

# CITY PLAN 2019 - 2040

## Integrated Impact Assessment – Appendix IX

### Policy Appraisals

Regulation 19 Consultation

March 2024

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This is Appendix IX to the City Plan Partial Review (Regulation 19) Integrated Impact Assessment. 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.

# 1.1 Affordable Housing Policy Appraisal

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## Summary of findings:

### 1. Communities:

The policy will have a major positive effect on achieving sustainability objectives for Communities. Maximising affordable housing delivery, especially from small-scale residential developments, will help to provide homes for those most in need and ensure access to local services, shops and community facilities. When a payment-in-lieu is made to the council's Affordable Housing Fund, the council will use it to deliver homes in accessible locations. When on-site provision is not possible, the council prefers off-site delivery in the vicinity of the host site to maintain sustainable communities. The council will consult with communities on affordable housing delivery and prioritise social housing in line with housing needs evidence. This will help to contribute to secure mixed and balanced communities and encourage engagement and participation from residents in decision-making and community activity.

### 3. Housing:

The policy will have a major positive effect on achieving sustainability objectives for Housing. The delivery of high-quality and affordable homes is emphasised in the policy and made clear through the sequential approach where on-site delivery of affordable homes are not feasible. The policy seeks to prioritise social housing to rebalance the affordable housing tenures in line with evidence and meeting Westminster's identified local housing needs. Prioritising socially rented homes and seeking contributions from small-scale residential development towards affordable housing will see to increase the availability of homes for specific groups and allow unfit homes to be decanted and refurbished.

### 4. Health and Wellbeing:

The policy will have a major positive effect on achieving sustainability objectives for Health and Wellbeing. The policy seeks to increase the provision of affordable housing that will ensure the availability of housing for those most in need is increased. In addition, the policy seeks to promote low-cost rented homes through intermediate products which will help to make provision for those unable to afford housing on the open market. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer and therefore, improving health inequalities, increasing healthy years life expectancy and improving the mental health and wellbeing of residents. Increasing the delivery of affordable homes will increase the availability of homes where access/movement to and within areas in Westminster are better, particularly where new housing is proposed on public sector land that are likely to be in sustainable locations. Increasing the delivery of affordable homes and low-cost rented homes will ensure mixed and balanced communities are secured and therefore, improve cultural wellbeing. Additionally, this will help to increase the availability of housing for older people and as a result, minimise loneliness, maximise independence and improve the mental and physical wellbeing of older people.

Affordable Housing Policy Detailed Appraisal		
Sustainability Appraisal Objective	Score	Analysis
<p><b>1. Communities</b></p> <ul style="list-style-type: none"> <li>i. Will it improve access to local services, shops and community facilities?</li> <li>ii. Will it increase ability to influence decision-making (neighbourhoods)?</li> <li>iii. Will it foster an inclusive Westminster community?</li> <li>iv. Will it encourage engagement in community activity?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. Maximising truly affordable housing delivery, including from small-scale residential developments will help to ensure those most in need have affordable homes in sustainable locations and therefore have access to local services, shops and community facilities. Where it is accepted that affordable housing cannot be provided on-site, development off-site in the vicinity of the host site is the council's priority. This is to ensure sustainable communities with access to local services, shops and communities are created and maintained as far as possible. When a payment-in-lieu is made to the council's Affordable Housing Fund, the council will ensure homes are delivered in accessible locations. (++)</li> <li>ii. As part of affordable housing delivery, the council will ensure communities are consulted, which will likely have a positive impact on the ability of neighbourhoods influencing decision-making on sites in the area. (++)</li> <li>iii. Maximising affordable housing delivery, including from small-scale residential developments and prioritising social housing in line with housing needs evidence will ensure mixed and balanced communities are secured. (++)</li> <li>iv. An increase in social rented homes could encourage community activity from those most in need. It could encourage new residents to engage and have an impact on delivering what they would like to see within their community. Requiring small-scale residential developments to deliver affordable housing may also help increase affordable housing delivery that meets different needs of the community. When delivered via a payment-in-lieu to the council's Affordable Housing Fund, the council would then decide how it spends those funds, following engagement from residents in community activity. (++)</li> </ul>
<p><b>2. Crime reduction</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce crime, disorder and antisocial behaviour?</li> <li>ii. Will it reduce fear of crime, disorder and antisocial behaviour?</li> </ul>	0	No impacts identified.

<p>iii. Will it reduce other behaviour adversely affecting the local environment?</p>		
<p><b>3. Housing</b></p> <p>i. Will it create high quality homes?</p> <p>ii. Will it increase range of affordable housing?</p> <p>iii. Will it reduce homelessness?</p> <p>iv. Will it provide housing than can help people stay independent for longer?</p> <p>v. Will it reduce number of unfit homes?</p> <p>vi. Will it provide a range of housing types and sizes?</p>	<p>++</p>	<p>i. The policy seeks to retain affordable homes in the city and ensure that new affordable homes are delivered. Affordable housing should be delivered on-site although in some cases, provision of affordable housing can be off-site or in the form of a payment-in-lieu to the council's Affordable Housing Fund. When no on-site homes are delivered, major developments will need to demonstrate why on-site is not feasible, or how it would lead to more and higher quality homes being delivered than would have otherwise been possible. (++)</p> <p>ii. The policy seeks to change the tenure split to prioritise social housing to ensure that the greatest level of local housing need is addressed. The revised tenure split will help meet Westminster's identified local housing needs. This rebalances the affordable housing tenures available by prioritising social housing over intermediate in line with new evidence. In addition, prioritising rented intermediate housing over intermediate for sale seeks to help address the prioritised needs of those whose housing needs are not currently being met. Each scheme will be assessed on its own merits but applicants will need to justify how the range of affordable housing being provided helps meet local needs. (++)</p> <p>iii. Contributions from small-scale residential developments towards affordable housing and an increase in socially rented homes would increase the availability of housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer. (++)</p> <p>iv. An increase in socially rented homes and small-scale residential developments' contributions towards affordable housing would increase the availability of housing for specific groups, including older people and those living with disabilities, increasing the amount of housing that would help people stay independent. (++)</p> <p>v. Increased number of socially rented homes and contributions from small-scale residential developments' towards affordable housing would increase the amount of affordable homes available across Westminster. This would enable flexibility for affordable housing providers across their portfolio, allowing unfit homes to be decanted and refurbished if necessary. (++)</p>

		<p>vi. The policy requires major development to provide affordable housing where the size of the affordable homes, including the number of bedrooms required, meets identified need. This will ensure that there will be a range of housing types provided and size which reflect the current need. An increase in social homes than intermediate homes would likely result in a range of sized-homes as intermediate homes usually cater to a market that has less demand for family sized units. (++)</p>
<p><b>4. Health and wellbeing</b></p> <ul style="list-style-type: none"> <li>i. Will it help improve health inequalities?</li> <li>ii. Will it contribute to a reduction in death rates?</li> <li>iii. Will it improve access/movement?</li> <li>iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity?</li> <li>v. Will it improve cultural wellbeing?</li> <li>vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people?</li> <li>vii. Will it provide access to a healthy diet?</li> <li>viii. Will it create healthy homes and workplaces?</li> <li>ix. Will it increase healthy years life expectancy?</li> <li>x. Will it improve mental health and wellbeing?</li> <li>xi. Will it improve facilities and accessibility for people with disabilities?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. The policy seeks to provide more affordable housing by requiring 50% of new housing to be affordable for proposals on public sector land. The policy also requires small-scale residential development proposals to deliver affordable housing. This increase in provision of affordable housing will ensure that the availability of housing for those most in need is increased. The policy also seeks to promote low-cost rented homes through intermediate products which will help to make provision for those unable to afford housing on the open market. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer and therefore, improving health inequalities. (++)</li> <li>ii. No likely impact.</li> <li>iii. The policy sets out a sequential approach to contribute to maximising affordable housing delivery. If delivering affordable housing on-site is not achievable then the policy allows for affordable homes to either be delivered off-site or require the applicant to make a financial contribution via payment-in-lieu. The policy states that as part of off-site delivery, affordable homes should be prioritised in areas within a sustainable and highly accessible location to local shops, community facilities and public transport networks to readily access these facilities. As a result, this would increase the availability of affordable homes where access/movement to and within areas in Westminster are better. The policy also seeks to provide more affordable housing by requiring 50% of new housing to be affordable for proposals on public sector land. This should seek to ensure improvement to access/movement for residents in sustainable locations as this is where the majority of public land will be located. (++)</li> <li>iv. No likely impact</li> </ul>

		<ul style="list-style-type: none"> <li>v. Maximising affordable housing delivery by requiring small-scale residential developments to contribute to affordable housing delivery and prioritising social housing through this policy will contribute to securing mixed and balanced communities. This should as a result, seek to improve cultural wellbeing. (++)</li> <li>vi. An increase in low-cost rented homes and affordable housing delivery from small-scale residential developments would increase the availability of housing for older people. This will as a result, minimise loneliness, maximise independence and improve the mental and physical wellbeing of older people. (++)</li> <li>vii. No likely impact.</li> <li>viii. No likely impact.</li> <li>ix. See response to i above. (++)</li> <li>x. See response to i above. (++)</li> <li>xi. See response to iii above. (++)</li> </ul>
<p><b>5. Climate change</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel?</li> <li>ii. Will it reduce ozone depleting emissions?</li> <li>iii. Will it reduce emissions through retrofitting new technology?</li> <li>iv. Will it reduce heat island effects on people and property?</li> <li>v. Will it increase resilience to climate change?</li> </ul>	0	No impacts identified.
<p><b>6. Natural resources</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce water consumption and improve water efficiency?</li> <li>ii. Will it reduce consumption of fossil fuels?</li> <li>iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?</li> </ul>	0	No impacts identified.



<ul style="list-style-type: none"> <li>iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> <li>v. Will it make efficient use of land?</li> </ul>		
<p><b>7. Flood risk and water quality</b></p> <ul style="list-style-type: none"> <li>i. Will it minimise flood risk from all sources of flooding?</li> <li>ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?</li> <li>iii. Will it reduce combined sewer overflow events?</li> <li>iv. Will it protect water quality?</li> </ul>	0	No impacts identified.
<p><b>8. Biodiversity</b></p> <ul style="list-style-type: none"> <li>i. Will it protect, enhance and increase biodiversity and protect habitats?</li> <li>ii. Will it preserve Sites of Importance for Nature Conservation?</li> <li>iii. Will it improve access to and promote educational value of sites of biodiversity interest?</li> <li>iv. Will it conserve and enhance species and habitats?</li> </ul>	0	No impacts identified.
<p><b>9. Air quality</b></p> <ul style="list-style-type: none"> <li>i. Will it improve air quality?</li> <li>ii. Will it reduce emissions of key pollutants?</li> </ul>	0	No impacts identified.
<p><b>10. Noise</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce noise concerns and noise complaints?</li> <li>ii. Will it reduce noise levels?</li> </ul>	0	No impacts identified.
<p><b>11. Transport</b></p>	0	No impacts identified.

<ul style="list-style-type: none"> <li>i. Will it reduce volumes of traffic?</li> <li>ii. Will it encourage walking and cycling?</li> <li>iii. Will it increase proportion of journeys using modes other than the car?</li> <li>iv. Will it improve public transport accessibility?</li> </ul>		
<p><b>12. Waste</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce consumption of materials and resources?</li> <li>ii. Will it reduce household waste?</li> <li>iii. Will it increase recycling, recovery and re-use?</li> <li>iv. Will it reduce construction waste?</li> </ul>	0	No impacts identified.
<p><b>13. Heritage</b></p> <ul style="list-style-type: none"> <li>i. Will it conserve or enhance heritage sites and cultural value?</li> <li>ii. Will it protect strategic views?</li> <li>iii. Will it conserve or enhance heritage assets and their settings?</li> <li>iv. Will it help preserve, enhance and record archaeological features and their settings?</li> <li>v. Will it protect and enhance the setting of the Westminster World Heritage Site?</li> </ul>	0	No impacts identified.
<p><b>14. Public Realm &amp; Townscape</b></p> <ul style="list-style-type: none"> <li>i. Will it enhance townscape?</li> <li>ii. Will it encourage exemplary design standards?</li> <li>iii. Will it reduce litter?</li> <li>iv. Will it enhance the quality of public realm?</li> </ul>	0	No impacts identified.

v. Will it improve access and mobility for all equality group strands?		
<b>15. Open Space</b> i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	0	No impacts identified.
<b>16. Employment Opportunities</b> i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	0	No impacts identified.
<b>17. Economy</b> i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	0	No impacts identified.

# 1.2 Retrofit-First Policy Appraisal

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## Summary of findings:

### 3. Housing

The policy will have a minor positive overall effect on achieving sustainability objectives for housing.

A retrofit first approach will bring forward opportunities to improve old housing stock, with the policy also stating that schemes with policy compliant levels of affordable housing will be required to reduce embodied carbon as much as possible, rather than adhere to a specific benchmark. This is in recognition of the high housing needs across Westminster, which will therefore assist in maintaining the delivery of affordable housing across the city. This provision would also create an incentive for developers to deliver policy compliant levels of affordable housing, to avoid the more stringent challenge of meeting the embodied carbon benchmarks. This will help meet housing needs for those most in need, whilst reducing the negative environmental impacts from development. Whilst viability arguments may be used by applicants to warrant a reduction in affordable homes on financial grounds, analysis which forms part of the evidence base for the policy highlights that the cost uplifts to meet the benchmarks within the policy will be minimal. Therefore, it is not anticipated that the adoption of the policy would result in a major reduction in new homes being built. Furthermore, the policy supports a retrofit-first approach alongside fulfilling other housing requirements (design, quality and range) that are already outlined in existing City Plan policies. Together, it is therefore assumed that the policy would have an overall positive impact on housing.

### 4. Health and Wellbeing

The policy will have a minor positive effect on achieving sustainability objectives for Health and Wellbeing.

A retrofit-first approach is likely to reduce extraction and transportation of raw materials, and to some extent building works and demolition. This will reduce the amount of particulates being released into the air, improving air quality and should also result in a reduction in noise disturbances during construction periods (due to less demolition, structural works such as piling and shorter construction periods overall). Furthermore, the policy should encourage the retention of culturally significant structures, which can support cultural wellbeing. The policy should therefore have a positive impact on health and wellbeing, helping create healthy homes and workplaces that are conducive to a high quality of life. The policy, however, will have a neutral impact on other objectives such as those related to access, physical activity and diet. It will continue to support extant City Plan policy which continues to require high-quality design, improved permeability and open space provision.

### 5. Climate Change

The policy will have a major positive effect on achieving sustainability objectives for climate change.

The policy places an emphasis on retrofitting instead of demolition. Encouraging development to consider retrofitting first will help reduce greenhouse gas emissions and reduce energy consumption through using retrofitting technology, and reducing the amount of demolition. Similarly, requiring embodied carbon targets for developments that do include demolition, will also help dramatically reduce emissions.

Retrofitting also involves installing climate change adaptation upgrades, which bolster building's resilience to climate change. The policy therefore increases current building's climate change resilience, whilst limiting the negative impacts from development on the environment. The policy however will be neutral on reducing urban heat island effect and reducing ozone depleting emissions.

## **6. Natural Resources**

The policy will have a major positive effect on achieving sustainability objectives for Natural Resources.

The policy seeks to increase the reuse of existing structures prior to the consumption of new resources/materials and sets embodied carbon targets for proposals that require demolition. This reduces the consumption of fossil fuels and the amount of natural resources used. Following the policy, it is also likely that renewable resources will be prioritised during construction due to the requirement to adhere to embodied carbon budgets.

The policy is neutral on efficient land use as there are both positive and negative arguments. There will be cases where, due to Westminster's densely populated landscape, reusing existing structures will be the most efficient use of land as it will maximise the use of available space. However, in some instances demolition/new build may be the most appropriate option in order to make the best use of land, for example in instances where the existing building is too technically challenging to retrofit, or where site reconfiguration may make it easier to provide publicly accessible open space, significant increases in affordable housing, or other important growth targets. The policy does support that demolition may be able to occur where a series of tests are met (such as significant public benefits), and so does not entirely reduce the negative impacts of demolition occurring. Furthermore, some alterations to existing buildings through retrofit options can also achieve similar outcomes in promoting an efficient use of land. As a result, this was deemed to have a neutral impact, with the overall scoring of this criteria still demonstrating major positive effects for objectives relating to Natural Resources.

## **7. Flood Risk and Water Quality**

The policy will have a neutral impact on achieving sustainability objectives for flood risk and water quality.

The policy stipulates development takes a retrofit-first approach prior to constructing new buildings, which means many buildings will keep their original footprints. This may limit opportunities for designing buildings to be resilient to flood risk, as the existing foundations and structure would be re-used. However, a retrofitted building is unlikely to be at any greater risk of flooding than the existing building so the overall impact is likely to be neutral. Similarly, the policy will likely have a neutral impact on reducing property damage from heavy precipitation events, sewer overflow events and protecting water quality.

However, the policy will help decrease the extraction of materials, levels of construction waste and embodied carbon emissions, which can negatively impact the environment and water quality and reduce the cities overall contribution to climate change. Decreasing the negative impact from development on the environment and climate change, this may result in some positive effects on minimising flood risk.

## **8. Biodiversity**

The policy will have a neutral effect on achieving sustainability objectives for biodiversity.

Retrofitted buildings usually offer less opportunity for biodiversity gain, as what can be delivered is governed by the existing building, although careful design can maximise habitat creation. The obligation to provide biodiversity net gain on sites where planning permission is needed will be in place regardless of whether a scheme is retrofitted or not. This will continue to promote enhancements to biodiversity across the city. However, it is recognised that this requirement only applies where planning permission is needed, which many retrofits may not need. As a result it is likely that the policy will have a net neutral impact on this objective.

## **9. Air Quality**

The policy will have a major positive effect on achieving sustainability objectives for air quality.

A retrofit first approach should result in less extraction and transportation of materials, decreasing the amount of construction related traffic travelling to and from building sites, and the emission of dust from demolition into the surrounding air, overall reducing key pollutants/particulates being released. This will result in improved air quality. The reuse of existing structures may also reduce construction periods, further reducing air pollution concerns, particularly through reduced demolition periods.

For these reasons, cumulatively, the policy will have a major positive impact on air quality.

## **10. Noise**

The policy will have a major positive effect on achieving sustainability objectives for noise.

A retrofit-first approach reduces resource extraction, minimizes heavy vehicle transport, and lessens demolition and piling/foundational work. Construction noise is a major source of noise complaints in the city, and so it is likely that this will have a major positive impact on noise pollution.

## **11. Transport**

The policy will have a neutral effect on achieving sustainability objectives for transport.

A retrofit first policy will encourage the upgrading of buildings, which will improve facilities for sustainable transport, however this is unlikely to be to any extent greater than a new building. The overall impact is therefore likely to be neutral.

## **12. Waste**

The policy will have a major positive impact on achieving sustainability objectives for waste.

The policy will encourage the reutilisation of existing buildings and encourage re-use of materials and the circular economy as more development will be set embodied carbon targets. This will divert a greater amount of construction debris from landfill, and dramatically reducing the amount of waste generated in the city. These measures will have an undoubtedly positive impact on reducing construction waste.

## **13. Heritage**

The policy will have a minor positive impact on achieving sustainability objectives for heritage.

A retrofit first approach increases opportunities to preserve heritage sites, including buildings of cultural significance and structures that reflect local history. The policy also discourages demolition and new build, which means there is less risk of harm to existing strategic views and archaeological features. Moreover, the policy requires a Sustainable Design Statement or Retrofit Plan to ensure the protection of heritage and cultural assets, supporting their conservation or enhancement. Retrofitting may also help to improve buildings with negative impacts on local character (most notably within Conservation Areas). However, it is noted that the policy does allow for some buildings to have extensions to support floorspace uplifts, thereby enabling additional floorspace, deterring the need for total demolition. In some instances, this might have an impact on the setting of heritage assets, although this would need to be mitigated against in line with current policies and regulations on heritage sites and assets.

## **14. Public Realm and Townscape**

The policy will have a neutral impact on achieving sustainability objectives for public realm and townscape.

The retrofit first policy will continue to support existing City Plan policies that require developments to enhance townscape, be accessible to all groups (regardless of ability) and include public realm improvements. However, it is acknowledged that new builds may be more efficient in some cases in incorporating changes such as public realm enhancements due to constraints arising from retrofitting. For these reasons, the policy will have a neutral impact on Public Realm and Townscape.

## **15. Open space**

The policy will have a neutral impact on achieving sustainability objectives relating to open space.

The policy will not preclude open space being delivered. The policy states that demolition may be allowed in instances where significant public benefits are delivered. For example, this may include the delivery of estate regeneration schemes or public infrastructure which may require the re-configuration of sites which could lead to a maximisation of publicly accessible open space. Furthermore, developments regardless of whether they are a retrofit or new build scheme involving demolition will be required to deliver biodiversity net-gain where planning permission is required. This will help to improve the green infrastructure network and overall landscape character.

## 16. Employment Opportunities

The policy will have a major positive impact on achieving sustainability objectives for employment opportunities.

The policy prioritizes the initial consideration of retrofit development before demolition and new build. Retrofitting creates managerial and specialized green economy jobs, enhancing qualifications and skills in a growing industry, and a significant increase in the amount of retrofitting is likely to create new green jobs in the city. In addition, the policy advocates for a retrofit first approach, which will result in the reuse and enhancement of existing buildings. This can help ensure there is a variety of sizes and types of office spaces on offer (instead of all new development being high-end, Grade A or of similar styles and sizes). This can provide more affordable workspace, which is more attractive to SMEs, new business startups and for a range of different industries, effectively catering to a broader audience.

Existing City Plan policies require major developments to prepare Employment and Skills Plans (ESPs). The policy will continue to support this where large-scale retrofit schemes are considered 'major applications' and/or when demolition is allowed, and low carbon new builds are also considered 'major applications'. This will mean that local residents will still benefit from ESP initiatives. For retrofit development which might be considered a 'minor application' and therefore not required to submit an ESP, job opportunities for local residents will still continue to be generated from this type of development activity. For this reason, access to lower skilled jobs and green jobs that are vital to retrofit projects should increase as more schemes implement retrofitting. These factors suggest the policy should help improve earnings and employment opportunities.

## 17. Economy

The policy will have a major positive impact on achieving sustainability objectives for economy.

It is noted that some building types may be harder to achieve through retrofitting options, such as high-end offices which may be constrained through structural requirements. However, this potential negative impact is outweighed by a number of positive factors. The policy will help avoid businesses becoming unlettable due to failing energy/environmental standards. This will increase business resilience, whilst promoting principles of sustainable growth across the city. In addition, the policy supports the diversification of workspaces, meaning there is likely to be an increase in affordable workspace to support small businesses and start-ups. Furthermore, the policy supports the development of businesses in a growing industry (retrofitting) and within the wider green economy, along with promoting regeneration outcomes.

For these reasons, cumulatively, the policy is likely to have a major positive impact on the economy.



Retrofit-First Policy Detailed Appraisal		
Sustainability Appraisal Objective	Score	Analysis
<b>1. Communities</b> i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	0	No impact identified.
<b>2. Crime reduction</b> i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	0	No impact identified.
<b>3. Housing</b> i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing that can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. The policy has the potential to cause a slight increase in costs to keep embodied carbon of new buildings within the benchmark ranges set for residential buildings. However, given the evidence base which supports the policy, it has been identified that this cost uplift would be minimal. Therefore, it is unlikely that fewer new build homes would be delivered. Furthermore, by setting tests for demolition in the policy, many developments will be steered towards retrofitting which could seek to improve the deliverability of high-quality homes compared to what is existing on-site, by bringing unfit homes back into use. It is also clear in the policy that schemes which deliver policy compliant levels of affordable housing will be exempt from meeting embodied carbon benchmarks and will instead be required to demonstrate that they have reduced embodied carbon as far as possible without impacting the delivery of affordable housing. This will mean that proposals to create high-quality homes in need across the city will continue to be brought

		<p>forward. Furthermore, the favourable view of extensions as part of this policy approach may also assist in achieving a residential floorspace uplift, delivery more high quality homes across the city. (+)</p> <ul style="list-style-type: none"> <li>ii. The policy may see an impact on the range of affordable housing being delivered through increased costs to keep embodied carbon of new buildings to set benchmarks, due to applicants raising viability concerns. However, the policy highlights that where schemes are providing affordable housing in line with the City Plan targets, then the embodied carbon targets may not apply and instead applicants will need to demonstrate how they have reduced embodied carbon as much as possible. Therefore, the overall delivery of affordable housing should have a neutral effect. (0)</li> <li>iii. The policy should not on the whole impact the delivery of homes (including bringing unfit homes back into use) and will therefore have a positive impact in reducing homelessness. (+)</li> <li>iv. The adopted City Plan policies already support development that produces homes that prolong independence and/or are fit for purpose and offer a range of housing types/sizes. The retrofit-first policy supports implementing a retrofit first approach whilst continuing to fulfil these housing objectives outlined in the City Plan. (0)</li> <li>v. See answer to (i) above (+)</li> <li>vi. See answer to (iv) above (0)</li> </ul>
<p><b>4. Health and wellbeing</b></p> <ul style="list-style-type: none"> <li>i. Will it help improve health inequalities?</li> <li>ii. Will it contribute to a reduction in death rates?</li> <li>iii. Will it improve access/movement?</li> <li>iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity?</li> <li>v. Will it improve cultural wellbeing?</li> </ul>	+	<ul style="list-style-type: none"> <li>i. The policy will encourage the reduced extraction and transportation of raw materials, along with reduced levels of demolition. It is expected that this will result in fewer particulates being released into the air, which will have a positive impact on respiratory health. This is especially the case for disadvantaged members of the Westminster community where particulates contribute to poorer health outcomes and earlier average mortality. Furthermore, some retrofit schemes will have a less intensive construction period which may benefit the health of local people nearby. This will have a positive impact on health inequalities. (+)</li> <li>ii. No likely impact (0)</li> <li>iii. No likely impact (0)</li> </ul>

<ul style="list-style-type: none"> <li>vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people?</li> <li>vii. Will it provide access to a healthy diet?</li> <li>viii. Will it create healthy homes and workplaces?</li> <li>ix. Will it increase healthy years life expectancy?</li> <li>x. Will it improve mental health and wellbeing?</li> <li>xi. Will it improve facilities and accessibility for people with disabilities?</li> </ul>		<ul style="list-style-type: none"> <li>iv. No likely impact (0)</li> <li>v. The policy promotes a retrofit first approach which supports the reuse and retention of important structures, which could include those of cultural significance. This can encourage more culturally important buildings to be kept and reutilised, instead of being demolished, improving the cultural wellbeing of areas within Westminster. (+)</li> <li>vi. No likely impact (0)</li> <li>vii. No likely impact (0)</li> <li>viii. The policy will continue to support City Plan policy which requires development to be of exemplary design standards, zero carbon and to reduce on-site energy demand. The policy also encourages the reuse of existing structures within development. This is expected to decrease building work and the levels or particulates associated with demolition and more broadly that associated with extraction and transportation of materials. This will help improve air quality and create healthier living and working environments. (+)</li> <li>ix. See answers to (i) and (ii) (+)</li> <li>x. Due to the environmental benefits aforementioned (improved air quality) it is likely there will be a positive impact on health, leading to improved wellbeing. For many buildings undergoing a retrofit, the main structural elements are retained which can mean that construction periods are shortened and can be less of a local disturbance (for example, the use of piling rigs may be minimised). This can help to improve wellbeing in the short term for neighbouring residents. (+)</li> <li>xi. No likely impact (0)</li> </ul>
<p><b>5. Climate change</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel?</li> <li>ii. Will it reduce ozone depleting emissions?</li> <li>iii. Will it reduce emissions through retrofitting new technology?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. Up to 50% of a building’s emissions over its lifetime can be from embodied emissions (e.g. construction, demolition, and disposal)<sup>1</sup>. Implementing embodied carbon targets for projects involving demolition and major developments will help reduce greenhouse gas emissions released from the various stages of development and enhance energy efficiency of buildings. (++)</li> <li>ii. No likely impact. (0)</li> <li>iii. The policy advocates a retrofit first approach. Maximising the reuse of existing buildings and their materials through retrofitting is the most impactful strategy for</li> </ul>

<ul style="list-style-type: none"> <li>iv. Will it reduce heat island effects on people and property?</li> <li>v. Will it increase resilience to climate change?</li> </ul>		<p>reducing embodied carbon in development. It also creates additional incentives for retrofitting, by allowing the benefits of retrofit to be considered when assessing alterations and extensions. Following the policy, proposals that involve demolition and all major schemes will have to meet embodied carbon benchmarks. This will encourage them to use new retrofitting technology to make these benchmarks achievable (++).</p> <ul style="list-style-type: none"> <li>iv. No likely impact (0)</li> <li>v. Retrofitting involves the reuse of existing structures and materials in order to minimise the impact of development on climate change. Retrofit development includes adaptation upgrades which can bolster a building’s resilience to climate change impacts. This increases current building’s climate change resilience whilst limiting the negative impacts on the environment that come from construction (such as extraction and transportation and associated embodied carbon). (++)</li> </ul>
<p><b>6. Natural resources</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce water consumption and improve water efficiency?</li> <li>ii. Will it reduce consumption of fossil fuels?</li> <li>iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?</li> <li>iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> <li>v. Will it make efficient use of land?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. Adopted City Plan policy 38 D states development will incorporate sustainable design principles which include optimising resource and water efficiency. The policy will steer many developments towards retrofitting which could seek to improve water efficiency. Where low-carbon new builds are also able to meet the benchmarks, these schemes will also use materials that are associated with less intensive water usage. (+)</li> <li>ii. Throughout the construction process, extraction, transport and manufacture of materials greatly increases the consumption of fossil fuels. The policy advocates the reuse of existing structures prior to the consumption of new resources/materials. This reduces the consumption of fossil fuels. Furthermore, for buildings that require demolition/major schemes setting embodied carbon targets will help limit the consumption of fossil fuels during both construction and operation phases. (++)</li> <li>iii. The policy will require developments to reduce their embodied carbon. This will require either the use of more sustainable products, fewer products overall, or the re-use of existing products. As such, natural resources such as quarried materials in steel and concrete which can be the most carbon intensive will be reduced. This would have an overall positive effect. (++)</li> </ul>

		<ul style="list-style-type: none"> <li>iv. The policy requires that development should incorporate low carbon materials in order to respond to the climate emergency. Also, development that requires demolition/is a major scheme must adhere to embodied carbon targets. This ensures that the use of renewable resources is prioritised in order to meet these requirements (++)</li> <li>v. Although new builds may have fewer spatial constraints compared to retrofits, in the context of Westminster, retrofitting will likely make efficient use of land. Westminster is a densely populated urban area with limited available space. Retrofitting existing buildings helps maximize the use of space. Furthermore, the policy encourages that where demolition may occur to make way for new buildings, this will be in order to make best use of the site (for example, through an enhanced number of public benefits or to rectify buildings which are structurally unsound). (+)</li> </ul>
<p><b>7. Flood risk and water quality</b></p> <ul style="list-style-type: none"> <li>i. Will it minimise flood risk from all sources of flooding?</li> <li>ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?</li> <li>iii. Will it reduce combined sewer overflow events?</li> <li>iv. Will it protect water quality?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. The policy stipulates that retrofitting buildings should be prioritised over demolition. This will mean that more building footprints will remain the same, which will have a neutral impact on flood risks. Adopted City Plan policies on minimising flood risks will remain alongside the new retrofit first policy, meaning that where there may be an increased flood risk through any development work, this will need to be mitigated against.</li> <li>ii. More broadly, the policy encourages reducing embodied emissions. Such emissions contribute to climate change which can affect changes in weather events and lead to effects such as increased rainfall. Decreasing contributions from developments to climate change can (in the long-term and cumulatively) can make a positive contribution to minimising flood risk. (++)</li> <li>iii. See response to (i) above (++)</li> <li>iv. No likely impact (0)</li> <li>v. No likely impact (0)</li> </ul>
<p><b>8. Biodiversity</b></p> <ul style="list-style-type: none"> <li>i. Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	<p>0</p>	<ul style="list-style-type: none"> <li>i. Retrofitted buildings usually offer less opportunity for biodiversity gain, as what can be delivered is governed by the existing building, although careful design can maximise habitat creation. For schemes where planning permission is required (for example larger scale retrofits and/or schemes where demolition is allowed), new</li> </ul>

<ul style="list-style-type: none"> <li>ii. Will it preserve Sites of Importance for Nature Conservation?</li> <li>iii. Will it improve access to and promote educational value of sites of biodiversity interest?</li> <li>iv. Will it conserve and enhance species and habitats?</li> </ul>		<p>legislation requires developments to deliver biodiversity net gain which will mean that in some instances, biodiversity will be enhanced. (0)</p> <ul style="list-style-type: none"> <li>ii. The policy may preserve sites of importance for nature conservation as the retention of existing buildings/materials will be a priority, causing the least damage to the environment (+)</li> <li>iii. No likely impact</li> <li>iv. See above (i). (0)</li> </ul>
<p><b>9. Air quality</b></p> <ul style="list-style-type: none"> <li>i. Will it improve air quality?</li> <li>ii. Will it reduce emissions of key pollutants?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. Following the policy, retrofit developments should have a positive impact on air quality. This is because less extraction and transportation of raw materials is required, leading to fewer particulates and key pollutants being released into the air, along with reduced construction periods where there may be less demolition and machinery used which can also have a negative impact on air quality. (++)</li> <li>ii. See answer to (i)</li> </ul>
<p><b>10. Noise</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce noise concerns and noise complaints?</li> <li>ii. Will it reduce noise levels?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. A retrofit first approach will decrease the need for extraction and transportation of natural resources. This means less large, heavy motor vehicles travelling to and from development sites. Furthermore, as retrofit buildings will reuse existing structures there is likely to be less demolition and less foundational works. This can help reduce noise levels and associated concerns and complaints. Furthermore, by indirectly encouraging more retrofits, these will likely have shorter construction periods. This will also have positive effects upon noise, as machinery will be used for shorter time periods. Buildings which are retrofitted will also be better able to have improvements to their internal noise mitigation, ultimately creating better environments for future residents and workers in retrofitted buildings (++)</li> <li>ii. See answer to (i)</li> </ul>
<p><b>11. Transport</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce volumes of traffic?</li> <li>ii. Will it encourage walking and cycling?</li> <li>iii. Will it increase proportion of journeys using modes other than the car?</li> <li>iv. Will it improve public transport accessibility?</li> </ul>	0	<ul style="list-style-type: none"> <li>i. Retrofitting existing structures and setting embodied carbon budgets for schemes involving demolition/major schemes, will help decrease the transport of materials and construction waste during construction periods. This will decrease the amount of large, heavy motor vehicles, thus reducing volumes of traffic. (+)</li> <li>ii. No likely impact (0)</li> <li>iii. No likely impact (0)</li> <li>iv. No likely impact (0)</li> </ul>

<p><b>12. Waste</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce consumption of materials and resources?</li> <li>ii. Will it reduce household waste?</li> <li>iii. Will it increase recycling, recovery and re-use?</li> <li>iv. Will it reduce construction waste?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. The policy stipulates that development should first consider the reutilisation of existing buildings, decreasing the consumption of resources and materials. Where this is not possible, schemes involving demolition/major schemes will adhere to embodied carbon budgets which will encourage development to use the lowest carbon materials/resources possible, this should also reduce consumption of materials and resources. (++)</li> <li>ii. No likely impact (0)</li> <li>iii. A retrofit first approach will encourage development to consider the recycling, recovery and re-use of existing buildings and materials in the first instance. (++)</li> <li>iv. Retrofitting involves reusing existing construction materials within a new scheme, which means there should be a reduction in construction waste. Furthermore, major schemes/schemes that require demolition will also seek to reduce construction waste in order to stay within embodied carbon budgets set by the policy (++)</li> </ul>
<p><b>13. Heritage</b></p> <ul style="list-style-type: none"> <li>i. Will it conserve or enhance heritage sites and cultural value?</li> <li>ii. Will it protect strategic views?</li> <li>iii. Will it conserve or enhance heritage assets and their settings?</li> <li>iv. Will it help preserve, enhance and record archaeological features and their settings?</li> <li>v. Will it protect and enhance the setting of the Westminster World Heritage Site?</li> </ul>	<p>+</p>	<ul style="list-style-type: none"> <li>i. Taking a retrofit first approach means there is more opportunity for development to conserve or enhance heritage sites and their cultural value, complementing adopted policy and statutory requirements. This includes the reuse of significant materials or retention of important structures that reflect local historical character. Moreover, the policy stipulates that retrofit schemes must be accompanied by a Sustainable Design Statement or Retrofit Plan to show how heritage sites and assets of cultural value have been protected. This shows the policy will help conserve or enhance heritage sites and assets of cultural value. However, the policy does encourage extensions on buildings to provide an uplift of floorspace. Whilst existing policies on heritage will still need to be adhered to (for example, in the context of listed buildings), there may be some changes to heritage sites as a result of the policy when the benefits of retrofitting are balanced alongside the conservation of heritage. Equally, retrofitting of existing buildings which have negative townscape values (particularly those identified in Conservation Areas) may be enhanced through the policy. Therefore, overall, it is assumed that the policy would have a positive effect on heritage. (+)</li> </ul>

		<ul style="list-style-type: none"> <li>ii. The reuse of existing buildings instead of redevelopments which alter the building envelope may mean less risk of new development which could potentially harm strategic views.(+)</li> <li>iii. See answer to (i) (+)</li> <li>iv. Reducing the number of schemes that require demolition, should help preserve archaeological features because as much of the existing structures will be reused as possible. Furthermore, retrofitting can include improvements that seek to better the preservation and enhancement of archaeological features. (+)</li> <li>v. No likely impact (0)</li> </ul>
<p><b>14. Public Realm &amp; Townscape</b></p> <ul style="list-style-type: none"> <li>i. Will it enhance townscape?</li> <li>ii. Will it encourage exemplary design standards?</li> <li>iii. Will it reduce litter?</li> <li>iv. Will it enhance the quality of public realm?</li> <li>v. Will it improve access and mobility for all equality group strands?</li> </ul>	0	<ul style="list-style-type: none"> <li>i. Under the current City Plan (Policy 38) development is required to respond to Westminster’s context and promote excellence in design. A retrofit first approach will mean development continues to follow these policy requirements whilst reusing existing materials and structures where possible. Redeveloping buildings which have a negative impact on townscape may also be achieved through this policy. (0)</li> <li>ii. See answer to (i) (0)</li> <li>iii. No likely impact (0)</li> <li>iv. The policy will steer many developments towards retrofitting which could encourage existing buildings to be designed for the users in mind and enhance the quality of the public realm. However, it is recognised that the building footprint of some existing buildings (which would be encouraged to be retained) may not maximise opportunities for reconfiguration which could otherwise have enhanced the public realm. Overall, this will have a neutral effect. (0)</li> <li>v. Under the current City Plan policy development should be made accessible for all abilities. Retrofitted buildings will be required to adhere to the same building regulations. (0)</li> </ul>
<p><b>15. Open Space</b></p> <ul style="list-style-type: none"> <li>i. Will it enhance the quality of open space?</li> <li>ii. Will it improve landscape character?</li> <li>iii. Will it improve access to open space?</li> </ul>	0	<ul style="list-style-type: none"> <li>i. In absence of the policy, new builds may have greater options to create new space, therefore may have a greater impact on enhancing open space. However, the policy would not preclude demolition occurring, as long as new builds were able to be built with a low embodied carbon, and where significant public benefits may be demonstrated (which might incorporate new public open space), along with other</li> </ul>



<p>iv. Will it enhance the green infrastructure network?</p>		<p>criteria such as the delivery of significant new jobs and affordable housing. This means that new open space may still be able to be delivered with the policy in place. Furthermore, retrofitting existing buildings could also still enhance existing open space areas that already exist, and/or improve access to them where possible through retrofitting options. (0)</p> <p>ii. Encouraging more buildings to retrofit through the policy may enhance landscape character as existing buildings with a negative impact on streetscape may be redeveloped. It is noted however that where new builds may be allowed, these may also have a positive impact on landscape character. This effect is therefore neutral overall. (0)</p> <p>iii. Development for new builds in absence of the policy may be able to more easily demolish underutilised buildings and create new play/green space, improving access to open space. Conversely, site constraints may make it more difficult to achieve the same level of open space using existing buildings. However, it is still possible that retrofitting options may enable improvements to access to green spaces. Therefore, the overall effect is neutral. (0)</p> <p>iv. Development for new builds in absence of the policy may be able to more easily demolish underutilised buildings and create new green infrastructure. In some instances of retrofitted buildings, site constraints may make it more difficult achieve the same level of public benefit relating to green infrastructure due to limited abilities to improve the quantum or accessibility of open space with existing building footprints (which would be encouraged by virtue of the policy). However, given the need to adhere to biodiversity net gain requirements, all development which requires planning permission, regardless of whether it is in line with the policy or not will still need to enhance green infrastructure, with innovative design solutions to a significant degree on both new build and retrofit schemes (0)</p>
<p><b>16. Employment Opportunities</b></p> <p>i. Will it improve qualifications, skills or training?</p>	<p>++</p>	<p>i. The policy calls for retrofitted buildings to be considered in the first instance of development. The type of green economy jobs created from this are likely to be managerial and/or require specialist skills and technical expertise. Growing this upcoming industry will therefore likely improve qualifications, skills and training.</p>

<ul style="list-style-type: none"> <li>ii. Will it create new jobs and reduce unemployment?</li> <li>iii. Will it provide jobs for those most in need?</li> <li>iv. Will it improve earnings?</li> <li>v. Will it promote equality of opportunity across the city by tackling barriers to employment?</li> </ul>		<p>Furthermore, if demolition is required as part of a proposal, the increased emphasis on circular economy will support new skilled jobs in this area. (++)</p> <ul style="list-style-type: none"> <li>ii. Development will continue to provide local jobs, including jobs through construction firms and developers who will continue to work with the Westminster Employment Service (secured through Section 106 for major developments) to support those furthest from the labour market in job opportunities within development schemes, including major retrofits schemes. This will provide more opportunities for those furthest away from the labour market to enter into new jobs, including those in sustainable green industries (such as low carbon building). For other minor planning applications which either involve demolition (and are therefore subject to the policy) and or are retrofits, activity in this industry will still continue to create new jobs for local people, even in absence of Section 106 agreements on employment initiatives, as is currently required for major applications. In addition, the policy supports the retrofitting of office space which can increase job density, maximising use of existing office space and creating new jobs. The reuse and enhancement of existing buildings can help ensure there is a variety of sizes and types of office spaces on offer (instead of all new development being high-end, Grade A or of similar styles and sizes). This can provide more affordable workspace which is more attractive to SMEs and new business startups, effectively catering to a broader audience across a range of industries. For the reasons listed above, the policy will help reduce unemployment and provide job opportunities for those most in need. (++)</li> <li>iii. By requiring development involving demolition to deliver public benefits, more schemes may provide affordable workplaces, which will enable greater small business and start ups, improving employment opportunities. (+)</li> <li>iv. A retrofit first policy will support the growth of the Green Economy in London, which will help create a positive relationship between economic growth and environmental needs. Furthermore, 28% of green jobs are located within London which suggests many (higher skilled) jobs created through retrofitting are likely to be sourced from the local economy. In addition, existing City Plan requirements for major planning applications to prepare and adhere to an Employment and Skills</li> </ul>
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		<p>Plan (ESP) means that as the policy is still encouraging development, local residents who are out of work, new to the workforce and/or are currently in education will be able to continue to benefit from ESP initiatives, where major development through retrofit and/or low carbon demolition and re-build schemes are brought forward. As was noted in the response to (ii) above, where schemes are considered to be minor applications (and therefore not subject to the preparation of an ESP), this will still provide job opportunities in the construction sector which could be taken up by local people. In the long term, this will continue to assist in improving earnings, including for lower skilled jobs which will remain vital in retrofit projects in a resilient business environment. These factors suggest the policy should help improve earnings, whilst ensuring reduced negative impacts on the environment. (+)</p> <p>v. See answer to (ii)</p>
<p><b>17. Economy</b></p> <ul style="list-style-type: none"> <li>i. Will it improve business development and environment?</li> <li>ii. Will it improve business resilience and economy?</li> <li>iii. Will it encourage new business start-ups, small businesses and opportunities for local people?</li> <li>iv. Will it promote business in key sectors?</li> <li>v. Will it promote regeneration?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. Under the retrofit first policy, improving/reusing existing buildings or in some cases bringing them back into active use, can prolong the use of buildings for some businesses. This avoids buildings becoming unlettable due to failing energy/environmental standards, improving business development and environment. Furthermore, the policy supports the development of businesses in a growing industry (retrofitting) and within the wider green economy which can help to promote sustainable growth across the city. However, some types of businesses across the city that require high-end office floorspace may need to adjust their approaches to development. This is because the need to reduce demolition and/or stay within embodied carbon 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, it has been evidenced that many global companies with high-end jobs have taken on retrofitted office premises across the city and that considerations of a 'desirable place to work' are not just based on structural elements of a building, but rather on the wider cultural and social ecosystem in the area surrounding the office. This has therefore proven that the ability to attract businesses which will continue to contribute to the city's economy</li> </ul>

		<p>will not be deterred by the policy. Furthermore, high-quality retrofitted buildings are able to still generate high rental yields which will ultimately help to continue to keep investment (and re-investment) in Westminster. The policy will ensure that where demolition does occur, this results in the delivery of the best outcomes, and most optimal building, bringing the biggest business development improvements. Furthermore, the 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, which could include things such as the delivery of vital public infrastructure. In both of these scenarios, development which could support high value jobs in the city would still be encouraged. Therefore overall, it is expected that the policy will still have a beneficial effect on the business environment across the city. The policy will also ensure a balance between best in class, and more affordable office space, by causing a reduction in the number of brand new buildings. This will create a more varied and balanced eco-system of office /retail space available, which will have a more balanced impact on the economy. (++)</p> <p>ii. A retrofit first approach promoted by the policy may have an initial impact on businesses in the city as they adapt to new requirements. However, this could help business resilience in the long term and would ensure a greener economy, focussed on sustainable growth. Encouraging retrofit as part of development will also help to grow an upcoming industry around retrofitting within London, which is arguably niche at present. The expansion of this new industry can improve business resilience and economy into the future. Furthermore, evidence suggests that future demand for retrofit spaces will be strong, as has been the case across areas such as the West End in recent years. Furthermore, the policy applies a favourable approach towards upwards extensions. In some cases, this could encourage businesses currently located in Westminster to remain (with the ability to still increase floorspace in their existing premises in line with other adopted policies in the Plan) which might have otherwise meant these businesses would relocate to a different part of London. (++)</p>
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|  |  | <ul style="list-style-type: none"> <li>iii. The policy advocates for a retrofit first approach, which will result in the reuse and enhancement of existing buildings. This can help ensure there is a variety of sizes and types of office spaces on offer (instead of all new development being high-end, Grade A or of similar styles and sizes). This can provide more affordable workspace which is more attractive to SMEs and new business startups, along with a wider range of industries, effectively catering to a broader audience. Furthermore, as more proposals implement retrofitting, there will be an increase in the demand for those with specialist skills which presents an opportunity to train and employ local people. It also encourages new business start-ups/small businesses within the retrofit industry (which is arguably still in its infancy). (++)</li> <li>iv. The policy will help promote green economy jobs, which are a key priority, nationally and locally. Also see answer to (ii) and (iii) (++)</li> <li>v. Encouraging retrofit and setting embodied carbon budgets for schemes involving demolition and major schemes may promote regeneration of existing developments that are seeking better energy efficiency, climate change resilience and accessibility improvements. The incorporation of an approach which is more favourable to extensions on buildings (as per Part C of the policy) may also further enhance regeneration outcomes in the delivery of increased floorspace, improving the viability of retrofit schemes and continuing to keep investment in Westminster. It is noted however that more widespread demolition and re-build schemes could also achieve more wholesale regeneration outcomes. However, it is clear within the policy that where proposals can demonstrate significant net additional public benefits (which could be linked to regeneration outcomes), demolition may still be allowed. This means that overall, the policy would still enable the promotion of regeneration across the city. (+)</li> </ul> |
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# 1.3 Site Allocations Reasonable Alternatives

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## **Grosvenor Sidings**

### **Summary of findings:**

#### **1. Communities:**

The policy will have a major positive effect on achieving sustainability objectives for communities. A residential-led, mixed use development (with commercial and community space) will bring forward affordable housing, meeting the housing needs for those most in need. This development will also provide more accessible, local services, opportunities for community activity and community participation in decision making. This is conducive to creating a thriving and inclusive community in Westminster.

#### **2. Crime Reduction**

The policy will have a major positive effect on achieving sustainability objectives for crime reduction. Following the policy, development must pay close attention to the design and layout of buildings to ensure crime and anti-social behaviour is deterred. For example, limiting overshadowing and following other principles outlined in Policy 38 C of the City Plan. The policy also calls for a mixed-used development which will increase footfall, providing more natural surveillance, and will provide new waste disposal/management, preventing other forms of negative behaviour.

#### **3. Housing**

The policy will have a major positive effect on achieving sustainability objectives for housing. The policy supports the development of high-quality homes (minimum of 50% affordable) which will increase the quality of affordable housing in Westminster whilst also increasing the range of housing types/sizes on offer. This will help reduce homelessness. Moreover, the increase in the number of affordable homes should help reduce the number of unfit homes in the borough and provide more accommodation for specific demographic groups (including the elderly). This ensures residents have safe, appropriate housing which fosters independence.

#### **4. Health and Wellbeing**

The policy will have a major positive effect on achieving sustainability objectives for Health and Wellbeing. The increase in affordable housing, improved permeability/connectivity and increased urban greening will help to improve health inequalities by creating a healthy environment for residents. It is likely death rates will be reduced as high-quality housing will be provided, public realm improvements will support physical activity and a mixed-use development will mean access to local services is improved. The increase in community space will also create spaces that can support cultural wellbeing, helping minimise

loneliness and improve mental health. In addition, these new community facilities can support other factors of a healthy lifestyle such as healthy eating, further encouraging residents to improve their health and wellbeing. Cumulatively, the improvements proposed by the policy will help create healthy homes and workplaces that provide a high quality of life.

## **5. Climate Change**

The policy will have a minor positive effect on achieving sustainability objectives for climate change.

The policy places an emphasis on the energy efficiency of new buildings (in order to reduce greenhouse emissions) and on ensuring buildings are carbon neutral. Also, as the policy will support new public realm improvements to make active travel more accessible/convenient, this too will contribute to the reduction of emissions as the need for private motor vehicles should decrease. The retention of local public transport services (railway) and potential reuse of existing structures on site, will also help in this regard.

The policy also supports green infrastructure enhancements which have provide multiple benefits for climate change, including reducing UHI effect and increasing resilience to climate change events (such as flooding).

Despite these positive impacts, a major mixed-use development will increase density on site which will increase the emission of greenhouse gases for the lifetime of the development. In conclusion, on balance, this policy will have a minor positive impact on climate change.

## **6. Natural Resources**

The policy will have a major positive effect on achieving sustainability objectives for Natural Resources. The policy seeks to maximise the use of land, which will greatly increase density on site. The increased density will subsequently increase water consumption and fossil fuel consumption, which has a negative impact on the use of natural resources. That being said, maximising the use of land means more efficient use of the space and providing a range of significant public benefits.

The policy also emphasises the need for water harvesting, the energy efficiency of buildings, increased pedestrian/cycle and the use of renewable energy. These measures collectively do help mitigate against the increase in the use of natural resources.

## **7. Flood Risk and Water Quality**

The policy will have a minor positive effect on achieving sustainability objectives for flood risk and water quality. Increased permeable surfaces is advocated by the policy as well as the need for a Site Specific Flood Assessment. Moreover, the policy lists flood mitigation recommendations that should also be considered to enhance flood resistance. These measures will help protect property from the impacts of storm events, minimise flood risk on-site and contribute to reduced combined sewer overflow events. Concerning water quality, the land is contaminated due to historical and current uses, however the use of green infrastructure should help ameliorate this to a certain extent.

## **8. Biodiversity**

The policy will have a major positive effect on achieving sustainability objectives for biodiversity. The policy states that opportunities should be taken to enhance urban greening on site which will protect and enhance biodiversity, species and habitats. The community uses supported by the policy will also create opportunities to improve access to and promote the educational value of sites of biodiversity interest. The policy also calls for public realm improvements which include provision of new play space/open space and improved pedestrian routes. This will add to the number of local, accessible spaces of biodiversity in the area and improve connectivity between the site and surrounding green spaces. Cumulatively, the policy will make a major positive contribution to improving biodiversity on site.

## **9. Air Quality**

The policy will have a major positive effect on achieving sustainability objectives for air quality. The retention of the railway will continue to negatively impact air quality to a certain extent (due to the continued use of diesel trains). However, the policy states that development proposals should ensure opportunities are taken to increase urban greening on site and buildings are designed appropriately to minimise impacts from air pollution. Furthermore, the emphasis on permeability and improved connectivity with the wider area means the sites PTAL rating can improve, and active modes of transport can be made more convenient and accessible. This reduces the need for private vehicles, ameliorating negative air quality impacts.

## **10. Noise**

The policy will have a minor positive effect on achieving sustainability objectives for noise. The policy calls for large-scale mixed-use scheme which will increase noise pollution during construction and the lifetime of the development. That being said, the policy also outlines appropriate measures should be taken to dampen the impact of noise pollution to reduce noise levels and subsequent concerns/complaints, including careful consideration of layout and building positioning. This should ensure noise pollution does not negatively impact residential amenity or the setting of nearby conservation areas.

## **11. Transport**

The policy will have a major positive effect on achieving sustainability objectives for transport. Following the policy, new commercial and community spaces will be brought forward, making services more accessible for local residents/workers. This accompanied with new/improved pedestrian routes, new/improved cycle paths and cycling provision within the development should reduce the need for private motor vehicles, thus decreasing volumes of traffic and increasing the number of journeys made by transport methods other than the car. There is potential for access to public transport (especially in the south) to greatly improve as new routes are introduced.

## **12. Waste**

The policy will have a minor positive effect on achieving sustainability objectives for waste. This is because intensification of the site (as supported by the policy) will increase the consumption of materials and resources. Household and construction waste will also not be reduced due to the increase in uses on



site. However, following the policy, proposals should recycle and reuse materials and resources as much as possible, this includes through water harvesting and potential re-purposing of some of the existing sidings/depot, Grade II listed building on site and ancillary structures.

### **13. Heritage**

The policy will have a major positive effect on achieving sustainability objectives for heritage. Following the policy, forthcoming proposals shall be sympathetic to heritage assets, protect strategic views through thoughtful design and layout, and consider opportunities to re-purpose existing heritage assets. Furthermore, the scheme should complement the character of adjacent Conservation Areas and adhere to City Plan policy 39, in regard to archaeological features. This helps balance growth against the need to preserve local character and cultural value, which is a key policy requirement.

Despite these positive measures, the increase of uses on the site (especially commercial uses / active frontages) may negatively impact local heritage. That being said, the number of positive impacts on heritage listed above are considered to outweigh the potential harm.

### **14. Public Realm and Townscape**

The policy will have a major positive effect on achieving sustainability objectives for public realm and townscape. Proposals are expected to provide improvements to public realm (as outlined in the policy). These include enhanced urban greening and necessary infrastructure to keep the environment litter free, such as proper waste disposal opportunities. Policy also supports the provision of safe transport routes and new open/play space that are accessible to all, regardless of ability levels. Furthermore, proposals should respond positively to local townscape in Pimlico and Ebury.

Cumulatively, these provisions will enhance the quality of the public realm and townscape.

### **15. Open Space**

The policy will have a major positive effect on achieving sustainability objectives for open space. The site is in an Area of Play Space Deficiency and an Area of Open Space Deficiency. For this reason, the policy calls for the provision of new, publicly accessible open space. These new spaces will support community interaction, encourage physical activity and enhance the green infrastructure network, linking new green spaces to adjacent developments such as Ebury Estate. Furthermore, due to the improved wayfinding opportunities and increased walkability of the site, access to surrounding open spaces can also be improved. Policy also supports the enhancement of landscape character through measures mentioned above, and the possible retention/ enhancement of important heritage assets and ancillary structures. Cumulatively, the policy will improve the quality of open space on site.

### **16. Employment Opportunities**

The policy will have a major positive effect on achieving sustainability objectives for employment opportunities. The policy supports development that provides opportunities to support employment, qualifications and skills through the retention of the British Transport Police building, the continued use of the railway and the provision of commercial floorspace. The new commercial floorspace will also help create new jobs on site, which should reduce unemployment and improve earnings in the area. In addition, the policy requires development to improve accessibility and mobility in and around the site.

This can help mitigate barriers to employment, ensuring jobs are equally accessible for all, including those most in need. To conclude, due to the positive measures listed above, the policy will have a major positive impact on employment opportunities.

## **17. Economy**

The policy will have a major positive effect on achieving sustainability objectives for economy. The policy requires proposals to deliver commercial space which will improve businesses development and will include opportunities for new startups and small businesses. Furthermore, the development will bring increased footfall to the area boosting business resilience and local economy. As the policy stipulates development should be primarily residential led, there is less opportunity for new jobs in key sectors (compared to a commercial led scheme) however, the continued use of the railway will support jobs in transportation. The policy also promotes regeneration as it outlines that developments should positively reflect the urban grain of nearby developments and enhance connections with neighbouring regeneration sites. Cumulatively, these measures show that the policy will have major positive effect on economy.

Grosvenor Sidings Policy Detailed Appraisal		
Sustainability Appraisal Objective	Score	Analysis
<p><b>1. Communities</b></p> <ul style="list-style-type: none"> <li>i. Will it improve access to local services, shops and community facilities?</li> <li>ii. Will it increase ability to influence decision-making (neighbourhoods)?</li> <li>iii. Will it foster an inclusive Westminster community?</li> <li>iv. Will it encourage engagement in community activity?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. Preferred land uses will be residential-led mixed use development. This will include residential units as well as some commercial space (retail/food and beverage/leisure) and community spaces. As 50% of homes should be affordable, this will help to ensure those most in need have convenience to local shops, services and community facilities. The site will also be made publicly accessible, improving access to local services, shops and community facilities proposed as part of the allocation for the wider community. (++)</li> <li>ii. As this site allocation will be a large mixed-use scheme, extensive public consultation will take place during the application stage which ensures community members can influence decision-making. Furthermore, increasing the amount of social housing on site is likely to boost community participation in decision-making. (++)</li> <li>iii. Stipulating a residential-led scheme on public land through the policy means there is an opportunity to maximise affordable housing delivery, as 50% homes will be affordable – this will facilitate the development of an inclusive Westminster community. Additionally, the development should enhance the accessibility of surrounding streets within the public realm to accommodate diverse abilities. (++)</li> <li>iv. Prioritising open and play spaces and community uses through policy may encourage engagement in community activity. It creates more spaces conducive to community interaction, giving peoples of different backgrounds the opportunity to engage and participate in local governance. (++)</li> </ul>
<p><b>2. Crime reduction</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce crime, disorder and antisocial behaviour?</li> <li>ii. Will it reduce fear of crime, disorder and antisocial behaviour?</li> <li>iii. Will it reduce other behaviour adversely affecting the local environment?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy states proposals should consider how new public spaces can provide activation to reduce crime and anti-social behaviour. This will be complemented by the policy ensuring the British Transport Police building remains operational during construction and is retained or re-provided within development plans for the site. (++)</li> <li>ii. Similar to the above, these improvements may decrease the fear of crime and disorder. (+)</li> </ul>

		<p>iii. New residential, leisure and community uses brings more opportunities for efficient waste disposal and collection and better designed spaces. This can discourage behaviours such as fly tipping, vandalism and loitering. (+)</p>
<p><b>3. Housing</b></p> <p>i. Will it create high quality homes?</p> <p>ii. Will it increase range of affordable housing?</p> <p>iii. Will it reduce homelessness?</p> <p>iv. Will it provide housing than can help people stay independent for longer?</p> <p>v. Will it reduce number of unfit homes?</p> <p>vi. Will it provide a range of housing types and sizes?</p>	<p>++</p>	<p>i. The policy sets out a vision for the site to deliver a high quality sustainable residential-led mixed use development. To complement this the residential units on site should seek to maximise residential amenity and enhance the surrounding townscape as required as part of the policy. This will ensure the creation of high-quality homes in Westminster. (++)</p> <p>ii. The policy seeks to support residential development on public land, with an expectation that a minimum of 50% of units will be affordable. This will increase the offer of affordable products in the area to address the level of local demand. (++)</p> <p>iii. An increase in affordable housing units on site would increase the availability of housing for those most in need, contributing to the reduction of homelessness. (++)</p> <p>iv. An increase in affordable homes would increase the availability of housing for specific demographic groups, such as older individuals and those with disabilities, thereby expanding the housing options that contribute to fostering independence. (++)</p> <p>v. The increased number of affordable homes on site means there is more opportunity for better provision of units that are fit for the purpose of local residents. It also means the affordable housing provider can improve their housing portfolio by moving residents from existing unfit homes and refurbishing those units. This helps decrease the number of unfit homes in Westminster. (++)</p> <p>vi. The policy supports residential uses which will help diversify the range of housing types and sizes in the area. (++)</p>
<p><b>4. Health and wellbeing</b></p> <p>i. Will it help improve health inequalities?</p> <p>ii. Will it contribute to a reduction in death rates?</p> <p>iii. Will it improve access/movement?</p>	<p>++</p>	<p>i. The policy seeks to bring forward more affordable housing, improved connectivity and permeability and better access to local services and community infrastructure. This will facilitate convenient access to essential services for those who need it most. Additionally, the policy supports new public spaces and open areas dedicated to play and physical activity. It also looks to increase urban greening and</p>

<ul style="list-style-type: none"> <li>iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity?</li> <li>v. Will it improve cultural wellbeing?</li> <li>vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people?</li> <li>vii. Will it provide access to a healthy diet?</li> <li>viii. Will it create healthy homes and workplaces?</li> <li>ix. Will it increase healthy years life expectancy?</li> <li>x. Will it improve mental health and wellbeing?</li> <li>xi. Will it improve facilities and accessibility for people with disabilities?</li> </ul>		<p>enhancing environmental quality on-site. These improvements will help create a healthy environment to live in, contributing to mitigating health disparities. (++)</p> <ul style="list-style-type: none"> <li>ii. The policy seeks to ameliorate the quality of living through improved social infrastructure, access to services and increased opportunities for physical activity (outdoor play/physical activity). As a residential-led scheme that will seek to maximise affordable housing on public land, this too should seek to reduce death rates by ensuring affordable homes are available to those most in need. (++)</li> <li>iii. The policy seeks to improve access and movement through increasing permeability through the site, supporting pedestrian access from Ebury Bridge to the River Thames. The policy also seeks to enhance permeability and provide access routes east to west through adjacent residential estates. Moreover, new routes should have enhanced wayfinding opportunities and should be designed with those with disabilities in mind. (++)</li> <li>iv. The area is currently an area of play space and open space deficiency. New public open and play spaces, as well as new community uses, and active transport routes are stipulated in the policy to provide opportunities for sport and physical activity. This will help encourage healthy lifestyles. (++)</li> <li>v. The policy supports new social infrastructure, providing opportunities for residents to practice and celebrate their beliefs, traditions, and values. Furthermore, proposals should protect and enhance elements of significant heritage and townscape value, contributing to conserving part of the local culture. (++)</li> <li>vi. The policy calls for an increase in residential and leisure/community uses, which should bring forward more affordable housing and spaces for social interaction. This will enhance the housing options for the elderly, supporting independent living. It should also help diminish social isolation, ameliorating mental well-being. (++)</li> <li>vii. The policy does little to contribute to healthy eating, however it supports new community facilities that can include educational food centres that support healthy eating or support residents in cultivating their own food. It also supports new food and beverage uses which could supply healthy food. (+)</li> </ul>
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		<ul style="list-style-type: none"> <li>viii. The policy allocates the site for new residential units and new retail and food/beverage spaces and increased access to open green space, which will help create healthy living and working environments. However, proximity to the retained active railway may negatively impact residential amenity. To mitigate this, the policy ensures high quality living is secured the provision of high levels of sound insulation given the noise associated with railway use. (+)</li> <li>ix. Providing new homes (especially affordable homes for those who need it most) and accessible open/green spaces should improve healthy years life expectancy, however proximity to the retained active railway may negatively impact residential amenity. To mitigate this, the policy ensures high quality living is secured the provision of high levels of sound insulation given the noise associated with railway use. (+)</li> <li>x. Yes, answered in points above (i, iv, v, ix) (++)</li> <li>xi. The policy requires residential development to have disabled access and one of the key principles of the site is for site to be accessible and support a range of uses. Having improved public realm will also include infrastructure that supports the mobility and movement for people with disabilities. (++)</li> </ul>
<p><b>5. Climate change</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel?</li> <li>ii. Will it reduce ozone depleting emissions?</li> <li>iii. Will it reduce emissions through retrofitting new technology?</li> <li>iv. Will it reduce heat island effects on people and property?</li> <li>v. Will it increase resilience to climate change?</li> </ul>	+	<ul style="list-style-type: none"> <li>i. This policy states that sustainability should be at the heart of proposals including, ensuring new buildings are to be as energy efficient as possible, which will help reduce greenhouse emissions. Development should also be carbon neutral by considering a low-carbon approach in the construction/design of the building. Furthermore, increasing permeability and accessibility to services and community facilities should reduce the need for travel, further reducing greenhouse emissions. However, increasing the density on site and the continued use of railway will contribute to emission of greenhouse gas throughout the lifetime of the development. That being said, the continued use of the railway as a public transport network across London and beyond will reduce the amount of private motor vehicle users on the road which will make a wider overall contribution to the reduction of greenhouse gas emissions. (+)</li> <li>ii. As per answer to (i) above. (+)</li> </ul>

		<ul style="list-style-type: none"> <li>iii. The policy supports retention of the various heritage assets on site and supports the re-purposing of the on-site Grade II Listed building and workshop. This provides opportunity for retrofit which may reduce emissions associated with its usage. (++)</li> <li>iv. Opportunities to green the area to deliver biodiversity net gain are supported, this can help provide a cooling effect which can reduce heat island effect. However, increasing site density will increase heat island effects, which will need to be mitigated through design and the use of specific heat resistant materials (+)</li> <li>v. The policy provides recommendations for flood resistance and requires financial contributions towards flood mitigation measures, increasing the sites resilience to climate change. It also stipulates careful consideration must be taken of how buildings will impact surface water flows and recommends the use of SuDS to increase resilience to climate change. (++)</li> </ul>
<p><b>6. Natural resources</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce water consumption and improve water efficiency?</li> <li>ii. Will it reduce consumption of fossil fuels?</li> <li>iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?</li> <li>iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> <li>v. Will it make efficient use of land?</li> </ul>	<p style="text-align: center;">++</p>	<ul style="list-style-type: none"> <li>i. The policy supports increased density in order to make efficient use of the site. This will increase water consumption, however amongst the flood mitigation measures includes water harvesting and recycling strategies to minimize water consumption to the greatest extent possible. (+)</li> <li>ii. Due to the significant increase in density, there will be an increase in the consumption of fossil fuels. This will be mitigated as much as possible as the policy states that sustainability should be at the heart of proposals ensuring development should maximise energy efficiency and the use of renewable energy. Moreover, making more attractive and accessible pedestrian/cycle routes help decrease the use of fossil fuels (+)</li> <li>iii. The policy states that sustainability should be at the heart of proposals which includes the use of materials and natural resources as part of a new scheme. Development proposals will also be expected to follow City Plan and London policies that encourage the recycling and reuse of resources to reduce consumption of natural resources as much as possible. (e.g. Policy 37 C) (++)</li> <li>iv. Same as above concerning the use of renewable/sustainable materials (e.g. Policy 38.11) (++)</li> </ul>

		v. The policy supports the site's redevelopment in order to make efficient use of a currently underutilised and non-accessible site. There are opportunities to provide significant amounts of housing, community facilities, accessible play space and open space and increase the number of jobs on site. (++)
<b>7. Flood risk and water quality</b>		
i. Will it minimise flood risk from all sources of flooding?		i. The policy advocates the increased provision of permeable surfaces to address the risk of surface water flooding. Other sources of flooding can be mitigated through increased urban greening (SuDS and green infrastructure) and a list of flood mitigation recommendations outlined in the policy. (++)
ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?		ii. The site is in flood zone 3 and is a surface water hotspot, placing new residential homes in a flood prone area may increase the risk of property damage due to storm events. However, the policy states that a Site Specific Flood Risk Assessment will be needed as well as financial contributions for flood mitigation measures to minimise the potential impact of heavy rainfall on property. (+)
iii. Will it reduce combined sewer overflow events?		iii. The policy states that development should follow the council's SFRA which explains any proposed system should aim to remove surface water from the combined sewer network and provide water quality treatment. (+)
iv. Will it protect water quality?	+	iv. iv. Land on the site is contaminated land due to historical and current use, however the policy advises development maximises the use of natural filtration techniques (like SuDS) to ameliorate water quality. (+)
<b>8. Biodiversity</b>		
i. Will it protect, enhance and increase biodiversity and protect habitats?		i. The policy states that opportunities to green the area to deliver biodiversity net gain should be taken, this will ensure habitats are protected and enhanced. (++)
ii. Will it preserve Sites of Importance for Nature Conservation?		ii. No impacts identified
iii. Will it improve access to and promote educational value of sites of biodiversity interest?	++	iii. Access to local play space/local green space is required in this allocation, this as well as the preference for community land uses, creates opportunities for promoting educational value of sites of biodiversity interest. (++)
iv. Will it conserve and enhance species and habitats?		iv. The policy requires an increase in urban greening of the public realm, this will help conserve and enhance species and habitats. (++)
<b>9. Air quality</b>		
i. Will it improve air quality?	++	i. The policy asks that any development within the site is designed to ensure air pollution is minimised. Furthermore, there is an emphasis on permeability and



<p>ii. Will it reduce emissions of key pollutants?</p>		<p>public realm improvements which will make active modes of transport more accessible, safer and convenient. This should reduce the need for car usage and help ameliorate air quality. The policy also calls for an increase in biodiversity/urban greening which provides a natural solution improving local air quality. However, the retention of the railways (which will include some diesel trains) will need to be mitigated. (++)</p> <p>ii. Yes, for reasons mentioned above (++)</p>
<p><b>10. Noise</b></p> <p>i. Will it reduce noise concerns and noise complaints?</p> <p>ii. Will it reduce noise levels?</p>	+	<p>i. The policy asks that development ensures that noise pollution is minimised and responds to nearby noise pollution from the railway line. (+)</p> <p>ii. No, the policy supports intensification of the site which will increase noise levels, but this will be mitigated through design, as stipulated in the policy (+)</p>
<p><b>11. Transport</b></p> <p>i. Will it reduce volumes of traffic?</p> <p>ii. Will it encourage walking and cycling?</p> <p>iii. Will it increase proportion of journeys using modes other than the car?</p> <p>iv. Will it improve public transport accessibility?</p>	++	<p>i. The policy asks for new community facilities and social infrastructure within a mixed used scheme, making services more locally accessible. Furthermore, the policy calls for new pedestrian through routes. These factors should reduce occupants need to travel and their need to use private motor vehicles, which should have a positive impact on nearby traffic. (++)</p> <p>ii. The policy calls for increased permeability through the site to enable safe and attractive pedestrian access from Ebury Bridge to the River Thames. Furthermore, working with neighbouring sites to ensure connectivity is enhanced across the wider area is encouraged. These public realm improvements should have wayfinding opportunities and support cycle infrastructure to encourage both walking and cycling. (++)</p> <p>iii. For the reasons mentioned in i and ii, yes (++)</p> <p>iv. Yes, new routes will expand the network linking Victoria to Grosvenor Road and residential estates east and west. Creating better permeability and connectivity throughout the site should increase the PTAL rating of the south section. (++)</p>
<p><b>12. Waste</b></p> <p>i. Will it reduce consumption of materials and resources?</p> <p>ii. Will it reduce household waste?</p>	+	<p>i. The policy supports the intensification of uses on the site which will increase consumption of materials and resources however, the policy seeks to put sustainability at the heart of proposals through retaining and re-purposing buildings on site and ensuring that new buildings should be as energy efficient as possible, this will contribute to the reduction of energy resources. (+)</p>

<ul style="list-style-type: none"> <li>iii. Will it increase recycling, recovery and re-use?</li> <li>iv. Will it reduce construction waste?</li> </ul>		<ul style="list-style-type: none"> <li>ii. The policy supports a residential led development, bringing a significant number of new homes to the site, this will increase household waste. That being said, the proposal seeks to put sustainability at the heart of proposals through reducing waste reduction and providing recycling waste bins and encouraging recycling/re-use practices. (+)</li> <li>iii. The policy requires the use of SuDS which can aid in the recycling and re-use of water and new residential and community spaces can provide more opportunity to implement recycling infrastructure (+)</li> <li>iv. The policy indicates that development on this site will be supported in order to meet housing need, contribute to economic growth and incorporate public realm improvements, this will bring an increase in construction waste. The policy however, seeks to put sustainability at the heart of proposals through initiatives such as the minimisation of construction waste through retaining and re-purposing the Grade II Listed building on site and prioritising the use of recycled and sustainable materials. (+)</li> </ul>
<p><b>13. Heritage</b></p> <ul style="list-style-type: none"> <li>i. Will it conserve or enhance heritage sites and cultural value?</li> <li>ii. Will it protect strategic views?</li> <li>iii. Will it conserve or enhance heritage assets and their settings?</li> <li>iv. Will it help preserve, enhance and record archaeological features and their settings?</li> <li>v. Will it protect and enhance the setting of the Westminster World Heritage Site?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. One of the key policy requirements is the need for development to balance growth against heritage sites and local cultural value. This includes conserving and enhancing local assets. (++)</li> <li>ii. Proposals will be required to respect strategic views of local heritage assets and the policy advises buildings to be of varying heights to accomplish this. (++)</li> <li>iii. The policy requires proposals be sympathetic to local character and history, the designs should complement the wider neighbourhood context and avoid negatively impact the Conservation Areas. However, the policy supports the increase of active frontage and food/beverage/leisure uses, overall increased intensification of the site and continued use of the railways – proposals will need to carefully consider impacts from noise on local heritage. That being said, the policy seeks to re-purpose and retrofit the existing Grade II listed building which should seek to enhance heritage assets and their settings. (+)</li> <li>iv. The allocation lists Pimlico Archaeological Priority Area as one of the sites key constraints. This means development will be expected to adhere to City Plan Policy 39 O and P. (+)</li> </ul>

		v. No impact identified
<b>14. Public Realm &amp; Townscape</b> i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	++	i. Yes, the policy requires improvements to public realm (new, safe and accessible transport routes and open space). It also requires that new buildings respond to local townscape of Pimlico and Ebury. (++) ii. Yes, to ensure the design requirements of the policy are achieved, exemplary design standards will be needed. (++) iii. New public realm improvements should include new waste disposal opportunities and new residential/social uses will also provide more opportunities to dispose of rubbish correctly, decreasing litter. (+) iv. One of the key principles for this site allocation is increased accessibility of routes, more public realm and green infrastructure. This includes increasing access to open and play spaces. (++) v. Yes, the policy states proposals should be designed with the needs of all users, including those with mobility issues. (++)
<b>15. Open Space</b> i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	++	i. The policy supports the enhancement of new open spaces in order to support community interaction and address green space deprivation (++) ii. Yes, the policy encourages development to think carefully about the local townscape character including potentially incorporating the reuse of existing important buildings of townscape value. This will help improve landscape character (++) iii. The creation of publicly accessible open space is included as a policy requirement for the allocation. The policy includes improving permeability and access between the Peabody Avenue estate and the site to encourage users of existing residents to open spaces within the new development. (++) iv. Flooding is a major concern for this site, for this reason the policy emphatically supports the use of green infrastructure (e.g. SuDS) as part of flood mitigation. Furthermore, proposals should also ameliorate the biodiversity levels on site, which also means enhancement of the green infrastructure network. (++)
<b>16. Employment Opportunities</b> i. Will it improve qualifications, skills or training?	++	i. The policy presents many opportunities to improve qualifications and training through the continued presence of the British Transport Police and the

<ul style="list-style-type: none"> <li>ii. Will it create new jobs and reduce unemployment?</li> <li>iii. Will it provide jobs for those most in need?</li> <li>iv. Will it improve earnings?</li> <li>v. Will it promote equality of opportunity across the city by tackling barriers to employment?</li> </ul>		<p>introduction of retail/food and beverage/leisure floorspace and community uses (which can be targeted at aiding skill development/increasing employability). (+)</p> <ul style="list-style-type: none"> <li>ii. For the reasons mentioned in i, there will be new job creation, and this can contribute to reducing unemployment. Moreover, the policy allocates this site for major development which means employment prospects for local residents throughout construction (++)</li> <li>iii. The policy states that opportunities should be explored to provide affordable workspace. Even in the event that this is not included within development plans, as a major development, the construction of any scheme on-site will help to provide new jobs. The construction sector can provide a wide array of jobs for people with differing skillsets. As such, this can assist in providing jobs to people most in need. (++)</li> <li>iv. The policy seeks to support a residential led scheme so potential improvements to earnings may be less than that of a commercial led scheme. However, the continued use of the train sidings/railway and introduction of new active frontages and leisure opportunities will improve earnings on a site which is currently underutilised. (++)</li> <li>v. Increasing accessibility, mobility and creating urban connectivity of the site to the wider Victoria area are priorities in the policy. This can help mitigate some barriers to employment. (++)</li> </ul>
<p><b>17. Economy</b></p> <ul style="list-style-type: none"> <li>i. Will it improve business development and environment?</li> <li>ii. Will it improve business resilience and economy?</li> <li>iii. Will it encourage new business start-ups, small businesses and opportunities for local people?</li> <li>iv. Will it promote business in key sectors?</li> <li>v. Will it promote regeneration?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy focuses mainly on delivering residential uses, open space and enhancing heritage conservation. Even though provision for commercial space will be small, retail/leisure businesses will be supported in this location, providing improvements to some business development (+)</li> <li>ii. The policy seeks to improve connectivity and permeability, through and around the site. This will increase footfall in this location and will also improve connectivity with Victoria, improving travel throughout the CAZ. This will improve the local economy (++)</li> <li>iii. The policy will bring forward a mixed-use scheme which will support new business start-ups and small businesses and provide opportunities for local people. (++)</li> </ul>

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|  |  | <ul style="list-style-type: none"><li>iv. The site will continue to provide employment for railway which is a key worker job (transportation) (++)</li><li>v. The policy supports a residential led scheme and looks to deliver a range of public benefits (public realm/open space). Furthermore, proposals should be in keeping with the urban grain of neighbouring areas, this includes the regeneration scheme in Ebury. This shows the policy will promote regeneration. (++)</li></ul> |
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## **Land adjacent to Royal Oak**

### **Summary of findings:**

#### **1. Communities:**

The policy will have a major positive effect on achieving sustainability objectives for communities. A commercial led, mixed-use development (with public realm enhancements and non-conventional residential uses) will deliver a range of new local shops and services, increasing access to facilities that can support the local community. Community engagement may also be enhanced by new development, as this will provide opportunity for community participation through public consultation in the decision-making process. The allocation also supports activation of public spaces at ground floor level and public realm improvements, that can make more inclusive and vibrant areas conducive to community activity. Cumulatively, the policy will greatly contribute to creating a thriving community in Westminster.

#### **2. Crime Reduction**

The policy will have a major positive effect on achieving sustainability objectives for crime reduction. Following the policy, development will include new and improved walkways and cycleways and pay close attention to design in order to make public spaces safer and to discourage crime and antisocial behaviour. Furthermore, the openness of the site will be enhanced which will increase natural surveillance and proper waste disposal opportunities will be included, preventing other forms of negative behaviour such as fly tipping. In conclusion, the policy should have a positive impact on crime and also the perception of crime in the area.

#### **3. Housing:**

The policy will have a minor positive impact on achieving sustainability objectives for housing. The policy supports the provision of non-conventional housing (such as student accommodation and live/workspaces). These units are expected to be of high-quality, providing healthy living environments. Furthermore, non-conventional units will offer greater variety of housing that are fit for purpose and as the site is on public land, a minimum of 50% of housing provided should be affordable, contributing to Westminster's affordable housing need. However, the focus on non-conventional housing means the variety of units on offer will be limited and some groups (large families, the elderly) will not be accommodated for.

#### **4. Health and Wellbeing:**

The policy will have a major positive effect on achieving sustainability objectives for Health and Wellbeing. The increase in activation of ground floor public spaces and public realm improvements will help encourage outdoor activity. Furthermore, improvements such as the expansion of the pedestrian route network towards Paddington should encourage more modal shift to healthier forms of transport. As the policy supports commercial-led development, it is anticipated the number of local services provided will increase, better catering to the needs of the local community. In addition, the new non-conventional residential uses will provide safe, healthy and fit for purpose living environments for residents. These improvements will have a substantial positive impact on

health and wellbeing however, it is noted that negative impacts from the active railway and proximity to the Westway will need to be mitigated. Cumulatively, the improvements proposed by the policy will create healthy homes and work environments that are conducive to a high quality of life.

## **5. Climate Change**

The policy will have a minor positive effect on achieving sustainability objectives for climate change. The policy (in context with the development plan) requires new development to maximise sustainability in the operation of new buildings, ensuring they are energy efficient and carbon neutral. This contributes to reducing developments impacts on climate change. In addition, the policy supports new public realm improvements, increasing connectivity in and around the site and making active travel more accessible. Moreover, a key objective is to enhance access to Royal Oak station. Both these changes will encourage greater use of public transport and/or active transport, reducing the need for private motor vehicles.

The policy also supports opportunities to reprovide and improve biodiversity on site which will provide multiple benefits for climate change, such as increasing flood resilience.

Even though these improvements will have a positive impact, it is noted that the intensification of uses on site will require intense structural works which will likely produce greenhouse emissions which will need to be mitigate. Furthermore, increased density on site will likely increase the emission of greenhouse gases for the lifetime of the development and urban heat island effect, which will also need to be mitigated. Cumulatively, the policy will have a minor positive impact on climate change.

## **6. Natural Resources**

The policy will have a minor positive impact on achieving sustainable objectives for Natural Resources. The policy seeks to increase the density on site which will increase water consumption. In addition, delivering new commercial and residential uses will also increase the consumption of fossil fuels, during construction and throughout the lifetime of the development.

However, the policy emphasises that sustainability should run through the heart of proposals. This means water consumption and fossil fuel consumption should be mitigated. It also means the use of renewable energy should be prioritised where possible. Furthermore, the policy encourages the reuse and recycling of materials, reducing the consumption of natural resources. The policy also calls for the transformation of currently underutilized and inaccessible land to commercial and residential uses and public spaces that deliver significant public benefit. This will make efficient use of the land. In conclusion, this means the policy will have a minor positive impact on Natural Resources.

## **7. Flood Risk and Water Quality**

The proposed policy will have a minor positive effect on achieving sustainability objectives for flood risk and water quality. The policy encourages the integration of green infrastructure and increase amount of permeable surfaces. Moreover, within the context of the wider Development Plan, the policy supports proposals to submit a Site-Specific Flood Assessment. This will contribute to enhancing flood resilience on site.

However, it is noted that the site is a surface water hotspot and the risk of property damage from storm events is increased by placing development in this location. Moreover, due to previous uses, the land on site may be contaminated, decreasing water quality. These negative aspects will need to be mitigated by future proposals. For these reasons, it is considered that the policy will have a minor positive effect on flooding and water quality.

## **8. Biodiversity**

The policy will have a major positive effect on achieving sustainability objectives for biodiversity. The policy stipulates the provision of on-site urban greening is necessary to safeguard and enhance biodiversity and bolster habitat creation. Furthermore, the policy advocates for enhancements to the public realm, including the optimisation of pedestrian routes which should help increase public access to local green space and sites of biodiversity interest. Collectively, these improvements should mean the policy has a substantive positive impact in elevating on-site biodiversity.

## **9. Air Quality**

The policy will have a neutral positive effect on achieving sustainability objectives for air quality. Delivering new development on site will increase the amount of key pollutants released from construction, having a temporary negative impact on air quality. Furthermore, the development will take place near to the existing uses of the Westway and Royal Oak Station, so will need to mitigate air pollution from these sources.

However, the policy stipulates development must take measures to minimise negative impacts on the environment, this includes air pollution. Furthermore, improved pedestrian access in and around the site is a key objective of the policy. This will help encourage modal shift to active forms of transport, decreasing the use of polluting forms of transport (like the private car). Cumulatively, it is considered that the policy will have a neutral impact on air quality.

## **10. Noise**

The policy will have a neutral impact on achieving sustainability goals for Noise. The policy supports the optimisation of uses on a currently underutilised site, increasing noise levels on site during construction and the lifetime of the development. These will need to be mitigated. In addition, the neighbouring uses of the Westway and Royal Oak Station, may exacerbate noise levels, therefore these will also require mitigation. The policy does emphasise development should provide high-quality living conditions, this includes the integration of noise dampening materials, to decrease the impact of noise pollution. Ultimately, it is considered the policy will have a neutral impact on noise.

## **11. Transport**

The policy will have a major positive effect on achieving sustainability objectives for transport. Following the policy, new non-residential uses will be delivered, increasing the number of locally accessible shops and services. This should mean journey times are shorter, reducing local volumes of traffic. In addition, the policy supports new and improve pedestrianised routes and cycle paths. This should make active forms of transport safer and more accessible, decreasing reliance on the private car. In addition, a key objective of the policy is to enhance access to Royal Oak station. This will provide major support to a



key piece of public transport infrastructure in Westbourne, enhancing the wider public transport network. In conclusion, the policy is likely to have a major positive impact on transport.

## **12. Waste**

The policy will have a neutral impact on achieving sustainability objectives for waste. This is because the site is currently underutilised, therefore, the intensification of uses on site will likely result in an increase in the consumption of materials and resources. The policy also supports the provision of non-conventional residential uses which will increase the amount of household waste on site.

However, within the context of the wider development plan, the policy encourages the provision of proper waste management and integration of recycling opportunities to mitigate the increase in waste. Furthermore, the policy supports the reuse and recycling of any materials from the site, which should help decrease the consumption of natural resources. Moreover, due to the lack of existing buildings on site is anticipated there will be little construction waste produced. In conclusion, the policy is likely to have a neutral impact on waste.

## **13. Heritage**

The policy will have a minor positive effect on achieving sustainability objectives for Heritage. The policy emphasises the need to conserve the Grade II listed Westbourne Bridge and the setting of neighbouring conservation areas. It also requires development to respect strategic views of local heritage assets and the local townscape character. Whilst proposals to intensify the site can affect the setting of local heritage assets and conservation areas, the policy seeks for proposals to be sympathetic and considered to avoid negative impact.

## **14. Public Realm and Townscape**

The policy will have a major positive effect on achieving sustainability objectives for Public realm and townscape. The policy sets out design requirements for improving the public realm, such as creating new active travel routes and urban greening. The policy also expects development to meet exemplary design standards of the City Plan, which include considerations for quality, sustainability, accessibility and safety. Ground floor uses that provide active frontages will seek to contribute to addressing this. The policy also requires proposals to improve permeability throughout the area through addressing the severance issues caused by the railway, canal, Harrow Road and the Westway. The policy states that proposals should be designed with the needs of all abilities in mind, which can promote social inclusion and accessibility.

## **15. Open Space**

The policy will have a major positive effect on achieving sustainability objectives for Open space. Whilst the policy does not include the provision of open space, it does support the provision of more accessible, safe and better connected active travel routes which will improve access to nearby open spaces. The policy seeks to protect the local townscape character and local heritage assets, such as the Grade II listed Westbourne Bridge. This will positively enhance the

sense of place and identity. Enhancement of the green infrastructure network and amelioration of biodiversity levels on site will contribute positively to the ecological value and resilience of the site.

## **16. Employment Opportunities**

The policy will have a major positive effect on achieving sustainability objectives for Employment Opportunities. The policy presents many opportunities to improve qualifications and training through the provision of commercial floorspace comprising offices, light industrial and logistics. The policy will seek to create new jobs, especially for local residents by supporting major mixed-use development. The policy aims to increase accessibility, mobility and address the issues of severance caused by the railway, canal, Harrow Road and the Westway. These issues can act as barriers to employment for some people, and the policy can help mitigate them.

## **17. Economy**

The policy will have a major positive effect on achieving sustainability objectives for Economy. The policy seeks to deliver commercial-led development with some non-conventional residential uses and improve connectivity and permeability which will help to support business and business start-up opportunities for local people in the North West Economic development Area (NWEDA). The policy includes the retention of Royal Oak station site, which is a key worker job in transportation, and calls for development to improve access to public transport and provide more live/workspaces and non-conventional housing. Commercial uses appropriate for the site could help to promote wider regeneration in the area by meeting the spatial development priorities for the NWEDA.

Land adjacent to Royal Oak Policy Detailed Appraisal		
Sustainability Appraisal Objective	Score	Analysis
<b>1. Communities</b> <ul style="list-style-type: none"> <li>i. Will it improve access to local services, shops and community facilities?</li> <li>ii. Will it increase ability to influence decision-making (neighbourhoods)?</li> <li>iii. Will it foster an inclusive Westminster community?</li> <li>iv. Will it encourage engagement in community activity?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. Preferred land uses will be commercial development with the potential for residential units (especially non-conventional housing). This will bring forward suitable non-residential land uses which can improve access to local services. The allocations aim to improve permeability, improving access to the station. (++)</li> <li>ii. Extensive public consultation will take place during the application stage as this site allocation will be a large mixed-use scheme. This ensures community members can influence decision-making. Furthermore, providing more social housing is likely to encourage greater community participation in decision-making. (++)</li> <li>iii. The policy includes that public realm improvements should enhance the accessibility and mobility for those with disabilities, making the area more accessible for all. There is an opportunity to deliver some affordable housing, which can also contribute to creating an inclusive Westminster community. (++)</li> <li>iv. The policy calls for new non-residential uses, ground floor activation and public realm improvements, which can support community activity. (+)</li> </ul>
<b>2. Crime reduction</b> <ul style="list-style-type: none"> <li>i. Will it reduce crime, disorder and antisocial behaviour?</li> <li>ii. Will it reduce fear of crime, disorder and antisocial behaviour?</li> <li>iii. Will it reduce other behaviour adversely affecting the local environment?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy states proposals should provide safe, overlooked new walkways and increase the openness of the site (through potentially removing the northern boundary). This can contribute to the reduction of crime and antisocial behaviour. (++)</li> <li>ii. Similar to the above, these improvements may decrease the fear of crime and disorder. (++)</li> <li>iii. New residential and commercial uses bring more opportunities for efficient waste disposal and collection and better designed spaces. This can discourage behaviours such as fly tipping, vandalism and loitering. (+)</li> </ul>
<b>3. Housing</b> <ul style="list-style-type: none"> <li>i. Will it create high quality homes?</li> <li>ii. Will it increase range of affordable housing?</li> <li>iii. Will it reduce homelessness?</li> </ul>	+	<ul style="list-style-type: none"> <li>i. The policy seeks to ensure that any housing is only delivered where it can be carefully designed to maximise residential amenity for occupants. This will ensure that the homes brought forward are of high-quality. (++)</li> <li>ii. The policy calls for non-conventional residential development on public land. This means it is expected that a minimum of 50% of those units will be affordable, increasing the range and type of affordable housing products in the area. However,</li> </ul>

<ul style="list-style-type: none"> <li>iv. Will it provide housing than can help people stay independent for longer?</li> <li>v. Will it reduce number of unfit homes?</li> <li>vi. Will it provide a range of housing types and sizes?</li> </ul>		<p>the policy places an emphasis on the need for non-conventional residential units (such as student accommodation and live/workspaces). This means housing for some groups in Westminster's (e.g. large families and the elderly) will not be met (+)</p> <ul style="list-style-type: none"> <li>iii. More affordable housing units, especially non-conventional housing, on site would increase the housing availability in the area, which could contribute towards reduce homelessness for some groups. (+)</li> <li>iv. The policy states that residential dwellings are supported where they support the wider spatial strategy, such as live/workspaces, or are non-conventional housing which diversify the range of tenures. This will not specifically target older groups so may not produce homes that help people stay independent for longer. However, they should be accessible and meet the needs of those with disabilities. (0)</li> <li>v. The increased number of affordable homes on site means there is more opportunity for better provision of units that are fit for the purpose of local residents. Furthermore, the policy specifies it supports non-conventional housing such as live/work units which are specifically designed to accommodate work facilities. This helps decrease the number of unfit homes in Westminster. (++)</li> <li>vi. The policy supports non-conventional residential uses. This will help diversify the range of housing types and sizes in the area to a certain extent, however this diversification will be limited (i.e. it is unlikely to meet the needs of large families). (+)</li> </ul>
<p><b>4. Health and wellbeing</b></p> <ul style="list-style-type: none"> <li>i. Will it help improve health inequalities?</li> <li>ii. Will it contribute to a reduction in death rates?</li> <li>iii. Will it improve access/movement?</li> <li>iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity?</li> <li>v. Will it improve cultural wellbeing?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy seeks to bring forward improved connectivity and permeability, and access to enhanced biodiversity on the site. This help improve living conditions and facilitate convenient access to essential services for those who need it most. These improvements will help create a healthy environment to live in, contributing to mitigating health disparities. (++)</li> <li>ii. The policy seeks to ameliorate quality of life through improved access to services and creating a greener and more pedestrian friendly environment. This can contribute towards reducing death rates. However, extensive new development on this site will temporarily cause an increase in the amount of air pollution.</li> </ul>

<ul style="list-style-type: none"> <li>vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people?</li> <li>vii. Will it provide access to a healthy diet?</li> <li>viii. Will it create healthy homes and workplaces?</li> <li>ix. Will it increase healthy years life expectancy?</li> <li>x. Will it improve mental health and wellbeing?</li> <li>xi. Will it improve facilities and accessibility for people with disabilities?</li> </ul>		<p>Furthermore, the air quality impacts from nearby uses outside the site boundary (railways/Westway) will need to be mitigated (0)</p> <ul style="list-style-type: none"> <li>iii. Following the policy, proposals are expected to increase permeability throughout the area, particularly pedestrian access from Royal Oak Station towards Kingdom Street. This will expand the pedestrian route network towards Paddington. Moreover, new routes should be safe and designed to be inclusive and accessible for all users, regardless of ability. (++)</li> <li>iv. No impact identified (0)</li> <li>v. The policy states proposed schemes should be designed to ensure they do not harm the townscape of the local Conservation Areas or local heritage assets. This will help maintain culturally significant townscape which can contribute to improving cultural wellbeing. (+)</li> <li>vi. The policy calls for an increase in residential and commercial uses, which should bring forward more affordable housing, work opportunities and spaces for social interaction. This should help diminish social isolation and ameliorate mental well-being. However, due to the type of housing supported, it is unlikely to enhance housing options for the elderly. (+)</li> <li>vii. No impact identified (0)</li> <li>viii. The policy will bring forward new (affordable) homes that are better fit for purpose (such as live/work accommodation) and new workspaces to support offices, light industrial, logistics. With surrounding environmental and public realm improvements, this should create healthy homes and workplaces. (++)</li> <li>ix. Providing new homes (especially affordable homes) and creating safer, pedestrianised transport routes should improve healthy years life expectancy, however negative impacts from the active railway and proximity to the Westway will need to be mitigated due to the impact on residential amenity. (+)</li> <li>x. See answers to (i, v, ix) (++)</li> <li>xi. The policy requires that improvements to public realm include the provision of lifts or level access, meaning surrounding improvements will be more accessible for a range of abilities. (+)</li> </ul>
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<p><b>5. Climate change</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel?</li> <li>ii. Will it reduce ozone depleting emissions?</li> <li>iii. Will it reduce emissions through retrofitting new technology?</li> <li>iv. Will it reduce heat island effects on people and property?</li> <li>v. Will it increase resilience to climate change?</li> </ul>	+	<ul style="list-style-type: none"> <li>i. The policy states that new schemes should install low-carbon technology, maximise greening opportunities and increase pedestrian movement and accessibility to services and facilities (reducing the need for travel). This should help reduce greenhouse gas emissions. However, forthcoming proposals will probably require intense structural works to make the development sound, which will produce greenhouse emissions which will need to be mitigated. (+)</li> <li>ii. No impact identified (0)</li> <li>iii. No impact identified (0)</li> <li>iv. The policy supports opportunities to re-provide and expand the biodiversity; this can help provide a cooling effect which can reduce heat island effect. Increased site density will increase heat island effect, and this will need to be mitigated by design/using specific materials. (+)</li> <li>v. The policy states that any development will need to minimise surrounding environmental impacts, including heating, cooling and ventilation, increase the biodiversity level on site, this will help increase resilience to climate change (+)</li> </ul>
<p><b>6. Natural resources</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce water consumption and improve water efficiency?</li> <li>ii. Will it reduce consumption of fossil fuels?</li> <li>iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?</li> <li>iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> <li>v. Will it make efficient use of land?</li> </ul>	+	<ul style="list-style-type: none"> <li>i. The policy supports increased density to make efficient use of the land, meaning water consumption will increase, however this can be mitigated through flood mitigation measures (such as water harvesting and recycling). (0)</li> <li>ii. Development on this site will not reduce consumption of fossil fuels. However, the increase in fossil fuel consumption will be mitigated the development maximising energy efficiency and encouraging more active travel through new attractive, safe and accessible pedestrian/cycle routes. This will help decrease the use of fossil fuels. (0)</li> <li>iii. The policy supports the recycling and reuse of resources to reduce consumption of natural resources as much as possible. (+)</li> <li>iv. The policy states that sustainability should be at the heart of proposals. This includes prioritising the use of sustainable materials, such as renewable resources, where possible (+)</li> <li>v. The policy calls for development to make efficient use of the land, transforming a presently underutilized and inaccessible area. This offers the potential to deliver</li> </ul>

		substantial (non-conventional/fit for purpose) housing and enhance job opportunities. (++)
<b>7. Flood risk and water quality</b> <ul style="list-style-type: none"> <li>i. Will it minimise flood risk from all sources of flooding?</li> <li>ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?</li> <li>iii. Will it reduce combined sewer overflow events?</li> <li>iv. Will it protect water quality?</li> </ul>	+	<ul style="list-style-type: none"> <li>i. The policy supports the increased provision of green infrastructure, increasing the amount of permeable surfaces and opportunities for water retention which can help address flood risk. Moreover, development may also provide opportunities for a site surface water drainage system which will comply with the policy and policies within the wider Development Plan. (++)</li> <li>ii. The site is a surface water hotspot, placing new development in this location may increase the risk of property damage due to storm events. However, the development plan as a whole includes provisions to ensure flood risk mitigation (e.g. Policy 35) (+)</li> <li>iii. No impact identified (0)</li> <li>iv. Land on the site may be contaminated due to historical/current use, however the policy calls for development to increase green infrastructure (like SuDS) which will increase natural filtration and ameliorate water quality. (+)</li> </ul>
<b>8. Biodiversity</b> <ul style="list-style-type: none"> <li>i. Will it protect, enhance and increase biodiversity and protect habitats?</li> <li>ii. Will it preserve Sites of Importance for Nature Conservation?</li> <li>iii. Will it improve access to and promote educational value of sites of biodiversity interest?</li> <li>iv. Will it conserve and enhance species and habitats?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy emphasizes the need to seize opportunities for greening the area and habitat creation to achieve biodiversity net gain, safeguarding and improving habitats in the process. (++)</li> <li>ii. No impacts identified (0)</li> <li>iii. The policy stipulates development must improve permeability throughout the area, particularly pedestrian access. This will improve access to nearby sites of biodiversity interest such as Paddington Basin and Westbourne Green Open Space (++)</li> <li>iv. The policy requires an increase in urban greening of the public realm, this will help conserve and enhance species and habitats. (++)</li> </ul>
<b>9. Air quality</b> <ul style="list-style-type: none"> <li>i. Will it improve air quality?</li> <li>ii. Will it reduce emissions of key pollutants?</li> </ul>	0	<ul style="list-style-type: none"> <li>i. Extensive new development on this site will temporarily cause an increase the amount of air pollution, and the air quality impacts from nearby railways/Westway will also need to be mitigated, however the policy states that development must take opportunities to green the area and environmental impacts (especially air pollution) should be minimised. (0)</li> </ul>

		<ul style="list-style-type: none"> <li>ii. As aforementioned, intensification of the site is likely to increase emissions of key pollutants (especially during construction). However, the policy focuses on enhancing permeability and the public realm, aiming to improve accessibility, safety, and convenience for active modes of transport, and access to public transport. This is expected to decrease reliance on cars and contribute to the improvement of air quality. (0)</li> </ul>
<b>10. Noise</b> <ul style="list-style-type: none"> <li>i. Will it reduce noise concerns and noise complaints?</li> <li>ii. Will it reduce noise levels?</li> </ul>	0	<ul style="list-style-type: none"> <li>i. The policy asks that development ensures that noise pollution is minimised through dampening features to ensure noise pollution from vehicular traffic and the nearby railway noise does not impact residential amenity. (+)</li> <li>ii. The policy supports intensification of the site which will increase noise levels, especially during construction. However, in the context of the plan as a whole will, the impact of noise levels will be mitigated (e.g. City Plan policy 33). (0)</li> </ul>
<b>11. Transport</b> <ul style="list-style-type: none"> <li>i. Will it reduce volumes of traffic?</li> <li>ii. Will it encourage walking and cycling?</li> <li>iii. Will it increase proportion of journeys using modes other than the car?</li> <li>iv. Will it improve public transport accessibility?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy requests new employment and commercial spaces in a mixed-use development, enhancing local accessibility to services. Additionally, the policy advocates for the creation of new pedestrian/cycle pathways, increasing connectivity and permeability around the site. These measures should decrease reliance on private vehicles, thereby positively influencing local traffic conditions. Furthermore, enhanced access to Royal Oak station is a key objective for the site. Enhancing access to this key piece of transport infrastructure will increase the sites PTAL rating , and further contribute to reducing volumes of traffic. (++)</li> <li>ii. The policy stipulates increased permeability through the site to enable safe and attractive pedestrian access, particularly from Royal Oak Station towards Kingdom Street. Furthermore, the creation of vehicle free routes within the site, particularly in conjunction with any envisioned commercial land uses is encouraged. (++)</li> <li>iii. See answers to i and ii (++)</li> <li>iv. The policy supports new mixed-use development (including public realm improvements) on site which is in an area with a high PTAL rating. Enhancing permeability and connectivity in such an area should improve public transport accessibility (+)</li> </ul>
<b>12. Waste</b>	0	<ul style="list-style-type: none"> <li>i. As the site is currently underused. New, major, mixed-used development will increase consumption of materials and resources however, the allocation in the</li> </ul>



<ul style="list-style-type: none"> <li>i. Will it reduce consumption of materials and resources?</li> <li>ii. Will it reduce household waste?</li> <li>iii. Will it increase recycling, recovery and re-use?</li> <li>iv. Will it reduce construction waste?</li> </ul>		<p>context of the development plan will encourage reduction of consumption of materials/resources. (e.g. Policy 36 and 37) (0)</p> <ul style="list-style-type: none"> <li>ii. The policy supports commercial as well as residential uses, bringing forward some residential floorspace. This will increase household waste on site however, in the context of the development plan as a whole, the policy supports waste management that focuses on maximising waste reduction and reuse and recycling. This means appropriate recycling facilities should be provided within the development, helping to mitigate any increase in household waste. (0)</li> <li>iii. The policy supports identifying opportunities for material re-use on site. Also, see answer to (ii) (+)</li> <li>iv. The policy supports major development, however there is limited demolition required to facilitate any development, so it is unlikely to result in large volumes of construction waste. (0)</li> </ul>
<p><b>13. Heritage</b></p> <ul style="list-style-type: none"> <li>i. Will it conserve or enhance heritage sites and cultural value?</li> <li>ii. Will it protect strategic views?</li> <li>iii. Will it conserve or enhance heritage assets and their settings?</li> <li>iv. Will it help preserve, enhance and record archaeological features and their settings?</li> <li>v. Will it protect and enhance the setting of the Westminster World Heritage Site?</li> </ul>	+	<ul style="list-style-type: none"> <li>i. The policy emphasises requirements that buildings near to the Grade II Listed Westbourne Bridge be set back in order to conserve this local asset. Furthermore, development should seek to preserve the setting of neighbouring conservation areas. (+)</li> <li>ii. Following the policy, proposals will be required to respect strategic views of local heritage assets and establish adequate spacing between buildings to ensure views are not obstructed. (+)</li> <li>iii. The policy supports the increase of active frontages, continued use of the railways/Westway and overall increased intensification of the site which may impact heritage assets and their settings. Proposals must therefore be sympathetic to local Conservation Areas and mitigate environmental impacts (noise/air pollution) as much as possible to avoid this negative impact. (+)</li> <li>iv. No impact identified (0)</li> <li>v. No impact identified (0)</li> </ul>
<p><b>14. Public Realm &amp; Townscape</b></p> <ul style="list-style-type: none"> <li>i. Will it enhance townscape?</li> <li>ii. Will it encourage exemplary design standards?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy requires improvements to public realm (new, safe and accessible active transport routes and enhanced urban greening). It also requires that massing responds to local conservation areas and be stepped down on the western end of the site. Development will also be required to respect the integrity of the adjacent</li> </ul>

<ul style="list-style-type: none"> <li>iii. Will it reduce litter?</li> <li>iv. Will it enhance the quality of public realm?</li> <li>v. Will it improve access and mobility for all equality group strands?</li> </ul>		<p>tall building cluster. This will ensure local townscape is not harmed and enhanced. (+)</p> <ul style="list-style-type: none"> <li>ii. In order to fulfil the policy’s design requirements (and those of the City Plan) exemplary design standards will be needed. (++)</li> <li>iii. The policy advises the site will support new commercial or residential functions. These uses will offer options for proper rubbish disposal (following City Plan guidance), leading to a reduction in litter. (+)</li> <li>iv. The policy requires development to improve permeability throughout the area (addressing severance issues caused by the railway, canal, Harrow Road and the Westway), enhance urban greening and create ground floor uses that provide active frontages where they afront the highway. These changes will help activate the public realm, increase its attractiveness and provide safety through natural surveillance. (++)</li> <li>v. The policy states that proposals should be designed with the needs of all abilities in mind. (++)</li> </ul>
<p><b>15. Open Space</b></p> <ul style="list-style-type: none"> <li>i. Will it enhance the quality of open space?</li> <li>ii. Will it improve landscape character?</li> <li>iii. Will it improve access to open space?</li> <li>iv. Will it enhance the green infrastructure network?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy does not include the introduction of open space. (0)</li> <li>ii. The policy encourages development to think carefully about the local townscape character and local heritage assets such as The Grade II listed Westbourne Bridge. Development should be designed in a way that complements the local character. (+)</li> <li>iii. The creation of more accessible, safe and better connect pedestrian routes will improve access to nearby areas of open space. (++)</li> <li>iv. The policy requires proposals to ameliorate biodiversity levels on site, which includes enhancement of the green infrastructure network. (++)</li> </ul>
<p><b>16. Employment Opportunities</b></p> <ul style="list-style-type: none"> <li>i. Will it improve qualifications, skills or training?</li> <li>ii. Will it create new jobs and reduce unemployment?</li> <li>iii. Will it provide jobs for those most in need?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy presents many opportunities to improve qualifications and training through the introduction of commercial floorspace comprised of offices, light industrial and logistics. Furthermore, construction on site will also provide more training opportunities. (+)</li> <li>ii. For the reasons mentioned in i, there will be new job creation, contributing to a decrease in unemployment. Furthermore, the proposed policy designates this site</li> </ul>

<ul style="list-style-type: none"> <li>iv. Will it improve earnings?</li> <li>v. Will it promote equality of opportunity across the city by tackling barriers to employment?</li> </ul>		<ul style="list-style-type: none"> <li>for significant development, thereby offering employment opportunities to local residents throughout the construction phase. (++)</li> <li>iii. As the policy supports major mixed-use development, jobs created during the construction process will go to those furthest from the labour market (++)</li> <li>iv. The policy seeks to support a commercial uses so there is great potential to improve earnings. (++)</li> <li>v. Increasing accessibility, mobility and addressing the issues of severance caused by the railway, canal, Harrow Road and the Westway can help mitigate some barriers to employment. (++)</li> </ul>
<p><b>17. Economy</b></p> <ul style="list-style-type: none"> <li>i. Will it improve business development and environment?</li> <li>ii. Will it improve business resilience and economy?</li> <li>iii. Will it encourage new business start-ups, small businesses and opportunities for local people?</li> <li>iv. Will it promote business in key sectors?</li> <li>v. Will it promote regeneration?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. The policy seeks to bring forward a commercial as well as residential uses. This will help to improve business development and environment by increasing footfall and providing a variety of business opportunities. (++)</li> <li>ii. The policy seeks to improve connectivity and permeability, through and around the site. This will increase footfall in this location, improve connectivity with Paddington Opportunity Area and improve travel throughout the NWEDA. This will improve the local economy and boost business resilience in the area. (++)</li> <li>iii. Commercial uses are supported in the policy which will create opportunities for new business start-ups, small business and opportunities for local people. (++)</li> <li>iv. The policy includes the retention of Royal Oak station site which is a key worker job (transportation). The policy also calls for development to improve access to public transport and provide more live/workspaces and non-conventional housing. These factors will help promote business in key sectors. (++)</li> <li>v. The policy suggests commercial uses appropriate for the site, this could help promote wider regeneration in the area by meeting the Spatial Development Priorities for the North West Economic Development Area. (++)</li> </ul>

## **St Mary's Hospital**

### **Summary of findings:**

#### **1. Communities**

The policy will have a major positive effect on achieving sustainability objectives for Communities. A mixed-use development that seeks to provide a modern hospital with additional commercial-led growth, enhanced public realm, residential development and improved food and beverage offer will create a thriving and inclusive community in Westminster. Consolidation and redevelopment of the site within a highly sustainable and accessible location will provide opportunities for increased community activity and community participation in decision-making.

#### **2. Crime Reduction**

The policy will have a major positive effect on achieving sustainability objectives for Crime Reduction. The policy will ensure vacant areas across the site are reduced and that there is greater activation at ground floor level at all hours of the day. Suitable design measures will be incorporated to ensure that overshadowing is limited and the presence of residential units where possible will limit travel for key workers and increase passive surveillance.

#### **3. Housing**

The policy will have a major positive effect on achieving sustainability objectives for Housing. The policy supports the development of high-quality homes (minimum of 50% affordable) which will increase the quality of affordable housing in Westminster whilst also increasing the range of housing types/sizes on offer. This will also help to reduce homelessness and could also increase the number of homes available for specific demographic groups such as the elderly. This ensures residents have safe, inclusive housing which fosters independence.

#### **4. Health and Wellbeing**

The policy will have a major positive effect on achieving sustainability objectives for Health and Wellbeing. The provision of a new, modern and efficient hospital will help to enhance the level of care provided, contributing to improving health inequalities and reducing death rates. Enhanced permeability and public realm will ensure that access and movement within and around the site are improved and encourage healthy lifestyles with opportunities to socialise, dwell and rest. Residential units on site will help to foster an inclusive community, promote cultural wellbeing and support people's independence and wellbeing by creating a range of housing. As part of a modern hospital, opportunities will exist for improving catering facilities to promote and improve access to a healthy diet for employees, patients and visitors. This will, as a result, help to create healthy homes and workplaces that provide a high quality of life for all.

#### **5. Climate Change**

The policy will have a major positive effect on achieving sustainability objectives for Climate Change. A new modern hospital is part of the vision and core principle for the policy, this will help to modernise aged energy systems and ensure new proposals are energy efficient and reduce greenhouse gas emissions.

Opportunities to explore new technologies as part of modernising the hospital can be taken, including remote consultations, retrofitting new technology, implementing green roofs, green spaces and permeable surfaces to help absorb heat and reduce the urban heat island effect and investing in backup power systems in efforts to increase resilience to climate change.

## **6. Natural Resources**

The policy will have a major positive effect on achieving sustainability objectives for Natural Resources. The policy sets out support for a new modern hospital with supporting residential and commercial/community uses that will help to reinstate new water systems that will reduce water consumption and improve water efficiency. A new scheme can help to reduce the consumption of fossil fuels and non-renewable resources by utilising renewable energy and prioritising recycling of construction materials to more sustainable alternatives. The policy seeks to maximise the use of land by consolidating the site and releasing surplus land for a mixed use development to improve the layout and make the most efficient use of land in an urban and sustainable location.

## **7. Flood Risk and Water Quality**

The policy will have a major positive effect on achieving sustainability objectives for Flood Risk and Water Quality. The policy sets out the provision of public spaces and enhanced public realm which includes dwell spaces and can incorporate the use of Sustainable Drainage Systems that minimise flood risk. In addition, as part of redevelopment of the site, opportunities can be taken to modernise aged systems which can reduce combined sewer overflow events and protect water quality.

## **8. Biodiversity**

The policy will have a major positive effect on achieving sustainability objectives for Biodiversity. The policy seeks to put sustainability at the heart of the proposals including securing biodiversity net gain and promote habitat creation. The site is located directly adjacent to the canal basin, a Site of Importance for Nature Conservation (SINC) which the policy seeks to preserve and enhance through permeability improvements and activation of the site along the canal. Overall, this will help to conserve and enhance species and habitats and promote educational value of sites of biodiversity interest, such as the canal basin.

## **9. Air Quality**

The policy will have a minor positive effect on achieving sustainability objectives for Air Quality. Some improvements to air quality and reduction of emissions from key pollutants will be made as part of modernising the hospital and reducing carbon emissions however, some degree of air quality will still be impacted due to the traffic movements to and from the hospital, including ambulance servicing. The policy though, makes clear that proposals should clearly detail how all transport needs will be met in a co-ordinated manner that does not compromise aims of a sustainable development.

## **10. Noise**

The policy will have a minor positive effect on achieving sustainability objectives for Noise. As a mixed-use scheme that includes the provision of some residential uses, there is the potential for more noise concerns and complaints to be raised with the sites continued use as a hospital. The policy however, makes clear that any new residential development should secure high quality living conditions through the provision of high levels of sound insulation. Although this will not seek to remove high levels of noise, this should seek to reduce the impact of noise levels associated with the hospital use upon neighbours.

## **11. Transport**

The policy will have a major positive effect on achieving sustainability objectives for Transport. The site is well connected and in a sustainable location and proposals to consolidate the hospital to release surplus land should seek to reduce volumes of traffic and encourage use of sustainable modes of transport. The ambulance serving of the hospital however, will be retained which will mean that some traffic will remain, along with the use of taxis and other rideshare vehicles for people who may not be able to access the hospital via public transport. To mitigate this, the policy makes clear that transport needs will need to be met in a co-ordinated manner that does not compromise aims of sustainable development. In addition to this, the policy seeks to enhance permeability through the site and improve the public realm, assisting to encourage walking and cycling. This also seeks to contribute to the increased proportion of journeys using modes other than cars. Improved legibility for those arriving from Paddington Station as part of the policy, will also seek to improve public transport accessibility and promote sustainable modes of transport.

## **12. Waste**

The policy will have a minor positive effect on achieving sustainability objectives for Waste. The policy will seek to modernise the hospital which will improve existing aged systems and ensure consumption of materials and resources are reduced. The addition of any new homes or commercial premises will however increase overall waste volumes. It is anticipated that this can be minimised through increasing and encouraging recycling on site. Recycling and reuse will also seek to be increased through the policy by retaining and reusing existing buildings on site, therefore minimising construction waste.

## **13. Heritage**

The policy will have a negligible effect on achieving sustainability objectives for Heritage. The hospital currently contains a number of heritage assets throughout the site that could be impacted should a new scheme come forward. However, the policy seeks to ensure that the heritage values are respected and responded to as part of delivering a new hospital on site. In addition to this, the policy makes clear that building heights should grade down from the height of any new hospital, which should also seek to minimise impact on strategic views. It is made clear that any impacts on heritage assets, strategic views and the setting of the Westminster World Heritage Site are protected and, where possible, enhanced as part of the policy.

## **14. Public Realm and Townscape**

The policy will have a major positive effect on achieving sustainability objectives for Public Realm and Townscape. A core principle of the policy seeks to enhance permeability through the site and activating public spaces. This will seek to enhance the townscape and quality of the public realm. The policy and

vision for the site also seeks to ensure proposals are of high quality and provide opportunities for encouraging exemplary design standards. Consolidation of the hospital should seek to encourage high quality design by also ensuring that access and wayfinding is improved, therefore ensuring mobility for all users of the hospital and wider site are taken into account.

## **15. Open Space**

The policy will have a major positive effect on achieving sustainability objectives for Open Space. As part of the core principles for the site, enhanced 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. In addition to this, consolidation of the site will help to improve the landscape character by enhancing and linking the site with its surroundings, including along the canal basin, Praed Street and South Wharf Road.

## **16. Employment Opportunities**

The policy will have a major positive effect on achieving sustainability objectives for Employment Opportunities. The vision for the site is to provide opportunities to contribute to the objectives of the Paddington Opportunity Area as an area for commercial-led growth. This will ensure there are increased opportunities to provide new jobs and schemes to improve qualifications, skills or training, particularly within the life sciences sector in connection with the hospital. Additional commercial floorspace will also seek to contribute to this and reducing unemployment, providing jobs for those most in need across a broad range of sectors. As a result, this will improve earnings in the area and promote equality of opportunity and tackling barriers to employment by ensuring jobs are created across different skill levels and sectors.

## **17. Economy**

The policy will have a major positive effect on achieving sustainability objectives for Economy. The policy seeks to contribute to the objectives of the Paddington Opportunity Area through providing a modern hospital and providing a mixed-use scheme. This should seek to improve the business development and environment in the area by increasing footfall, providing links to nearby businesses in the area and improving the attractiveness of the area. The policy seeks to encourage commercial-led growth by incorporating additional commercial floorspace as part of a new scheme for the site. This should seek to improve business resilience and economy, as well as encouraging new business start-ups and opportunities for local people. The site itself is located in a highly sustainable location that could help to promote wider regeneration, making it an attractive location for new businesses with its links to the hospital should seek to promote business key sectors.

St Mary's Hospital Policy Detailed Appraisal		
Sustainability Appraisal Objective	Score	Analysis
<b>1. Communities</b> i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	++	i. St Mary's hospital has a major positive effect on the community as it is located in central London, providing a key community facility to a wide population. The hospital is also walking distance to Paddington train station and a number of bus stops. The area is a mixed use with community facilities such as the canal, shops and restaurants nearby. The policy will ensure that the hospital can be delivered by securing an appropriate masterplan approach whilst delivering a high-quality scheme that respects and responds to its surroundings. Uses with active frontages could also provide a range of community uses that meet the needs of those working or living in the area. (++) ii. The policy seeks to ensure that the approach is delivered via a masterplan approach. This will allow for visitors and workers of the hospital, as well as the local community to be consulted and influence decision making as part of redevelopment proposals. (++) iii. St Mary's hospital is a public hospital, meaning it does help to foster an inclusive Westminster community by providing healthcare services to people from all walks of life. The policy makes clear that the site is within public ownership and therefore, require 50% of all housing units to be affordable. This will help to foster an inclusive Westminster community. In addition, the policy makes clear that proposals should be designed with the needs of all users, including those with mobility issues in mind and which promotes accessibility contributing to an inclusive Westminster. (++) iv. See response to answer ii and iii above. (++)
<b>2. Crime reduction</b> i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	++	i. As part of the policy, the new hospital which will have reduced vacant areas across the Estate and greater activation all hours of the day. The policy will ensure that lighting is enhanced and overshadowing is limited and provides suitable design measures to enhance accessibility along the south of the canal basin where this is operationally possible in the context of hospital security. Proposals will further reduce crime, disorder and antisocial behaviour by the presence of residential



		<p>units and activation of frontages which will also increase passive surveillance and the activation of the site after working hours (++)</p> <p>ii. As part of the requirement for 50% of housing units to be affordable, there are opportunities through this scheme to provide housing for key workers on shift at the hospital which will reduce the fear of crime by limiting travel at unsociable hours. Other commercial uses will also assist in activating the area at all times of the day, reducing fear of crime and helping to deter antisocial behaviour. This will be further enhanced through the provision of residential units which will again ensure a presence on site after business hours (++)</p> <p>iii. Enhancing the public realm and activating frontages should seek to reduce other behaviour adversely affecting the local environment. (++)</p>
<p><b>3. Housing</b></p> <p>i. Will it create high quality homes?</p> <p>ii. Will it increase range of affordable housing?</p> <p>iii. Will it reduce homelessness?</p> <p>iv. Will it provide housing than can help people stay independent for longer?</p> <p>v. Will it reduce number of unfit homes?</p> <p>vi. Will it provide a range of housing types and sizes?</p>	<p>++</p>	<p>i. The provision of residential units as part of the scheme will increase the provision of high-quality new homes that will help to meet those most in need. (++)</p> <p>ii. The site is currently used by public bodies and is partly publicly owned. This means that 50% of new homes built on site will be expected to be affordable, increasing the range of affordable housing tenures available across the borough. (++)</p> <p>iii. The provision of affordable residential units on-site will seek to reduce homelessness through availability of more social housing to address waiting lists. (++)</p> <p>iv. As the ageing population increases, healthcare facilities like St Mary's Hospital must consider how their presence can support independent living for longer. The provision of residential units on-site would provide a range of homes that can help people stay independent for longer by providing homes for those most in need. In addition, the policy makes clear that proposals should be designed with the needs of all users, including those with mobility issues in mind and which promotes accessibility supporting people to stay independent for longer. (++)</p> <p>v. As the site does not currently support any housing, the scheme will not reduce the number of unfit homes across the City. (0)</p> <p>vi. The site is currently used by public bodies and is partly publicly owned. This means that 50% of new homes built on site will be expected to be affordable, increasing</p>

		the range of housing tenures, types and sizes to meet the needs of the community. (++)
<b>4. Health and wellbeing</b> i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?	++	i. A modern hospital can help to promote a wide range of health services which help to improve health inequalities. By providing equitable access to quality healthcare services, regardless of socioeconomic status, the hospital can contribute significantly to reducing health disparities in the community. The provision of a new, modern and efficient hospital will help to enhance the level of care provided. (++) ii. A modern hospital can help to provide exemplar care to members of the community, helping to reduce death rates. In addition, the policy makes clear that an existing operational hospital will need to remain on the site as a new hospital is being constructed this will contribute to a reduction in death rates. (++) iii. The policy ensures that development proposals are designed in a way where access and movement in and around the hospital are enhanced. It will ensure permeability is increased through the site to enable safer and more attractive pedestrian access between Paddington Basin, Praed Street and Paddington Station, incorporating improved access via London Street and Tanner Lane. It also encourages proposals to be designed with the needs of all users, including those with mobility issues in mind. (++) iv. The policy makes provision for new and enhanced public realm to provide opportunities for social interaction, dwell time and rest which will encourage healthy lifestyles through increased participation in sport and physical activity. (++) v. A modern hospital can help to cater to a range of different cultures and people from different backgrounds by having facilities in place to cater for all. Residential units, particularly affordable units, will also help to foster an inclusive community and promote cultural wellbeing. (++) vi. A modern hospital can help to support patients (including older patients) to promote greater independence and wellbeing. In addition, residential units on site can help to promote a range of housing types to for older people, maximising their independence and improving their mental and physical wellbeing by being housed in appropriate accommodation, close to key community services. The policy also

		<p>makes provision for improved public realm to provide opportunities for social interaction, dwell time and rest. This will contribute to maximising and improving the physical and mental wellbeing of older people. (++)</p> <p>vii. Improved catering facilities within a new modern hospital can help to promote and provide access to a healthy diet for employees, patients and visitors. Additionally, the hospital can promote nutritional education and healthy eating habits to combat diet-related health issues. (++)</p> <p>viii. A new, modern hospital can help to ensure the building supports healthy workplaces for healthcare workers to enable them to productively work to their full potential. New, high quality homes for residents and employees, as part of a key worker scheme, will also help to create healthy homes. In addition, provision of enhanced public realm and new open spaces can contribute to creating healthy homes and workplaces for users of the site. (++)</p> <p>ix. A new, modern hospital can help to ensure the building supports an increase in healthy years life expectancy amongst patients. (++)</p> <p>x. A new, modern hospital can help to ensure facilities and services are in place to help improve mental health and wellbeing. New, high-quality homes for residents and employees, as part of a key worker scheme, will also help to improve mental health and wellbeing. In addition, provision of enhanced public realm and new open spaces can contribute to an improved mental health and wellbeing for users of the site. (++)</p> <p>xi. A new, modern hospital can help to ensure facilities and services are in place to help improve facilities and accessibility for people with disabilities. (++)</p>
<p><b>5. Climate change</b></p> <p>i. 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>ii. Will it reduce ozone depleting emissions?</p> <p>iii. Will it reduce emissions through retrofitting new technology?</p>	<p>++</p>	<p>i. A new modern hospital will help to modernise aged energy systems which mean it will have a decreased energy consumption and therefore emits less greenhouse gas emissions. A modern hospital would also have more scope to implement new technological solutions to consultations such as telemedicine options and remote consultations to reduce the need for patient and staff travel, thereby mitigating transportation-related emissions. The policy seeks to ensure sustainability is at the heart of proposals, this includes reducing greenhouse gas emissions through the</p>

<ul style="list-style-type: none"> <li>iv. Will it reduce heat island effects on people and property?</li> <li>v. Will it increase resilience to climate change?</li> </ul>		<ul style="list-style-type: none"> <li>ii. design and operation of new buildings, the retention of existing buildings and transport and access. (++)</li> <li>iii. A new modern hospital can help to modernise aged energy systems which mean it will have a decreased energy consumption and therefore emits less ozone depleting emissions. See response to i above. (++)</li> <li>iv. Opportunities can be explored to retrofit the hospital infrastructure with new technology that promotes energy efficiency and emission reduction. By integrating eco-friendly technologies, the hospital can reduce its carbon footprint and become more climate resilient. (++)</li> <li>v. A new modern hospital and supporting alternative uses can help to minimise heat island effects on people and property. Implementing green roofs, green spaces, and permeable surfaces can help absorb heat and reduce the urban heat island effect. (++)</li> <li>vi. As part of a new scheme, opportunities can be explored to enhance resilience to climate change by developing climate adaptation plans, investing in backup power systems, and ensuring robust emergency response procedures. (++)</li> </ul>
<p><b>6. Natural resources</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce water consumption and improve water efficiency?</li> <li>ii. Will it reduce consumption of fossil fuels?</li> <li>iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?</li> <li>iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> <li>v. Will it make efficient use of land?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. A new modern hospital with other alternative land uses will help to reinstate new water systems that will reduce water consumption and improve water efficiency. (++)</li> <li>ii. A new scheme can help to reduce fossil fuel consumption by utilising renewable energy that includes wind, solar and geothermal electricity. (++)</li> <li>iii. The use of natural resources can be minimised as much as possible, through prioritising recycling of construction materials and using more sustainable alternatives instead of conventional construction practices, such as using materials from environmentally responsible suppliers. The policy seeks to put sustainability at the heart of proposals, which includes the approach to the retention of existing buildings. This should ensure recycling of construction materials is prioritised and minimises the consumption of non-renewable resources. (++)</li> <li>iv. Encouragement of the use of renewable resources to be prioritised over non-renewable resources can be made as part of any new scheme. See response to iii above. (+)</li> </ul>

		v. Consolidation of the site to improve the layout for employees, patients and visitors as well as releasing surplus land for a mixed-use, scheme will make efficient use of land in an urban location well serviced by public transport and active transport routes. (++)
<b>7. Flood risk and water quality</b> i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	++	i. The site allocation will be subject to the provisions set out in City Plan Policy 35 which will ensure that measures to reduce flood risk are considered as part of any future proposals. (++) ii. Through the application of flood resistant measures, the risk of property damage in heavy rainfall events can be reduced. Residents and workers can also be given flood awareness information and flood emergency plans, so they are better prepared for heavy rainfall events. (+) iii. As part of the redevelopment of the site, opportunities can be taken to reduce combined sewer overflow events. (+) iv. As part of redevelopment of the site, opportunities can be taken to modernise aged systems and protect water quality. The development should positively contribute to improving water quality on site and in the surrounding area, using eco-friendly solutions such as green infrastructure and sustainable drainage systems (SuDS) which can also naturally help increase local water quality. (++)
<b>8. Biodiversity</b> i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	++	i. The policy seeks proposals to deliver a net-gain improvement in biodiversity and promote habitat creation, with a focus on the ecological values of the canal in support of the council's declaration of an Ecological Emergency. (++) ii. The policy makes reference of the need to enhance lighting, limit overshadowing and enhancement of accessibility of the canal basin, along with enhancing it as a heritage asset and site of local importance for recreational purposes. This will contribute to the preservation of the Sites of Importance for Nature Conservation (SINCs) in its vicinity, including the canal. (+) iii. See answer to ii above. Provision of new green and open spaces can also help to improve access and promote educational value of sites of biodiversity interest. (++) iv. See response to i and ii above. (++)
<b>9. Air quality</b> i. Will it improve air quality?	+	i. Some improvements to air quality will be made as part of modernising the hospital and reducing carbon emissions however, some degree of air quality will still be

<p>ii. Will it reduce emissions of key pollutants?</p>		<p>impacted due to the traffic movements to and from the hospital, including ambulance servicing. The policy though, seeks to make sustainability the heart of proposals in the approach to transport and access such as, detailing how all transport needs will be met in a co-ordinated manner that does not compromise aims of a sustainable development. (+)</p> <p>ii. Same as answer above. (+)</p>
<p><b>10. Noise</b></p> <p>i. Will it reduce noise concerns and noise complaints?</p> <p>ii. Will it reduce noise levels?</p>	<p>+</p>	<p>i. As a mixed-use scheme that includes residential uses, there is the potential for more noise concerns and complaints to be raised due to the impact on residential amenity from future occupiers with the site being so close to the hospital, along with other additional commercial floorspace. The policy makes clear that any residential development will be expected to provide high levels of sound insulation given likely noise levels associated with hospital use. (+)</p> <p>ii. See answer above. (+)</p>
<p><b>11. Transport</b></p> <p>i. Will it reduce volumes of traffic?</p> <p>ii. Will it encourage walking and cycling?</p> <p>iii. Will it increase proportion of journeys using modes other than the car?</p> <p>iv. Will it improve public transport accessibility?</p>	<p>++</p>	<p>i. Consolidation of the hospital to release surplus land could help to reduce volumes of traffic. The site is well connected by public transport which users of the site will benefit from and enable car-free development. The policy seeks to encourage use of sustainable modes of transport by requiring residential and commercial developments to be car free. This will help to reduce volumes of traffic in the vicinity. That being said, the ambulance servicing of the hospital will still be retained on site which means emergency vehicles will still contribute to volume of traffic within the area. To mitigate this, the policy makes clear that proposals should clearly detail how all of these transport needs will be met in a co-ordinated manner that does not compromise aims of a sustainable development that also secures a safe and attractive pedestrian environment. (+)</p> <p>ii. Enhanced pedestrian access throughout the site and in the vicinity via the Grand Union Canal, is encouraged in the policy. This is supported by the central location of the hospital, which can be accessed through a wide network of footpaths and designated cycle routes. Enhanced public realm improvements and provision of new and green spaces can assist to encourage walking and cycling to and from the site. (++)</p>

		<ul style="list-style-type: none"> <li>iii. Given the proximity of the hospital to public transport routes, it is presumed that the majority of journeys currently made to the hospital are through modes other than cars already. Enhanced public realm improvements and provision of new and green spaces can assist to encourage other more sustainable modes of travelling to the site. (++)</li> <li>iv. The site currently has exemplar public transport accessibility and improvement of access points will ensure accessibility by people with a range of physical abilities. (++)</li> </ul>
<p><b>12. Waste</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce consumption of materials and resources?</li> <li>ii. Will it reduce household waste?</li> <li>iii. Will it increase recycling, recovery and re-use?</li> <li>iv. Will it reduce construction waste?</li> </ul>	+	<ul style="list-style-type: none"> <li>i. A new scheme will improve existing aged systems and ensure reduction of consumption of materials and resources. The policy seeks to re-use and/or redevelop existing buildings across the site for alternative uses. This will help to significantly reduce consumption of raw materials and resources. (++)</li> <li>ii. Increasing the number of homes/workspace units onsite will increase household waste however, this can be minimised through providing recycling waste bins onsite. Also, new workspaces can use green procurement practices and implement low waste practices such as being paperless. The hospital can also implement waste segregation programmes to decrease household waste generated within the hospital premises as part of its commitment to waste reduction. By providing recycling bins and promoting awareness among staff and visitors about waste separation, the hospital can divert significant waste from landfills and promote responsible waste management. (+)</li> <li>iii. As part of the new scheme, provision will be made to increase recycling waste bins onsite. Initiatives to recover and reuse specific waste streams, such as medical equipment refurbishment or donation programmes for used furniture, can significantly reduce the hospital's waste output. As mentioned in i above, the policy includes reference to reuse and/or redevelopment of existing buildings which will positively contribute to meeting this objective. (+)</li> <li>iv. The new scheme will increase consumption of materials and resources during construction and the life of the development. This will be minimised during the construction phase by having site waste management plans, prioritising the use of recycled materials and using innovative waste reduction techniques such as water</li> </ul>

		harvesting/recycling. The development will also be subject to emerging City Plan policies on retrofit and whole-life carbon which will likely further reduce construction waste. (+)
<b>13. Heritage</b> i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	0	i. The site currently contains a number of heritage assets. The heritage and cultural value may be impacted should a new scheme come forward. However, the policy makes a reference to optimising densities across the site in the context of responding to heritage value. As part of the justification for this, the policy states that intensification of the site will need to respect and respond to the existing heritage and townscape value, as far as possible within the context of the need to deliver a new hospital on site. (0) ii. There are no strategic views in proximity to the site, as identified within the adopted City Plan. Further, as part of proposals for a new hospital, the policy makes clear that building heights should grade down from the height of any new hospital building which should seek to minimise impact on strategic views. (0) iii. In line with existing policy 39 of the adopted City Plan, existing heritage assets throughout the site will need to be conserved or enhanced. Whilst there may be some impacts due to a change in character across the site, it is expected that this would primarily be outside of the Bayswater Conservation Area. Furthermore, whilst there may be the potential to impact some heritage asset, overall the redevelopment of the site includes opportunities to further enhance the setting of these assets, and to redevelop buildings which currently have a negative townscape value. (0) iv. Before construction or renovation projects, archaeological assessments may be conducted to identify and protect significant archaeological sites or artefacts. Recording and documenting these findings can contribute to broader archaeological research and historical understanding. (0) v. The redevelopment of the site is not expected to have any impacts upon the Westminster World Heritage Site. (0)
<b>14. Public Realm &amp; Townscape</b> i. Will it enhance townscape?	++	i. A core principle of the policy seeks to enhance permeability through the site and activate public spaces, as well as providing new and enhanced public realm



<ul style="list-style-type: none"> <li>ii. Will it encourage exemplary design standards?</li> <li>iii. Will it reduce litter?</li> <li>iv. Will it enhance the quality of public realm?</li> <li>v. Will it improve access and mobility for all equality group strands?</li> </ul>		<ul style="list-style-type: none"> <li>including dwell spaces, this will seek to enhance the townscape of the existing area. (++)</li> <li>ii. Ensuring proposals are of high quality is a key part of the vision for the allocation. Configuration and redevelopment of the site will provide opportunities to encourage any new scheme to be of exemplary design standards beyond what is currently in place. (++)</li> <li>iii. As part of a new scheme that seeks to create and enhance the public realm, providing sufficient bins and encouraging proper waste disposal can be embedded within the design to help to reduce litter. (+)</li> <li>iv. Enhancing the public realm is a key part of the vision and feature of a core principle underpinning the policy for the site. The quality of the public realm will be significantly improved by creating well-designed outdoor spaces and can serve as places for relaxation, exercise, and social interaction, contributing to the community's wellbeing. Improved wayfinding and access points will also ensure the site will be accessible for all. (++)</li> <li>v. Consolidation of the hospital and public realm improvements will be designed in such a way to ensure mobility for all users are taken into account. (++)</li> </ul>
<p><b>15. Open Space</b></p> <ul style="list-style-type: none"> <li>i. Will it enhance the quality of open space?</li> <li>ii. Will it improve landscape character?</li> <li>iii. Will it improve access to open space?</li> <li>iv. Will it enhance the green infrastructure network?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. As part of the core principles for the site, enhanced permeability and activation of public spaces at ground floor level is proposed. This will help to activate the canal basin and incorporate dwell spaces contributing to an enhanced quality of the public realm throughout the site. (++)</li> <li>ii. Consolidation and redevelopment of the site will contribute to an improvement of the landscape character. As part of the core principles for the site, enhancements within the site and its surroundings, including along the canal basin, Praed Street and South Wharf Road will help to improve the landscape character. (++)</li> <li>iii. Provision of new open spaces and enhanced public realm can help to improve access to open spaces for future occupiers of the site. Improved wayfinding and consolidation of the hospital to enhance patient experience and improve legibility for those arriving from Paddington Station will help to increase connections and access to open spaces. (++)</li> </ul>

		iv. Activation of the canal basin and provision of new open spaces can help to enhance the green infrastructure network. (++)
<b>16. Employment Opportunities</b> <ul style="list-style-type: none"> <li>i. Will it improve qualifications, skills or training?</li> <li>ii. Will it create new jobs and reduce unemployment?</li> <li>iii. Will it provide jobs for those most in need?</li> <li>iv. Will it improve earnings?</li> <li>v. Will it promote equality of opportunity across the city by tackling barriers to employment?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. As part of the vision for the site, St Mary's Hospital provides an opportunity to contribute to the objectives of the Paddington Opportunity Area as an area for commercial-led growth. Alongside commercial growth, new high value jobs including in the life sciences sector will seek to be delivered. This will help to increase opportunities to provide further jobs and schemes to improve qualifications, skills or training. (++)</li> <li>ii. See response to i above. Reconsolidation of the hospital and additional commercial floorspace will increase opportunities to provide further jobs and reduce unemployment. The hospital can partner with local organisations and businesses to foster a supportive ecosystem for job opportunities. (++)</li> <li>iii. The policy seeks to ensure that job growth is created and responds to the objectives of the CAZ and Paddington Opportunity Area. This includes providing employment opportunities across a broad range of sectors and skill levels and providing jobs for those most in need. (++)</li> <li>iv. The jobs available across the site can help to ensure secure earnings, improving the incomes of local people. (++)</li> <li>v. The hospital through the NHS has a wide range of initiatives in place to promote diversity in their workforce and to promote equality of opportunity to persons who may traditionally face barriers to employment. Additional commercial floorspace can also help to promote equal opportunity by providing employment for residents living nearby or new residents on the site. In addition, the site is well connected which makes it a suitable location to promote equality of opportunity across the city and providing employment for those most in need who would benefit from jobs in easily accessible locations. (++)</li> </ul>
<b>17. Economy</b> <ul style="list-style-type: none"> <li>i. Will it improve business development and environment?</li> <li>ii. Will it improve business resilience and economy?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. As part of optimising the site, the policy makes clear that through intensification and its location within the CAZ and Paddington Opportunity Area will contribute to improving business development and environment. A mixed use scheme will help to increase footfall and provide links to nearby businesses in the area. By fostering</li> </ul>

<ul style="list-style-type: none"> <li>iii. Will it encourage new business start-ups, small businesses and opportunities for local people?</li> <li>iv. Will it promote business in key sectors?</li> <li>v. Will it promote regeneration?</li> </ul>		<ul style="list-style-type: none"> <li>ii. A mixed use scheme that incorporates a vision that seeks to contribute to the objectives of the Paddington Opportunity Area as an area for commercial-led growth will help to improve business resilience and economy. This will increase footfall within the area and provide some element of additional commercial floorspace to help boost business resilience in the area. As a significant institution, St Mary's Hospital plays a role in contributing to the resilience of the local economy. By maintaining stable employment opportunities and investing in long-term economic strategies, the hospital can anchor the community, providing stability and contributing to economic growth. (++)</li> <li>iii. A mixed use scheme could help to encourage start-up businesses and small businesses within the area. The hospital may seek to provide opportunities for future residents on-site and prioritise hiring locally, creating job opportunities for the community and supporting economic empowerment. (++)</li> <li>iv. The site is well served by public transport, shops and services as it is within the CAZ and partially within the Praed Street District Centre, which supports commercial growth in this area and promotes business in key sectors. The hospital can promote critical sectors in the local economy, such as healthcare, research, and technology. The hospital can create a dynamic ecosystem that attracts investment and supports growth in these vital sectors by fostering partnerships with other healthcare institutions, research centres, and technology companies and beneficially using the new commercial floorspace to support a life-sciences cluster. (++)</li> <li>v. A mixed use scheme could help to promote wider regeneration in the area by complementing nearby uses. In addition, the site is within the Paddington Opportunity Area which seeks to support regeneration within the wider Paddington area. (++)</li> </ul>
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## **Westbourne Park Bus Garage**

### **Summary of findings:**

#### **1. Communities**

The policy will have a major positive effect on achieving sustainability objectives for Communities. The site is within a sustainable location that is already well-connected by public transport networks and within the vicinity of the Harrow Road District Centre where access to local services, shops and community facilities are readily available. The policy seeks to enhance these routes as well as making provision for commercial and community spaces to provide direct access for existing and future residents. The policy also seeks to provide residential uses of which, some provision of affordable housing will be delivered. This will contribute to creating an inclusive community and encourage participation in decision-making and community activity.

#### **2. Crime Reduction**

The policy will have a major positive effect on achieving sustainability objectives for Crime Reduction. The policy seeks to ensure the provision of a more welcoming public realm and enhanced pedestrian routes as part of a residential-led scheme. Additionally, the policy ensures that overshadowing from the bridge and Grand Union Canal are minimised and to enhance light along this route. Cumulatively, this will help to reduce fear and existing crime, disorder and antisocial behaviour as well as deterring other behaviour affecting the local environment.

#### **3. Housing**

The policy will have a minor positive effect on achieving sustainability objectives for Housing. As part of a residential-led scheme, the site will benefit from providing high quality new homes that seeks to secure high quality living conditions with high levels of sound and vibration insulation associated with nearby transport infrastructure. In addition, the policy will ensure a range of housing types and tenures, including some provision of affordable housing which will seek to reduce homelessness, help people stay independent for longer and help to reduce the number of households leaving in overcrowded or unfit homes. However, the policy does seek to provide a residential-led scheme north of the site which would provide less affordable homes than if the scheme were to be proposed on public land south of the site. Overall, the policy does have a minor positive effect on achieving this sustainability objective.

#### **4. Health and Wellbeing**

The policy will have a major positive effect on achieving sustainability objectives for Health and Wellbeing. The provision of a residential-led scheme in a highly accessible location and retained bus garage with retained employment opportunities will contribute to improving health inequalities for all members of the community. Affordable housing provision as part of the policy will also seek to contribute to a reduction in death rates by providing homes for those most in need and foster an inclusive community. In addition, the policy makes provision for new commercial uses to support small and medium enterprises to meet the communities needs by the delivery of new community spaces. Overall, this should help to improve cultural wellbeing within the community and contribute to providing both healthy homes and workplaces. Activation of the canal frontage, enhanced permeability and the creation of new open spaces

will help to improve access/movement and encourage healthy lifestyles, provide dwell spaces for older people to socialise and rest and improving physical and mental wellbeing.

## **5. Climate Change**

The policy will have a major positive effect on achieving sustainability objectives for Climate Change. The policy aims to promote sustainability by reducing greenhouse gas emissions, energy consumption, and the need to travel. An improved bus garage can contribute by updating its systems to be more energy efficient. Whilst the bus garage faces the challenge of reducing emissions from the buses themselves, the policy has the potential to deliver a greener and more sustainable scheme which is part of the public transport network for London. The policy also encourages a new residential-led mixed use scheme to be carbon neutral, reduce ozone depleting emissions, and to mitigate the heat island effect by using low or zero carbon technologies, implementing green roofs, providing shaded areas and biodiversity enhancements.

## **6. Natural Resources**

The policy will have a major positive effect on achieving sustainability objectives for Natural Resources. Proposals as part of the policy seek to support the efficient use of land in an urban location well serviced by public transport by redeveloping the bus garage and releasing surplus land for a residential-led mixed use scheme. The policy seeks to put sustainability at the heart of proposals by encouraging development to update systems to reduce water consumption, improving water efficiency. In addition, the policy aims to reduce fossil fuel consumption by utilising renewable resources and minimising the use of natural resources by prioritising the recycling of materials and using more sustainable alternatives as part of construction.

## **7. Flood Risk and Water Quality**

The policy will have a major positive effect on achieving sustainability objectives for Flood Risk and Water Quality. The policy aims to minimise flood risk and encourage the use of flood resistant measures by using sustainable urban drainage systems, which can reduce surface runoff, increase filtration, improve water quality and protection of properties from flood damage. As part of the site redevelopment, opportunities can be taken to reduce combined sewer overflow events by creating sewer separation, storage and treatment. It is acknowledged that there is potential presence of contaminated land on site which will require appropriate remediation proposals to be submitted and approved before development.

## **8. Biodiversity**

The policy will have a major positive effect on achieving sustainability objectives for Biodiversity. The policy aims to put sustainability at the core of proposals by securing biodiversity net gain. As part of proposals, the policy seeks to create a green corridor that would protect and enhance biodiversity and protected habitats within and near the site. As the Grand Union Canal is a Site of Importance for Nature Conservation which the policy seeks to preserve and activate along the towpath. This will also help to improve access and educational value of sites of biodiversity interest and help to conserve and enhance species and habitats.

## **9. Air Quality**

The policy will have a minor positive effect on achieving sustainability objectives for Air Quality. Whilst the bus garage would remain on-site with associated negative impact on air quality from buses remaining, the policy makes provision to improve and modernise the bus garage in order to reduce the impact on air quality. In addition, the policy seeks to put sustainability at the heart of proposals ensuring air quality is improved for future residents.

## **10. Noise**

The policy will have a minor positive effect on achieving sustainability objectives for Noise. The policy seeks to improve and modernise the bus garage which should lead to reduced noise levels and potential complaints associated with the buses. Whilst a residential-led scheme will provide potentially increased noise concerns and complaints raised by future occupiers, the policy ensures that high quality living conditions are secured through the provision of high levels of sound and vibrations associated with the buses, the Westway and the trainline. Overall, this should help to mitigate and reduce noise concerns and complaints being generated.

## **11. Transport**

The policy will have a major positive effect on achieving sustainability objectives for Transport. The site is in a highly accessible location, where the policy supports car-free development by reducing the reliance on private motor vehicles and promoting the use of public transport, especially the bus garage that is part of the site and serves London's transport network. The policy aims to improve sustainability and active travel by enhancing the canal's frontage, creating new walking and cycling routes, and increasing the attractiveness and safety of the site and its surrounding.

## **12. Waste**

The policy will have a negligible effect on achieving sustainability objectives for Waste. Whilst the policy will increase the consumption of materials and resources during construction and operation, sustainability is stated as being at the heart of proposals to minimise waste. As part of proposals for development on the site, the policy ensures that the use of materials and waste generation is recycled in order to achieve a reduction of household, commercial and construction waste.

## **13. Heritage**

The policy will have a major positive effect on achieving sustainability objectives for Heritage. The Grand Union Canal is classed as a non-designated heritage asset that the policy seeks to activate and enhance as part of a new scheme. The policy also ensures that any new scheme responds to its context, having regard for the heritage and townscape values of the Grand Union Canal and other relevant heritage assets.

## **14. Public Realm and Townscape**

The policy will have a major positive effect on achieving sustainability objectives for Public Realm and Townscape. The policy aims to respond to the context of the site, located between Great Western Road and the Grand Union Canal, and to enhance the townscape values of the area. Sustainability is stated as

being at the heart of proposals, including in the design and provision of high quality living conditions for the future residents and visitors of the site. The policy seeks to improve the public realm by creating new routes and visual connections between the road and the canal, activating and improving the canal frontage, providing new green and open spaces, and ensuring the site is permeable and accessible to all. As part of enhancing the public realm, the policy ensures improvements are designed to accommodate the mobility needs of all users, including pedestrians, cyclists and people with disabilities.

### **15. Open Space**

The policy will have a major positive effect on achieving sustainability objectives for Open Space. The policy ensures to secure open spaces on site through making provision for the delivery of dwell spaces and opportunities for a green corridor. This will help to ensure the landscape character are improved. In addition, the policy seeks to enhance the public realm through the improvement and activation of the canal frontage and ensuring the site is accessible to all. This contributes to the provision of improved access and movements, including access to the Meanwhile Gardens.

### **16. Employment Opportunities**

The policy will have a major positive effect on achieving sustainability objectives for Employment Opportunities. As the policy will be retaining use of the bus garage and incorporating new commercial uses on the site, this will contribute to improving qualifications, skills or training opportunities in the transport service industry and create new employment opportunities reducing local unemployment. The site is well connected and suitable for promoting equality of opportunity across the city and providing affordable workspace for those most in need. Overall, earnings could be improved as the retained use of the bus garage and new commercial uses will create new jobs and generate income for those most in need.

### **17. Economy**

The policy will have a major positive effect on achieving sustainability objectives for Economy. The policy aims to provide a healthy work environment for existing employees by upgrading the existing bus garage facilities. In addition, the policy seeks to improve the business environment in the area by introducing additional commercial uses, such as retail, office and community spaces that can support small and medium enterprises and contribute to the North Paddington Creative Enterprise Zone goals. Enhancing the public realm and the canal towpath by providing better access, landscaping, lighting and activating the space with cultural and leisure activities will complement the local economy. The core principles and vision of the policy in supporting a residential-led mixed use scheme can help to promote wider regeneration in a well-connected location.

Westbourne Park Bus Garage Policy Detailed Appraisal		
Sustainability Appraisal Objective	Score	Analysis
<p><b>1. Communities</b></p> <ul style="list-style-type: none"> <li>i. Will it improve access to local services, shops and community facilities?</li> <li>ii. Will it increase ability to influence decision-making (neighbourhoods)?</li> <li>iii. Will it foster an inclusive Westminster community?</li> <li>iv. Will it encourage engagement in community activity?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The site is well-connected by public transport networks and within the vicinity of the Harrow Road District Centre, making it an ideal location for future residents to access local services, shops and community facilities. The policy seeks to enhance key routes for access to the site and for connections to Harrow Road District Centre, this will improve access to local services, shops and community facilities. Permeability and connectivity improvements, including via the potential delivery of a new bridge, will improve access to different local areas and services. Additionally, the policy makes provision for commercial activities such as food and beverage and community spaces, which will provide direct access for existing and future residents to key services, shops and community facilities. Retaining use and modernising the existing bus garage will contribute to a good level of access to local services, shops and community facilities across the city. (++)</li> <li>ii. A new residential development on site will increase ability for residents to influence decision-making. (++)</li> <li>iii. New homes (including affordable housing) and a more welcoming public realm will contribute to achieving inclusive communities. In addition, the policy makes provision for new commercial uses to support small and medium enterprises to meet the communities needs by the delivery of new community spaces. This will help to foster an inclusive Westminster community. (++)</li> <li>iv. Provision of affordable homes and community spaces on site will encourage engagement in community activity. (++)</li> </ul>
<p><b>2. Crime reduction</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce crime, disorder and antisocial behaviour?</li> <li>ii. Will it reduce fear of crime, disorder and antisocial behaviour?</li> <li>iii. Will it reduce other behaviour adversely affecting the local environment?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. Development of the site for a residential-led scheme with provision of commercial/community floorspace and more welcoming public realm and pedestrian routes, should reduce fear and existing crime, disorder and antisocial behaviour. The policy seeks to make provision to limit overshadowing from the bridge and Grand Union Canal. As well as enhancing light along this route, this will help to reduce crime, disorder and antisocial behaviour. (++)</li> <li>ii. See answer to i above. (++)</li> </ul>



		<p>iii. Increased permeability through the site should enable safe and attractive pedestrian access between Westbourne Park station, the Harrow Road District Centre and buildings around the Grand Union Canal. This should reduce other behaviour adversely affecting the local environment. (++)</p>
<p><b>3. Housing</b></p> <ul style="list-style-type: none"> <li>i. Will it create high quality homes?</li> <li>ii. Will it increase range of affordable housing?</li> <li>iii. Will it reduce homelessness?</li> <li>iv. Will it provide housing than can help people stay independent for longer?</li> <li>v. Will it reduce number of unfit homes?</li> <li>vi. Will it provide a range of housing types and sizes?</li> </ul>	<p>+</p>	<ul style="list-style-type: none"> <li>i. As a residential-led scheme, the site would benefit from the provision of high-quality new homes that will help those most in need. The policy seeks to secure high quality living conditions, including through the provision pf high levels of sound and vibrations insulation associated with nearby transport infrastructure. (++)</li> <li>ii. A new residential scheme should deliver affordable housing, both ‘social’ and ‘intermediate’ therefore increasing the range of affordable housing. However, as a residential-led scheme would be proposed only to the northern portion of the site, this will result in less affordable homes being delivered compared to if there were a residential-led scheme to the north and south of the site combined. This could impact on the range of affordable housing. (+)</li> <li>iii. A residential-led scheme will reduce homelessness. However, as a residential-led scheme would be proposed to the northern portion of the site, this will result in less affordable homes being delivered compared to if there were a residential-led scheme to the north and south of the site combined. This could impact on the reduction of homelessness. (+)</li> <li>iv. A residential-led scheme would provide a range of homes that can help people stay independent for longer by providing homes for those most in need. (++)</li> <li>v. As there are currently no homes on site, there is unlikely to be any impact on this indicator. However, the provision of affordable housing could reduce the number of households leaving in overcrowded or unfit homes (+)</li> <li>vi. A residential-led development will provide a range of housing types (market and affordable) and sizes, in line with council’s policy. However, as a residential-led scheme would be proposed to just the northern portion of the site, this will result in less homes being delivered compared to if there were a residential-led scheme to the north and south of the site combined. This could impact on the range of housing types and sizes. (+)</li> </ul>

<p><b>4. Health and wellbeing</b></p> <ul style="list-style-type: none"> <li>i. Will it help improve health inequalities?</li> <li>ii. Will it contribute to a reduction in death rates?</li> <li>iii. Will it improve access/movement?</li> <li>iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity?</li> <li>v. Will it improve cultural wellbeing?</li> <li>vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people?</li> <li>vii. Will it provide access to a healthy diet?</li> <li>viii. Will it create healthy homes and workplaces?</li> <li>ix. Will it increase healthy years life expectancy?</li> <li>x. Will it improve mental health and wellbeing?</li> <li>xi. Will it improve facilities and accessibility for people with disabilities?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. Redevelopment of the site could improve health inequalities by providing homes for those most in need in a highly accessible location connected to shops, services and community facilities. It will also retain the existing bus garage use which will retain employment opportunities that the site currently offers and create new jobs as part of a mixed-use development. The sites continued use as a bus garage may help to improve health inequalities by providing a public transport service for all members of the community. Whilst the site is located amongst a range of transport infrastructure which will have some degree of negative impact on residential amenity, the policy ensures that high quality living conditions are secured through the provision of high levels of sound and vibration insulation. (+)</li> <li>ii. Providing sustainable transport options and infrastructure, homes and employment for those most in need will contribute to a reduction in death rates. (++)</li> <li>iii. The policy makes provision for a retained but moder bus garage, as well an enhanced public realm with improved access routes throughout and in the vicinity of the site. Overall, this will contribute to improved access/movement to local services in and around Westminster for future residents and users of the site (++)</li> <li>iv. Activation of the canal frontage and creation of new open and green spaces will encourage healthy lifestyles through increased participation in sport and physical activity through a more attractive, safer environment (++)</li> <li>v. A residential-led scheme with some provision of affordable housing and a more inclusive public realm will encourage inclusive communities, this in turn should improve cultural wellbeing. In addition, the policy makes provision for new commercial uses to support small and medium enterprises to meet the communities needs by the delivery of new community spaces. Overall, this should help to improve cultural wellbeing within the community. (++)</li> <li>vi. See answer to v above. The policy also makes provision for dwell spaces which will provide opportunities for older people to socialise and rest, improving their mental and physical wellbeing. (++)</li> <li>vii. The policy makes provision for commercial activities such as food and beverage, which has the potential to provide access to a healthy diet through provision of</li> </ul>
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		<p>local shops which may sell healthy food. The policy also makes provision for amenity which may provide opportunities for residents to grow their own food. (++)</p> <p>viii. The policy seeks to deliver a modern bus garage and provide a healthy work environment for staff members with modernised offices and provision of accessible green and open spaces on site. A new residential-led scheme will also contribute to providing healthy homes and workspaces with access to new local services, shops and community facilities on-site, limiting travel to access these facilities. Whilst the site is located amongst a range of transport infrastructure which will have some degree of negative impact on residential and commercial amenity, the policy ensures the provision of high levels of sound and vibration insulation to mitigate for this. (++)</p> <p>ix. See answer to i above (+)</p> <p>x. See answer to i above (+)</p> <p>xi. New buildings and public realm improvements will be designed with all users in mind and will improve facilities and accessibility for people with disabilities. (++)</p>
<p><b>5. Climate change</b></p> <p>i. 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>ii. Will it reduce ozone depleting emissions?</p> <p>iii. Will it reduce emissions through retrofitting new technology?</p> <p>iv. Will it reduce heat island effects on people and property?</p> <p>v. Will it increase resilience to climate change?</p>	<p>++</p>	<p>i. The policy seeks to put sustainability at the heart of proposals which will help to reduce greenhouse gas emissions, reduce energy consumption, generate low or zero carbon energy and/or reducing the need to travel. An improved bus garage will help reduce green gas emissions on-site by updating systems that can help to reduce energy consumption. Supporting uses as part of a mixed-use development site will help reduce the need to travel as the new homes will be well-connected to shops, services and community facilities. (++)</p> <p>ii. Same as i above. An improved bus garage will help reduce ozone depleting emissions. (++)</p> <p>iii. Same as i above. New major development should at least be Carbon Neutral and reduce emissions through retrofitting new technology. (++)</p> <p>iv. Same as i above. A new residential-led development will help to reduce the heat island effect through installation of energy-efficient equipment, green roofs, increasing shaded areas and other biodiversity improvements. (++)</p>

		<p>v. Opportunities exist to deliver a greener bus garage and a sustainable mixed-use scheme that reduces carbon emissions, provides new open and green spaces and permeable surfaces to prevent surface water flooding. As a retained bus garage, however, it is inevitable that emissions from the buses will contribute to climate change. That being said, the site itself supports the public transport network for London. (+)</p>
<p><b>6. Natural resources</b></p> <p>i. Will it reduce water consumption and improve water efficiency?</p> <p>ii. Will it reduce consumption of fossil fuels?</p> <p>iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?</p> <p>iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</p> <p>v. Will it make efficient use of land?</p>	<p>++</p>	<p>i. As part of redevelopment proposals, there is potential to update systems to contribute to the reduction of water consumption and improve water efficiency. (++)</p> <p>ii. As part of redevelopment proposals, there is potential to reduce fossil fuel consumption by utilising renewable sources. Whilst the retained use of the bus garage increases consumption of fossil fuels, the policy seeks to modernise the bus garage and put sustainability at the heart of proposals which should seek to reduce the use of resources. (+)</p> <p>iii. The policy seeks to put sustainability at the heart of proposals, minimising the use of natural resources through prioritising recycling of construction materials and using more sustainable alternatives instead of conventional construction practices, such as using natural resources. (++)</p> <p>iv. The policy seeks to put sustainability at the heart of proposals through the encouragement of the use of renewable resources to be prioritised over non-renewable resources as part of any new scheme. (++)</p> <p>v. Redevelopment of the site to release surplus land for a mixed-use, residential-led scheme will make efficient use of land in an urban location well serviced by public transport. (++)</p>
<p><b>7. Flood risk and water quality</b></p> <p>i. Will it minimise flood risk from all sources of flooding?</p> <p>ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?</p>	<p>++</p>	<p>i. The policy seeks to put sustainability at the heart of proposals through minimising flood risk through the use of sustainable Urban Drainage Systems. (++)</p> <p>ii. Same as i above. Through the application of flood resistant measures, the risk of property damage in heavy rainfall events can be reduced. Residents and workers can also be given flood awareness information and flood emergency plans, so they are better prepared for heavy rainfall events. (++)</p>

<ul style="list-style-type: none"> <li>iii. Will it reduce combined sewer overflow events?</li> <li>iv. Will it protect water quality?</li> </ul>		<ul style="list-style-type: none"> <li>iii. As part of the redevelopment of the site, opportunities can be taken to reduce combined sewer overflow events. (++)</li> <li>iv. Same as i above. The site may be constrained by contaminated land from a previous usage; however, development should consider appropriate remediation proposals which should enhance water quality. (+)</li> </ul>
<p><b>8. Biodiversity</b></p> <ul style="list-style-type: none"> <li>i. Will it protect, enhance and increase biodiversity and protect habitats?</li> <li>ii. Will it preserve Sites of Importance for Nature Conservation?</li> <li>iii. Will it improve access to and promote educational value of sites of biodiversity interest?</li> <li>iv. Will it conserve and enhance species and habitats?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy seeks to put sustainability at the heart of proposals through securing biodiversity. In addition to this, the policy seeks to create opportunities for a green corridor which should seek to protect and enhance biodiversity and protected habitats within and in the vicinity of the site. (++)</li> <li>ii. Same as i above. Redevelopment of the site and activation of the canal towpath will help to reduce antisocial behaviour within this part of the site and can help to preserve the functions of both the Grand Union Canal and Meanwhile Gardens. (++)</li> <li>iii. Activation of the canal towpath and provision of new green and open spaces can help to improve access and promote educational value of sites of biodiversity interest. Access will also be improved to the canal to facilitate better connections into Meanwhile Gardens. (++)</li> <li>iv. Redevelopment of the site could provide opportunities to maximise solutions to conserve and enhance species and habitats from existing and new open and green spaces. (++)</li> </ul>
<p><b>9. Air quality</b></p> <ul style="list-style-type: none"> <li>i. Will it improve air quality?</li> <li>ii. Will it reduce emissions of key pollutants?</li> </ul>	+	<ul style="list-style-type: none"> <li>i. As the bus garage would remain on-site, the negative impact on air quality associated with buses will remain. However, although buses create emissions, they also contribute to the reduction of the use of private motor vehicles in London. In addition as part of the policy, provision is made for an improved and modern bus garage which could seek to reduce the impact on air quality. Whilst the site is located immediately adjacent to the Westway which could impact air quality for future residents of any new buildings, the policy seeks to put sustainability at the heart of proposals through improving air quality. (+).</li> <li>ii. See answer to I above (+).</li> </ul>
<p><b>10. Noise</b></p>	+	<ul style="list-style-type: none"> <li>i. An improved bus garage could lead to reduce noise levels and potential complaints associated with buses. However, as a residential-led scheme, there is the potential</li> </ul>

<ul style="list-style-type: none"> <li>i. Will it reduce noise concerns and noise complaints?</li> <li>ii. Will it reduce noise levels?</li> </ul>		<p>for more noise concerns and complaints to be raised due to the impact on residential amenity from future occupiers with the site being so close to the bus garage, the Westway and train line. The policy however, ensures that high quality living conditions are secured through the provision of high levels of sound and vibration insulation to mitigate impacts on noise and thus noise concerns and complaints being generated. (+)</p> <ul style="list-style-type: none"> <li>ii. Same as i above. (+)</li> </ul>
<p><b>11. Transport</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce volumes of traffic?</li> <li>ii. Will it encourage walking and cycling?</li> <li>iii. Will it increase proportion of journeys using modes other than the car?</li> <li>iv. Will it improve public transport accessibility?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The site is in a highly accessible location, therefore users and new residents of the redeveloped site will benefit from and enable car-free development. Whilst the bus garage will be retained on site which means buses will still contribute to volume of traffic within the area, the policy makes provision for a modern bus garage that meets current and projected future transport needs. This will ensure that the approach to access and traffic is sustainable and help to reduce volumes of traffic. (+)</li> <li>ii. The policy seeks to put sustainability and active travel at the heart of proposals through the activation and expansion of the canal's frontage, permeability and connectivity improvements including via the potential delivery of a new bridge, new walking and cycling routes and creating an attractive, safe and enhanced permeability through the site and within the vicinity. (++)</li> <li>iii. The policy seeks to enable car-free development on site by increasing the proportion of journeys using private vehicles. The site is well-connected by public transport and the bus garage itself contributes to London's transport network and contributes to an increase in the number of journeys using modes other than the car. (++)</li> <li>iv. The site itself helps to support public transport accessibility and contributes to London's transport network (++)</li> </ul>
<p><b>12. Waste</b></p> <ul style="list-style-type: none"> <li>i. Will it reduce consumption of materials and resources?</li> <li>ii. Will it reduce household waste?</li> </ul>	0	<ul style="list-style-type: none"> <li>i. Whilst a new scheme will increase consumption of materials and resources during both the construction phase and the life of the development, the policy seeks to put sustainability at the heart of proposals. This will ensure consumption is minimised by having site waste management plans, prioritising the use of recycled</li> </ul>

<ul style="list-style-type: none"> <li>iii. Will it increase recycling, recovery and re-use?</li> <li>iv. Will it reduce construction waste?</li> </ul>		<ul style="list-style-type: none"> <li>ii. Increasing the number homes/workspace units onsite will increase household waste however, the policy seeks to put sustainability at the heart of proposals which will include ensuring the majority of household/commercial waste produced on site is recycled. (0)</li> <li>iii. Same as i and ii above. (0)</li> <li>iv. See answer to i above. (0)</li> </ul>
<p><b>13. Heritage</b></p> <ul style="list-style-type: none"> <li>i. Will it conserve or enhance heritage sites and cultural value?</li> <li>ii. Will it protect strategic views?</li> <li>iii. Will it conserve or enhance heritage assets and their settings?</li> <li>iv. Will it help preserve, enhance and record archaeological features and their settings?</li> <li>v. Will it protect and enhance the setting of the Westminster World Heritage Site?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The low quality of the existing buildings and open spaces, and potential improved activation of the canal's frontage and accessibility of the site will enhance the Grand Union Canal as a non-designated heritage asset. The policy also seeks for proposals to respond to its context, including having regard for the heritage and townscape values of the Grand Union Canal and other relevant heritage assets. (++)</li> <li>ii. The redevelopment will continue to protect strategic views, as set out in the core policy objectives where new development shall respond to relevant heritage assets and associated views. (+)</li> <li>iii. See answer to i above. (++)</li> <li>iv. No likely impact. (0)</li> <li>v. No likely impact. (0)</li> </ul>
<p><b>14. Public Realm &amp; Townscape</b></p> <ul style="list-style-type: none"> <li>i. Will it enhance townscape?</li> <li>ii. Will it encourage exemplary design standards?</li> <li>iii. Will it reduce litter?</li> <li>iv. Will it enhance the quality of public realm?</li> <li>v. Will it improve access and mobility for all equality group strands?</li> </ul>	++	<ul style="list-style-type: none"> <li>i. The policy seeks for proposals to respond to its context, including having regard to townscape values. In addition to this, the policy seeks to enhance the townscape through creating new routes and visual connection between Great Western Road and the Grans Union Canal, enhancing permeability and enhancing active transport routes. (++)</li> <li>ii. The policy seeks to put sustainability at the heart of proposals through the design and ensuring proposals make provision for high quality living conditions. (++)</li> <li>iii. As part of redevelopment, opportunities exist to ensure bins are incorporated and effective waste management are in place to help reduce litter. (+)</li> </ul>

		<ul style="list-style-type: none"> <li>iv. See response to i above. The quality of the public realm will be significantly improved by activating and improving the canal’s frontage, providing new green and open spaces and ensuring the site is permeable and accessible to all. (++)</li> <li>v. Public realm improvements will be designed in such a way to ensure mobility for all users are taken into account. (++)</li> </ul>
<p><b>15. Open Space</b></p> <ul style="list-style-type: none"> <li>i. Will it enhance the quality of open space?</li> <li>ii. Will it improve landscape character?</li> <li>iii. Will it improve access to open space?</li> <li>iv. Will it enhance the green infrastructure network?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. The policy makes provision for the delivery of dwell spaces and opportunities for a green corridor, this will help to ensure the quality of open spaces are secured on site. (++)</li> <li>ii. The landscape character will be improved through enhancement of the public realm, improvement and activation of the canal frontage, provision of new dwell spaces and green corridor and ensuring the site is permeable and accessible to all. (++)</li> <li>iii. See response to i above. The policy also makes provision of improved access to Meanwhile Gardens. In addition activation of the canal’s frontage, permeability and connectivity improvements including via the potential delivery of a new bridge, can help to improve access to open spaces. (++)</li> <li>iv. See response to i and ii above. (++)</li> </ul>
<p><b>16. Employment Opportunities</b></p> <ul style="list-style-type: none"> <li>i. Will it improve qualifications, skills or training?</li> <li>ii. Will it create new jobs and reduce unemployment?</li> <li>iii. Will it provide jobs for those most in need?</li> <li>iv. Will it improve earnings?</li> <li>v. Will it promote equality of opportunity across the city by tackling barriers to employment?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. Retaining use of the bus garage and incorporating new commercial uses will contribute to improving qualifications, skills or training opportunities. (++)</li> <li>ii. The site as a bus garage is a source of employment providing jobs and income within the transport service industry. Whilst redevelopment of the bus garage to a mixed-use scheme will seek to retain employment opportunities on site, this will be enhanced through the provision of additional commercial floorspace. This will assist in providing new employment opportunities whilst reducing levels of local unemployment. (++)</li> <li>iii. The site is well connected which makes it a suitable location to promote equality of opportunity across the city and providing employment for those most in need who would benefit from jobs in easily accessible locations. This could also be achieved through the provision of affordable workspace floorspace. (++)</li> </ul>



		<ul style="list-style-type: none"> <li>iv. Earnings could be improved as employment opportunities from the existing bus garage will be retained and some additional commercial floorspace will be provided. (++)</li> <li>v. See answer to iii above (++)</li> </ul>
<p><b>17. Economy</b></p> <ul style="list-style-type: none"> <li>i. Will it improve business development and environment?</li> <li>ii. Will it improve business resilience and economy?</li> <li>iii. Will it encourage new business start-ups, small businesses and opportunities for local people?</li> <li>iv. Will it promote business in key sectors?</li> <li>v. Will it promote regeneration?</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>i. The policy seeks to make provision for a modern bus garage that provides a healthy work environment for staff members. In addition, the policy seeks to improve the business environment through incorporating additional commercial uses, providing enhancements and improved access to dwell spaces, activation of the canal towpath. Delivering new employment space, increasing footfall and providing links to nearby businesses in the area will assist in improving business development and environment. (++)</li> <li>ii. See response to i above. The policy makes provision for additional commercial floorspace to help boost business resilience in the area. (++)</li> <li>iii. The policy makes provision for new commercial uses to support small and medium enterprises to contribute to the North Paddington Creative Enterprise Zone goals and the communities needs by the delivery of new community spaces. This will encourage new business start-ups, small businesses and opportunities for local people. (++)</li> <li>iv. The site is well served by public transport, shops and services and within the North West Economic Development Area (NWEDA) policy area and North Paddington Creative Enterprise Zone – both designations support commercial and residential growth in this area and promote businesses in key sectors. (++)</li> <li>v. A residential-led mixed use scheme could help to promote wider regeneration in the area. (++)</li> </ul>

Westminster City Council  
64 Victoria Street  
London, SW1E 6QP

020 7641 6000

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