

CITY PLAN 2019 – 2040

**SUSTAINABILITY APPRAISAL OF
MAIN MODIFICATIONS TO
WESTMINSTERS CITY PLAN**

2019-2040

NOVEMBER 2020

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Non-Technical Summary

Introduction

The Westminster draft City Plan 2019-2040 was submitted to the Secretary of State for Housing, Communities and Local Government on 19th November 2019. On behalf of the Secretary of State, 2 Inspectors were appointed to lead the independent examination of the Plan– Mr Kevin Ward BA (Hons) MRTPI and Mr Luke Fleming BSc (Hons) MRTPI.

The examination hearings took place virtually over Microsoft Teams, started on Monday 28th September 2020 and closed on 15th October 2020. At the concluding session on the 15th October 2020, the Inspectors agreed a list of actions, with Westminster City Council, that considered would make the City Plan sound.

Subsequent to which, the Inspectors wrote to the Council identifying a list of ‘main modifications’ to the submitted plan.

These proposed modifications are now published for consultation. The aim of this Sustainability Appraisal (SA) Report Addendum to the Integrated Impact Assessment, is essentially to present an appraisal of the proposed modifications, with a view to informing the current consultation. This report is required to ensure that the potential social, environmental and economic effects of main modifications to the Westminster City Plan are fully assessed for significant sustainability impacts and reported on as part of the plan making process.

Appraising Main Modifications

The main task is to appraise proposed modifications against the SA framework, and also discuss the ‘submission plan plus proposed modifications’.

The document specifically meets the requirements of Sustainability Appraisal (SA) and the SEA Directive. The initial chapters of this report identify the legislation governing SA and SEA and outlines the main modifications under assessment.

Those modifications ‘screened in’ for further SA appraisal are assessed in terms of the overall balance of impacts on an agreed set of Sustainability Appraisal objectives, as set out in the Integrated Impact Assessment (IIA) (Core_024). This appraisal is part of an iterative process, which seeks to achieve policies that are in line with the principles of sustainable development.

Reasonable alternatives

As required by Regulations, the IIA Framework (2019) along with supplementary information presented in the IIA addendum Report presented detailed information on reasonable alternatives to provide further detail of what other growth options were not considered to represent reasonable options and have therefore not been subject to full IIA testing which is fully justified in document Core_024

The Inspectors have not presented the Council with a need to re-appraise spatial strategy alternatives following the conclusion of the public hearings. As such, this report does not contain information on alternatives. There are two final points to note -

- As part of the appraisal of proposed modifications presented below (Chapter 3), consideration is given to how the new proposed spatial strategy (20,680 homes) performs against the submission spatial strategy (22,222 homes). As such, it can be

said that these two strategies are not dissimilar and do not warrant further assessment of examined alternatives.

- At the time of Plan adoption an 'SA Statement' will be published that explains how the Plan (as modified) is justified.

Generally, the effect of the modifications taken together on the Plan, as modified did not alter the overall conclusions of the IIA Framework. The proposed main modifications have resulted in major positive effects on 14 of the policies assessed and minor negative effects on two policies as discussed below:

- The expression of growth targets as minimums has resulted in an increase in scoring against the SA objective of natural resources for policies 2 (Tottenham Court Road Opportunity Area), 3 (Paddington Opportunity Area), 4 (Victoria Opportunity Area) 8 (housing delivery) 9 (Affordable Housing) 15 (town centres, high streets and the CAZ) 16 (visitor economy) now better supports the efficient use of land;
- Policies 8 (housing delivery) and 9 (affordable housing) also had positive impacts on the economy objective in recognition of the greater emphasis on intensification and affordable housing, which has the potential to promote regeneration.
- Policy 13 (Housing quality) has a positive impact on heritage and public realm and townscape objectives in recognition of the greater flexibility the policy provides, as this change allows applicants to take into account the context, character and setting of the site and thereby being responsive to heritage assets and their settings, including views, good designed spaces and the townscape. A negative impact has resulted against the noise objective as greater flexibility can give rise to applicants not providing external amenity space in noisy areas.
- Policy 15 (Town Centres, High Streets and the CAZ) now makes specific reference to intensification in a manner that respects heritage and townscape, as such more positive effects can be seen. The modification also gives rise to positive impacts against the natural resources (i.e. efficient use of land) objective.
- Policy 16 (Visitor Economy) has resulted in positive impacts against climate change and heritage which reflects the updated requirements on developments at existing hotels to address these issues where opportunities exist, which contributes to the increased emphasis enhancing and protecting Westminster's cultural heritage.
- Policy 17 (Food, drink and entertainment uses) the modifications have resulted in positive impacts against the SA objective of housing as greater scope now exists for new provision on the upper floors of public houses. However, given the detrimental impacts of shisha smoking on public health, the modifications have resulted in a reduction in overall scoring against the health and wellbeing objective, in that the policy now offers greater scope for new premises (subject to mitigation of their impacts on the local environment) than the earlier iteration of the policy.
- Policy 19 (Education and Skills) the modifications remove reference to upgraded and new teaching and research facilities and purpose-built student housing only being for students studying within Westminster. This has resulted in an increased positive effect on the housing objective, with the policy now being more supportive of student housing.

- Policies 23 (Harley Street SPA) and 24 (Saville Row SPA) respond to the governments changes to the Use Classes Order, and the extent to which it is now possible to protect the clustering of medical and retail uses in these areas. The modifications to the two policies also clarify that the impact on townscape and heritage will be key considerations when assessing proposals for additional floorspace in the area. This has a positive impact against the heritage and public realm and townscape objectives.
- Policy 27 (Public transport and infrastructure) proposes a change that encourages developments to improve accessibility to, and legibility of existing and proposed public transport by creating and improving walking and cycling links to stops or stations facilitate, rather than seeking a financial contribution. This modification contributes a major positive benefit against the public realm and townscape objective.
- Policy 28 (Parking) adopts the London Plan standards, which have contributed to greater positive impacts against climate change, air quality and public realm objectives.
- Policy 29 (Highway access and management) provides clarification on policy wording and this has resulted in a positive impact on health and well-being which contributes to improving the pedestrian environment and ensuring pedestrian safety and movement is not compromised.
- Policy 32 (waterways and waterbodies) proposes a few new clauses to proposals for permanent moorings on the River Thames and its flood defences, specifically in terms of impacts on the biodiversity value of the foreshore, making reference to the London Biodiversity Action Plan. These modifications make a major positive contribution to the biodiversity and flood risk objectives, by preserving and mitigating against the impact of development on biodiversity habitats and reducing flood risk from all sources.
- Policy 36 (Flood Risk) provides further clarification on the protection of flood defences, wastewater and sewerage infrastructure. This change makes a positive contribution to the waste objective as it requires developers to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades at the early stages of development.
- Policy 38 (Waste Management) proposed changes strengthen Westminster's policy approach to waste management to achieve greater alignment with the London Plan approach, taking account of the Westminster's Waste Data Study. These changes have resulted in positive impacts on climate change and natural resources objectives.

Next steps

The next step is for the Inspector to consider the representations raised as part of the consultation on the main modifications, alongside this SA Report Addendum, before concluding on the Plan's soundness and closing the examination of Westminster's City Plan 2019 - 2040.

1.0 INTRODUCTION TO WESTMINSTER CITY PLAN

Background

Westminster City Plan Examination

Westminster's draft City Plan 2019-2040 was submitted to the Secretary of State for Housing, Communities and Local Government on 19 November 2019. On behalf of the Secretary of State, 2 Inspectors were appointed to lead the independent examination of the Plan– Mr Kevin Ward BA (Hons) MRTPI and Mr Luke Fleming BSc (Hons) MRTPI. The examination hearings took place virtually over Microsoft Teams. The examination hearing sessions started on Monday 28th September 2020 and closed on 15th October 2020.

SA of the Main Modifications to the Westminster City Plan

In considering representations received and discussions at the examination hearing sessions, the Inspectors have written to the Council (document reference INSP-24v2) to indicate that they are satisfied that the examination can proceed to consultation on the main modifications (document reference CORE_28).

This SA Report Addendum

The aim of this SA Report Addendum is essentially to present an appraisal of the proposed modifications, with a view to informing the current consultation.

In addition to presenting an appraisal of the proposed modifications, this report presents an appraisal of the 'the Plan as modified' by assessing the cumulative impacts of the modifications, thereby updating the appraisal findings presented within the SA Report (Core _024).

It is important to emphasise that this is an addendum to the IIA Framework and hence should be read alongside the full Integrated Impact Assessment (IIA) Framework, the IIA Scoping Report (June 2019) and the IIA Addendum Report (March 2020) (document reference CORE_024).

2.0 BACKGROUND TO THE SUSTAINABILITY APPRAISAL

Introduction

Under the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for Local Plans. The purpose of SA is to set out how sustainable development will be achieved through the integration of economic, environmental and social considerations into the preparation and adoption of Local Plan documents. SA is an integral part of good plan making and should not be seen as a separate activity, it is an iterative process that identifies and reports on the likely significant effects of the Plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined.

Compliance with SEA Directive

It is a requirement of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC for an Environmental Report to be produced for certain plans and programmes "identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme". The objective of the SEA Directive is:

"To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans, with a view to promoting sustainable development"

SEA is transposed into UK legislation through the Environment Assessment of Plans and Programmes Regulations 2004. SEA is focused on environmental effects, whereas SA goes further by examining all the sustainability related effects of plans, be they economic, social or environmental.

The SEA Directive states that a SEA/Environmental Report is mandatory for plans/programmes which:

are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste/ water management, telecommunications, tourism, town & country planning or land use and which set the framework for future development consent of projects listed in the EIA Directive.

OR

have been determined to require an assessment under the Habitats Directive.

Government Guidance integrates the requirements of the SEA Directive into the SA process. To comply with the Directive, authorities are obliged to report on the environmental impacts of various alternatives considered before the plan is adopted, and the guidance calls for the SA Report to incorporate the elements of the Environmental Report required by the Directive. The requirements of the SEA Directive are considered in detail in the Councils IIA Scoping Report (Sections 3 and 4) as follows:

1. Contents, main objectives of the Local Plan and relationship with other relevant plans and programmes.
2. The relevant aspects of the current state of the environment, and the likely evolution thereof without implementation of the Plan.
3. The environmental characteristics of the area.
4. Any existing environmental problems.

The remaining requirements of the SEA Directive are detailed in turn below.

Sustainability Objectives

The objectives used to assess the sustainability implications of the main modifications are set out in table 1. These were developed and refined as part of the Sustainability Appraisal Scoping process. The 17 sustainability objectives, each with several guide questions that correspond to one of the assessments as outlined within table 1 of the IIA Framework are known collectively as the SA Framework.

The baseline information set out in Table 1 below has been collected under several sub-topics which can be broadly classified as social, economic and environmental to demonstrate how the SEA topic areas (as set out in Annex 1 of the SEA Directive) have been covered.

It is these indicators that have been used to establish the baseline of current social, economic and environmental conditions and the identification and review of other plans that influence and govern development in Westminster, which has led to the establishment of Sustainability Appraisal (SA) Objectives.

Table 1: Sustainability Objectives for Westminster's City Plan

SA Objective	Sustainability Framework: Guidance on making progress towards each objective	Type of objective	SEA Directive theme
1. Communities	Will it improve access to local services, shops and community facilities? Will it increase ability to influence decision-making (neighbourhoods)?	Social	Population and Human health and social inclusion
2. Crime reduction	Will it reduce crime, disorder and antisocial behaviour? Will it reduce fear of crime, disorder and antisocial behaviour? Will it reduce other behaviour adversely affecting the local environment?	Social	Population and Human health and social inclusion
3. Housing	Will it create high quality homes? Will it increase range of affordable housing? Will it reduce homelessness? Will it reduce number of unfit homes? Will it provide a range of housing types and sizes?	Social	Population and Human health and social inclusion
4. Health and Wellbeing	Will it help improve health inequalities? Will it contribute to a reduction in death rates? Will it improve access/movement? Will it encourage healthy lifestyles through increased participation in sport and physical activity? Will it improve cultural wellbeing?	Social	Population and Human health and social inclusion
5. Climate change	Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? * Will it reduce ozone depleting emissions? * Will it reduce emissions through retrofitting new technology? * Will it reduce heat island effects on people and property? * Will it increase resilience to climate change? *	Environmental	Climate change, Air and Water
6. Natural resources	Will it reduce water consumption and improve water efficiency? Will it reduce consumption of fossil fuels? * Will use of other natural resources (e.g. quarried materials, wood) be minimised? Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? Will it make efficient use of land?	Environmental	Material assets
7. Flood risk and water quality	Will it minimise flood risk from all sources of flooding? * Will it reduce property damage due to storm events/heavy rainfall by	Environmental	Climate change, Air and Water

	improving flood resistance and flood resilience?*		
	Will it reduce combined sewer overflow events?*		
	Will it protect water quality?*		
8. Biodiversity	Will it protect, enhance and increase biodiversity and protect habitats? Will it preserve Sites of Importance for Nature Conservation? Will it improve access to and promote educational value of sites of biodiversity interest?*	Environmental	Biodiversity, flora and fauna
9. Air Quality	Will it improve air quality? * Will it reduce emissions of key pollutants?*	Environmental	Climate change, Air and Water
10. Noise	Will it reduce noise concerns and noise complaints? Will it reduce noise levels? *	Environmental	Population and Human health and social inclusion
11. Transport	Will it reduce volumes of traffic?*	Environmental	Transport and Accessibility / Population
	Will it encourage walking and cycling?*		
	Will it increase proportion of journeys using modes other than the car?*		
	Will it improve public transport accessibility?*		
12. Waste	Will it reduce consumption of materials and resources? Will it reduce household waste? Will it increase recycling, recovery and re-use? Will it reduce construction waste?	Environmental	Climate change, Air and Water
13. Heritage	Will it conserve or enhance heritage sites and cultural value? Will it protect strategic views? Will it conserve or enhance heritage assets and their settings? Will it help preserve, enhance and record archaeological features and their settings? Will it protect and enhance the setting of the Westminster World Heritage Site?	Social	Built and Cultural Heritage, Landscape and Local Distinctiveness
14. Public Realm and Townscape	Will it enhance townscape? Will it encourage exemplary design standards? Will it reduce litter? Will it enhance the quality of public realm? Will it improve access and mobility for all equality group strands? **	Social	Climatic factors/ Material assets
15. Open Space	Will it enhance the quality of open space?*	Social	Population and Human health and social inclusion
	Will it improve landscape character? Will it improve access to open space? **		
	Will it enhance the green infrastructure network? **		

16. Employment Opportunities	Will it improve qualifications, skills or training? ** Will it create new jobs and reduce unemployment? * Will it provide jobs for those most in need? * Will it improve earnings? Will it promote equality of opportunity across the city by tackling barriers to employment?	Economic	Economy and Employment
17. Economy	Will it improve business development and environment? Will it improve business resilience and economy? Will it encourage new business start-ups, small businesses and opportunities for local people? * Will it promote business in key sectors? Will it promote regeneration? **	Economic	Economy and Employment

Methodology to the Sustainability Appraisal

Stages of the SA

The Planning Advisory Service plan-making manual¹ and the National Planning Practice Guide outlines the following five stages for SA:

- **Stage A-** Setting the context and objectives, establishing the baseline and deciding the scope (*IJA Scoping Report, June 2018*);
- **Stage B-** Developing and refining plan options and assessing effects (*IJA Framework (June 2019) and the IJA Addendum Report (March 2020)*);
- **Stage C-** Appraising the effects of the plan (*IJA Framework Table 1 and this SA Addendum Report, published June 2019*);
- **Stage D-** Consulting on the main modifications and the SA report; and
- **Stage E-** Monitoring implementation of the Plan.

Stage A- The Scoping Report

A first draft of the full IJA was prepared alongside the first informal draft of the City Plan 2019-2040 in November 2018. As the City Plan policies were revised following informal consultation on the Plan, the assessments were reviewed and updated to inform the Plan, accordingly the IJA Framework was updated and refined considering comments received to the baseline information (Annex III) and the IJA Scoping Report (Section 3).

Links to Other Policies, Plans and Programmes and Sustainability Objectives

The relevant plans and programmes are listed at Annex IV of the IJA Framework (Core_006). No additional plans or programmes have been reviewed as part of the SA process for the main modifications, as those detailed are the most up to date and have been considered in the formulation of the Plan.

¹ PAS Plan Making Manual – www.pas.gov.uk

Stage B- Developing and Refining Plan Options and assessing their effects

The IIA Framework section 2 sets out the options and reasonable alternatives considered for the Westminster draft City Plan. The options and alternatives for the policies to be included in the draft City Plan were assessed against the 17 sustainability objectives; the results of these assessments are contained within Annex I, table 3 of the IIA framework, which sets out the effects of policies and the extent to which the options and alternatives for the policies help to achieve the relevant sustainability objectives.

This document forms Stages C and D of the above process.

Stage C- Assessment of Effects

As part of the Sustainability Appraisal process, the Council is required to determine the likely significant effects of the main modifications on the social, environmental and economic sustainability objectives with a view to informing the consultation and subsequent plan finalisation.

Table 2 sets out scoring related to the significance of the potential effects of the policies.

Table 2: Scoring matrix	
Significance of Effect	
++	Significant positive effect
+	Minor positive effect
0	Neutral/ No effect
-	Minor Negative effect
--	Major Negative effect

For each policy, there is a narrative setting out the impact of the changes against each of the relevant SA objectives and a corresponding matrix where the changes have led to a revised scoring within the matrix.

Policies not referenced in the discussion below are those that are 'screened-out' on the basis that they are likely to have limited substantive implications, and in turn not likely to lead to significant effects, either alone or in combination (see SA screening table at Appendix 1), in these cases the original assessments in the IIA Framework (CORE_006, June 2019) still stand.

3.0 APPRAISING PROPOSED MODIFICATIONS

The main task is to appraise proposed modifications against the SA framework, and discuss the cumulative impact of these modifications on the Plan against the sustainability objectives, see Table 1.

Generally, the effect of the modifications taken together on the Plan, as modified did not alter the overall conclusions of the IIA Framework.

The proposed main modifications taken together have resulted in major positive effects on 14 of the policies and resulted in minor negative effects on two policies as discussed below:

- The expression of growth targets as minimums has resulted in an increase in scoring against the SA objective of natural resources for policies 2 (Tottenham Court Road Opportunity Area), 3 (Paddington Opportunity Area), 4 (Victoria Opportunity Area) 8 (housing delivery) 9 (Affordable Housing) 15 (town centres, high streets and the CAZ) 16 (visitor economy) now better supports the efficient use of land;
- Policies 8 (housing delivery) and 9 (affordable housing) also had positive impacts on the economy objective in recognition of the greater emphasis on intensification and affordable housing, which has the potential to promote regeneration.
- Policy 13 (Housing quality) has a positive impact on heritage and public realm and townscape objectives in recognition of the greater flexibility the policy provides, as this change allows applicants to take into account the context, character and setting of the site and thereby being responsive to heritage assets and their settings, including views, good designed spaces and the townscape. A negative impact has resulted against the noise objective as greater flexibility can give rise to applicants not providing external amenity space in noisy areas.
- Policy 15 (Town Centres, High Streets and the CAZ) now makes specific reference to intensification in a manner that respects heritage and townscape, as such more positive effects can be seen. The modification also gives rise to positive impacts against the natural resources (i.e. efficient use of land) objective.
- Policy 16 (Visitor Economy) has resulted in positive impacts against climate change and heritage which reflects the updated requirements on developments at existing hotels to address these issues where opportunities exist, which contributes to the increased emphasis enhancing and protecting Westminster's cultural heritage.
- Policy 17 (Food, drink and entertainment uses) the modifications have resulted in positive impacts against the SA objective of housing as greater scope now exists for new provision on the upper floors of public houses. However, given the detrimental impacts of shisha smoking on public health, the modifications have resulted in a reduction in overall scoring against the health and wellbeing objective, in that the policy now offers greater scope for new premises (subject to mitigation of their impacts on the local environment) than the earlier iteration of the policy.
- Policy 19 (Education and Skills) the modifications remove reference to upgraded and new teaching and research facilities and purpose-built student housing only being for students studying within Westminster. This has resulted in an increased positive effect on the housing objective, with the policy now being more supportive of student housing.
- Policies 23 (Harley Street SPA) and 24 (Saville Row SPA) respond to the governments changes to the Use Classes Order, and the extent to which it is now possible to protect the clustering of medical and retail uses in these areas. The modifications to the two policies also clarify that the impact on townscape and heritage will be key considerations when assessing proposals for additional

floorspace in the area. This has a positive impact against the heritage and public realm and townscape objectives.

- Policy 27 (Public transport and infrastructure) proposes a change that encourages developments to improve accessibility to, and legibility of existing and proposed public transport by creating and improving walking and cycling links to stops or stations facilitate, rather than seeking a financial contribution. This modification contributes a major positive benefit against the public realm and townscape objective.
- Policy 28 (Parking) adopts the London Plan standards, which have contributed to greater positive impacts against climate change, air quality and public realm objectives.
- Policy 29 (Highway access and management) provides clarification on policy wording and this has resulted in a positive impact on health and well-being which contributes to improving the pedestrian environment and ensuring pedestrian safety and movement is not compromised.
- Policy 32 (waterways and waterbodies) proposes a few new clauses to proposals for permanent moorings on the River Thames and its flood defences, specifically in terms of impacts on the biodiversity value of the foreshore, making reference to the London Biodiversity Action Plan. These modifications make a major positive contribution to the biodiversity and flood risk objectives, by preserving and mitigating against the impact of development on biodiversity habitats and reducing flood risk from all sources.
- Policy 36 (Flood Risk) provides further clarification on the protection of flood defences, wastewater and sewerage infrastructure. This change makes a positive contribution to the waste objective as it requires developers to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades at the early stages of development.
- Policy 38 (Waste Management) proposed changes strengthen Westminster's policy approach to waste management to achieve greater alignment with the London Plan approach, taking account of the Westminster's Waste Data Study. These changes have resulted in positive impacts on climate change and natural resources objectives.

4.0 CONCLUSIONS AND NEXT STEPS

Generally, the effect of the modifications taken together on the Plan, as modified did not alter the overall conclusions of the IIA Framework. The proposed main modifications have resulted in major positive effects on 14 of the policies assessed and minor negative effects on two policies namely:

- Policy 13 (Housing Quality) where a minor negative impact on the health and wellbeing objective has been recorded, recognising that the greater flexibility the policy provides may contribute to applicants not providing external amenity space in noisy areas. These changes do not affect the earlier assessment of the policy against the relevant objectives of communities, housing, health and wellbeing, open space, heritage and public realm and townscape; and

- Policy 17 (food, drink and entertainment uses) has resulted in a reduction in the health and well-being objective given the detrimental impacts of shisha smoking on public health, the policy now offers greater scope for new premises (subject to mitigation of their impacts on the local environment) than the earlier iteration of the policy. Other SA objectives are not materially affected by these modifications and scoring therefore remains as previously.

Nineteen policies recorded no change as the modifications provided clarity, and taken as a whole, these changes did not change the policies which was reflected in the assessments.

Overall the modifications have contributed to major positive impacts against the sustainability objectives across fourteen policies, with only two policies identifying minor negative impacts. As such, it can be seen that the main modifications improve the Plan's performance in terms of sustainable development.

Monitoring

The SEA regulations set out that local planning authorities should monitor the significant environmental effects of implementing the local plan, with the aim of identifying any unforeseen adverse effects at an early stage so appropriate remedial actions can be taken.

Detailed information regarding monitoring the sustainability effects of implementing the City Plan is set out in Section 4 of the full Integrated Impact Assessment Framework (June 2019). Westminster will continue to monitor the sustainability effects of City Plan policies and report on the outcomes through the Council's Annual Monitoring Report.

Next steps

The next step is for the Inspectors to consider the representations raised as part of the consultation on the main modifications, alongside this SA Report Addendum, before deciding whether they are in a position to determine Westminster's City Plan 2019 – 2040 is sound.

Assuming that the Inspectors are able to find the Plan 'sound', it will then be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full.

APPENDIX 1 – Screening Table

Main Modification as set out in Core_28V2	Policy/ Section of the Plan	Reason for change	Further SA required?
MM01	Introduction, How to use this plan, Step 2 page 4	Deleted text to reflect other changes in the Plan	Screened out. Deleted text does not require SA.
MM02	How to use this plan, Step 2 page 4	Deleted text accepted for clarification.	Screened out. Deleted text does not require SA.
MM03	Contents, page 7	Deleted text accepted as a main modification to reflect changes to Appendix 1.	Screened out. Deleted text does not require SA.
MM04	Policy 1	Modifications to Clauses A and B: <ul style="list-style-type: none"> • Clarify that modern architecture is supported,; • Reduce the housing delivery target and express affordable housing targets as a minimum; • Better recognise the role of jobs growth through a range of commercial development; • Place greater emphasis on heritage and climate change considerations; and • Clarify growth targets and nature of development across different parts of the city. 	Screened in. Amended policy 1 will require further SA.
MM05	Policy 2	Modifications to Policy Clause A: <ul style="list-style-type: none"> • to provide greater clarity of the growth targets for West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area and express them as minimum; and • provide a clearer distinction of how the nature of development within the Opportunity Area is envisaged to be different to that in the rest of the WERLSPA, given its high heritage and townscape value. • Delete Clause B re-name subsequent clauses accordingly • Remove reference to key development sites from Figure 8 to reflect changes to Appendix 1. 	Screened in. Amended policy 2 will require further SA.

MM06	Policy 3	<p>Amend clauses A, F and G to:</p> <ul style="list-style-type: none"> • provide greater clarity of the growth targets within the Paddington Opportunity Area, and express them as minimums. • Introduce reference to the provision of upgrades and increased healthcare provision in the area to properly reflect aspirations for St Mary's Hospital • Introduce reference to the provision of community facilities in the area for local and nearby residents. • Remove reference to key development sites from Figure 9 to reflect changes to Appendix 1. 	Screened in. Amended policy 3 will require further SA.
MM07	Policy 4	<p>Amend Policy and clause A to:</p> <ul style="list-style-type: none"> • provide greater clarity of the growth targets within the Victoria Opportunity Area, and express them as minimums. • Remove reference to key development sites from Figure 10 to reflect changes to Appendix 1. 	Screened in. Amended policy 4 will require further SA.
MM08	Policy 5	Remove reference to key development sites from Figure 11 to reflect changes to Appendix 1.	Screened Out. No policy wording change.
MM09	Policy 6	Remove reference to key development sites from Figures 12 and 13 to reflect changes to Appendix 1.	Screened Out. No policy wording change.
MM10	Policy 8	<p>Amend policy title and clause A to:</p> <ul style="list-style-type: none"> • Reduce the housing delivery target from 22,222 homes to 20,685 homes during the Plan period. The target is now in line with the London Plan target and better reflects updated evidence on housing supply. 	Screened In. Amended policy 8 requires further SA.
MM11	Policy 9	<p>Amend clauses A and H to:</p> <ul style="list-style-type: none"> • Requires "at least" 35% of affordable housing. • Prevents the demolition or loss of existing affordable floorspace unless it is replaced but at least 	Screened In. Amended Policy 9 requires further SA.

		the equivalent amount of floorspace. The approach is now in line with the London Plan approach.	
MM12	Policy 10	Delete policy 10 in its entirety.	N/A
MM13	Policy 11	Amend Clauses B, D, G, H, I and J to: <ul style="list-style-type: none"> Clarify the 25% family-sized homes is a strategic target and not applicable to every site. Removes the requirement to replace surplus 'specialist' housing with affordable housing (it can now be replaced by other types of housing). Removes requirement that Purpose Build Student Accommodation (PBSA) be used by institutions with a main hub in Westminster and that PBSA development should not result in the loss of other housing types. Clarifies that the requirement for affordable student housing is in line with the London Plan requirement. Allows the loss of PBSA where it is demonstrably surplus to requirements, rather than only as part of an institution's published strategy. Widens the scope of considerations for any applications for gypsy & traveller accommodation. 	Screened In. amended policy 11 will require further SA.
MM14	Policy 12	Amend Clauses A and B to: <ul style="list-style-type: none"> Clarify how different types of housing contribute to affordable housing in different ways and to remove the reference to intermediate rent. 	Screened In. amended policy 12 will require further SA.
MM15	Policy 13	Amend Clauses D and E to: <ul style="list-style-type: none"> Clarify the approach to the provision of external amenity space. 	Screened In. amended policy 13 will require further SA.
MM16	Policy 14	Amend Clauses A and D to respond to the government's changes to the Use Classes Order.	Screened In. amended policy 14 will require further SA.
MM17	Policy 15	Amend Clauses A, B, C, H, I and J to respond to the government's changes to the Use Classes Order.	Screened In. amended policy

		Delete clause D.	15 will require further SA.
MM18	Policy 16	Amend Clauses B, G and H to: <ul style="list-style-type: none"> • Extend protection to 'uses of cultural significances' given their importance to Westminster's heritage; • Clarify locations where hotels and conference facilities are supported; and • Realise opportunities for upgrades to existing hotels and consideration of their impacts on surrounding areas. 	Screened In. amended policy 16 will require further SA.
MM19	Policy 17	Amend Clauses A, B and F to: <ul style="list-style-type: none"> • Consider proposals for new food, drink and entertainment uses to ensure they are not detrimental to town centre vitality and viability; • Provide a less restrictive approach to shisha premises and provides greater clarity of the exceptional circumstances in which they may be acceptable, subject to mitigation measures. 	Screened In. amended policy 17 will require further SA.
MM20	Policy 19	Amend Clause B to remove reference to upgraded and new teaching and research facilities and purpose-built student housing only being for students studying within Westminster.	Screened In. amended policy 19 will require further SA.
MM21	Policy 21	Amend Clause C to respond to reflect the governments changes to the Use Classes Order within the Soho SPA.	Screened In. amended policy 21 will require further SA.
MM22	Policy 22	Amend Clause A to respond to the government's changes to the Use Classes Order within the Mayfair and St. James SPA. Delete clauses B and C.	Screened In. amended policy 22 will require further SA.
MM23	Policy 23	Amend Clauses B and C to respond to the government's changes to the Use Classes Order within the Harley Street SPA.	Screened In. amended policy 23 will require further SA.
MM24	Policy 24	Amend Clauses A and B to respond to the government's changes to the Use Classes Order and to make clear that a range of commercial uses are supported alongside	Screened In. amended policy 24 will require further SA.

		tailoring uses within Saville Row SPA. Insert new clause C and guidance on Use class E	
MM25	Policy 25	Amend Clause C part 5 to remove reference to cycles and broaden the scope of the policy to include all infrastructure and routes and where necessary, to mitigate the impacts of new development.	Screened In. amended policy 25 will require further SA.
MM26	Policy 26	Amend Clause D part 3 to meet the cycle parking and cycle facilities standards as set out in the London Plan.	Screened In. amended policy 26 will require further SA.
MM27	Policy 27	Amend clause C part 1 to remove reference to a financial contribution and require access and improvements all sustainable transport modes through improvements to the public realm.	Screened In. amended policy 27 will require further SA.
MM28	Policy 28	Amend Policy to reflect the London Plan parking standards.	Screened In. amended policy 28 will require further SA.
MM29	Policy 29	Amend clauses A and B to protect footways and highway land in new developments.	Screened In. amended policy 29 will require further SA.
MM30	Policy 31	Amend clause C to removes reference to Westminster's Electric Vehicle Strategy (2019) and Appendix 2 to align with the London Plan approach.	Screened In. amended policy 31 will require further SA.
MM31	Policy 32	Amend clause G to enhance protection of the River Thames and its flood defences, specifically the foreshore in terms of biodiversity.	Screened In. amended policy 32 will require further SA.
MM32	Policy 33	Amend Clauses B and C and the air quality positive approach to align with the London Plan Policy S11.	Screened In. amended policy 33 will require further SA.
MM33	Policy 34	Amend clause A to extend protection against environmental impacts to future occupiers.	Screened In. amended policy 34 will require further SA.
MM34	Policy 35	Amend clause G to promote net gains in biodiversity.	Screened In. amended policy 35 will require further SA.

MM35	Policy 36	Amend clauses G, H and J to enhance protection of flood defences and Insert new clauses I to respond to wastewater infrastructure needs over the plan period.	Screened In. amended policy 36 will require further SA.
MM36	Policy 37	Amend clause B and provide clarification on the zero carbon targets and how they should be applied.	Screened In. amended policy 37 will require further SA.
MM37	Policy 38	Amend Policy to align with the London Plan approach to waste management and to take account of the findings of the Waste Data Study.	Screened In. amended policy 38 will require further SA.
MM38	Policy 39	Amend clause D part 3 to clarify how development will address water efficiency.	Screened In. amended policy 39 will require further SA.
MM39	Policy 40	Amend policy to clarify approach and implementation.	Screened In. amended policy 40 will require further SA.
MM40	Policy 41	Amend clause E to and delete clauses F and G to clarify policy implementation and approach.	Screened In. amended policy 41 will require further SA.
MM41	Policy 42	Amend clauses A and E to clarify definition of tall building and where they will be appropriate and delete clauses B and C.	Screened In. amended policy 42 will require further SA.
MM42	Policy 43	Amend clause B correctly name housing renewal areas.	Screened In. amended policy 43 will require further SA.
MM43	Land use swaps, Page 174	Amended text for clarification.	Screened out. text does not require further SA.
MM44	New paragraph in Implementation chapter, page 174	Amended text for clarification.	Screened out. text does not require further SA.
MM45	New paragraph in Implementation chapter, page 174	Amended text for clarification.	Screened out. text does not require further SA.
MM46	Monitoring page 174	Amended text for clarification.	Screened out. text does not require further SA.
MM47	New Paragraph under monitoring, page 174	Amended text for clarification.	Screened out. text does not

			require further SA.
MM48	KPIs Table	Replace and update table	Screened out. text does not require further SA.
MM49	Appendix 1	To be replaced in its entirety	Screened out. text does not require further SA.
MM50	Appendix 2	To be removed entirely	Screened out. text does not require further SA.
MM51	Glossary – Air Quality Neutral	Definition as London Plan	Screened out. text does not require further SA.
MM52	Glossary- carbon neutral/ zero carbon	Definition as London Plan.	Screened out. text does not require further SA.
MM53	Glossary- context height	Definition provided for clarity	Screened out. text does not require further SA.
MM54	Glossary- gross floorspace	Definition provided for clarity	Screened out. text does not require further SA.
MM55	Glossary- zero emissions.	Definition provided for clarity	Screened out. text does not require further SA.

**CITY
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2019 – 2040**



City of Westminster