out the likely cumulative effects of other plans, policies and proposals.

4.2 Policy 9 – Affordable Housing

Policy description

The policy requires all residential development on private land to provide a minimum of 35% affordable housing and an increased requirement to 50% on public sector land, subject to development viability. Of these affordable homes, the policy requires at least 70% of the homes to be social homes and 30% to be provided as intermediate homes.

The policy also seeks to maximise affordable housing delivery through applying a sequential approach to securing affordable housing delivery with on-site being prioritised, followed by off-site and payment in lieu to the council's Affordable Housing Fund. In addition to this, the policy also requires small-scale residential developments (those providing fewer than 10 homes) to financially contribute to affordable housing delivery – this can be done on-site, off-site or via payment in lieu to the council's Affordable Housing Fund. This policy ensures opportunities for additional affordable housing provision are maximised.

Table 9: Summary of potential sustainability effects of Final Affordable Housing Policy

Policy	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Final Policy 9	++	0	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0

Conclusion

The final affordable housing policy will have a major positive effect on achieving sustainability objectives for **Communities, Housing and Health and Wellbeing**. The policy will seek to improve access to local services, foster an inclusive and mixed community, and encourage engagement and participation in decision-making and community activity. The policy will create high-quality and affordable homes, increase the range of affordable housing tenures, reduce homelessness, provide housing for specific groups, reduce the number of unfit homes, and provide a range of housing types and sizes. The policy will improve health inequalities, increase healthy years life expectancy, improve mental health and wellbeing, improve access and movement, improve cultural wellbeing, and minimise loneliness and maximise independence for older people and people with disabilities.

The policy will have no likely impact on achieving sustainability objectives for other themes, such as Climate change, Natural resources, Flood risk and water quality, Biodiversity, Air quality, Noise, Transport, Waste, Heritage, Public realm and townscape, Open space, Employment opportunities, and Economy.

4.3 New Retrofit-First Policy

Policy description

The policy seeks to encourage development to consider retrofitting options in the first instance, to prior to the conventional process of demolition and new build. Where substantial or total demolition is proposed, this should be fully justified through an appraisal of the construction options, assessing the carbon cost and public benefits of refurbishment, retrofit, deep retrofit or newbuild options.

The policy sets out that for all development involving total or substantial demolition of a building which has more than a single storey, and all major developments, applicants are required to submit a Whole Life-Cycle Carbon assessment demonstrating how proposed development will meet set embodied carbon targets. Applicants are also required to submit a Circular Economy Statement.

Table 10: Summary of potential sustainability effects of Final Retrofit-First Policy

Policy	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Final Retrofit-First Policy	0	0	+	+	++	++	++	0	++	++	0	++	+	0	0	++	++

Conclusion

The final retrofit-first policy will have a major positive effect on achieving sustainability objectives for **Climate change, Natural resources, Flood risk & water quality, Air quality, Noise, Waste, Employment opportunities and Economy**. The policy will support the city's response to the climate emergency and the net zero carbon target by 2040 with the aim to reduce embodied carbon emissions from construction and demolition, as well as improve the energy efficiency and resilience of buildings. The policy will help reduce greenhouse gas emissions, resource consumption, construction waste, air and noise pollution and foster the green economy and create new skills and jobs in the retrofit sector.

The policy will have minor positive effects on achieving sustainability objectives for Housing, Health & wellbeing and Heritage with negligible effects on achieving sustainability objectives for Communities, Crime reduction, Biodiversity, Transport, Public realm & townscape and Open space.

4.4 New Site Allocations Policies

SA1: Grosvenor Sidings

The site allocation for Grosvenor Sidings seeks to redevelop the site to deliver a residential-led development with a mix of uses (including new homes, shops, community spaces, open space and play space). The policy ensures development will contribute to meeting Westminster’s housing need and also deliver community and commercial uses that meet the needs of the wider Victoria area.

Table 11: Summary of potential sustainability effects of Final Grosvenor Sidings Allocation

Policy	IIA Objectives																	
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
Final Grosvenor Sidings Allocation	++	++	++	++	+	++	+	++	++	+	++	+	++	++	++	++	++	++

Conclusion

The policy will have major positive effects on most of the sustainability objectives, especially on **Communities, Crime reduction, Housing, Health and wellbeing, Natural resources, Biodiversity, Air quality, Transport, Heritage, Public realm and townscape, Open space, Employment opportunities and Economy**. The draft policy will also have minor positive effects on **Climate change, Flood risk & water quality, Noise and Waste**.

A new residential-led mixed-use development is the core principle and priority for the site, as it will help to meet the housing need in Westminster and create a vibrant and diverse community. Supporting uses as part of the allocation will support the retail and leisure offer in the area and seek to provide more accessible, local services and opportunities for community activity for existing and future communities. The enhancement of the public realm and green infrastructure network and provision of open spaces will seek to improve permeability across the site and beyond, as well as encourage physical activity and support community interaction. The policy will ensure that the development is sustainable, inclusive, and responsive to the site's context and heritage, including through re-purposing the on-site Grade II 123A Grosvenor Road building and protecting strategic and local views. Overall, the site allocation will seek to contribute positively to meeting the majority of sustainability objectives.

SA2: Land adjacent to Royal Oak

The site allocation for Land adjacent to Royal Oak seeks to redevelop and underused site to deliver a mixed use commercial-led development that includes some provision of non-conventional residential housing (such as student housing and live/workspaces). The policy also ensures the provision of enhanced and high-quality station access, new and improved public realm and biodiversity enhancements.

Table 12: Summary of potential sustainability effects of Final Land adjacent to Royal Oak Allocation

Policy	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Final Land adjacent to Royal Oak Allocation	++	++	+	++	+	+	+	++	0	0	++	0	+	++	++	++	++

Conclusion

The policy will have major positive effects on most of the sustainability objectives, especially on **Communities, Crime reduction, Health and wellbeing, Biodiversity, Transport, Public realm and townscape, Open space, Employment opportunities and Economy**. The draft policy will also have minor positive effects on **Housing, Climate change, Natural resources, Flood risk & water quality and Heritage** with a negligible effect on **Air quality, Noise and Waste**.

A commercial-led scheme with some provision of non-conventional housing is the core principle and priority for the site, as it will help to meet the economic and housing need in Westminster. The commercial uses as part of the allocation will provide much needed the commercial-led growth in the North West Economic Development Area and make provision for new commercial uses to support small and medium enterprises for local people. The non-conventional residential uses will contribute to meeting housing need for particular groups and help to create a vibrant and diverse community. The enhancement of the public realm and townscape will seek to improve permeability through the creation of new active travel routes and addressing severance issues caused by the railway, canal, Harrow Road and the Westway. Activation and improvement of the public realm will ensure the site is permeable, safe and accessible to all. Overall, the site allocation will seek to contribute positively to meeting the majority of sustainability objectives.

SA3: St Mary’s Hospital

The site allocation for St Mary’s Hospital seeks to deliver a new modern hospital to meet modern healthcare needs, alongside commercial-led growth, enhanced public realm and complementary uses.

Table 13: Summary of potential sustainability effects of Final St Mary’s Hospital Allocation

Policy	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Final St Mary’s Hospital Allocation	++	++	++	++	++	++	++	++	+	+	++	+	0	++	++	++	++

Conclusion

The policy will have major positive effects on most of the sustainability objectives, especially on **Communities, Crime reduction, Housing, Health and wellbeing, Climate change, Natural resources, Flood risk and water quality, Biodiversity, Transport, Public realm and townscape, Open space, Employment opportunities and Economy**. The policy will also have minor positive effects on **Air quality, Noise and Waste** with a negligible effect on **Heritage**.

A new hospital is the core principle and priority for the site, as it will provide essential healthcare services and facilities for the local and wider population of London. The residential and/or community uses will help to meet the housing need in Westminster and create a vibrant and diverse community. Supporting uses as part of the allocation will support the commercial-led growth and the life sciences sector in the Paddington Opportunity Area. The enhancement of the public realm and townscape will seek to improve permeability and activation of public spaces, as well as activating the canal basin and incorporating dwell spaces. These improvements to the site will seek to enhance the quality, increase access to open spaces and enhance the green infrastructure network for future occupiers and visitors to the site. The policy will ensure that the development is sustainable, inclusive, and responsive to the site's context and heritage. Overall, the site allocation will seek to contribute positively to meeting the majority of sustainability objectives.

SA4: Westbourne Park Bus Garage

The site allocation for Westbourne Park Bus Garage seeks to redevelop and upgrade the existing bus garage. The redevelopment will help release land to deliver a mixed-use, residential-led development. The

policy ensures that development contributes to meeting both the city’s housing needs and current and projected future transport needs for London.

Table 14: Summary of potential sustainability effects of Final Westbourne Park Bus Garage Allocation

Policy	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Final Westbourne Park Bus Garage Allocation	++	++	+	++	++	++	++	++	+	+	++	0	++	++	++	++	++

Conclusion

The policy will have major positive effects on most of the sustainability objectives, especially on **Communities, Crime reduction, Health and wellbeing, Climate change, Natural resources, Flood risk and water quality, Biodiversity, Transport, Heritage, Public realm and townscape, Open space, Employment opportunities and Economy**. The draft policy will also have minor positive effects on **Housing, Air quality and Noise** with a negligible effect on **Waste**.

A modern bus garage with a residential-led scheme is the core principle and priority for the site, as it will help to meet the housing need in Westminster and deliver an upgraded, modern bus garage that will help to meet the current and future transport needs for London. The residential and/or community uses will provide much needed high-quality new homes and help to create a vibrant and diverse community. Supporting uses as part of the allocation will support the commercial-led growth in the North West Economic Development Area and make provision for new commercial uses to support small and medium enterprises to contribute to the North Paddington Creative Enterprise Zone goals. The enhancement of the public realm and townscape will seek to improve permeability through the creation of new active travel routes and visual connections between Great Western Road and the Grand Union Canal. Activation and improvement of the canal frontage and provision of new green and open spaces will ensure the site is permeable, safe and accessible to all. Overall, the site allocation will seek to contribute positively to meeting the majority of sustainability objectives.

4.5 Likely significant effects of the City Plan Partial Review

This section sets out the likely significant effects of the City Plan Partial Review when considered as a whole. The SEA Directive requires the overall effects of the plan to be considered in addition to the appraisal of the individual policies undertaken. This includes the secondary, synergistic and cumulative effects of plan policies, which are known as inter-plan effects.

Appendix I provides a cumulative summary of the Partial Review City Plan policies. The cumulative and likely significant effects of the City Plan Partial Review have been reviewed as part of this assessment and the majority of policies in scope are major or minor positive with direct and long-term effects against the 17 sustainability objectives. Some objectives identified as having no negative impacts however, the following points show those cumulative effects that are likely to show negative impacts and mitigation actions that can be taken to reduce their impact:

Objective 4 – Health & Wellbeing

Creating healthy homes and workplaces and increasing healthy years life expectancy is an important consideration in ensuring health and wellbeing in Westminster. The majority of proposed site allocations are in proximity to major transport infrastructure such as railway lines and strategic road corridors which has the potential to impact on residential amenity and as a result, health and wellbeing. To mitigate this, the relevant site allocation policies ensure that residential amenity is a key consideration as part of proposals and noise and vibration mitigation measures such as noise insulation should be embedded into design of proposals. Overall, it is fair to assume that policies will therefore have a negligible effect.

Objective 5 – Climate Change

All site allocation policies will involve some level of intensification on site than is currently existing, this will contribute to an increase in heat island effect. To mitigate this, the relevant site allocation policies ensure that sustainability is at the heart of proposals for the sites which will include measures that will assist in mitigating climate change such as biodiversity net gain, green infrastructure enhancements, provision of open spaces etc.

In addition to this, some of the site allocation policies will be retaining uses that will contribute to the emission of greenhouse gas emissions such as the ambulance servicing of St Mary's Hospital and the buses at Westbourne Park Bus Garage. To mitigate this, as part of upgrades to these existing uses there is the potential that existing systems will be modernised to mitigate against climate change impacts such as use of electric vehicles, submission of transport management plans to co-ordinate transport routes etc. These mitigation measures, in addition to the introduction of a new retrofit-first policy will help to contribute to mitigation of negative impacts on climate change. Overall, it is fair to assume that policies will therefore have a negligible effect.

Objective 6 – Natural Resources

All site allocation policies will involve some level of intensification on site than is currently existing, this will contribute to an increase in water consumption and consumption of fossil fuels. To mitigate this, the relevant site allocation policies ensure that sustainability is at the heart of proposals for the sites which will include measures that will assist in mitigating climate change and reduce the consumption of fossil fuels. This coupled with the introduction of a new retrofit-first policy and application of existing adopted City Plan policies will ensure that negative effects affecting this objective are limited.

It is recognised that new builds or developments involving demolition has the potential to help reconfigure sites and their relationships to the local area easier than through retrofitting. That being said, retrofitting existing structures does have the opportunity to retain and possibly even enhance the existing character of the area. On balance with this and other potential positives the introduction of a retrofit-first policy can bring, it is predicted that likely significant effects in relation to this objective are limited. Overall, it is fair to assume that policies will therefore have a negligible effect.

Objective 7 – Flood Risk & Water Quality

The majority of site allocation policies will support higher density development that will either intersect a flood risk zone or a surface water hotspot area. In each case development will deliver benefits which could serve to justify developments in an identified area of potential flood risk or can be mitigated through a range of design factors, as explored through the Level 2 SFRA, and which can be further explored through a Flood Risk Assessment at the planning application stage. Overall, it is fair to assume that policies will therefore have a negligible effect.

Objective 9 – Air Quality

The majority of proposed site allocations are in proximity to major transport infrastructure such as strategic road corridors where current air quality is very poor. In addition to this, the majority of site allocation policies will support higher density development that will increase air pollution either through construction practices or through increased traffic movements of vehicles supporting existing major infrastructure such as St Mary's Hospital and Westbourne Park Bus Garage. To mitigate this, as part of upgrades to these existing uses there is the potential that existing systems will be modernised to mitigate against climate change impacts such as use of electric vehicles, submission of transport management plans to co-ordinate transport routes etc. A number of the site allocation policies will also deliver benefits to contribute to off-setting impacts on air quality such as biodiversity net gain, green infrastructure enhancements, provision of open spaces etc. These mitigation measures, in addition to the introduction of a new retrofit-first policy will help to contribute to mitigation of negative impacts on air quality. Overall, it is fair to assume that policies will therefore have a negligible effect.

Objective 10 – Noise

All site allocations will be proposing some provision of residential within close proximity to major transport infrastructure such as railway lines, strategic road corridors and active hospital. This has the potential to impact on residential amenity and generate an increase in noise levels and complaints. To mitigate this, the relevant site allocation policies ensure that residential amenity is a key consideration as part of proposals and noise and vibration mitigation measures such as noise insulation should be embedded into design of proposals. Overall, it is fair to assume that policies will therefore have a negligible effect.

Objective 11 – Transport

Some site allocation policies will contribute to an increase in volume of traffic within the area however, all sites are with sustainable locations with access to public transport readily available and minimising the impact on the volume of traffic within the area. Two sites will be retaining their uses as key infrastructure sites that contribute to the health and transport networks beyond Westminster which could serve to justify an increase in volume of traffic on the immediate area. To mitigate this, as part of upgrades to these existing uses there is the potential that existing systems will be modernised to mitigate against climate change impacts such as use of electric vehicles, submission of transport management plans to co-ordinate transport routes etc. Overall, it is fair to assume that policies will therefore have a negligible effect.

Objective 12 – Waste

All site allocation policies will involve some level of intensification on site than is currently existing, this will contribute to an increase in household and construction waste. To mitigate this though, the site allocation policies will seek to ensure that sustainability is at the heart of proposals. In addition to the introduction of a new retrofit-first policy and application of adopted City Plan policies, this will help to contribute to mitigation of negative impacts on waste. Overall, it is fair to assume that policies will therefore have a negligible effect.

Objective 13 – Heritage

The majority of site allocation policies intersect or are adjacent to a designated heritage asset and/or Conservation Area where insensitive development could have a negative impact. In these instances, the policies make clear to protect and where possible enhance the setting of these heritage assets which could seek to contribute a long-term positive effect. Overall, it is fair to assume that policies will therefore have a negligible effect.

Objective 17 – Economy

As part of the retrofit-first policy, it is recognised that some uses that improve business development (high-end office space, specialist workspace etc. for key workers) may be deterred. This is because the need to stay within embodied carbon budgets targets may conflict with structural and layout requirements in existing buildings, such as floor to ceiling heights, which may be perceived to be needed to attract specific high-end tenants which offer high-value jobs. However, the draft policy includes a number of tests which will mean that some demolition may be allowed, for example in the context of bespoke operational requirements and the delivery of significant net public benefits. Overall, it is fair to assume that policies will therefore have a negligible effect.

In conclusion, the majority of likely significant effects of the policies in scope of this partial review will have major/minor positive, direct and long term effects on the majority of objectives. Of those identified as providing a likely significant negative effect, all of these have mitigation measures that will result in an overall negligible effect.

4.6 The City Plan in combination with other plans, policies, and proposals.

The City Plan Partial Review has the potential to combine with other planned and on-going activities in the vicinity of Westminster to result in cumulative effects. The effects of the plan in combination with other plans, policies and proposals are known as intra-plan effects. The following bullet points cover some key considerations related to this partial review that has the potential to lead to cumulative effects:

Although Westminster's housing needs are assessed within the borough boundary, in reality Westminster cannot be considered as a self-contained housing market. It is part of a global property market attracting investment and buyers from around the world and has a complex relationship with the wider London property market. Westminster is also part of London's housing market, which extends beyond the administrative area of London.

Housing targets for each London Borough and other principles for growth are set out in the London Plan. Borough Local Plans set out the approach to development of that housing growth for their local area. Housing and population growth, as well as growth in other sectors across London has the potential to lead to cumulative effects.

Additional cumulative effects may arise from:

- Proposals linked to the Tottenham Court Road Opportunity Area, which stretches outside the borough into Camden.
- The Elizabeth Line
- Crossrail 2
- High Speed 2
- Heathrow expansion

Potential effects that may occur as a result of in-combination effects of the City Plan with other plans and programmes include:

- Improved accessibility could lead to increased traffic flows and congestion, impacting on local environments, including on air quality.
- Enhanced accessibility as a result of public transport, walking & cycling investments, increasing visitor numbers across transport modes.
- Increased development in and around Westminster could increase the urban heat island effect.
- Increased population and visitor numbers could put additional pressure on ecological networks.
- Improved transport accessibility could lead to an increase in land values, affecting the affordability of living and doing business in parts of the city.

The policies in the City Plan will help reduce the significance of many of the in-combination impacts identified above. The London Plan and various borough Local Plans will need to be monitored to ensure unforeseen adverse environmental effects are highlighted and remediated when they arise.

5 Monitoring the IIA

5.1 Monitoring the IIA

The SEA regulations set out that local planning authorities should monitor the significant environmental effects of implementing the local plan. The purpose of this is to identify any unforeseen adverse effects at an early stage so appropriate remedial actions can be taken.

Details of Westminster's monitoring arrangements are set out in the City Plan. The council's Authority Monitoring Report (AMR) will report on the monitoring results.

6 Next steps

6.1 Next steps

This IIA accompanies the Westminster's City Plan Partial Review Pre-Submission Draft. The consultation will run from 14 March 2024 and 25 April 2024.

Consultation responses will be considered prior to submission of the City Plan Partial Review and IIA Report to the Secretary of State.

At Examination, representations alongside the IIA Report will be considered by the Inspector. If the Inspector identifies the need for modifications, these might need to undergo an IIA and the IIA Report Addendum will be published alongside the modifications during consultation.

Once the Inspector finds the plan to be 'sound', the plan will be formally adopted by the council. This will be supported by an IIA Statement that sets out the monitoring approach.

7 Appendix

7.1 Appendix I – Effects of City Plan policies

Westminster's City Plan policies	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Chapter 2 – Housing																	
9. Affordable housing	++	0	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0
Retrofit-First	0	0	+	+	++	++	+	0	++	++	0	++	+	0	0	++	++
SA1 Grosvenor Sidings	++	++	++	++	+	++	+	++	++	+	++	+	++	++	++	++	++
SA2 Royal Oak	++	++	+	++	+	+	+	++	0	0	++	0	+	++	++	++	++
SA3 St Mary's Hospital	++	++	++	++	++	++	++	++	+	+	++	+	0	++	++	++	++
SA4 Westbourne Park Bus Garage	++	++	+	++	++	++	++	++	+	+	++	0	++	++	++	++	++

7.2 Appendix II – Consultation responses to IIA Scoping Report

Ref.	Subject Area	Comment	How comments have been taken on board
NHS HUDU			
IIA1.1	Health and Wellbeing	<p>We note that the intention is to retain 2019 City Plan integrated impact assessment framework. However, the baseline data changes within the scoping document do not reference the substantial impact of the pandemic and the current economic position on communities, and, on their health and wellbeing.</p> <p>We ask that there is a review of health and wellbeing data using data available to the Council, collected/published by the Office for Health Improvement and Disparities and the NHS. The review of this data will help inform and potentially expand the appraisal questions. Questions that we suggest are considered include: ‘Will it increase healthy years life expectancy? The subdivision of the question in relation to improving health inequalities should be considered as this is such an important and broad area. There is a question in relation to minimising loneliness, maximise and improvement mental and physical wellbeing of older people. There is the potential for this to be broadened to include the wider community as the incidence of loneliness and poor mental health is increased across all age groups, including young people. An alternative would be to have additional questions in relation to ‘improving mental health and wellbeing’ and ‘will this improve facilities and accessibility for people with disabilities’. It is important to recognise the wider range of disabilities and health conditions that should be considered which the planning system can influence. For example, there is increasing recognition of the importance of planning for neurodiversity with new British Standards recently introduced.</p>	<p>Noted. Baseline data has been reviewed in light of pandemic/economic position. New questions related to health and wellbeing objective have been added and considered as part of the IIA process.</p>

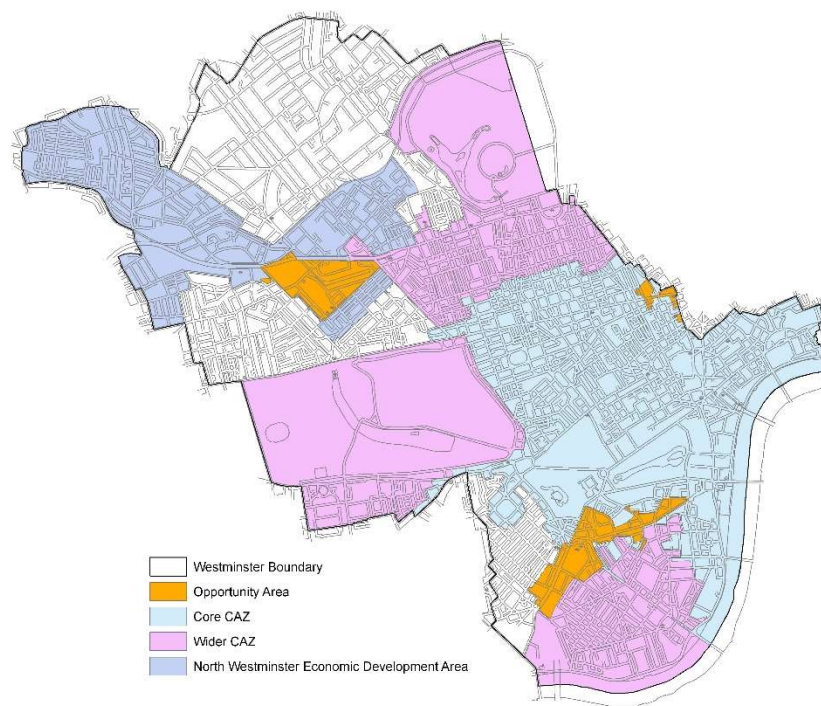
7.3 Appendix III – Baseline data

The requirement for Baseline Information

3.1 The baseline information sets out the current conditions in Westminster. This information helps identify the key sustainability issues and problems, establishing the current economic, social and environmental context. As such it provides the baseline for assessment and then future monitoring of City Plan amended and new policies. The SEA Directive requires information on the evolution of baseline conditions to help identify whether conditions are already improving or worsening, and the rate of such change. As well as the baseline conditions, set out by issue, this section also therefore includes information on projections and trends- ‘the likely future conditions’- where this information is available. For avoidance of doubt, it deals with the position under current policies.

Economic conditions

Figure 3.1 – Map of Westminster showing key economic designations



Employees

3.2 Westminster functions as a national and international centre for business; shopping; arts, culture and entertainment. It accommodates 788,600 jobs (2022)³, 14% of London’s employee total. It contains the most workplace jobs of any London borough by some distance, and more than the City of London and Canary Wharf combined.⁴

3.3 Employee jobs are overwhelmingly located in the two central wards of St. James’s and the West End, which combined account for nearly two thirds of all Westminster jobs.

Businesses

³ Business Register and Employment Survey (Employees Count) (2022) *Office for National Statistics*

⁴ London Datastore. Employment (workplace) by industry (2019) *Office for National Statistics*

- 3.4 Westminster has the single largest number of businesses of any London borough, with 52,120 businesses currently in the city, around 10% of London's total. The number is increasing.⁵
- 3.5 The majority of Westminster's businesses are small, with 84% of local business units having fewer than ten employees.⁶ There are also a number of multi-national corporations, headquarters and large companies located in Westminster; nearly 925 enterprises have over 100 employees, about half of which are in areas such as the Paddington and Victoria Opportunity Areas, where most of the larger office spaces and floorplates are located.⁷
- 3.6 In conjunction with the size of Westminster's economy, one of its key features is its diversity in terms of industrial sectors and the range of occupations on offer to employees. The largest employment sector is professional, scientific and technical services, which have been the main drivers of the economy in recent times, and are expected to be so for the next twenty years.
- 3.7 Beyond the services, Westminster is the centre of national government, which is reflected in the number of public sector employees in the city. Tourism and entertainment related industries are also significant employers and drivers of the economy, as is the world renowned retail sector in the West End. Further key sectors of interest include creative industries and the knowledge economy, where Westminster is a world leader.

Offices

- 3.8 Offices are the second largest land use in Westminster, making up 25% of all floorspace. Westminster's office stock accommodates over 21,700 businesses and has a rateable value of over £2.5 billion.⁸ The Central Activities Zone (CAZ) designated in both the London and City Plans is home to most of Westminster's office floorspace.
- 3.9 There are three Opportunity Areas in Westminster: Paddington, Victoria and Tottenham Court Road (part of which is within the London Borough of Camden). These are designated in the London Plan and in Westminster's City Plan. The Paddington Opportunity Area is the only opportunity area to see significant office gains between 1997-2016 with over 132,000 sqm.
- 3.10 However, Westminster's office floorspace has witnessed a decline over the past years of over-300,000 sqm with further losses of-293,000 sqm under construction and-282,000 with planning permission (see figure below).

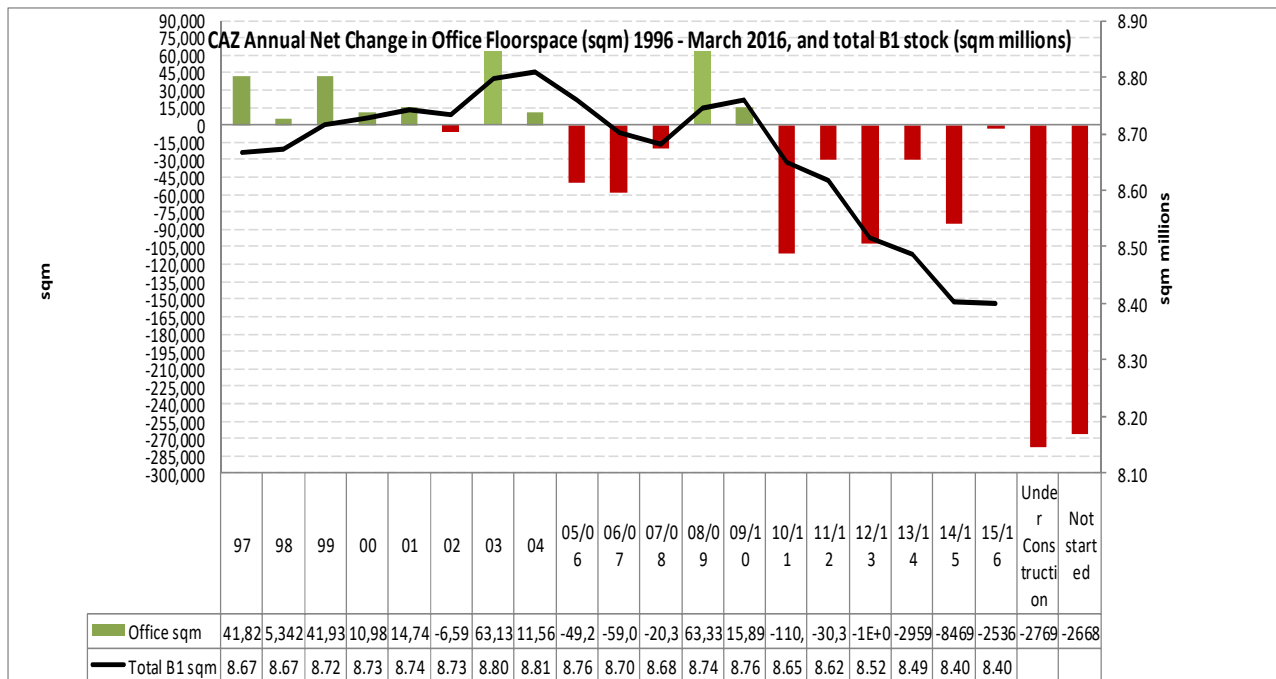
Figure 3.2 – CAZ annual net change in office floorspace (sqm) 1996 – March 2016

⁵ UK Business Counts (Local Units) (2021) *Office for National Statistics*

⁶ UK Business Activity, Size and Location (2023) *Office for National Statistics*

⁷ UK Business Activity, Size and Location (Business, Local Units, Sizeband) (2023) *Office for National Statistics*

⁸ Non-domestic rating: business floorspace (2023) *Valuation Office Agency*



- 3.11 With reference to the CAZ in particular, from 2010/11 there has been sustained office loss mostly driven by the change of use from office to residential use. The rate of loss does seem to be abating, following a change in Westminster planning policy in November 2016 on office to residential changes, but there is still significant loss in the pipeline with over-276,000 sqm under construction and a further-267,000 sqm yet to start.
- 3.12 In September 2020 a new Class E in the Use Classes Order was to include several uses that previously fell under A, B and D use classes, ranging from shops and restaurants to offices and medical services. This provides more flexibility, making it possible to change use within the range of uses supported by Class E without needing planning permission however, this flexibility makes it very difficult for us to monitor Class E floorspace changes. The recently published Authority's Monitoring Report (2022/23)⁹ stated that the city saw a net loss of approximately 25,500sqm of Class E floorspace compared to 33,200sqm net loss the previous year. The loss of Class E floorspace was predominantly in the Central Activities Zone indicate that gains of office floorspace are taking longer to recover.
- 3.13 In 2020 the West End was recognised as the most expensive office market in the world, overtaking Hong Kong and maintaining the global top spot from the latest Savills Prime Office Costs analysis for Q2 2023 with rents achieving £214 per square foot.¹⁰
- 3.14 The city's unparalleled global appeal, robust economy and status as a financial hub contribute to its consistently high commercial property values. Despite geopolitical uncertainties and the impacts of the global pandemic, investors worldwide continue to see London as a safe and resilient investment destination. Across the West End vacancy stands at 6.0%.
- 3.15 A further indicator of diversity is in the size of businesses, as Westminster contains both large multinational corporations and small businesses. This is reflected in the office floor space available which is flexible and responsive to need in different parts of the city.
- 3.16 Westminster is at the heart of the creative sector and contains the highest number of creative industry jobs (89,751) in London and 8% of all creative jobs in the UK.¹¹ The majority of creative industries operate from B1 office floorspace,

⁹ [Westminster City Council Authority Monitoring Report \(2022/23\)](#)

¹⁰ Prime Office Costs: Quarterly Highlights (July 2023) *Savills*

¹¹ City of Westminster Local Economic Assessment Baseline Study (emerging) (2017) *Westminster City Council*

with only 1% actually operating within the B1c light industrial floorspace use class.¹² These uses are clustered in parts of Westminster, such as Soho.¹³

3.17 There are no Strategic Industrial locations in Westminster.

Westminster a Global Economy

3.18 Westminster includes buildings for the state and national government. Royal Palaces sit alongside the home of government, acting as an international focus point for events and ceremonies, and as a generator for employment and as a tourist attraction.¹⁴

3.19 This status is reflected in the global nature of its local economy. Of the 29 'Global 500' companies headquarters in the United Kingdom, six are in Westminster, including BP, BAE Systems and the Rio Tinto Group.¹⁵

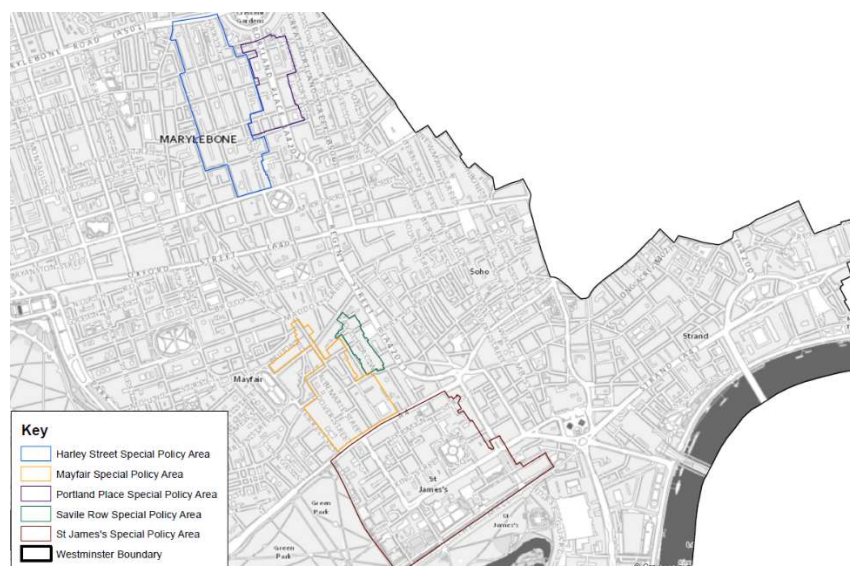
3.20 Higher Education employs over 20,000 people in Westminster, this category includes universities, language schools, and arts related colleges.¹⁶

3.21 There are 96 embassies/high commissions in Westminster. The majority of these (83) are inside the Central Activities Zone.¹⁷

3.22 There are currently five Special Policy Areas (SPA's) in Westminster with the following specialisms:

- Harley Street- medical facilities;
- Portland Place- institutional uses;
- Savile Row- tailoring;
- St. James's- private member's clubs, art galleries, and niche retail;
- Mayfair- art galleries, antique traders.

Figure 3.3 – Map of Special Policy Areas



¹² City of Westminster Local Economic Assessment Baseline Study (emerging) (2017) *Westminster City Council*

¹³ Westminster Creative Industries (October 2011 and Statistical update 2010) *GVA Grimley and Burns and Owens Partnership Ltd*

¹⁴ Westminster's Economy Developing Westminster's Local Plan Consultation booklet (2014) *Westminster City Council*

¹⁵ Fortune Global 500 (2016) *Fortune.com*

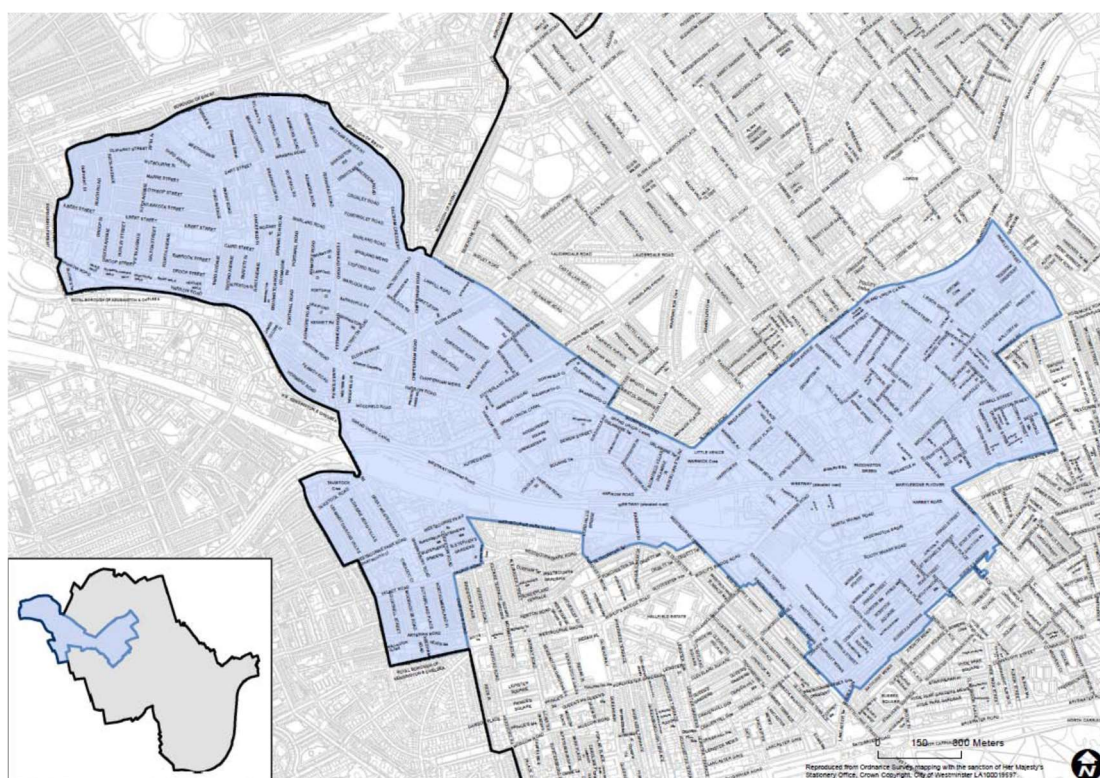
¹⁶ All staff by HE provider (2014/15) *Higher Education Statistics Agency Limited*

¹⁷ Diplomatic List September (2013) *Westminster City Council*

The North West Westminster Economic Development Area (NWEDA)

- 3.23 The North West Economic Development Area (NWEDA) which includes the Paddington Opportunity Area, was designated in the 2011 Core Strategy as an area where the Council wishes to encourage more economic activity and enterprise. Much of the area is primarily residential with a high proportion of social rented housing. It is also marked by a high level of deprivation – 41.3% of Westminster’s deprived population live in the four electoral wards that comprise most of NWEDA (Church Street, Westbourne, Queen’s Park and Harrow Road).¹⁸ 36 % of Westminster’s Job Seekers Allowance claimants reside in these wards.¹⁹
- 3.24 The average rent for small sized offices in NWEDA is considerably below the Westminster average.²⁰

Figure 3.4 – Map of the North Westminster Economic Development Area (NWEDA)



Retail

- 3.25 Retail is a major part of Westminster’s economy, particularly the international retail centre in the West End which is a significant draw for shoppers from all over the world, while acting as one of its most significant industries in terms of employment. Experian estimate that in 2012 there were 6,800 shops in Westminster, employing around 60,000 people. During August 2012 an average of 6 million shoppers visited the West End every week. Shop vacancy rates are low in the West End and most of Westminster. Prime zone A retail rents are amongst the highest in the world and continue to rise, currently achieving over £2,000 per sq ft in parts of the West End such as Bond Street.²¹
- 3.26 Westminster’s town centres of different scales and functions, identified through a hierarchy agreed with the Mayor through the London Plan, cater for a diverse range of needs and markets. The international shopping centres (Oxford Street, Regent Street, Bond Street and Knightsbridge) are the nation’s most eminent shopping streets and a major location for flagship and iconic department stores. The Core Central Activities Zone (CAZ) contains a variety of comparison retail and includes specialist shopping in Soho and Covent Garden and the high-end and luxury retail in Mayfair and St. James’s. The CAZ Frontages are mixed use streets with a predominant retail focus (such as Marylebone High Street, Baker Street and Victoria Street). Outside of the central area there are a range of high street style centres,

¹⁸ Index of Multiple Deprivation (2015) *DCLG data modelled by Westminster City Council*

¹⁹ Claimant Count (May 2017) *Office for National Statistics*

²⁰ City of Westminster Local Economic Assessment Baseline Study (emerging) (2017) *Westminster City Council*

²¹ Central London Retail Report Spring 2017 (2017) *BNP Paribas Real Estate*

including the Queensway/Westbourne Grove Major Shopping Centre with a borough wide catchment area. The District Centres (including St. John's Wood High Street and Harrow Road) are key neighbourhood centres providing convenience and some comparison retail alongside other town centre uses and local services. In addition there are 39 Local Centres across Westminster which provide convenience shopping focused centres providing essential accessible locations for local residents.²²

- 3.27 Westminster has made an Article 4 Direction to remove permitted development rights for changes of use from A1 (shops) to A2 (financial and professional services) in the Core CAZ and the designated shopping centres throughout the city. While financial services like banks provide a valuable local service, it is important for the council to be able to use its planning powers to protect variety and vitality, preventing particular industries from dominating retail space in shopping centres. The Article 4 direction came into force on 1 January 2017.
- 3.28 In September 2020 a new Class E in the Use Classes Order was introduced to include several uses that previously fell under A, B and D use classes, ranging from shops and restaurants to offices and medical services. This provides more flexibility, making it possible to change use within the range of uses supported by Class E without needing planning permission however, this flexibility makes it very difficult for us to monitor Class E floorspace changes. The recently published Authority's Monitoring Report (2022/23)²³ stated that the city saw a net loss of approximately 25,500sqm of Class E floorspace compared to 33,200sqm net loss the previous year. The loss of Class E floorspace was predominantly in the Central Activities Zone indicate that gains of office floorspace are taking longer to recover.
- 3.29 The Council regularly commissions health checks of its town centres the most recent detailed results of which can be found [here](#)

Arts, Culture, Tourism, Entertainment, Food and Drink

- 3.30 The attractive, historic environment of Westminster is a desirable place to live, work and locate new businesses. Westminster is also a national and international destination for tourism of all types, from daytrips based around its important heritage and popular tourist attractions, shopping and the evening and night-time economy, to longer international stays. In addition to having a number of the most popular individual visitor attractions in the country, whole areas in Westminster act as magnets for visitors, such as Theatreland and the West End for its evening and night-time economy; the area around Parliament for its heritage; Oxford and Regent Street for comparison retail trips; and Bond Street and Mayfair and St James's for luxury retail. The vast tourist economy is reflected in the number and range of uses such as restaurants, bars, hotels, shops, galleries, theatres, cinemas and other uses present throughout the central part of Westminster.
- 3.31 Westminster has a daytime population of over 1 million people. In terms of daily visitor numbers, Westminster far outstrips any other borough – on a normal working day, Westminster has nearly 200,000 visitors (this may be higher at weekends and at certain parts of the year), which equates to nearly 70 million visits per year. Westminster has around a third of London's overseas visitor overnight stays, illustrating both its popularity and reflected in its dominance in terms of hotel provision. On an average day there are over 95,000 overseas visitors staying in Westminster, compared to 201,000 for all other boroughs combined (RBKC is second with 31,500).²⁴
- 3.32 Westminster has seven of the top 50 paid attractions in London, attracting a total of around 5.8 million visitors per year. Westminster also has four of the top 50 free attractions in London, totalling almost 9.8 million visitors per annum.²⁵
- 3.33 Westminster hosts a number of high profile and internationally recognised events throughout the year such as international film premieres, the Proms at the Royal Albert Hall, the BAFTAs and London Fashion Week. Westminster also has a national-level sporting presence as the home of international Cricket at Lords Cricket Ground. The city hosted several sports events during the 2012 Olympics e.g. beach volleyball and cycling events.²⁶

²² Westminster's Economy Developing Westminster's Local Plan Consultation booklet (2014) *Westminster City Council*

²³ [Westminster City Council Authority Monitoring Report \(2022/23\)](#)

²⁴ London Datastore. Daytime population 2014 (2015) *Greater London Authority*

²⁵ Annual Survey of Visits to Visitor Attractions (2015) *Visit England*

²⁶ Westminster's Economy Developing Westminster's Local Plan Consultation booklet (2014) *Westminster City Council*

- 3.34 Westminster provides world-class and world-renowned entertainment and leisure. The evening population is estimated to be around 400,000 people and in some wards the night-time population is five times that of the resident population.²⁷
- 3.35 The City of Westminster's evening and night-time economy (ENTE) is the largest concentration of its kind if it is compared to anywhere in the UK. It is larger than the combined ENTEs of Edinburgh, Birmingham and Manchester.²⁸
- 3.36 There are over 3,100 licensed premises in Westminster, more than any other local authority in the UK. This includes nearly 500 pubs, bars and wine bars, over 1,000 restaurants licensed to serve alcohol, 39 theatres and 136 night clubs and dance venues.²⁹ The West End is the entertainment heart of London and is internationally renowned.
- 3.37 Westminster plays an important role in London's visitor economy with an unrivalled range and combination of visitor attractions and hotel accommodation. Around 40% of London's hotels and guesthouses are located in Westminster.³⁰
- 3.38 The food, drink, tourism and entertainment sector accounts for 23% of all employment in Westminster and 13% of all sales revenue³¹.
- 3.39 Focusing on the New West End Company BID area around Oxford, Regent and Bond streets, the average daily footfall is around 3.5 million visitors³², with an average 7 million on Friday and Saturday combined. Within this, the distribution throughout the day is fairly predictable, peaking between noon and 6pm. The Heart of London BID area, which covers Leicester Square, Chinatown and Shaftesbury Avenue currently records weekly footfall of around 2.2 million while the Piccadilly and St James's BID area, which now has footfall cameras, records approximately 0.5m visitors per week³³.

Issues and problems

- 3.40 So many people coming into Westminster including workers, visitors and tourists, puts pressure on existing infrastructure, local services, transport and the public realm. Such intense activity is part of what makes Westminster exciting and vibrant and of economic significance, but is also one of its greatest challenges.
- 3.41 This experience is felt perhaps most acutely in the Evening and Night Time Economy (ENTE). Westminster City Council strongly believes that a truly resilient and diverse ENTE requires a mix of activity ranging from those activities that have traditionally formed part of people's perception of the ENTE (e.g. drink-led activity in bars, pubs and clubs) to expansion in other types of 'softer' activity which currently span the day time and evening hours. These include food-led activity in both restaurants and takeaways, later opening of theatres, museums and art galleries as well as proper consideration of the role that can be played by retail later into the night time. This is an aspect of policy that needs to be considered in the light of the introduction of weekend Night Tube services from the summer of 2016.³⁴ The high level of activity and 24 hour nature of some parts of the city can detrimentally affect quality of life for residents, reduce air quality and lead to heightened crime levels. During 2023, 97,779 crimes were reported in Westminster, which equates to a 352.6 crimes per 1000 people³⁴. However, this does not necessarily indicate how likely residents are to become victims of crime and crime in Westminster is heavily skewed by having major tourist attractions, shops and a thriving night time economy.³⁵
- 3.42 The high volume of people, nationally important buildings, visitor attractions and government-related functions also give rise to particular security risks, and specific concerns in relation to terrorism.

Growth and future development

²⁷ Better City, Better Lives (2013) *Westminster City Council*

²⁸ Westminster Evening & Night Time Economy: A Cost Benefit Study for Westminster City Council (July 2015) *Terry Bevan and TBR*

²⁹ Statement of Licensing Policy (2016) *Westminster City Council*

³⁰ Projections of demand and supply for visitor accommodation in London to 2050 (2017) *GLA Economics*

³¹ Statement of Licensing Policy (2016) *Westminster City Council*

³² New West End Company, April 2015

³³ Heart of London Business Alliance, October 2015

³⁴ Crime Data Dashboard (2023) *Metropolitan Police Service*

³⁵ Westminster Profile (October 2014) *Westminster City Council*

- 3.43 Westminster is one of the most densely developed areas in the UK. The very high land values and rich heritage means development is often geared towards refurbishment and sensitive adaptation of the existing building stock rather than significant land use change. Economic development in Westminster is directed to the three opportunity areas, NEWDA and the Core Central Activities Zone.

Issues and problems

- 3.44 Future economic growth is both inescapable and vital to Westminster's future success. London's – and Westminster's – population and economy continue to grow, which means that demands and targets for residential and commercial growth increase in parallel.
- 3.45 The 2021 census showed that there had been a 6.9% decline in Westminster's population between 2011 and 2021 (204,300 down from 219,400). The census was carried out during the Covid-19 Pandemic, when the country was placed under many restrictions on social and economic activity. Westminster's population is projected to grow to 23,200 by 2040, which means that 17,953 new homes have to be delivered to meet this new demand in addition to the need to address existing backlog demand.³⁶
- 3.46 An additional two million square meters of business floor space also have to be created to accommodate 77,000 new jobs in the new plan period and to make up for the significant amount of office space lost to housing since 2005.
- 3.47 The loss of office floorspace to residential since 2005 (see para 3.9) is a cause for concern and would need to be addressed at a strategic level. Westminster City Council can help to meet this need through its approach to planning and development. Although space for new very large regeneration scheme may be limited, there may be opportunities for mid and small scale developments. Careful adaptations across individual properties and modest property holdings will still be very important for the delivery of future growth in Westminster.
- 3.48 To help inform a plan-led approach to growth, the City Council has undertaken consultation on growth and building height during spring/summer of 2017. The "Building height: Getting the right kind of growth for Westminster" consultation initiated a dialogue on the best way forward to accommodate future growth in Westminster and to engage with people who work, visit and live in Westminster on options for making the most efficient use of the City's scarce land resources, including increasing building height. The initial survey was followed up by face to face interviews across the borough and a pan-London online tall buildings survey. The results of the consultations will be used to inform the emerging planning policies and the future approach to growth in the borough.
- 3.49 In order to improve the local economy and the skills and prospects of residents in NWEDA a key priority is to maximise opportunities that promote sustainable economic growth and create employment.
- 3.50 The economy of Westminster was not immune from the 2008/09 recession. However, research³⁷ shows that the mix of uses in Westminster means it has been better protected and more resilient to the economic downturn than other locations dominated by one commercial main use.

Likely future conditions

- 3.51 The working population of Westminster is projected to increase to 813,000 in 2036.³⁸
- 3.52 In 2020, the withdrawal agreement entered into force upon the UK's exit from the European Union (EU). The exact impact of Brexit on the Westminster economy and its labour market is currently unknown, but it should be noted that the City of Westminster is home to around 33,000 EU nationals, some 13.6% of our resident population. Some 15% of the workforce in Westminster are EU nationals. They are particularly represented in some specific sectors – 44% of those employed in the accommodation and food industry, 19% of construction and 14% of finance and insurance sector employees are drawn from the EU national workforce.³⁹ Overall, in the last five years, the proportion of EU workers has grown by more than a third, and research for the City Council suggests that this may reflect a lack of the kinds of skills amongst UK nationals that the local labour market requires. In practice, of course, it is extremely difficult to estimate the potential impact of Brexit, which will happen over an extended period during which many other factors (national and international) will arise affecting levels of employment and how these feed into demand for

³⁶ Westminster Strategic Housing Market Assessment (January 2024)

³⁷ Westminster Office Study – Impact of the Recession (December 2009) *Drivers Jonas*

³⁸ Employment projections for London by borough (2016) *GLA Economics*

³⁹ Change and vulnerability in the business base (emerging research 2017) *Westminster City Council*

space. This is of course a broader debate which the country needs to have, but could potentially be a significant issue for the future of the Westminster's economy in coming years.

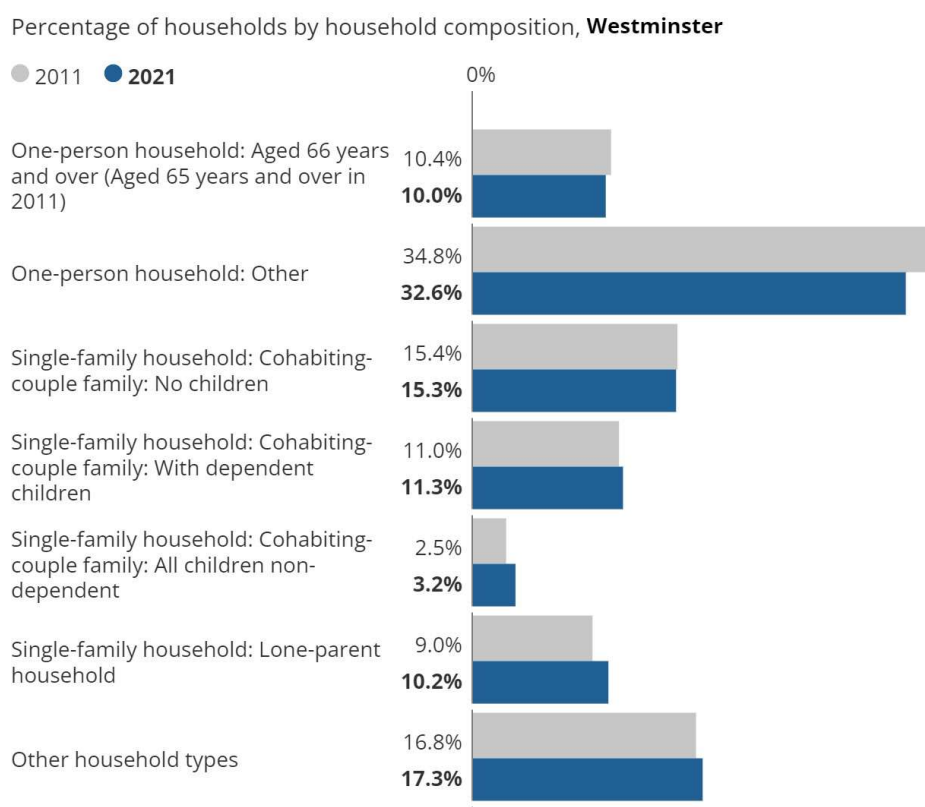
- 3.53 It is increasingly clear that businesses and other organisations have changing expectation about the types of workspace they occupy. Increasingly, they are looking for accommodation giving greater scope for interaction and collaboration, with greater attention to design and public realm to provide workspaces attractive to workers with key skills. There is also likely to be increasing demand for co-working and other flexible workspaces, particularly for start-up, micro- and small businesses.
- 3.54 Overcrowding on the existing public transport system may impact on the desire of new businesses to locate in Westminster and may be off-putting for visitors who come to shop and use the entertainment facilities. While overcrowding may be partly addressed by the introduction of the Elizabeth Line in 2022, growth is likely to increase pressure on the transport network, requiring further investment to ensure the most is made of existing infrastructure and additional capacity is brought forward.
- 3.55 The impact of the Night Tube on Westminster is currently being monitored but it has not currently led to any obvious or consistent changes in patterns of crime, anti-social behaviour/noise or service requests.

Social Conditions

Westminster's Residents

- 3.56 Westminster has experienced significant population growth and diversification over the past 10 years, with some of the highest rates of international migration in the UK. According to the 2021 Census, Westminster has an estimated population of 204,236.⁴⁰

Figure 3.5 – Make up of Households (2011 Census and 2021 Census)

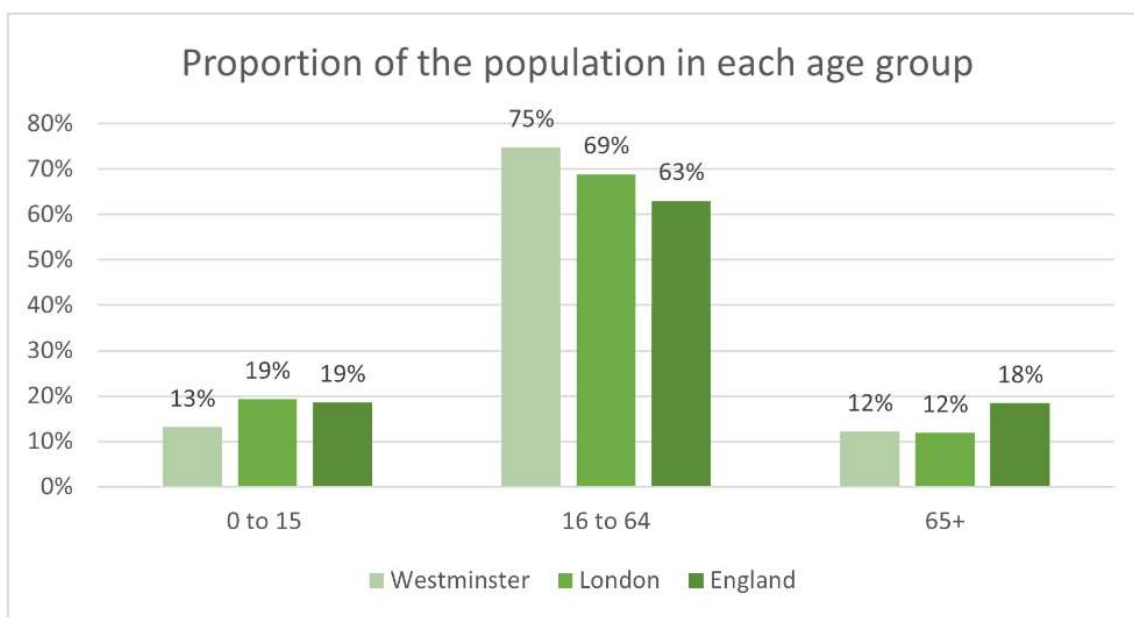


Source: Office for National Statistics – 2011 Census and Census 2021

⁴⁰ Census 2021 *Office for National Statistics*

- 3.57 Single adults make up the largest proportion of households in Westminster, although there is a wide variety of household composition, with a cumulative total of 11% families with children⁴¹. Westminster has proportionally more working age people than London or England, a similar percentage of elderly population (12% over 65s) and fewer children (13% under 15s).⁴² The city contains 2,920 short-term migrants, which is highest number of all local authorities in London.⁴³ The population of Westminster ‘churns’ at approximately 30% each year and even more in some parts of the city.
- 3.58 The 2021 Census showed that the number of households has decreased by 10.4% since that conducted in 2011.
- 3.59 The majority of residents have lived in Westminster between 3-10 years. Half of non-UK born Westminster residents (50%) have lived in the UK for less than 10 years. Westminster is more ethnically diverse than most other London boroughs: 45% of residents are from non-white ethnic groups. The three main places outside the UK where residents were born are: EU countries (4%), the Middle East (3.4%) and United States (3.1%).⁴⁴ At least 140 different languages are spoken by residents of Westminster.⁴⁵ Other than English which is spoken as a first language by 67% of the population, the other main languages are: Arabic, French, Spanish, Italian and Portuguese.⁴⁶

Figure 3.6 – Age Distribution



- 3.60 The population that is under 5 or at primary school age (those aged 5 to 11) has fallen since 2011, in some areas up to 30%. Secondary school aged residents (11-16) have increased by 5% since 2011. There was also an 11% increase in the number of young adults (aged 20 to 24) from 2011. The population of over 65s has increased by 1%, with over 85s also remaining at similar levels compared with 2011, with a slight increase of 0.6%.

While the number of under 5s and primary age school children has fallen since 2011, Westminster retains a younger age profile than England, particularly because it has a much higher proportion of working-age adults (those 16-64).⁴⁷

- 3.61 In common with the rest of England, Westminster’s population of older residents is likely to increase over coming years. The number of residents aged 65 or over is forecast to rise from 29,216 (2016) to 36,663 by 2024, and to 45,206 by 2031, representing an increase in the proportion of the population from 11.8% to 15.6% This represents a 55% increase

⁴¹ Census 2021 *Office for National Statistics*

⁴² Census 2021 *Office for National Statistics*

⁴³ Census 2021 *Office for National Statistics*

⁴⁴ Census 2021 *Office for National Statistics*

⁴⁵ Pupil Level Annual School Census 2015 (Language Spoken) (2016) *Department for Education*

⁴⁶ Census 2021 *Office for National Statistics*

⁴⁷ Census 2021 *Office for National Statistics*

of 65s or older by 2031. The number of more elderly residents (85 or older) is forecast to increase from 3,807 in 2016, to 5,344 in 2024, and to 6,973 in 2031. This is an increase in their proportion in the population from 1.5% to 2.4%. The figures increase most particularly after 2021. In terms of the actual numbers, this represents an 83% increase of 85+ residents in Westminster.⁴⁸

- 3.62 With the ageing of the population, people from Black Asian and Minority Ethnic communities are likely to account for an increasing proportion of people aged 65 and over.⁴⁹
- 3.63 The 2021 Census figures show that the proportion of residents specifying their religion as Christian has decreased since 2011 from 45% to 37%. Islam is the second largest religion recorded by Westminster residents, with the proportion of residents specifying this religion increasing from 18% in 2011 to 20% in 2021. Some 26% of Westminster residents stated they had no religion, which has increased from 20% in the 2011 Census.
- 3.64 In Westminster around 5% (9,727) of people identified with an LGB+ orientation (“Gay or Lesbian”, “Bisexual” or “Other sexual orientation”). This is slightly higher than the London proportion of 4% and the England proportion of 3%.⁵⁰

Issues and problems

- 3.65 In Westminster the most common household size is one person per household; this is reflected in particular patterns of demand for public services and utilities (for example often using as much or more electricity and water⁵¹ than a typical family household⁵²). Westminster is also home to many families. The population is ethnically diverse and the 30% churn indicates the transient nature of the population. Westminster’s prominence as a cultural and business destination attracts migrants from all over the world. These patterns have implications for the City’s housing market and the number and types of home required. Its attractiveness means that housing – and particularly affordable housing – is at a premium in a location with some of the highest housing costs in the country. There will be a need to ensure that more housing of all kinds is provided to help meet population growth, particularly affordable housing and homes suitable for people at all stages of their lives.

Likely future conditions

- 3.66 The estimated population of Westminster in 2036 is predicted to be 290,585 by 2031 and 308,055 by 2041.⁵³ Population growth and household size and type has an impact on a wide range of policy matters including housing, social infrastructure, transport, waste and the environment. In particular, the likely increase in older residents means that there is likely to be more housing provided to meet their needs specifically, supported by appropriate social infrastructure.
- 3.67 A comparison of recent census data shows that the number of children in Westminster has increased. This is likely to place additional demand for certain types of services, and in particular school places.

Health and Wellbeing

- 3.68 The Index of Multiple Deprivation (2019) identifies Westminster as the 134th most deprived of the 317 districts in England, from being the 57th most deprived Local Authority in 2015ⁱ. Although this is an improvement, Westminster remains in the bottom half of the most deprived local authorities in the country.
- 3.69 Three Westminster wards have at least one Census lower super output area (or LSOA, the Census reporting area covering around 1,000-1,200 households) in the worst 10% deprived in England.

⁴⁸ GLA 2015-based trend population projections (Short-term Trend) (2017) *Greater London Authority*

⁴⁹ Older people: housing and care- A Strategic Framework for Westminster (2007) *Westminster City Council*

⁵⁰ Census 2021 *Office for National Statistics*

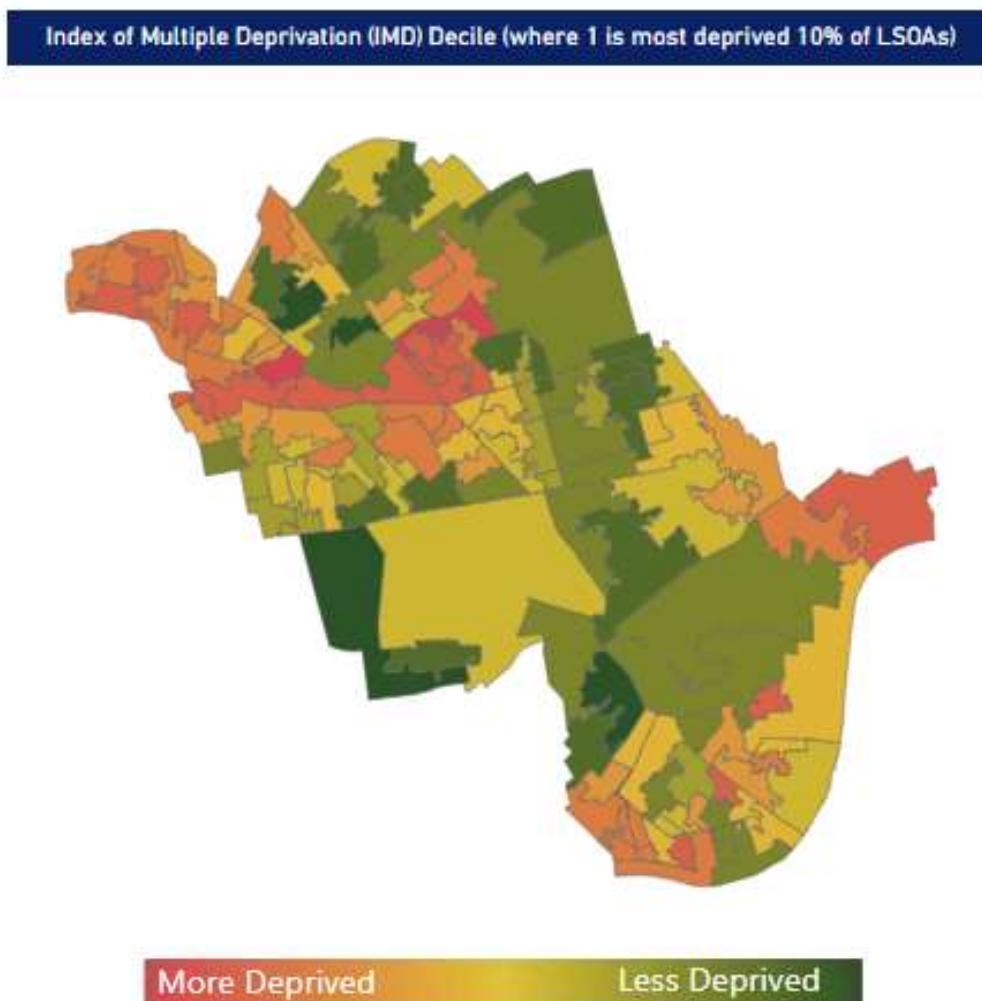
⁵¹ Environment Agency 2013

⁵² Powering the Nation: Household electricity using habits revealed (2012) *Energy Saving Trust*

⁵³ GLA 2015-based trend population projections (Short-term Trend) (2017) *Greater London Authority*

3.70 The combined index shows that at the LSOA level, deprivation is mainly confined to the wards in the north-west of the City, Church Street and to small pockets within the South and East.⁵⁴ In 2015 the electoral constituency of Westminster North had 38% of children living in poverty; this was as high as 50% in Westbourne Ward.⁵⁵

Figure 3.7 – Index of Multiple Deprivation score per LSOA in Westminster (2019)



- 3.71 In 2022 the average household income for Westminster was £53,676. The ward with the lowest average household income is Church Street with £34,852 and the highest are Marylebone with £61,711.⁵⁶
- 3.72 Westminster’s percentage of adults classed as overweight or obese is 49.7%⁵⁷. This is lower than the London average (21%), but the rate is likely to be almost double in deprived areas compared to affluent areas. In addition, the obesity rate among primary school children (year 6) is 28.6% which is higher than the average for London.⁵⁸
- 3.73 Life expectancy for men in Westminster is 85 years and 87 years for women.⁵⁹ However The more deprived an area you live in, the more likely you are to be impacted by poor health. Queen’s Park, Harrow Road, Church Street and Westbourne have some of the most deprived neighbourhoods in the country.⁶⁰

⁵⁴ Index of Multiple Deprivation 2019 (2021) *Office for National Statistics*

⁵⁵ Campaign to End Child Poverty (2016)

⁵⁶ Westminster Ward Profiles (2023) *Westminster City Council*

⁵⁷ Office for Health Improvement and Disparities. Public health profiles. 2024 <https://fingertips.phe.org.uk> (Accessed 19/02/24)

⁵⁸ Office for Health Improvement and Disparities. Public health profiles. 2024 <https://fingertips.phe.org.uk> (Accessed 19/02/24)

⁵⁹ Making Health Everyone’s Business: Annual Report of the Director of Public Health (2022) *Westminster City Council*

⁶⁰ Making Health Everyone’s Business: Annual Report of the Director of Public Health (2022) *Westminster City Council*

- 3.74 In November 2016 there were 9,510 Employment Support Allowance/Incapacity Benefit (ESA/IB) claimants across the city. The claimant rate is 5.4% of the population, which is similar to the London average of 4.8%.⁶¹
- 3.75 The 2021 Census showed that there are many more one-person households in Westminster. These make up 43% of households compared with 29% in London and 30% in England.
- 3.76 The 2021 Census, showed 63% of Westminster residents were economically active, which was lower than the London rate of 66%, and the England average of 61%. Of the economically inactive residents, the majority were students.⁶² Over half of Westminster's residents are educated to at least degree level, with over two thirds educated to A-level and beyond. This is above the average for England at 34% and above the average for London at 47%.⁶³
- 3.77 Over a third of adults are recorded as taking part in one or more 30 minute plus sessions of exercise at least moderate intensity once a week. This is similar to the London participation rate of 36% and the England rate of 35%.⁶⁴

Issues and problems

- 3.78 Whilst Westminster is generally viewed as a place of affluence and performs well in health indicators overall, there are pockets of significant deprivation and patterns of health inequality mirror the patterns of social and economic deprivation particularly in the north-west of the city.
- 3.79 Westminster has a higher than average London level of childhood obesity. Encouraging children to integrate physical activity into their daily routine in the form of walking or cycling to school and encouraging play may help to tackle the obesity problem.

Likely future conditions

- 3.80 The built environment is a contributing factor affecting the health and well-being of a local population. For example access to play space, open space, education, shopping and transport choices (e.g. healthy food and safe pedestrian environments), safe and healthy working environment and low pollution all combine to contribute to good health. Access to housing with high sanitation levels and access to healthcare also contribute to a high standard of healthy living. Planning policy may be able influence these matters, in particular where there are significant spatial disparities as evident in Westminster.
- 3.81 Westminster has developed a Joint Health and Wellbeing Strategy (2017-2022) setting out long term goals to improve the health and wellbeing of Westminster's residents, workers and visitors.⁶⁵

Westminster's Housing

- 3.82 Westminster has approximately 94,814 residential properties; the majority of these are affordable rented flats/maisonettes.⁶⁶

Figures 3.8 and 3.9 – Household Tenure and Type of Dwelling⁶⁷

⁶¹ DWP Benefits (benefit claimants – working age client group) (2017) *Office for National Statistics*

⁶² *Census 2021 Office for National Statistics*

⁶³ *Census 2021 Office for National Statistics*

⁶⁴ Westminster Profile (2015) *Westminster City Council*

⁶⁵ Health and Wellbeing Strategy for Westminster 2017-2022 (2016) *Westminster City Council*

⁶⁶ Westminster Profile (October 2013) *Westminster City Council*

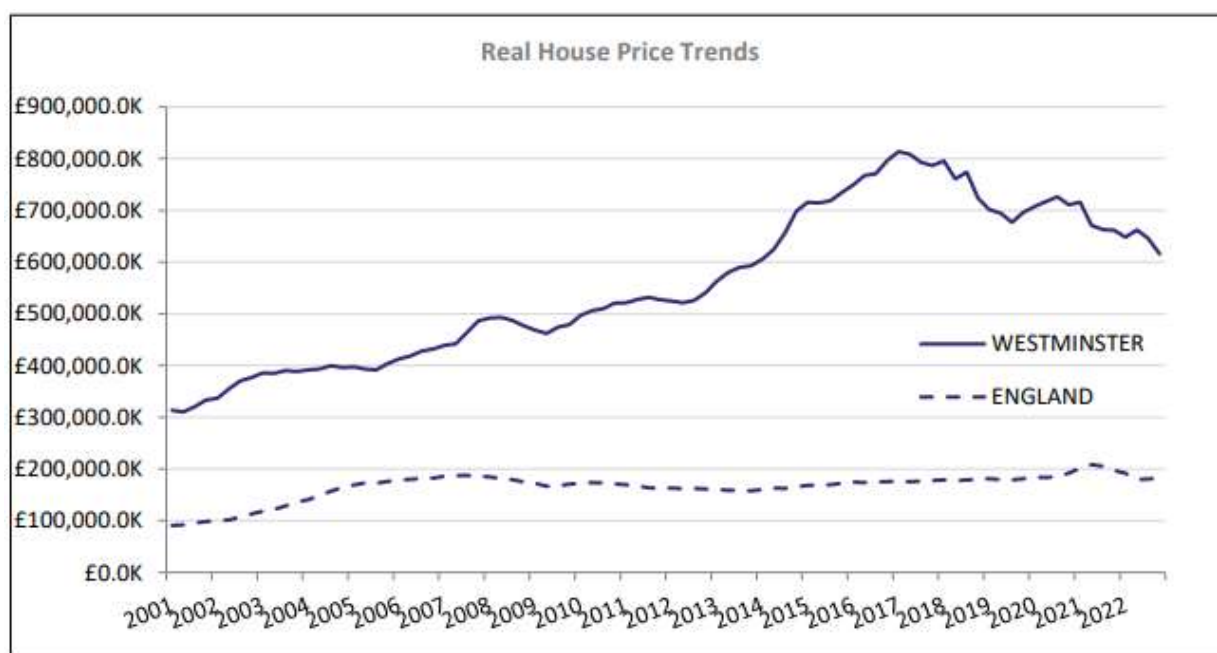
⁶⁷ Westminster Strategic Housing Market Assessment (2024) *Opinion Research Services*

	Number of Households				
	1981	1991	2001	2011	2021
Owner occupied	15,141	29,026	31,831	33,172	26,657
Private rent	29,618	24,621	32,976	45,252	41,347
Affordable Rented Housing	28,359	26,310	26,365	27,348	26,810
TOTAL	73,118	79,957	91,172	105,772	94,814

	Number of Households		2011-2021
	2011	2021	
Detached	1,229	1,047	-182
Semi-detached	1,992	1,735	-257
Terraced	8,075	6,847	-1,228
Flat or maisonette (purpose built or converted house)	89,323	81,709	-7,614
Flats in converted commercial buildings)	3,096	3,366	+270
TOTAL	103,715	94,704	-9,011

- 3.83 Westminster's housing sector differs markedly from other areas of London and in part reflects Westminster's role at the centre of a world city. Real house prices in Westminster, are both higher and increasingly divergent from England as a whole. More detailed profile data for the wards of shows how diverse is the City of Westminster. In Church Street, the median house price is £408,000 while in Knightsbridge and Belgravia the median price is £3,750,000. Even removing more expensive houses from the picture, the median flat price in Knightsbridge and Belgravia is still over £3,000,000.

Figure 3.10 – Average property price in Westminster and the UK (2001-2022)



- 3.84 The 2021 Census showed that 27.4% of Westminster’s households owned their home (3.1% less than in 2011) while 43.3% lived in private rented housing (up 3.6% since 2011); 28.2% lived in public rented housing (an increase of 2.4% over 2011) and 0.7% in shared ownership (a decrease of 0.1% over 2011).
- 3.85 30,225 people whose main home is located in Westminster have a second address elsewhere in the UK or abroad, this represents 15% of all residents and is some indication of part-time occupation.⁶⁸ The Census empty home rate in Westminster was recorded as being 25.4%, which effectively means that one in four properties in Westminster were marked as being empty at the time of the Census. An enormous rise in comparison to the figure for the 2011 Census (10.6%).⁶⁹
- 3.86 In September 2015, older people/physical disability services supplied by the council supported 4,480 people in the community.⁷⁰ Some 40% of older people aged 65 plus live alone in Westminster.⁷¹
- 3.87 The Westminster Strategic Housing Market Assessment 2024 indicates both population and household growth is expected for older people and older households, particularly amongst those over 65.⁷²
- 3.88 The 2021 Census revealed that there is still an overcrowding problem, mainly focused in the north-west of Westminster. Those parts of Westminster with the highest concentrations of social housing and overcrowding are also those which suffer from deprivation.
- 3.89 There are 363 Houses in Multiple Occupation in Westminster, accommodating around 3500 people.⁷³ It is estimated that there are 2,900 purpose built student rooms and between 1,300 and 3,000 properties privately rented by students in Westminster.⁷⁴

Issues and problems

⁶⁸ Census 2021 *Office of National Statistics*

⁶⁹ Westminster Strategic Housing Market Assessment (2024) *Opinion Research Services*

⁷⁰ Westminster Profile (November 2015) *Westminster City Council*

⁷¹ Westminster Profile (November 2015) *Westminster City Council*

⁷² Westminster Strategic Housing Market Assessment (2024) *Opinion Research Services*

⁷³ Census 2011 *Office of National Statistics*

⁷⁴ Housing Need, Delivery and Quality Developing Westminster’s Local Plan consultation booklet (2014) *Westminster City Council*

- 3.90 Westminster's central residential market attracts interest from global investors as well as prime/super prime investors based in the UK. This helps enhance Westminster's global city role and the owners of these premises may help make a significant positive contribution to London's economy and by implication the UK as a whole.
- 3.91 Westminster has the second highest house prices in the country with a median household income in Westminster standing at £44,868⁷⁵, average house prices are 24 times the average Westminster household income. This makes provision of housing available at sub-market rents or prices particularly important. Providing affordable housing raises particular difficulties in Westminster, given its lack of surplus industrial or other vacant land that can be 'released' for housing, reflected in the relatively small number and size of strategic sites identified in the City Plan. This also means that what land is available is very expensive. Residential development within Westminster is therefore typically small-scale and achieved through the sensitive redevelopment of smaller sites and refurbishment of existing buildings. However in recent years there has been an increase in residential floorspace resulting from a change of use from existing office accommodation following introduction of permitted development rights to change from office to residential use for which Westminster's Central Activities Zone obtained an exemption in 2013.
- 3.92 Housing plays an important role in the wellbeing of individual households and communities and in the shaping of neighbourhoods. This is reflected in the particularly high priority being given by the City Council to increase delivery of housing, and of affordable housing in particular.⁷⁶
- 3.93 There is no identified need for provision of gypsy and traveller accommodation in Westminster.

Likely future conditions

- 3.94 The growth trends identified in this report suggest that there will continue to be a high level of demand for housing of all kinds in Westminster. The need for housing available at sub-market prices and rents is likely to remain high as those on even average incomes are likely to continue to find market housing unaffordable. At present, those on low and average incomes are poorly catered for and if left unaddressed this trend is likely to continue, with implications for the City's social cohesion, the success of its economy and provision of local services, as those working here increasingly cannot afford to live here.
- 3.95 The London Plan 2021 sets a minimum 10 year target for Westminster of 9,850 new homes for the period 2019- 29, an average of 985 per year.
- 3.96 Westminster's population is aging at a similar or slightly faster rate than the London average. If the existing trend continues in terms of the type of housing occupied by the older population there will be a need for more privately rented accommodation suitable for elderly residents including that need wheelchair-accessible accommodation. There are expected to be between 469 and 777 people requiring community supported housing in Westminster by 2030⁷⁷. The London Plan has set an indicative strategic benchmark for Westminster to deliver 100 specialist housing units for older people each year between 2017 and 2029. The council has recently made clear its strong commitment to expanding housing provision, both through its renewal of housing estates and through use of its planning powers. The policies in the new City Plan will provide a basis for implementing this commitment.

Environmental Conditions

Heritage, Design and Public Realm

- 3.97 Westminster has in excess of 11,000 listed buildings and structures. Its cultural heritage is unique also in a national perspective with regards to the exceptional quality of the heritage. Some 77% of its land area falls within its 56 conservation areas; of these, 46 have adopted conservation area audits. Westminster has 21 listed historic squares and gardens as set out in "Registered Parks and Gardens of Special Historic Interest", which include the Royal Parks. Westminster's 85 London Squares enjoy protection under the London Squares Preservation Act 1931. 19 listed buildings and places of worship in Westminster are currently on Historic England's Heritage at Risk Register (2024). It also has one of London's four World Heritage Sites designated by UNESCO.

⁷⁵ Westminster Profile (Household Income) (2021) *Westminster City Council*

⁷⁶ Statement on Affordable Housing Policies (June 2017) *Westminster City Council*

⁷⁷ Review of Community Supported Housing (Draft – publication forthcoming, 2017) *Housing LIN and Archadia Chartered Architects*

- 3.98 Seventeen of the 27 views identified in the London Plan are either to or from Westminster. It is crossed by five important viewing corridors, including those to Westminster's World Heritage Site: the Palace of Westminster and Westminster Abbey including St Margaret's Church. Westminster's World Heritage Site was inscribed in 1987 for its outstanding universal cultural heritage.
- 3.99 There are three scheduled ancient monuments in Westminster – The Jewel Tower and The Chapter House and Pyx Chambers in the Abbey Cloisters and Subterranean commercial ice-well, Park Crescent West). Following a recent review completed in 2017 the number of archaeological priority areas (APA) recommended in Westminster, with a known archaeological interest or particular potential for new discoveries, based on the National Heritage List for England (NHLE) register has increased from five to sixteen. The recommended 16 Archaeological Priority Areas will cover 61 % of the land area of Westminster. The APAs are identified in four tiers of significance, with Tier 1 (of national significance) representing 8% of Westminster.
- 3.100 Until very recently, there had been a steady increase in applications for basement extensions; in 2011-12 Westminster determined 182 applications (161 of these were approved). The City Plan was revised in 2016 to address concerns about the impacts of this form of development and there are indications that the numbers of applications have reduced as a result (from a peak of 295 residential basement applications in 2015/15 to 184 in January-November 2016). The basement policy set limits on depth and extent of excavation and introduced a range of additional controls and requirements aimed at mitigating the impact on the heritage, environment and local amenity. Westminster has also issued an Article 4 Direction making applications for planning permission necessary for all residential basements.
- 3.101 Westminster has a legacy of good quality accessible and secure streets. The Council has de-cluttered many streets by removing unnecessary street signs and barriers etc. and continues to de-clutter, especially as it is faced with new types of street furniture, such as new telephone boxes sited primarily for their advertising potential. Westminster's streets require maintenance and upgrading, and many city streets need frequent management to better enforce against badly sited tables and chairs and other clutter on the footway. Westminster also has an impressive collection of historic street furniture, much of it listed.

Issues and problems

- 3.102 Westminster's outstanding heritage is of international and national as well as local importance. It is a key contributor to Westminster's special character and its economic well-being (as a visitor attraction in its own right, for example). The concentration of heritage assets in Westminster is unlike any other part of London, not only in terms of the high representation of listed buildings, protected historic townscapes, landscapes and spaces but the quality and importance of the distinctive identity of its world famous neighbourhoods which contribute to Westminster being one of the most historically and culturally important areas in Europe.
- 3.103 National policy recognises the key role the historic environment can have in delivering sustainable development. Westminster and surrounding boroughs are facing increasing pressures for growth and intensification both for commercial and residential uses. A tailored and creative approach to managing growth is required, retaining and enhancing the existing heritage, making positive use of it and unlocking its potential. High standards of design and exemplary contemporary architecture will be required, particularly in parts of the city where new developments are focussed. The impact of development and particularly tall buildings on the setting of the World Heritage Site is an important issue⁷⁸.
- 3.104 It is unclear how many buildings in Westminster have had sustainability measures fitted and the current environmental performance from all existing buildings has not been measured.
- 3.105 There is likely to be an increasing need to retrofit the historic building stock to ensure economic viability and improve environmental performance, whilst protecting the intrinsic historic character of Westminster. This could be assisted by specific information campaigns including the showcase of positive examples of how to best tailor retrofit activities for historic buildings of different types of construction. There is also increasing need to incorporate sustainable design measures into new build development to improve environmental performance, create a safe and healthy indoor environment and to minimize and mitigate different negative impacts of climate change, at city-wide and neighbourhood levels.

Likely future conditions

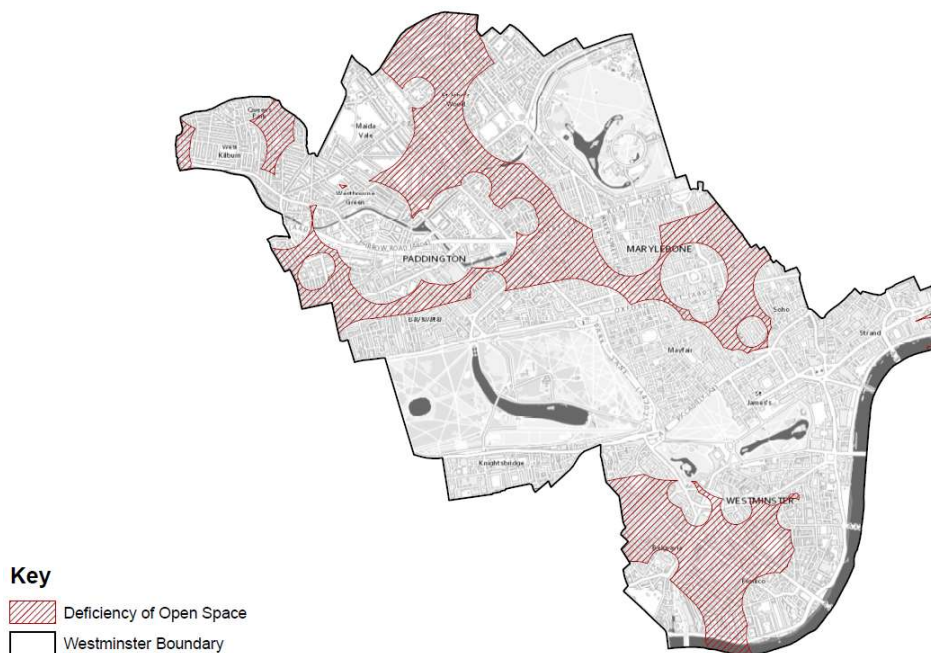
⁷⁸ Mission Report 21-23 February 2017 (June 2017) *UNESCO World Heritage Committee*

- 3.106 The demands of growth are likely to mean that increasing attention will have to be given to ways of accommodating it in ways that secure its benefits while protecting and enhancing Westminster's heritage. There will be a need to ensure that policies and practices are kept up to date to help deliver this objective, including a programme to revise conservation area audits that will take account of current conditions and national guidance on issues like non-designated heritage assets issued since the original audits were published.
- 3.107 Basement developments will need to be monitored to ensure any adverse impact on adjacent structures, street scene character, hydrology, geology, flooding or biodiversity are identified and action to prevent or mitigate them taken.
- 3.108 Loss of front gardens to hard standing, as well as the loss of walls or railings, could have a cumulative impact on flooding, biodiversity and hydrology as well as a detrimental impact on the townscape character.
- 3.109 There is an increasing need to reduce the amount of street clutter in Westminster to provide more footway space for London's growing population. At the same time the use of different types of street clutter is changing – the growth in mobile devices reducing the need for telephone boxes, an increasing requirement for benches, bins, and cycle stands for example. Further changes and innovations in communications and information technology are likely to have particular impacts on the need for different forms of street furniture and may provide opportunities to reduce clutter.

Open Space

- 3.110 The open space network in Central Westminster is different to that elsewhere in London. It includes the River Thames, canals, the Royal Parks and historic London Squares and a range of smaller spaces. Westminster has 436 hectares of open space in total, which amounts to 2.19 hectares per 1000 population. It should be noted, though, that with the considerable inflation in Westminster's population during the daytime (with visitors and workers included), provision effectively falls to around 0.4 hectares per 1000 people during that time. This is lower than the London and national average, although this is to be expected given the intensely built up nature of the area and current land use.
- 3.111 Westminster contains five Royal Parks: Regent's Park; Kensington Gardens; Hyde Park; Green Park and St. James's Park, which cumulatively provide 250 hectares of centrally located open space. Apart from being protected for their heritage status, these are also designated as Metropolitan Open Land, and as such have a protected status similar to that of the Green Belt. Together they comprise 89% of Westminster's public open space and it is estimated that 25 million people visits them per year.
- 3.112 Access to open spaces is essential for people's health and wellbeing. Apart from playing an important role for recreational, cultural and social values green, open spaces are important for improving air quality, preventing and mitigating flooding. They are also important as living spaces and stepping stones for wildlife and strongly contribute to the character of the neighbourhood, of Westminster and the capital.
- 3.113 Open spaces are also an integral part of Westminster's heritage and essential to its unique character. The Royal Parks and River Thames form essential elements of the settings of world famous landmarks such as the Palace of Westminster and Buckingham Palace and Westminster's open spaces feature in many of the protected views across the City. Over half of Westminster's open spaces have heritage designation, with 85 London Squares and 21 Historic England's registered parks and gardens of special historic interest, including the Royal Parks.
- 3.114 Also considered part of our 'portfolio' of open spaces is Westminster's waterways and waterbodies, forming part of London's Blue Ribbon Network. The Blue Ribbon is of strategic importance to London and includes the River Thames, Grand Union and Regent's canals, the Serpentine and the Long Water in Hyde Park and Kensington Gardens. These water elements also play an important role for Westminster's character and environmental qualities.

Figure 3.11 – Map of open space deficiency areas



Issues and problems

- 3.115 Despite having an impressive green network, given its location at the heart of a global city, Westminster has both an overall and localised shortage of open space, with some neighbourhoods being deficient in open space and in access to play space for children (see figure 3.11). The council seeks to protect and wherever possible increase its open spaces and green infrastructure, through its City Plan policies and strategic approach⁷⁹. Areas of shortage in green assets will be prioritised.
- 3.116 Provision of large open spaces is inevitably a particular challenge in Westminster, with great pressure on land space. The Royal Parks provide the only metropolitan-scale public spaces in Westminster; they are therefore important in providing open landscapes and tranquillity amidst a busy, densely built up area and have significant heritage, ecological and natural conservation value. Beyond the Royal Parks (and with the exception of Paddington Recreation Ground), Westminster’s parks are comparatively small in size.
- 3.117 Although Westminster has over 200 ‘parcels’ of open space,⁸⁰ only 65% of this total space offers free access to the public⁸¹. Many spaces offer restricted access to the public or are entirely private, including some of Westminster’s most cherished and iconic open spaces which are privately owned.
- 3.118 Alongside public spaces, private open spaces are also vitally important for the well-known streetscene character of Westminster, making a major contribution to the ambience and attractiveness of the City for visitors and those who live, work or invest in Westminster.
- 3.119 Given this shortage of publicly accessible open space, in particular green space, and the difficulty in finding appropriate new sites, the protection of existing sites is especially important.
- 3.120 The health and wellbeing benefits, both mental and physical, of open spaces and having contact with nature are well documented. Accessible safe green space is shown in particular to reduce mental distress and depression in children.

⁷⁹ Westminster’s Open Spaces and Biodiversity Strategy (under development and due for publication in late 2017) *Westminster City Council*

⁸⁰ Westminster’s Open Spaces and Biodiversity Strategy (under development and due for publication in late 2017) *Westminster City Council*

⁸¹ Site Audits (2016) *Groundwork London*

Access to a garden or living a short distance from green areas, as well as leading to improvements in the environment are associated with general improvements in mental health and wellbeing.⁸²

- 3.121 Westminster's open spaces can often be in high demand to be used for public events. These can deliver a range of benefits to the local area, economy and community. It is important to ensure these are managed in ways that ensure the protection of those spaces as places for public enjoyment.

Likely future conditions

- 3.122 Open space is a finite resource and often its loss is incremental rather than through wholesale development. Policy intervention is important to guard against this kind of loss through development and, more positively, to ensure its protection and extension. The positive environmental, health and wellbeing and heritage impacts resulting from open space are likely to increase in importance and value. In addition to the health, wellbeing and community benefits already outlined, perhaps the most significant are environmental. In the context of ever growing concerns about air quality and a changing climate, the contribution of green assets to mitigating pollution will be key; they will also be important in addressing the urban heat island effect as the climate warms, helping to improve the comfort of Westminster's people as they use the city.

Other green infrastructure and biodiversity⁸³

- 3.123 In 2021, new legislation known as the Environment Act 2021, has specified that new development must provide at least 10% biodiversity net gain from 2 February 2024.
- 3.124 On 20th September 2023, the Council declared an ecological emergency, recognising the importance of a healthy and biodiverse environment that ensures the wellbeing of all in Westminster. As part of this declaration, the Council has made a pledge to act within the Council's power to reverse the decline in biodiversity and deliver measurable biodiversity net gain within Westminster.
- 3.125 Westminster's total green infrastructure comprises parks and gardens including residential gardens, green corridors, pocket parks and small open spaces, street trees and living roofs and walls, roof terraces and balconies which individually and collectively provide habitat for a diverse range of species. Waterways provide important habitats for aquatic species – for example the Grand Union Canal (which is considered to be in generally healthy condition) supports fish species including bream, roach, perch, tench and carp and has been designated a 'good' status under the Thames Water Directive Framework.
- 3.126 Although it is densely developed Westminster has a diverse ecology. The following wildlife species have all been spotted in Westminster: robin, dunnock, blackbird, song thrush, starling, blackcap, tawny owl, stock dove, great spotted woodpecker, stag beetles, hedgehogs, five different species of bat, reptiles and amphibians, including frogs, toads and smooth newts. Some sites make a particularly significant contribution to supporting biodiversity, such as the wildlife garden in Regent's Park and the St John's Wood Local Nature Reserve (which has been recognised as one of the best small open spaces in inner London for birds).
- 3.127 The built environment itself is recognised as an important habitat for biodiversity. An increase in the number of living roofs and walls is having a positive impact on this.
- 3.128 Westminster has over 30 designated Sites of Importance for Nature Conservation (SINCs) all of which are to be protected and enhanced for their biodiversity and ecological value.

Issues and problems

- 3.129 Supporting the natural environment increases the number and quality of habitats, which in turn supports a greater population and range of animal, bird, insect and aquatic species. With great pressures on available land, providing additional habitats can be challenging, although much can be achieved even in smaller green spaces to support Westminster's wildlife. There are opportunities to support biodiversity as part of the development process through design, provision of new green space and enhanced public realm and specialist provision for species on a site. Engaging the public can also be important, encouraging people to use their own gardens, balconies and window boxes

⁸² Better Environment, Better Health A GLA guides for London Boroughs, London Borough of Westminster (November 2013) *Mayor of London*

⁸³ Westminster Biodiversity Action Plan (2007) *Westminster City Council*

to help protect biodiversity by choosing specific plant species for example. Residents and private businesses can also install bird boxes, bat boxes and so on.

- 3.130 The provision of private spaces, roof terraces, balconies, and living roofs and walls can make an important contribution to green infrastructure. Utilising any opportunities to enhance biodiversity is important throughout Westminster, particularly in areas of wildlife deficiency. Strategic green structures should be integrated at the initial stage of any forthcoming larger development or regeneration scheme in Westminster.

Likely future conditions

- 3.131 The importance of green space is likely to increase against the background of a changing climate and increased attention to tackling air quality problems. As it is unlikely that there will be large-scale increases in accessible green spaces due to the high development pressures and values in Westminster, finding opportunities to secure incorporation of green infrastructure in new development (such as green roofs and walls, as well as landscaping) is likely to be important. Proactive management and education and engagement to enable local communities to get the greatest benefit possible from the open and green spaces the city already has to offer will also be important.

Climate Change

- 3.132 Climate change is a global problem and the baseline is not local to Westminster. The Government’s latest UK Climate Change Projections⁸⁴ suggest that by the 2050’s London could see a 2.7 degree Celsius increase in mean summer temperature, a 15% increase in mean winter rainfall and an 18% decrease in mean summer rainfall over a 1961-1990 baseline.⁸⁵

- 3.133 The impacts of a changing climate in London are shown in the table below (taken from the Mayor of London’s Climate Change Adaptation Strategy, 2011).⁸⁶

Rising temperatures	Summers will be hotter. By the middle of the century, the average summer day is projected to be 2.7°C warmer and very hot days 6.5°C warmer than the baseline average. By the end of the century the average summer day is likely to be 3.9°C warmer and the hottest day of the year could be 10°C hotter than the hottest day today. Winters will be warmer, with the average, mid-century winter’s day being 2.2°C warmer and a very warm winter day 3.5°C above the baseline. Very cold winters will still occur, but will occur less frequently.
Seasonal rainfall	Summers will be drier. By the middle of the century, the average summer is projected to be 19% drier and the driest summer 39% drier than the baseline average. By the end of century average summers could be 23% drier. Winters will be wetter. By the middle of the century, the average winter is projected to be 15% wetter and the wettest winter 33% wetter than the baseline average.
Tidal surges	Tidal surges are not projected to increase in frequency or height, except under an extreme scenario, where a 70cm increase has been projected.
Sea level rise	Sea levels are projected to rise by up to 96cms by the end of the century. An extreme projection of a 2 metre increase has been generated using the latest ice-sheet modelling published after the IPCC (Intergovernmental Panel on Climate Change) Fourth Assessment report.

- 3.134 In September 2019, the Council declared a climate emergency and committed to achieve net zero emissions by 2040. A Climate Emergency Action Plan has been developed to set out comprehensive actions for reducing carbon emissions across the city, working in partnership with businesses, communities and residents.

Issues and problems

- 3.135 Climate change will significantly affect the way the City works and is experienced and will have major implications for the health and well-being of its people. These effects are likely to include heat-related health issues, flooding damage to buildings and infrastructure. But the indirect impacts upon cities can be much broader. Climate change will affect air temperature and quality, biodiversity, and the local micro-climate, exacerbating some and lessening others. There is likely to be greater attention to whether infrastructure (including social infrastructure like hospitals and schools) remains fit for purpose and requires adaption or replacement to meet changing conditions. Creating well managed

⁸⁴ UK Climate Projections 2009 (June 2009) *Department for Environment, Food and Rural Affairs*

⁸⁵ The London Plan1 (March 2016) *Greater London Authority*

⁸⁶ Managing risks and increasing resilience: the Mayor’s climate change adaptation strategy (2011) Mayor of London

and used green spaces and building efficient community capacity will increase Westminster's resilience and improve quality of life.

- 3.136 Preparing for extreme weather and further climate change is about managing risks and increasing our resilience to them – it is therefore as much about the economy, quality of life and social equality, as about the environment.
- 3.137 Many of the vulnerabilities to climate impacts stem from London's 'urbanisation' – built up area absorb and retain heat. Because of its central location Westminster suffers disproportionately from the effects of London's 'urban heat island' (which is defined as an area significantly warmer than surrounding areas due to human activity). In central areas, this is exacerbated by the 24 hour nature of this part of the city. To ensure the well-being and health of Westminster's people it will be important that new developments are built in accordance with adopted sustainable design standards. Not only the buildings but the surrounding area should be planned and designed to minimise and mitigate any negative effects of climate change. Noise and poor air quality are also relevant to this issue as they increase reliance on air conditioning, which further contributes to localised heating effects, noise pollution and energy consumption.

Likely future conditions

- 3.138 Central London is already vulnerable to extreme weather, in the form of floods, droughts, heat waves and very cold weather. Westminster has already experienced some changes to its climate including warmer wetter winters and hotter, drier summers and these trends are likely to continue (with what is currently experienced as a heatwave becoming a summer norm, for example) in the future. Extreme weather, such as heat waves and very heavy rainfall such as that experienced in early 2014 is expected to become more frequent and intense. Very cold winters will still occur, though they will become less frequent. Climate change is recognised as an increasingly significant challenge. Central London including Westminster is likely to suffer more regularly from the adverse effects of the heat island effect and be more susceptible to surface water and storm water flooding.

As the climate changes it will be important to find ways of adapting to its effects, some of which may be unanticipated. It will also be important to ensure that steps are taken to mitigate future change, particularly by keeping future carbon emissions to a minimum.

Air Quality

- 3.139 Poor air quality in Westminster is the result of a complex urban environment with very high number of vehicles travelling through the city, emissions from boilers used to heat buildings and a high density of roads and buildings which prevents the dispersal of pollution. Parts of Westminster have some of the worst air quality levels in the country. There are two air pollutants of major concern for Westminster: nitrogen dioxide (NO₂) and particulate matter (PM). Air quality in London has gradually improved in recent years as a result of policies to reduce emissions, primarily from road transport. However Westminster's monitoring data indicates that NO₂ concentration still exceeds the EU limit values both on the short and long term objective limit, whilst particulate matter (PM₁₀ and PM_{2.5}) both meet the EU objectives⁸⁷. However, all three concentrations exceed the World Health Organisation's annual mean guidelines.⁸⁸
- 3.140 Traffic emissions from road vehicles such as heavy goods vehicles (HGVs), light goods vehicles (LGVs), buses and coaches, cars and taxis are the major contributor to PM10 pollution across Westminster. The emissions from road sources also account for 55.2%⁸⁹ of all PM10 emissions in Westminster, nearly 60% of NO₂ emissions and nearly two-thirds of PM_{2.5} emissions come from road transport.⁹⁰
- 3.141 As engine technology has improved, the significance of contributions from gas combustion in the built environment – from both commercial and domestic sources has been a growing concern, to the point where emissions from this source are now greater than those from road traffic. Commercial and domestic gas combustion together accounts for 32.17%⁹¹ of the NO_x emissions.

⁸⁷ Air Quality Annual Status Report for 2016 (2017) *Westminster City Council*

⁸⁸ Updated Analysis of Air Pollution Exposure in London (2017) *Greater London Authority*

⁸⁹ Air quality improvement initiatives in other cities. A brief review of evidence to inform the Westminster City Council Air Quality Task Group (June 2017) *King's College London*

⁹⁰ Report of the Air Quality Task Group (June 2017) *Westminster City Council*

⁹¹ London Atmospheric Emissions Inventory (LAEI) 2013 (2016) *Greater London Authority*

- 3.142 The areas with the highest levels of pollution are along main roads and at major traffic junctions. Higher levels of pollution also relate to areas of high development density such as the West End. Areas with the lowest levels of pollution tend to be in areas of low density development or open spaces such as Hyde Park.

Issues and problems

- 3.143 Air quality has direct implications for human health. Research shows that poor air quality can reduce the quality of life by causing health problems, especially in those who are more vulnerable such as children, the elderly and those with pre-existing health conditions. There is considerable research showing a link between exposure to air pollution and effects on health and, importantly, for particulate matter – studies have been unable to identify a safe level at which there is no effect on health.
- 3.144 Studies show that poor air quality principally affects respiratory and cardiovascular systems with some initial symptoms being sore eyes and nose, itchy irritated throat, coughing and troubled breathing. There is also evidence that high levels of air pollution can trigger an increase in admissions to hospital and contribute to the premature death of those people that are more vulnerable to daily changes in levels of air pollutants. Pollutants have the following effects on health:
- PM₁₀ particles (10 microns diameter)
Clear evidence of a causal link to lung cancer, asthma, bronchitis symptoms especially in the young.
 - PM_{2.5} particles (2.5 microns diameter)
Clear evidence of a causal link to cardio-vascular disease, stroke, lung cancer, respiratory disease. Public Health England estimates it causes 3,389 premature deaths in London each year with children, women and those affected by deprivation affected more. These are also associated with cognitive impairment, Parkinson's, Alzheimer's, Type II diabetes and adverse birth outcomes.
 - PM_{0.1} particles (0.1 microns diameter)
There is probable evidence that this is the most damaging form of pollution for health, with no safe limit. They can penetrate the lungs, brain and other organs causing inflammation.
 - NO_x & O₃ gas
There is clear evidence that these cause respiratory disease at levels found in London and most UK and EU cities. Those suffering from cardio-vascular disease, chronic obstructive pulmonary disease and diabetes patients are particularly vulnerable.
- 3.145 A report on 'Long-Term Exposure to Air Pollution: Effect on Mortality' published in 2009 by the Committee on the Medical Effects of Air Pollutants (COMEAP) states that population life expectancy is shorter in areas of high pollution when compared to areas with less pollution.
- 3.146 The increasing push to move to electric vehicles would reduce pollution by removing particulates from exhausts. However, a significant amount of pollution is also created by the wear of brake pads and tyres on the road. There will be a need to manage traffic levels and encourage more sustainable forms of transport of people and goods, for example reducing the number of commercial movements through use of measures like freight consolidation.
- 3.147 There is much less awareness about the significant contribution of emissions from buildings and construction to air pollution. Whilst some good practices have been developed (e.g. the Green Club in the Marylebone Low Emission Neighbourhood), emissions from buildings are not predicted to fall, unlike emissions from transport. It is therefore crucial for the Council to raise awareness of this both with residents and with businesses, and set and enforce high standards for development, construction and refurbishment to accelerate the improvement of the building stock in the City.

Likely future conditions

- 3.148 Improving air quality in London is a national and regional priority and the issue is likely to be given an increasingly high profile over the period covered by the new Plan. Tackling air pollution is one of the City Council's key priorities, highlighted in "City for All". This refers to publication of a Clean Air Strategy setting out a range of action to address the issue, including a campaign to stop vehicle idling. In 2016 the council launched an Air Quality Task Group to focus on collecting evidence to help build on its efforts to tackle harmful air pollution in central London. Westminster's population swells to over one million every weekday. This influx impacts both on energy use and transport services. In addition people are generally using more energy to heat their homes and water than in the past. Actions to improve air quality may have helped mitigate some of the impact that population growth may have caused, but there has been only very little improvement to overall air quality and, given the predicted increases in population, more needs to be done in order to meet the national objectives.

- 3.149 The pressure on the streets of Westminster means that road transport emissions remain a key source of air pollution and CO₂ emissions, although emissions from transport sources have somewhat reduced in the last decade as engines become cleaner and the Low Emissions Zone was introduced across London in 2008. Pollution linked with vehicular traffic is expected to be further reduced with the introduction of the world's first Ultra-Low Emission Zone in 2020, which will comprise a large part of Westminster.
- 3.150 There is a growing need to find ways of managing growth in ways that protect and enhance the environment. Increasing development density can itself contribute to this, enabling use of shared facilities, reducing the need for vehicle movement while increasing the potential for cost-effective public transport. There will be a need to ensure that design and construction of new development goes further, ensuring emissions from domestic, commercial and industrial energy generation and heating are kept to a minimum. This will be particularly important to the health and well-being of all Westminster's people, particularly as a growing population could lead to higher numbers of people exposed to poor air quality, which may have significant health service implications.
- 3.151 The significant pressure to reduce emissions of greenhouse gases, particularly CO₂, is leading a drive for more renewable energy. Whilst increased use of renewable energy is to be encouraged, certain technologies and fuels such as biomass (e.g. wood pellets and chips) can have harmful consequences for air quality, and other emerging fuels such as liquid biofuels and biogas may have some currently unclear consequences for local air pollution.
- 3.152 The Mayor's Air Quality Fund (MAQF) currently supports a significant number of active projects and has encouraged more partnership working across boroughs. Westminster has engaged with the Mayor's sponsored "Clean Air Better Business" programme, initiated via the Cross River Partnership, involving collaboration between Business Improvement Districts (BIDs) and Central London boroughs. This has delivered projects such as cleaner walking routes away from polluted roads and green infrastructure improvements.⁹² In 2016 Westminster worked in partnership with local stakeholders and secured funding from the MAQF to create a Low Emission Neighbourhood (LEN) in Marylebone, an area-based scheme with a set of measures aimed at reducing transport emissions, encouraging sustainable ways of transport and improving air quality.

Flooding

- 3.153 Westminster's Strategic Flood Risk Assessment 2023 (SFRA) indicates provides information on the main sources of flood risk within Westminster. Westminster has an extremely high level of flood protection from fluvial and tidal flooding including the Thames Barrier and the Embankment wall. However, a residual risk exists from a breach of the flood defences.
- 3.154 In highly developed areas like Westminster, surface water flooding occurs when intense rainfall is unable to soak into the ground or enter drainage systems, because of gully or pipe blockages, breakages in water pipes or where drainage capacity has been exceeded. Westminster has experienced localised surface water flooding in the past (e.g. at Victoria Underground station resulting in its temporary closure). While there have been significant regional flooding events which have affected Westminster (e.g. the 1928 and 1947 Thames floods), the city has not suffered any past floods which had significant harmful consequences of a scale registered on a national scale (comparable for instance, to the summer 2007 and winter 2013/ 2014 floods). The SFRA identifies areas at the highest risk of surface water flooding. In these surface water flooding hotspots the potential impacts on people and property are the greatest.

⁹² Local Authorities and Air Quality (February 2017) *Greater London Authority*

Figure 3.12 – Map of Flood Zones

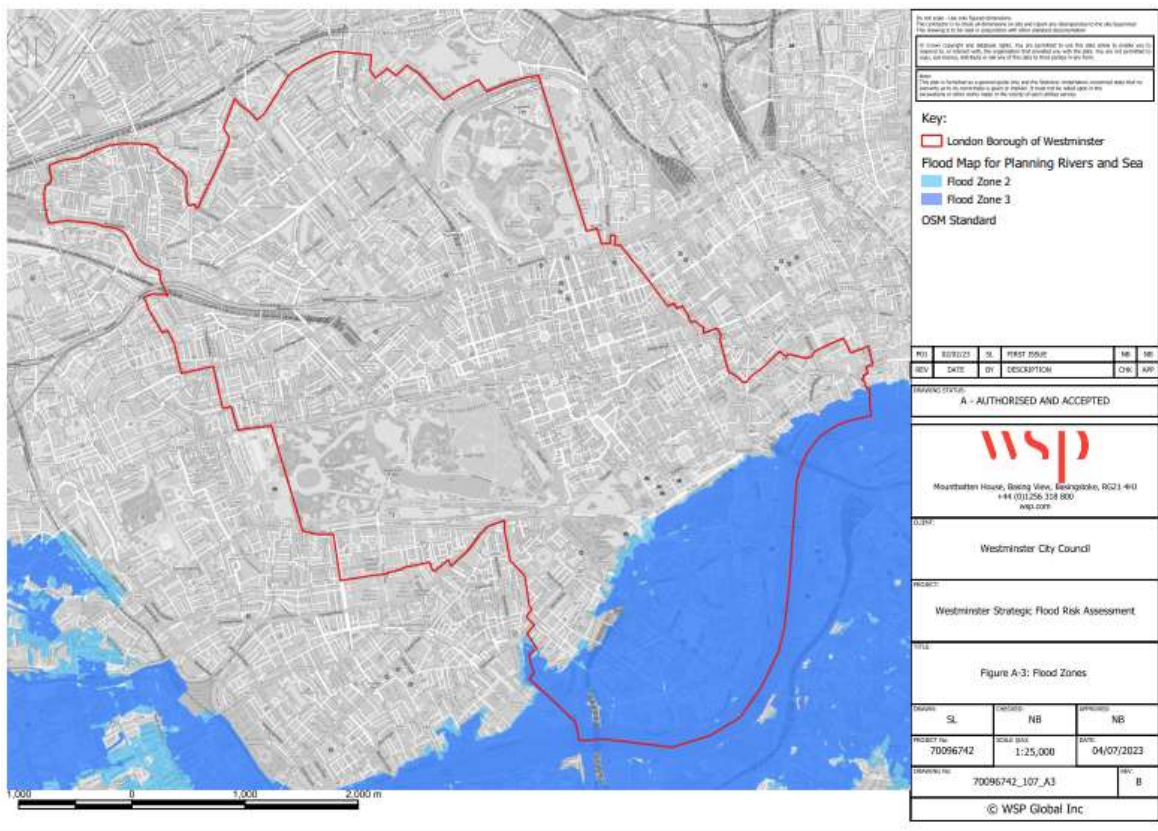
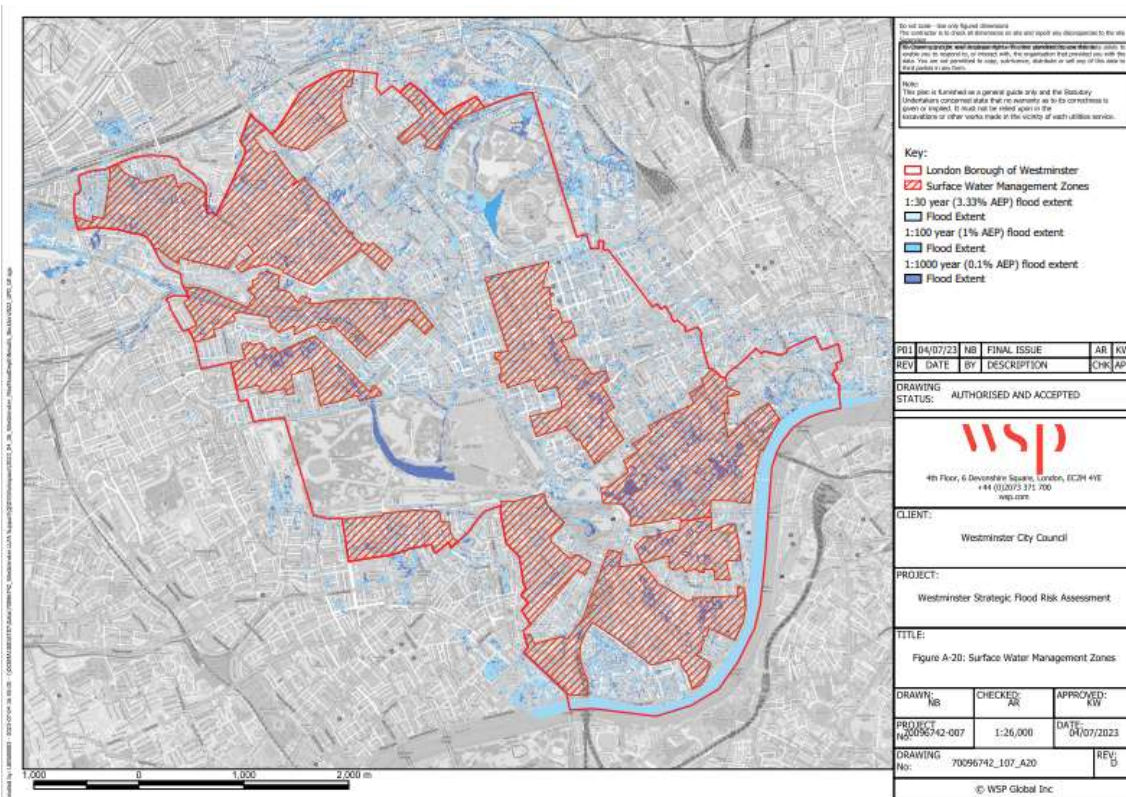


Figure 3.13 – Map of Surface Water Management Zones⁹³



⁹³ Strategic Flood Risk Assessment 2023 (SFRA) Westminster City Council

Likely future conditions

- 3.155 Climate change projections indicate rising sea levels will have an impact on the risks of flooding from the River Thames. However, the Environment Agency is considering new approaches to flood defences that will protect Westminster (and London more widely) into the next century. The Thames Estuary 2100 Plan is the Environment Agency's plan to manage tidal flood risk in the Thames estuary up to 2100. The Thames River Basin District Flood Risk Management Plan 2021-2027⁹⁴ requires the Council to produce a local flood risk assessment and a flood risk management strategy. Westminster will continue to update its flood risk advice based on changes to flood risk management options.
- 3.156 Climate change predictions indicate increased volume and intensity of rainfall, which will result in greater risks of surface water flooding incidents as current drainage capacity is exceeded. The use of Sustainable Urban Drainage Systems⁹⁵ will become increasingly important to minimise surface water flooding and mitigate the impacts. Retaining existing open areas and permeable surface materials in the otherwise dense, urban context of Westminster as well as increase planting is of upmost importance to minimise and mitigate increased summer temperatures as well as the risk for increased flooding.

Water

- 3.157 The River Thames is the primary source of water supply in London. Two thirds of London's supply is taken from the freshwater River Thames, a further 22% comes from the River Lee and the remaining 15% comes from groundwater. Westminster is located in Thames Water's London Water Resource Zone classified as 'seriously water stressed'.
- 3.158 The average consumption of water in Westminster in 2010-2011 was 166.5 litres per person per day, which is slightly lower than the 168 litres per day in 2000-01. The five year average for Westminster between 2006-07 and 2010-11 is 160.8 litres per day. All of these figures are significantly higher than the average water consumption figure for England and Wales of 150 litres per person per day.⁹⁶ Nearly a quarter of Westminster households now have a water meter- an increase from 15% in 2000-01.⁹⁷
- 3.159 No major (Category 1)⁹⁸ pollution incidents were recorded in Westminster between 2005 and 2010. One significant (Category 2)⁹⁹ incident connected to sewage pollutants was registered in 2015.¹⁰⁰ However, 38 million tonnes of raw sewage are released into the Thames each year affecting water quality and biodiversity. Thames Water is constructing a Thames Tideway Tunnel – a major sewer running underneath the Thames that will help tackle the problem of overflows from existing historic sewers and will protect the River Thames from increasing pollution.¹⁰¹ As part of the proposals there is a worksite and long term creation of new public realm on the Victoria Embankment Foreshore. The Thames River Basin Management Plan provides evidence on how all waterbodies in the Thames catchment are currently perform (under the Water Framework Directive) and specifies objectives and measures to improve water quality in rivers, canals, groundwater and surface water bodies.

Issues and problems

- 3.160 London has been declared an area of serious water stress by the Environment Agency. Water consumption in Westminster is already significantly above the average for England and Wales.

Likely future conditions

- 3.161 Water is a precious resource (increasingly so as the population continues to grow and the climate change brings about drier summers) and therefore ways need to be found to reduce consumption. Water consumption per person will need to be reduced given pressures on supply from an expanding population and climate change; this will require

⁹⁴ Thames River Basin District Flood Risk Management Plan 2021-2027 (2022) *Environment Agency*

⁹⁵ Sustainable Urban Drainage Systems (SUDs) are a sequence of water management practices(1) and facilities(2) designed to drain surface water in a manner that will provide a more sustainable approach than what has been the conventional practice of routing run-off through a pipe to a watercourse.

⁹⁶ Environment Agency 2013

⁹⁷ London Borough Environmental Fact Sheet November (2011) *Environment Agency*

⁹⁸ Category 1 – major, persistent, extensive or serious impact or damage to air, land, water, people, property, ecosystems, habitats and/or amenity

⁹⁹ Category 2 – significant impact or effect on the environment, people and/or property

¹⁰⁰ What's in Your Backyard interactive mapping service (data retrieved on 6 July 2017) *Environment Agency*

¹⁰¹ Thames Tideway Tunnel Website February 2014

both increased water use efficiency and increased water recycling. Planning policy will have a part to play by ensuring that new development is designed and built to make the most efficient use of water resources.

Carbon and Green House Gas Emissions

3.162 Westminster's Climate Emergency Action Plan¹⁰² states that the city generated almost 45,000 tonnes of carbon from our buildings and activities from in 2018/19. The City of Westminster has some of the highest carbon emissions by local authority area in the UK, producing over two million tonnes in 2017. This is largely a reflection of its densely built environment, with 86% of Westminster's emissions produced from the energy used in our homes, hospitals, shops, offices, hotels and other buildings. Unlike other parts of the country, Westminster's carbon footprint is not linked to large scale industrial activity, which can be more easily reduced. Rather it is the cumulative impact of many small occupiers, with approximately 75% of the emissions from the use of commercial occupiers, particularly electricity. This is much higher than the national average level for emissions from commercial and domestic buildings of about 37%.¹⁰³

Issues and problems

3.163 With 2,276 kilo-tonnes of carbon emitted in 2017, Westminster has some of the highest carbon emissions in the UK, larger than that of other major cities such as Edinburgh and Manchester which are considerably larger in terms of area and population. Approximately 37% of Westminster's carbon emissions come from institutional buildings, 23% from industrial buildings, 15% from residential buildings and 11% from both commercial buildings and road transport.

3.164 The density, accessibility and complex mix of uses in Westminster and its unique heritage – particularly in central areas – provide significant opportunities for sustainable development: making the most efficient use of land; extending the lifetimes of existing buildings; reducing the number of vehicle movements while maximising the use of sustainable modes of transport through measure like freight consolidation and encouraging walking and cycling; and opportunities for local and neighbourhood solutions such as Combined (Cooling), Heat and Power networks, local in-vessel composting and other waste solutions. However, the quality and extent of heritage assets means that innovative solutions adapted to Westminster's unique conditions are required to meet carbon reduction targets.

Likely future conditions

3.165 Data produced by the Department of Energy and Climate Change for 2005 to 2014¹⁰⁴ indicate that the emissions of carbon dioxide from Westminster fell by 18% over this period; however much greater progress will be needed in future years if Westminster is to contribute to meeting regional and national carbon reduction targets and mitigating global climate change.

Heat and Power Networks

3.166 The Pimlico District Heating Undertaking (PDHU) is the UK's first combined heat and power network and provides low carbon, low cost heating and hot water services to 3,256 homes, 50 commercial premises and three schools in the area. Electricity produced is also sold to the national grid and achieves considerable carbon savings, as well as subsidising the PDHU operation financially. There is also a system at Whitehall which can provide heat and electricity for 18 government departments.

Issues and problems

3.167 The larger the network the greater the synergies and savings and the more efficient the system becomes. These networks are a significant part of Westminster's strategy to combat fuel poverty and deliver reductions in greenhouse gas emissions by providing residents and businesses with cost-competitive, low carbon heat, whilst also enabling areas to benefit from future technological advances in heat generation plant.¹⁰⁵

Likely future conditions

3.168 The Pimlico and Whitehall district heating undertakings have the potential to be networked more widely and there are early opportunities in both the Victoria and Paddington Opportunity Areas, where it is possible to plan a network in at the earliest design stage. Whilst the Decentralised Energy Masterplan for Westminster¹⁰⁶ concludes that most of the City is technically and commercially viable for heat networks, it also recognises that public sector support will be

¹⁰² Climate Emergency Action Plan 2040 *Westminster City Council*

¹⁰³ Committee on Climate Change, emissions from buildings (2013)

¹⁰⁴ 2011 Carbon dioxide emissions for local authority and regional level (January 2013) *Department of Energy and Climate Change*

¹⁰⁵ Retrofitting Soho, Decentralised Energy Masterplan for the City of Westminster (January 2014) *Parsons Brinckerhoff*

¹⁰⁶ Decentralised Energy Masterplan for Westminster (August 2013) *Parsons Brinckerhoff*

essential to roll out a network over the less dense areas. This will help deliver carbon reduction, reduce fuel poverty and deliver local energy security, but significant decisions are to be made regarding the potential level of intervention by the Council.

Noise

- 3.169 In 2016/17 the council noise team received 17,598 complaints. The Westminster Noise Strategy (2010) identifies that average noise levels in Westminster are 62 decibels (dB) LAeq¹⁰⁷ in the day (07:00 – 19:00 hrs) and 55.7dB LAeq in the night (23:00 – 07:00 hrs. This compares to WHO guidelines which say that in order to protect the majority of people from being seriously annoyed, the noise levels on balconies, terraces and outdoor living areas should not exceed 55dB LAeq for steady continuous noise in the day and 45dB LAeq and 60dB LAm_{ax} at night. Road traffic is the main source of noise, and it is the biggest cause for concern amongst residents. In 2016/17 most complaints were received in relation to noise originating from residential premises (over 40%), followed by noise incidents on streets (27.6%) and commercial premises (11.5%).¹⁰⁸ The majority of complaints received in 2016/17 originated from the West End (354,000) and St. James's (244,000)¹⁰⁹.
- 3.170 Westminster's noise levels exceed World Health Organisation (WHO) guidelines. Noise can have a negative impact on sleep, learning and communication and generally lead to annoyance. The recent European WHO Night Time Noise Guidance document strengthens the link between high ambient noise and night time noise events with adverse health effects. The mixture of land uses and volume of vehicle and pedestrian movement combine to create a complex urban environment and the sound environment is intrinsic to this complexity. Activities in many parts of Westminster are 24 hour in nature which contributes significantly to the problem and means that the quiet night-time period is shorter in many parts of the city and comparably noisier than other cities.

Issues and problems

- 3.171 Addressing noise issues is particularly challenging in a densely-developed and intensively used urban environment like Westminster, and it will be important to ensure that policies manage growth in ways that minimise noise problems, particularly for those with particular sensitivity. In addition to health impacts on residents, noise can be a significant issue for businesses as well whether because it affects activities within a building or because development that brings more people close to uses like theatres that generate noise can make their functioning difficult. There will be a need to ensure appropriate and realistic standards to balance all these needs and to ensure protection of those parts of the City that are relatively tranquil. One approach being taken is encouragement of new technologies such as electric and hybrid vehicles which are generally quieter than other vehicles. An expansion in the use of other quieter technologies has significant potential to reduce noise levels.

Likely future conditions

- 3.172 Westminster is noisy and without intervention and strategies, noise levels are unlikely to decrease. The planning process is an opportunity to secure proactive improvements to the noise climate where other legislation can only react to problems and to help support development of a market in quieter technologies and noise reduction measures.

Waste

- 3.173 Despite a small increase in recent years, there has been a marked reduction in municipal waste collected in Westminster from the high of 2001 of 250,000 tonnes to a low of 178,000 tonnes in 2013. In 2016 196,000 tonnes of municipal waste were collected in Westminster. Half of the municipal waste collected comes from businesses, 40% from residents and 10% from street litter.¹¹⁰ The majority of municipal waste in Westminster is paper and card (34%) followed by kitchen waste 22%.

Figure 3.14 – Municipal Waste Management Tonnages (1999-2013 and projected to 2026)¹¹¹

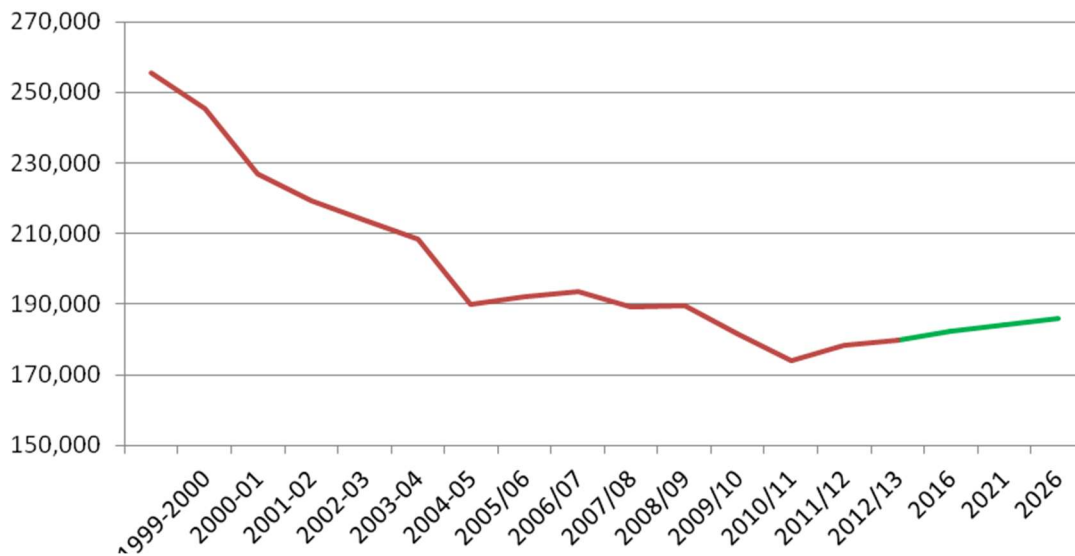
¹⁰⁷ LAeq Ambient noise is normally measured as LAeq. LAeq T is the equivalent A-weighted sound pressure level that gives the energy average of a fluctuating sound level measured over a specified time duration. LAm_{ax}. The maximum A-weighted, sound pressure for a discrete event or over a specific time period (LAm_{ax} T).

¹⁰⁸ Service Requests 2016/17 (2017) Westminster City Council (Noise Team)

¹⁰⁹ Total Number of Service Request by Ward (2017) Westminster City Council (Noise Team)

¹¹⁰ Municipal Waste Management Strategy 2016-2031 (November 2014) Westminster City Council

¹¹¹ Municipal Waste Management Strategy 2016-2031 (November 2014) Westminster City Council



- 3.174 Most of Westminster’s waste (82%) is transferred to Energy from Waste (EfW) facilities outside of Westminster, whilst 18% is recycled. No Westminster waste goes directly to landfill.¹¹²
- 3.175 Westminster does not itself operate any waste management or re-use facilities. The majority of waste is delivered to the South East London Combined Heat and Power (SELCHP) facility. Recyclables are delivered to a Material Recycling Facility (MRF) in Southwark or to the Brent Waste Transfer Facility from where they are transferred to processors. The Brent Waste Transfer Station also accepts general waste when SELCHP is closed. Food waste is delivered to the Southwark Transfer station.
- 3.176 At 19% Westminster had one of the lowest household recycling and composting rates in London in 2016 (the London average is 34%). Although the percentage of recycling has increased from 7% in 2000/1, progress has been reversed in recent years, slipping from 25% between 2010 and 2012 to 19% in 2016/7.¹¹³ This reflects the high proportion of households (over 90%) living in flats.
- 3.177 Of the 95,000 tonnes of commercial waste collected in 2016/17, 16,000 was recycled. This represents 16% of all commercial waste collected and the majority (8000 tonnes) of this was from commingled collections. The City Council aims to achieve a municipal waste recycling rate of 30% by 2020, 35% by 2025 and 40% by 2031.¹¹⁴
- 3.178 The construction sector produces the largest amount of waste in London.¹¹⁵ On an average day more than 600 building projects are underway in Westminster. In 2016 200,000 tonnes of construction demolition and excavation waste was produced in Westminster, this is predicted to rise to 219,000 in 2036.¹¹⁶

Issues and problems

- 3.179 Predicting the amount of waste generated in Westminster is particularly challenging as street cleaning and commercial services make up 60% of the municipal waste stream.
- 3.180 In London it is estimated that there is a need for 22 hectares of additional land in order to effectively manage waste.¹¹⁷ The current London Plan has reduced Westminster’s waste apportionment from previous estimates to:
- 86,000 tonnes-in 2016,
 - 99,000 tonnes in 2021
 - 119,000 tonnes in 2026
 - 121,000 tonnes in 2031

¹¹² IIA scoping report for the Draft Municipal Waste Management Strategy 2016-2031 (October 2013) *Westminster City Council and AMEC*

¹¹³ WasteDataFlow – Local Authority Collected Waste Statistics, *Department for Environment, Food and Rural Affairs*

¹¹⁴ Municipal Waste Management Strategy 2016-2031 (November 2014) *Westminster City Council*

¹¹⁵ The London Plan (2016) *Greater London Authority*

¹¹⁶ Local Aggregate Assessment for London 2016 (December 2016) *GLA for the London Boroughs*

¹¹⁷ SPG Land for Industry and Transport (September 2012) *Greater London Authority*

- 124,000 tonnes- in 2036.¹¹⁸
- 3.181 The lack of available sites in Westminster means the Council has been unable to identify enough capacity within the borough itself to meet these apportionments.¹¹⁹
- 3.182 The management of waste contributes towards climate change. Throughout the various stages of its production, transportation, handling, treatment and disposal carbon dioxide and methane is released.
- 3.183 Methane is 23 times more potent than carbon dioxide as a greenhouse gas and is released as waste decomposes in landfill. Diverting waste from landfill to for example recycling and energy generation facilities is a key priority for all UK local authorities, and the Mayor has set a strategic policy for London to manage the equivalent of 100% of its waste within its boundaries by 2026.

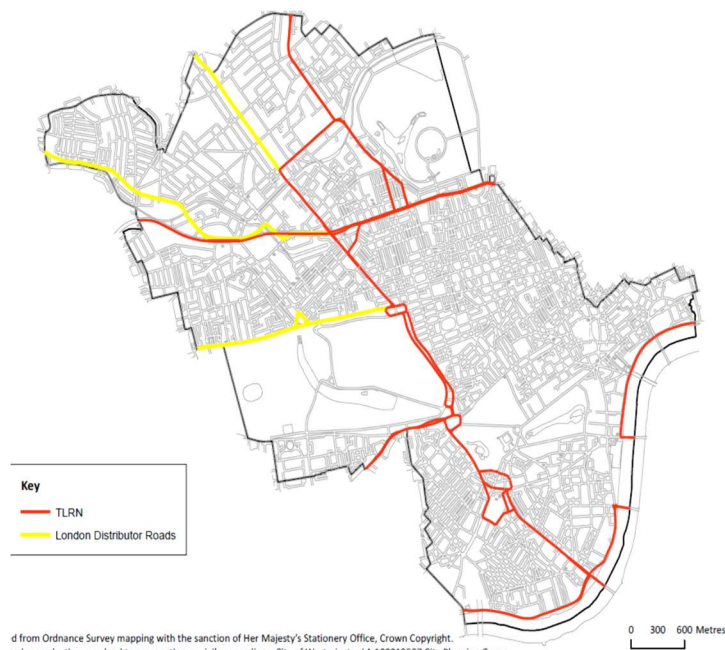
Likely future conditions

- 3.184 There remains a strong national and regional drive to increase municipal waste recycling rates but without intervention to compel higher rates of participation and capture recycling and composting rates are likely to remain broadly static. The Mayor of London aims to achieve net self-sufficiency for household and commercial waste by 2026, seeking to ensure that there are facilities to deal with the equivalent of 100% the waste apportioned to the boroughs.¹²⁰ Westminster will need to ensure it can meet these national and regional targets.
- 3.185 The Circular Economy – in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life – will become more developed in the plan period.

Transportation and Pedestrians

- 3.186 Westminster is among the most comprehensively served locations by public transport in the country and one of the best served in the world. There are four main rail termini; 32 underground stations with 10 of the 12 tube lines running through the city, including all 5 night tube routes; 4 river bus piers with commuter services; 157 daytime, night bus and 24 hour bus routes; and 169 cycle hire docking stations. European, National and local express coach services also serve the city from Victoria Coach Station.¹²¹ In addition, the Elizabeth Line is due to open in late 2018 which will add 10% to London’s rail capacity and an extra 1.5 million people within 45 minutes of central London. Westminster will be served by 3 Elizabeth Line stations, which will provide step-free accessibility at all stations along this line.

Figure 3.15 – Westminster’s Road Hierarchy



¹¹⁸ The London Plan (March 2016) *Greater London Authority*

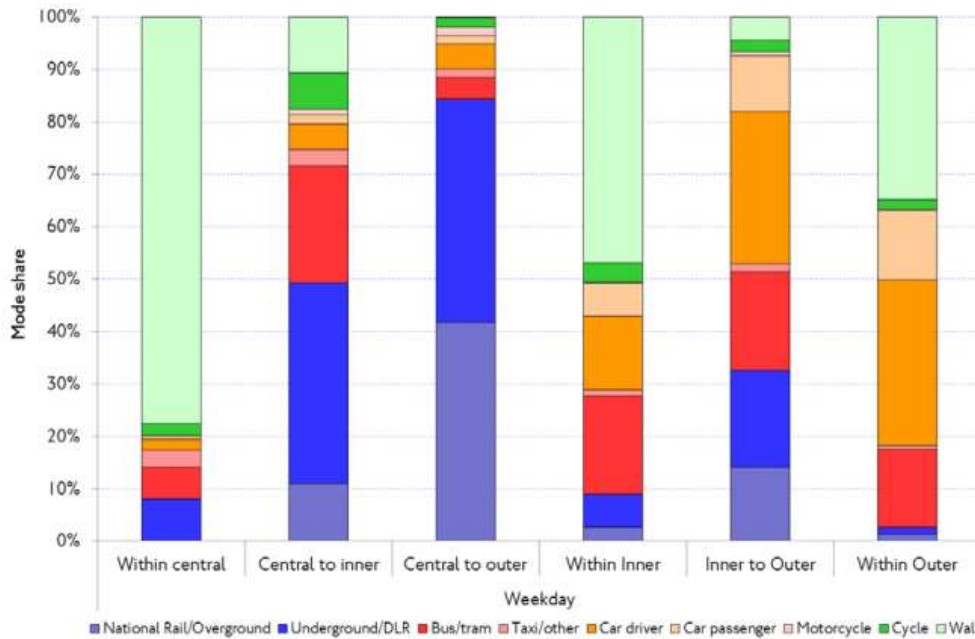
¹¹⁹ Technical Paper 1: Waste, Core Strategy Technical Papers for Submission Draft LDF (March 2010) *Westminster City Council*

¹²⁰ The London Plan (March 2016) *Greater London Authority*

¹²¹ Local Implementation Plan a Transport Delivery Plan up to 2031 (2011) *Westminster City Council*

- 3.187 Westminster’s highway network consists of: 350kms of carriageway including 27.5kms of strategic roads managed by Transport for London (TfL), 623 kms of footway including 55km on strategic roads. Westminster’s position at London’s centre, with its unique mix of residential and commercial neighbourhoods, many of the country’s iconic visitor attractions and its dense pattern of development and economic activity means that there are competing demands for use of its highway space throughout the day and increasingly at night. For example freight and servicing makes up a quarter of central London weekday traffic; 150,000 taxi passengers use Oxford Street each day; 100,000 pedestrians pass through the West End during one hour at peak time¹²², which is far more than all other town centres in Westminster and across London¹²³, and around 4 million vehicles enter the Congestion Charge Zone per month.¹²⁴
- 3.188 In Westminster high numbers of people participate in active travel,¹²⁵ with the percentage of people cycling to work higher than the greater London average.¹²⁶ The modal share of journeys originating in Westminster is as follows: 40% walk; 23% use the Underground; 13% bus, 7% rail, 21% use a car or a motorcycle; 4% taxi and 3% cycle.¹²⁷

Figure 3.16 – Weekday mode share by trip origin and destination, LTDS 2012/13 to 2014/15 average¹²⁸



Source: TfL Planning, Strategic Analysis.

Figure 3.17 – Mode of travel for Londoners on an average day, by borough of origin (2009/10 – 2011/12 (2015))

¹²² The count was undertaken during the course of one hour at peak time (between 3 and 4pm).

¹²³ London Datastore. Camera Captures and Confirmed Vehicles seen in the Congestion Charge Zone by Month (2017) *Greater London Authority*

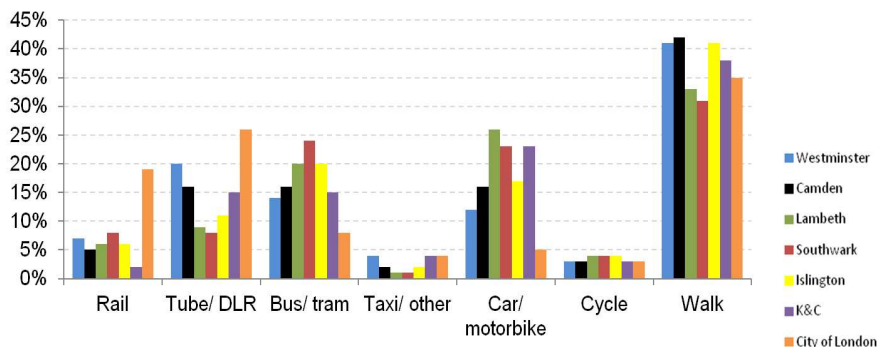
¹²⁴ London Datastore. Camera Captures and Confirmed Vehicles seen in the Congestion Charge Zone by Month (2017) *Greater London Authority*

¹²⁵ This is an approach to travel and transport focused on physical activity (walking and cycling) as opposed to motorised and carbon dependent means.

¹²⁶ Better Environment, Better Health A GLA guide for London Boroughs, London Borough of Westminster (November 2013) *Mayor of London*

¹²⁷ Westminster Fact sheet (2017) *Transport for London*

¹²⁸ Travel in London. Report 9 (2016) *Transport for London*



Source – London Travel Demand Survey

3.189 In 2015, 45% of journey stages in London were made by public transport, compared with 32% by private transport.¹²⁹ These figures reflect an established shift away from private motorised transport to the public transport modes. Between 2000 and autumn 2012 the average number of cyclists per day passing through central London increased significantly by 150%¹³⁰. Other changes since 2012 are likely to be slight increases in people using the Underground and taxi (with private hire vehicles). Rail use will also increase after 2018 once the Elizabeth line opens.

3.190 Car ownership has fallen across central and inner London in recent years. Car ownership in households in Westminster has fallen from 63% to 56% between 2001 and 2011 according to Census data, and in some areas like the West End only 30% of households own a vehicle. This equates to 0.5 cars per resident, compared with 0.8 in London as a whole and 1.1 nationally. The use of cars in Westminster by its residents is 25% below the average for greater London and is the lowest rate in London.¹³¹ The relatively low car usage is particularly influenced by the relatively good public transport network, the densely built-up nature of the area and constraints on parking space at destinations in central area. The council's on-street car parking stress surveys continue to indicate high demand for residential car-parking across the City. Partly this is due to the historic nature of the building stock here which means that many existing residents do not have access to off-street parking.

3.191 The on-street parking stock across the borough consists of:

- 33,000 resident bays,
- 4,149 visitor pay-by-phone bays,
- 2,604 'other' paid visitor bays,
- 3,274 shared use resident bays,
- 6,150 paid motorcycle bays,
- 7,818 cycle parking spaces,
- 220 White Badge disabled bays,
- 480 Blue Badge disabled bays,
- 185 car club bays,
- 154 taxi ranks providing 676 spaces,
- 223 rest/shelter spaces for taxis,
- 55 coach bays,
- 60 electric charging bays,
- and other more specialist bays such as diplomatic and doctor bays.¹³²

¹²⁹ Travel in London. Report 9 (2016) *Transport for London*

¹³⁰ Westminster Cycling Strategy (2013) *Westminster City Council*

¹³¹ Better Environment, Better Health A GLA guide for London Boroughs. London Borough of Westminster (November 2013) *Mayor of London*

¹³² Transport and Movement consultation booklet (2014) *Westminster City Council*

- 3.192 In 2013 264 kilo tonnes of CO₂ emissions emanated from all sources of ground based transport in Westminster.¹³³
- 3.193 From 2017 all Westminster schools will have a Travel Plan in place which looks at ways in which pupils can be encouraged to walk or cycle to school.¹³⁴
- 3.194 Westminster typically has the highest number of road casualties in all London boroughs, which in 2015 involved a total of 1808 casualties, which are categorised as follows: 4 fatal, 131 serious, 1673 slight¹³⁵.

Issues and problems

- 3.195 Westminster's function as a centre of business and government and its position at the heart of London's transport infrastructure requires the movement of people and goods on a large scale without delay. The transport system also gives access to shopping, entertainment and attractions for workers, residents, students and visitors. The existing transport networks within Westminster do not always meet these needs, which is not helped by the responsibility for transport in Westminster being shared between the Council and a number of agencies and transport providers including TfL and the Department for Transport.
- 3.196 The high level of demand for transport together with the movement of people into and out of Westminster can have detrimental impacts on the local environment and the public realm for example congestion at popular interchanges such as Oxford Circus. The level of vehicle movement on Westminster's road network results in increased congestion and emissions leading to poor air quality and noise pollution in these locations. Westminster's location and the fact that highway management is split between the City Council and Transport for London requires joint work between agencies.
- 3.197 Sustainable transport options (encouraging walking and cycling in particular) are consequently very relevant for Westminster. The density of land use and movement means that many journeys are short and can be made by foot. Walking is considered by many as the best way to improve health. It helps to reduce traffic congestion, and hence air and noise pollution and may often result in quicker journey times. Prioritising pedestrian movement encourages improvements to the public realm, for example, by ensuring that proposals to place furniture or other objects do not obstruct safe and efficient movement or cause confusion to people unfamiliar with the layout of the city. There are a number of opportunities and challenges associated with the increase in cycling and this can be supported through a wide range of schemes and initiatives.
- 3.198 The concentration of commercial premises (office, retail and entertainment venues), interspersed with residential, and the dense historic urban fabric characteristics of Westminster create both opportunities and challenges in terms of servicing and deliveries, safety, noise and disturbance. Density of use offers opportunities for innovative transport schemes that do not risk the safety of other users of the highway or the public realm. Promoting safe and fuel efficient driving techniques for vehicles (e.g. no idling), including heavy goods vehicles, can also significantly minimise air and noise disturbance. There is also scope for shared facilities reducing the need for movements, such as freight consolidation centres.
- 3.199 Road safety is a significant issue within Westminster, with the highest number of casualties and fatalities in London. Pedestrians and cyclists are the most vulnerable users of the highway and there has been an increase in accidents resulting in fatal or serious injuries among these groups.
- 3.200 Parking is a complex and sometimes contentious issue in Westminster, requiring a balance to be struck between competing interests, in a location where land is limited.

Likely future conditions

- 3.201 The pressure on Westminster's transport network is going to increase, with a growing population and economy however, it is hoped that the recent opening of the Elizabeth Line in 2022 will help to cater for some of this projected growth. It is estimated that the Elizabeth Line services will transport 200 million passengers each year. This is partly because it will enable an extra 1.5 million people to be within 45 minutes of central London, linking London's key employment, leisure and business districts.¹³⁶ The Elizabeth stops at three stations in Westminster: Paddington, Bond Street and Tottenham Court Road. In the medium-term it is likely that the additional capacity brought by schemes like the Elizabeth Line and upgrades to London Underground services will be outweighed by additional growth-generated demand which will start increasing issues of congestion and crowding.

¹³³ London Atmospheric Emissions Inventory (LAEI) datastore (2013) *Greater London Authority*

¹³⁴ Local Implementation Plan a Transport Delivery Plan up to 2031 (2011) *Westminster City Council*

¹³⁵ Surface Transport. Casualties in Greater London during 2015 (June 2016) *Transport for London*

¹³⁶ Crossrail Website (retrieved July 2017)

- 3.202 Crossrail 2 (a rail service linking south-west to north-east London and running through Westminster) is already subject to a safeguarding direction from the Secretary of State. In the autumn of 2015 TfL consulted on a preferred route, which crosses Westminster and would include stations at Tottenham Court Road and Victoria. In the 2017 election none of the political party manifestos provided support to fund Crossrail 2. It also did not feature in the Queen's Speech in 2017, however the Mayor of London remains committed to the project and is consulting on a new CIL charge to part-fund the line's construction. In July 2017 support for Crossrail 2 was expressed by the Secretary of State for Transport and the Mayor of London, announcing the next stage of consultation.
- 3.203 There is increasing concern about the environmental impact of transport. The most effective way to reduce CO₂ emissions from vehicles is to reduce congestion by changing to other modes. This can occur by creating more opportunities to enable Westminster's residents and visitors to walk and cycle, which also has potential health benefits. This could also lead to a reduction in congestion, which in turn may reduce carbon emissions and improve air quality. Other approaches include cleaning up vehicles by switching to electric cars, taxis and buses and by using car club vehicles. However, this is less effective as it maintains and possibly increases vehicles and hence congestion from other polluting vehicles, and about half of the electrical power used in electric vehicles is generated from carbon sources (like gas and coal).
- 3.204 The most significant future transport innovation is likely to be the introduction of autonomous vehicles. Driverless vehicles should result in distinct improvements in road safety and are much cheaper to use, which is likely to create new markets for transporting the young, the elderly, disabled and for convenience. They are also likely to reduce the need for car ownership and on-street parking, but will increase the volume of driving on the roads. As such, autonomous vehicles are likely to challenge and change all other modes of surface transport. In addition, the transition to driverless vehicles is unlikely to be a smooth series of improvements because it may easily result in higher levels of congestion, and possibly pollution, and more and/or different types of accidents.

7.4 Appendix IV – Plans and programmes

As part of the IIA scoping process a comprehensive review of relevant plans, programmes and strategies was carried out. This review ensures that the any relevant information contained within these documents is taken on board for the preparation of the IIA for Westminster's City Plan as required by the SA/SEA process. The list of plans and programmes was updated following the consultation on the IIA Scoping Report. The relevant documents are set out below in accordance with their spatial significance and grouped accordingly as International; National; Regional (London wide); Neighbouring Authorities and Local (Westminster).

International

- Commitments arising from the Paris Agreement (2016) on climate change
- EU Directives 79/409/EEC; 92/43/EEC; 2000/60/EC; 96/62/EC; 75/442/EEC; 99/31/WC
- EU Directive 2002/49/EC – Environmental Noise Directive (END)
- EU Directive 2008/50/EC
- EU Water Directive Framework 2000
- Kyoto protocol to the United Nations framework convention on climate change (2005)
- The World Summit on Sustainable Development – Commitments arising from Johannesburg Summit United Nations (2002)
- United Nations Sustainable Development Goals (2015)

National

- Air pollution: Action in a Changing Climate (2010) *Department for the Environment, Food and Rural Affairs*
- Air Quality Standards Regulations 2010
- Amendment to Part 3 of Schedule 2 of the General Permitted Development Order 2015 (GDPO) creating new Class MA, removing need for planning permission of Class E uses to Class C3 (2021) *MHCLG*
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) *Department for the Environment, Food and Rural Affairs*
- Clean Air Act 1993
- Climate Change Act 2008
- Conservation Principles, Policies and Guidance for the sustainable management of the historic environment (2015) *Historic England*
- Crowded Places Guidance: The Planning System and Counter-Terrorism (2012) *Home Office*
- Design and Construction. SPG on the London Plan policies regarding environmental sustainability (2014)
- Energy Efficiency and Historic Buildings (2012) *Historic England*
- Environment Act 1995 (updated 2007)
- Environment Act 2021
- Environment Bill 2020 (2021) *HM Government*
- Equality Act 2010
- Fixing our broken housing market (2017) *Department of Communities and Local Government*
- Further amendment to Town and Country Planning (Use Classes) Order 1987 (As Amended) creating a new Class E (commercial, business and service use) *MHCLG*
- Heritage 2020: Strategic Priorities for England's Historic Environment 2015-2020 (2014) *Historic England*
- Housing and Planning Act 2016
- Integrated Security. A Public Realm Design Guide for Hostile Vehicle Mitigation. Second edition. (2014) *Centre for the Protection of National Infrastructure*
- Inclusive Transport Strategy (2020) *Department for Transport*

- UK plan for tackling roadside nitrogen dioxide concentrations (2017) *Department for Environment Food and Rural Affairs, Department for Transport, Scottish Government, Department of Agriculture Environment and Rural Affairs, Welsh Government*
- London Borough Environmental Fact Sheet (2011) *Environment Agency*
- National Planning Policy Framework (2023) *Department for Levelling Up, Housing & Communities*
- National Planning Policy for Waste (2014) *Department for Communities and Local Government*
- National Model Design Code (2021) *MHCLG*
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Planning Act 2008
- Planning and Compulsory Purchase Act (2004)
- Planning for The Future White Paper (2020) *MHCLG*
- Planning Policy for Traveller Sites (Updated 2015) *Communities and Local Government*
- Planning Practice Guidance (2023) (including revisions from 2023 and 2024)
- Proposed Changes to Part L and Part F of the Building Regulations (2020) *MHCLG*
- Secured by Design. Commercial developments (2015) *Official Police Security initiative*
- Secured by Design. Homes (2016) *Official Police Security initiative.*
- Seeing the History in the View: A method for assessing Heritage Significance within Views (2011) *Historic England*
- Tall buildings. Historic Environment Advice Note 4 (2015) *Historic England*
- The Air Quality Strategy for England, Scotland, Wales and Northern Island (2007) *Department for Environment, Food and Rural Affairs, Scottish Executive, Welsh Assembly Government and Department of the Environment Northern Ireland. Published by DEFRA*
- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 *HM Government*
- The importance of good design. Planning Practice Guidance (2014) *Department for Communities and Local Government*
- (The) Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning Note 3 (2015) *Historic England*
- The Ten Point Plan for a Green Industrial Revolution (2020) *HM Government*
- Technical Guidance to the National Planning Policy Framework (2012) *Department for Communities and Local Government*
- Town and Country Planning (Local Planning) (England) Regulations 2012
- Understanding Place: Historic Area assessments. Historic England Advice Note 1 (2017) *Historic England*
- Waste Management Plan for England (2021) *DEFRA*
- Working Together to Promote Active Travel. A briefing for local authorities (2016) *Public Health England*
- 2010 Local Authority Carbon Dioxide Figures (2012) *Department of Climate and Energy Change*
- 2010 to 2015 government policy: environmental quality (Updated May 2015) *Department for the Environment, Food and Rural Affairs*

Regional

- Affordable Housing and Viability SPG (2017) *Mayor of London*
- Better Environment, Better Health: A GLA guide for London Boroughs. London Borough of Westminster (2013) *Mayor of London*
- Circular Economy Statement Guidance (2020) *Mayor of London*
- Culture and the night time economy SPG (2017) *Mayor of London*
- Energy Assessment Guidance (2020) *Mayor of London*
- Energy Planning: GLA Guidance on preparing energy assessments (2016) *Greater London Authority*
- Draft London Plan (2017) *Mayor of London*
- (Draft) London Housing Strategy (2017) *Mayor of London*
- Good Growth by Design (2017) *Greater London Authority*
- Health Issues in Planning- Best Practice Guidance, (2007) *Mayor of London*
- Homes for Londoners: Affordable Homes Programme 2021-2026 Funding Guidance (2020) *Mayor of London*
- Housing SPG (2016) *Mayor of London*
- Land for Industry and Transport SPG (2012) *Mayor of London*
- Local Authorities and Air Quality (2017) *Mayor of London*

- London Carbon Scenarios to 2026 Report (2006) *London Energy Partnership*
- London Office Policy Review (2017) *Ramidus Consulting Limited and CAG Consulting*
- London Plan (2016) *Mayor of London*
- London Plan (2021) *Mayor of London*
- London View Management Framework SPG (2012) *Mayor of London*
- Air Quality Strategy: Cleaning London's Air (2014) *Mayor of London*
- Green infrastructure and open environments: All London Green Grid SPG (2012) *Mayor of London*
- Climate Change Mitigation and Energy Strategy (2011) *Mayor of London*
- Cultural Metropolis: Mayor's Cultural Strategy (2014) *Mayor of London*
- Delivering London's Energy future: the Mayor's climate change mitigation and energy strategy (2011) *Mayor of London*
- Economic Development Strategy for London (draft) (2017) *Mayor of London*
- London's Foundations Supplementary Planning Guidance (2012) *Mayor of London*
- London's World Heritage Sites – Guidance on Settings Supplementary Planning Guidance (2012) *Mayor of London*
- Managing risks and increasing resilience: the Mayor's climate change adaptation strategy (2011) *Mayor of London*
- Mayor's Transport Strategy 2017 (Consultation Draft) (2017) *Mayor of London*
- River Action Plan (2013) *Transport for London*
- Securing London's water future: the Mayor's Water Strategy (2011) *Mayor of London*
- Sustainable Design and Construction SPG (April 2014) *Mayor of London*
- Thames Estuary 2100 Plan (2012) *Environment Agency*
- Thames flood risk management plan (FRMP) 2015 to 2021 (2016) *Environment Agency*
- Thames river basin management plan (2015) *Department for the Environment, Food and Rural Affairs*
- Thames river basin management plan (2022) *Environment Agency*
- The Vision for the Tidal Thames (2016) *Port of London Authority*
- Transport Strategy (2018) *Mayor of London*
- Green infrastructure and open environments: Tree and Woodlands Supplementary Planning Guidance (2013) *Mayor of London*
- Waste Management Strategies (2011) *Mayor of London*
- Whole Life-Cycle Carbon Assessment Guidance (2020) *Mayor of London*

Neighbouring Authorities

- *City of London* – Local Plan (adopted January 2015)
- *London Borough of Brent* – Brent Local Plan (adopted 2022)
- *London Borough of Camden* – Local Plan (adopted July 2017)
- *Royal Borough of Kensington and Chelsea* – Consolidated Local Plan (adopted July 2015) and review of the Local Plan (2015- 2017)
- *London Borough of Lambeth* – Local Plan (adopted 2021)
- *London Borough of Wandsworth* – Local Plan (adopted July 2023)

Local

- Air Quality Action Plan 2013-2018 (2013) *Westminster City Council*
- Basement Development in Westminster SPD (2014) *Westminster City Council*
- Biodiversity Action Plan (2007) *Westminster City Council*
- Church Street Master Plan (2017) *Westminster City Council, Peter Brett Associates LLP*
- City For All (2017) *Westminster City Council*
- Climate Emergency Action Plan (2022) *Westminster City Council*
- Core Strategy Sustainability Appraisal Scoping Report (2007) *Westminster City Council*
- Core Strategy Sustainability Appraisal- Publication Draft (2009) *Westminster City Council*
- Core Strategy NPPF Revision (Draft) IIA (2012) *Westminster City Council*
- Cycling Strategy (2014) *Westminster City Council*
- Decentralised Energy Masterplan for the City of Westminster (2014) *Parsons Brinckerhoff. Published by Westminster City Council*
- Environmental SPD (2022) *Westminster City Council*

- Economic Development Strategic Framework (2015) *Westminster City Council*
- Fairer Westminster Strategy (2022) *Westminster City Council*
- Health and Wellbeing Strategy for Westminster 2017- 2022 (2016) *Westminster City Council, NHS Central London CCG, West London CCG*
- Housing Renewal Strategy (2010) *Westminster City Council*
- (Draft) Housing Strategy (2015) *Westminster City Council*
- Local Development Scheme (2017) *Westminster City Council*
- Local Economic Assessment Baseline Study (emerging) (2017) *Westminster City Council*
- Local Implementation Plan: a Transport Delivery Plan up to 2031(2011) *Westminster City Council*
- Local Flood Risk Management Strategy (emerging) (2017) *Westminster City Council*
- Municipal Waste Management Strategy 2016-2031 (November 2014) *Westminster City Council*
- Planning Obligations and Affordable Housing SPD (emerging 2024) *Westminster City Council*
- Preliminary Flood Risk Assessment (2011) *Drain London Westminster City Council*
- Rough Sleeping Strategy (2017-2022) *Westminster City Council*
- Safer Westminster Partnership Strategy (2011- 2014) *Westminster City Council*
- Statement of Community Involvement (2014) *Westminster City Council*
- Statement of Licensing Policy (2016) *Westminster City Council*
- Statement on Affordable Housing Policies (2017) *Westminster City Council*
- Strategic Flood Risk Assessment 2018 (emerging) *Westminster City Council*
- Strategic Flood Risk Assessment 2023 *Westminster City Council*
- Study of Small Offices in Westminster 2008 (2009) *DTZ Research. Published by Westminster City Council*
- Trees and the Public Realm (2011) *Westminster City Council*
- Walking Strategy 2017 – 2027 (2017) *Westminster City Council*
- Westminster Infrastructure Delivery Plan (2018) *Westminster City Council*
- Westminster Noise Strategy (2010) *Westminster City Council*
- Westminster’s Open Spaces and Biodiversity Strategy (emerging) (2018) *Westminster City Council*
- Westminster’s City Plan: Strategic Policies (2016) *Westminster City Council*
- Westminster Way (2011) *Westminster City Council*

7.5 Appendix V – Background to IIA Objectives

The establishment of appropriate objectives and associated more detailed sub-criteria¹³⁷ is central to the assessment process. Together, these provide a framework that can be fairly easily used to test the likely effects of policies in Westminster's City Plan Partial Review in delivering identified sustainable development objectives on a systematic basis. The sustainability issues set out in this section form the basis of the objectives.

Selection of the key sustainability issues has been informed by the examination of baseline information and the review of plans, programmes and strategies (see previous sections). Consideration has been given to equalities and health objectives. Account has also been taken of the IIA Assessment Framework for the Core Strategy NPPF Revision; the SA/SEA for the Core Strategy (adopted January 2011); and the need to ensure the objectives meet the environmental objectives set out in the SEA Directive. The identified sustainability issues are bullet pointed below to include a consideration of why the key sustainability issues have been chosen and which IIA Objective the issues relate to (as set out in the IIA Framework).

- **IIA Objective 1. To create cohesive and inclusive communities, supported by the delivery of physical and social infrastructure.**

Westminster has a growing and diverse population marked by a high level of churn. It is a place of economic contrast, with areas of high wealth and significant deprivation. Its housing market has increasingly failed to provide for those on low and average incomes which, over time, may lead to increasing social polarisation. As well as the provision of social and community facilities, access to local services including shops can improve community interaction. The creation of cohesive and inclusive communities is a key Westminster equalities priority and may be influenced by development, land use, environmental or social policy considerations. The council has a renewed focus on how it acts as a custodian of the city and advocates for resident interests. These are some of the most pressing issues facing the City and are therefore important to give prominence to in this assessment framework.

- **IIA Objective 2. To reduce crime and the fear of crime (including disorder and antisocial behaviour).**

Westminster's national status and position in the centre of London, its attractiveness to large numbers of workers and visitors and the intensity with which it is used around the clock means that crime (including terrorism) and anti-social behaviour are particularly important issues here. Section 17 of the Crime and Disorder Act 1998 (as amended by the Police and Justice Act 2006) places a responsibility on local authorities to exercise their various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder. Crime, disorder and antisocial behaviour issues cut across a number of policy matters and can usefully be considered as an objective in the IIA.

- **IIA Objective 3. To boost the supply of high quality housing of all types and tenures including affordable and specialist housing to address a range of needs.**

There is a large mismatch between income and house prices in Westminster – the borough has the second highest house prices in the country and an extremely high demand for all types of housing. Space for housing development is extremely constrained and unlike other parts of London there is a lack of surplus brownfield industrial land that can be 'released' for new housing. New housing is therefore normally secured through 'small scale' and infill development. Site constraints and land prices are particularly problematic for Westminster's delivery of affordable housing and the Council is required to meet its strategic housing targets. Providing homes of all types and tenures will create opportunities for people to do the best for themselves and their families. As the population ages, there will be a particular need for housing that meets peoples' needs at all stages of their lives. Again, the importance and scale make this an important issue to test through the IIA process.

- **IIA Objective 4. To promote and improve quality of life and health and wellbeing of residents.**

¹³⁷ The sub-criteria used for assessment is set out in the form of guide questions in the IIA Framework (Table 3 pp 72-74).

Westminster's unique circumstances give rise to a number of challenges to health, safety and wellbeing. There is a spatial contrast in life expectancy in Westminster, with life expectancy is 16.9 years lower for men and 9.7 years lower for women in the most deprived areas of Westminster compared to the more affluent areas. Health is connected to a number of factors including social and environmental conditions and access to decent housing can play an important role in the wellbeing and health of individuals. Throughout Westminster there are high accident rates, areas of open space deficiency, poor air quality and high noise levels, which can all impact negatively on health and wellbeing. Westminster a diverse range of cultural facilities and there is a link between cultural wellbeing and health and wellbeing. The pressures and global role of Westminster needs to be managed effectively to ensure all can share in the benefits of the City's success.

- **IIA Objective 5. To reduce greenhouse gas emissions and support climate change adaptation.**

Westminster has some of the highest carbon emissions in the UK. Some 75% of carbon emissions come from commercial occupiers, which is higher than the national average (about 37%). Climate change is a global problem, as its central location means that Westminster suffers disproportionately from the effects of London's 'heat island effect'. The most up to date environmental standards need to be applied in new developments to mitigate climate change.

- **IIA Objective 6. To reduce the use of natural resources and make efficient use of land.**

Westminster is a densely developed location which has continuing pressure to develop and grow; this can have an impact on the use of natural resources such as water. The average water consumption per person per day in Westminster is significantly higher than the average per person per day in England and Wales. Efficient use of land is needed to balance different priorities in the already dense city, including the protection of valuable spaces.

- **IIA Objective 7. To reduce flood risk, promote SuDS, protect surface and groundwater quality.**

In Westminster the greatest flood risks are from the River Thames and surface water. Management of flood risk through the planning process is less about avoiding any development in high risk areas and more about locating the *most vulnerable* uses outside these areas, ensuring that new schemes are designed to reduce and mitigate flood risk and that developments are safe and include suitable flood resistance and resilience measures. The provision of Sustainable Drainage Systems (SuDS) is increasingly important in reducing surface water flood risk.

- **IIA Objective 8. To protect, enhance and create environments that encourage and support biodiversity.**

Although densely developed, Westminster has a diverse ecology. The city has over 30 designated Sites of Importance for Nature Conservation. There are however areas of wildlife deficiency. The best opportunity for improving biodiversity is through integration within built structures. Supporting the natural environment can help to mitigate the negative effects of climate change and improve air quality.

- **IIA Objective 9. To improve air quality**

In Westminster the high levels of nitrogen dioxide and particulate matter have adverse effects on the environment and health. While particulate matter concentrations (PM₁₀ and PM_{2.5}) both meet the EU objectives, those for NO₂ still exceed them and all concentrations still exceed the WHO's annual mean guidelines. Although air quality in London has gradually improved in recent years as a result of policies to reduce emissions, there is less awareness about the significant contribution of emissions from buildings and construction to air pollution, and emissions from buildings are not predicted to fall as much as those from transport. This is likely to be an issue that will be given greater national, regional and local prominence over the period of the Plan.

- **IIA Objective 10. To reduce noise and the impact of noise.**

Noise levels in Westminster are higher than WHO guidelines. Traffic is the main cause of noise complaints in Westminster although the high level and 24 hour nature of activity (particularly construction noise) in some parts of the city contribute significantly to the problem. Noise is not just an environmental issue but can adversely affect health and wellbeing.

- **IIA Objective 11. To encourage sustainable transport and major public transport improvements.**

Westminster is well served by public transport but suffers from high levels of traffic and resultant noise and air pollution. Sustainable transport options are particularly suitable in Westminster given the density of land uses and high PTAL levels. A high number of people already participate in active travel (walking and cycling).

- **IIA Objective 12. To reduce waste production and increase recycling, recovery and re-use of waste.**

Waste collection in Westminster is complex with half of all waste coming from businesses. Household recycling and composting rates are amongst the lowest in London and there is a need to reduce the production of waste in the first instance. Westminster will need to ensure that it can meet national and regional targets as far as is practicably possible given the restrictions of its built environment.

- **IIA Objective 13. To conserve and enhance the significance of heritage assets and their settings.**

Westminster's existing townscape and character is dominated by the high concentration and significance of its heritage assets, many of which are of national and international importance. There are in excess of 11,000 listed buildings and structures. Conservation areas cover 77% of Westminster's land area. With this high quality baseline there is a need to secure growth in ways that will respect and build on this inheritance while also being accessible, safe, sustainable and suitable for modern city life.

- **IIA Objective 14. To enhance public realm and townscape.**

The majority of the existing public realm is of high quality and needs continual management to withstand the complex and sometimes conflicting demands. Improvements to the public realm, in particular by ensuring the pavement is free from obstruction may encourage more people to walk thereby contributing to their personal health and reducing emissions from private vehicle travel. Design excellence needs to be achieved to maintain and enhance townscapes in Westminster.

- **IIA Objective 15. To protect Westminster's world class open and civic spaces, the Thames and other waterways and seek opportunities to increase open space and further greening.**

Despite the abundance of prestigious open spaces such as the Royal Parks, the River Thames and London Squares there is both an overall and localised shortage of open space, in particular green space, in Westminster. These spaces are important not only for their environmental value but also in terms of providing a space for relaxation and exercise and are an important addition to the health and wellbeing of residents and visitors to the city.

- **IIA Objective 16. To ensure equality of opportunities, improve local opportunities and support sustainable economic growth throughout Westminster.**

Westminster is a place of both great wealth and great poverty and this is expressed spatially in the city. A flourishing local economy and economically active residents are crucial to delivering sustainable development, addressing both economic and social objectives. A more skilled resident workforce will allow residents to engage in the wider economy within Westminster. Removing barriers to employment can have significant benefits in terms of health, wellbeing, life chances and support local shops and services through increased local spending power.

- **IIA Objective 17. To meet Westminster's need for workspace, shops, cultural facilities and other uses of local, London-wide and national importance to maintain economic diversity and support sustainable economic growth.**

Westminster is an 'economic powerhouse'. Its businesses play a very important role in creating economic prosperity. It functions as a national and international centre for business, shopping, arts, culture and entertainment. This diversity is part of its strength and helps maintain economic resilience. It has a high percentage (80%) of small businesses and a range of business sizes ensures sustainability. Studies show that Westminster's diverse economy and mixed use nature (including residential accommodation directly alongside commercial) helped to protect it from the worst of the 2008-09 recession. However, a careful balance needs to be maintained between commercial and residential development – particularly as the value of different land uses fluctuates and makes one a more attractive investment opportunity than another e.g. the trend for office to residential conversions experienced in past years.

Many of the objectives will overlap in terms of sustainability issues and others may be in conflict. The impact of this has become more evident in the next stage of the IIA when the individual policies in Westminster's City Plan have been assessed against the objectives.

7.6 Appendix VI – Fairer Westminster and the IIA

The Fairer Westminster is linked to the IIA objectives as follows:

Fair Westminster priorities	Fairer Westminster objective	IIA Objectives
Fairer Communities	Poverty and inequality are reduced, making Westminster a healthier and more equitable place.	1, 3, 4, 14, 16, 17
	The city is a safe place where all discrimination is tackled and everyone feels welcome.	1, 2, 3, 4, 16
	Westminster provides excellent public health and social care services, and physical activity opportunities that ensure all adults can stay healthy and thrive as they age.	1, 4
	Westminster is a great place for children to grow up, with its cultural and learning opportunities, active communities, and excellent schools.	1, 4, 8, 16, 17
	Community and voluntary sector organisations are empowered to prosper in Westminster.	1, 4
Fairer Housing	The housing needs of residents, families and social care users are met through the provision of greener and more genuinely affordable housing, the majority of which is for council rent, aiming for 70% on council-owned developments.	1, 3, 4, 5, 6, 12
	Homelessness is reduced due to increased support.	1, 3, 4
	Private rented sector properties are well managed.	3
	Our tenants and lessees are consistently satisfied with our housing services, and the improved condition and energy efficiency of our housing stock.	3, 5, 5, 12
Fairer Economy	Westminster remains economically successful, with a diverse, sustainable, resilient economy that delivers growth and benefits for all residents today and in the future.	16, 17
	Oxford Street and the West End are reimagined and revived, safeguarding their position in the national economy, and ensuring they deliver a world class offer and experience to residents, businesses, workers and visitors.	17

	Small businesses are supported to grow and remain, whilst our local high streets are prepared to face the future, becoming more vibrant and accessible, at the heart of communities.	17
	Residents have the right skills to take advantage of the city's employment opportunities and develop fulfilling careers.	16, 17
Fairer Environment	The Council takes ambitious action on climate change with the aim of becoming a net zero Council by 2030 and a net zero city by 2040.	5, 6, 7, 9, 10, 12, 14, 15
	The city matches World Health Organization guidelines to limit residents' and visitors' exposure to air pollution.	5, 9
	Westminster's streets are cleaner and safer, our services use clean technology, and recycling is increased.	2, 5, 12, 14
	People have access to high-quality green spaces, shops, voluntary, community, health and leisure services within a 15-minute distance from their home.	1, 4, 11, 14, 15
	Residents, workers and visitors are enabled and are encouraged to travel through Westminster in more active and sustainable ways.	11, 14
Fairer Council	People can more easily find the information and services they need to improve their lives.	1
	We make decisions more transparently in a way that makes residents feel listened to.	1
	We are financially sustainable so that we can continue supporting residents and businesses.	1, 3, 17
	Our procurement is responsible and ensures ethical treatment of people, and our investment activity takes account of environmental impacts.	1, 3, 5, 6, 7, 8, 9, 11, 12, 14, 16, 17

7.7 Appendix VII – SEA Compliance

The IIA report incorporates a Strategic Environmental Assessment (SEA). Table 1 demonstrates compliance of the IIA with the SEA Directive, as set out in Schedule 2 of the SEA Regulations. Table 2 outlines the relationship between the identified 17 IIA objectives (set out above) and those that are required for consideration in Annex 1 of the SEA Directive. Those in bold text indicate the primary objective and the others are linked through outcome or impact.

Table VII.1 Compliance with the SEA Directive

Requirements of SEA Regulations	Westminster City Plan IIA Report
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Section 1.1, Appendix IV
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Appendix III
3. The environmental characteristics of areas likely to be significantly affected.	Appendix III
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.	HRA Screening Report (separate document)
5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 1.4, Appendix V
6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as- (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).	Section 2, Section 3
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 2, Section 3
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 2, Section 1.5
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Section 4
10. A non-technical summary of the information provided under paragraphs 1 to 9.	Non-technical summary

Table VII.2 The relationship between SEA Issues and identified IIA objectives

Key SEA Issues	IIA objectives
Biodiversity	4,5, 8 , 9, 15
Population	1, 2, 3 , 4
Human Health	1,2, 3, 4 , 5, 6, 7, 8, 9, 10, 11, 14, 15, 16 ,17
Fauna	4,5, 8 ,9,15
Flora	4,5, 8 ,9,15
Soil	5, 7, 8, 9, 15
Water	6 , 7
Air	4,5, 8, 9 , 11, 15
Climatic Factors	4, 5 , 6, 7, 8, 9,11
Material Assets	3, 4, 12,13,16, 17
Cultural Heritage	13 , 14, 15
Landscape	4, 8, 14, 15

7.8 Appendix VIII – Reasonable Alternative Appraisals

See separate document titled Appendix VIII Reasonable Alternative Appraisals. This document sets out the detailed reasonable alternative appraisal assessments undertaken to inform the preferred option of the policies in scope for this partial review. This document should be read in conjunction with the main Integrated Impact Assessment report.

7.9 Appendix IX – Policy Appraisals

See separate document titled Appendix IX Policy Appraisals. This document sets out the detailed policy appraisal assessments undertaken to inform the wording of the policies in scope for this partial review. This document should be read in conjunction with the main Integrated Impact Assessment report.

Westminster City Council
64 Victoria Street
London, SW1E 6QP

020 7641 6000