



City of Westminster

# CITY PLAN

## Integrated Impact Assessment: Scoping Paper



## **Integrated Impact Assessment: Scoping stage**

### **What is this document?**

In 2019, as part of the development of the City Plan 2019 – 2040, the council produced an Integrated Impact Assessment (IIA). The IIA includes an Sustainability Appraisal, considering all likely significant effects on the environment, economic and social factors in line with relevant legislation; Equalities Impact Assessment (EqIA) – considering equality impacts, having regard to the protected characteristics in the Equalities Act 2010; Health Impact Assessment (HIA) – seeking to maximise positive health impacts; and a Community Safety Assessment – seeking to prevent crime and disorder in line with the Crime and Disorder Act 1998. The IIA was commenced in 2017 with a scoping exercise, and was updated during the development of the City Plan to reflect the most up to date data and published policy framework.

The council are currently at scoping stage for an IIA as part of a review of the City Plan, and are considering using of the objectives produced in the 2019 IIA as the basis for the objectives for the IIA that will be produced for the partial review of the City Plan.

The 2017 IIA scoping report consisted of a literature review of the plans, strategies and programmes that were published at the time, and an analysis of the baseline data for the city. From the literature review and data analysis, the report identified key sustainability issues for the city and developed an IIA framework which comprised a series of objectives to assess the policies that were developed as part of the City Plan. A copy of these objectives, which cover environmental, social, economic, equalities, health, and crime and disorder issues, is included in Appendix 1.

The council are currently embarking on a partial review of the City Plan, and are looking to amend or introduce policies relating to site allocations, affordable housing and retrofit development. In conducting this partial plan review, the council will need to assess new or revised policies and site allocations against an IIA Framework. This document therefore examines if the objectives prepared through the 2017 scoping exercise and listed in Appendix 1 require any amendment in light of a review of key data and literature published since the IIA process began.

This paper has been prepared as part of stage one of the Integrated Impact Assessment (IIA) process for the Westminster City Plan Partial Review. A full Integrated Impact Assessment, assessing the impact of proposed policies and site allocations against the IIA Framework will be produced alongside the development of the City Plan Partial Review.

### **Consultation arrangements**

The council want to seek the views of the relevant statutory consultees on this approach, and this paper will be sent to the statutory bodies as part of the Regulation 18 consultation on the City Plan Partial Review, i.e. before the IIA Framework for appraising the City Plan Review is finalised to ensure feedback can be taken on board in a timely manner.

### **Baseline Data changes:**

This section sets out key changes in baseline data since the 2017 IIA Scoping Report was produced.

### **Office for National Statistics Census 2021:**

The ONS carried out a census survey during 2021, the results of which have not yet been fully published. The initial data that has been published shows that Westminster has had a 6.9% decline in its population from 2011 – 2021 (204,300 down from 219,400). It also shows some changes in age structure of the resident population - there has been an increase of 0.8% in people aged 65 years and over, a decrease of 5.6% in people aged 15 to 64 years, and a decrease of 19.4% in children aged under 15 years.

It is important to note that this Census data only provides a snapshot in time, and the survey was carried out during the Covid-19 pandemic, when it is suspected that many residents from Westminster temporarily moved away from the area.

### **Climate Change:**

Westminster's emissions have continued to fall from 2502 kilo tons per annum in 2014, to 1760 kilo tons per annum in 2020<sup>i</sup>. The reduction may have been influenced by some reduction in economic activity during the Covid-19 pandemic.

The decade from 2011 to 2020, the UK climate was 1.1°C warmer on average than the 1961 to 1990 average<sup>ii</sup>, as well as increased frequency of extreme weather events affecting the City (widespread flooding in 2021, and prolonged heat wave in 2022), suggesting that despite a drop in emissions, climate change is an increasingly challenging issue for the city.

### **Deprivation:**

The Index of Multiple Deprivation (2019) identifies Westminster as the 134th most deprived of the 317 districts in England, from being the 57th most deprived Local Authority in 2015<sup>iii</sup>. Although this is an improvement, Westminster remains in the bottom half of the most deprived local authorities in the country.

### **Housing Market:**

Average property prices in Westminster have declined since 2017, from an average of £1,040,211 to £881,375 in 2022<sup>iv</sup>. The average median rents for a 1 bedroom flat in the City have however risen to £1885<sup>pcm</sup>, and over £2,700 <sup>pcm</sup><sup>v</sup>.

### **Income and employment:**

The employment rate of economically active individuals in Westminster is around 66.4%, compared to around 75.2% in London<sup>vi</sup>. The median annual pay in Westminster in 2021 was around £39,564<sup>vii</sup> compared to £38,089 in 2017.

## Analysis

While some of the baseline data for the 2017 Report is now several years old, the key data updates provided above are not considered to raise any new issues which are not already addressed by the objectives of the 2019, or reduce the pertinence of any of the issues previously identified in the IIA provided at Appendix 1, and the existing IIA framework is likely appropriate.

## **Recently Adopted Relevant Plans, Programmes and Strategies**

This section sets out a summary of key new plans, programmes and strategies that have been adopted since the 2017 IIA Scoping Report, and their implications for the IIA Framework. A full list of the documents reviewed can be found in Appendix 2.

### **Climate, Environment and Biodiversity:**

Since the 2017 Report was produced, the council have declared a climate emergency and have adopted a *Climate Emergency Action Plan*, which sets out the council's plan to achieve net-zero across the city by 2040. The Environment Agency has adopted their new Flood and Coastal Erosion Risk Management Strategy Roadmap to 2026 (2020), which re-affirms the partnership work required in the Thames Estuary 2100 Plan (2012). The NPPF was also updated in 2019 to require plans and decisions to ensure development achieves biodiversity net gain.

The council are of the view that these updated plans and strategies will impact the IIA process, specifically the NPPF's stronger emphasis on delivering a net-gain in biodiversity. It is proposed to amend the 2017 aims and objectives to reflect this change in emphasis - **To protect, enhance and create environments that secure and support a net increase in biodiversity** (8).

The other objectives are considered to suitably capture the increased emphasis on the climate emergency: *To reduce greenhouse gas emissions and support climate change adaptation* (5); *To reduce the use of limited natural resources e.g; water, fossil fuels, quarried materials, wood* (6); *to reduce flood risk, promote sustainable urban drainage, protect surface and groundwater quality* (7);

### **Heritage:**

Historic England have updated their Tall Buildings: Historic England Advice Note, which provides guidance on the information required in planning for tall buildings, and identifying suitable locations, which is reflected in objective 13 of the existing IIA Framework i.e. *To conserve and enhance the historic environment and architectural, archaeological and cultural heritage*

## **Housing:**

Since the 2019 IIA, Government have introduced through Planning Practice Guidance a requirement for a new form of affordable housing known as 'First Homes'. As objective 3 of the existing IIA Framework already seeks to meet demand for affordable housing, no amendment to the IIA Framework is considered necessary.

## **The London Plan:**

Since the last IIA the Mayor of London has adopted an updated London Plan, and a suite of related guidance documents and strategies that touch on a variety of themes, including: Mayor's Transport Strategy (2018); Mayor's Housing Strategy (2019); the London Environment Plan; London Plan Guidance Whole Life-Cycle Carbon Assessment; The Mayor's Cultural Strategy; and Affordable Housing And Viability SPG. Whilst all of these documents strengthen and provide additional detail on how sustainable development can be achieved, none are considered to necessitate amendment to any of the existing IIA objectives listed in Appendix 1. Instead, the following existing objectives are considered to resonate well with the Mayor's ambitions as set out in the above documents: *to reduce the need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport (11) and; ensure provision of appropriate housing types to reduce homelessness, reduce overcrowded households and meet the demand for affordable housing and family sized units (3).*

## **Covid19: Business and Planning Act**

Since the 2017 IIA scoping report was completed, the Government has enacted the Business and Planning Act (2021) which amended parts of the planning system to support business with coping during the Covid-19 pandemic. It is acknowledged that the Covid-19 pandemic did cause a disruption to Westminster's economy, as well as the UK economy as a whole, and the long terms impacts of this are not yet fully understood. Nevertheless, the following objectives from the 2017 Scoping Report are still considered relevant and not in need of update as they are considered to sufficiently reflect the impacts of the pandemic on the economy: *16. To ensure equality of opportunities, and support sustainable economic growth throughout Westminster; and 17. To maintain economic diversity and support sustainable economic growth.*

## **Conclusion**

While the council do acknowledge that some of the baseline data from the 2017 IIA Scoping report has changed since it was produced, and that significant new plans, strategies and programmes have also been adopted in recent years, the existing IIA objectives remain relevant and, with exception of an amendment to the objective relating to biodiversity, no further objectives are considered necessary. Therefore, with the exception of the amendment to objective (8), there is no need to amend the existing IIA Framework as set out in Appendix 1. Subject to any feedback from stakeholders, it is therefore intended that these will be used to carry out the IIA of new or amended policies and site allocations as work on the City Plan Partial Review progresses.

**How to comment:**

We welcome your views on the approach to the IIA Framework explained in this report, and would particularly like to hear your views on if there is any other important updates in terms of data or new plans, programmes or strategies that mean that the IIA Framework set out in Appendix 1 now needs amending.

Please provide your comments by 5pm on 18th November 2022. Comments should be sent to:

By email: [planningpolicy@westminster.gov.uk](mailto:planningpolicy@westminster.gov.uk)

By post: City Plan Team Policy & Projects, Innovation and Change, Westminster City Council, 17th floor, 64 Victoria Street, London SW1E 6QP

## Appendix 1: 2019 IIA Framework

	IIA Objective	Appraisal questions (EQIA/IIA)
<b>1. Communities</b>	To create cohesive and inclusive communities, supported by the delivery of physical and social infrastructure.	Will it improve access to local services, shops and community facilities? Will it increase ability to influence decision-making (neighbourhoods)? * Will it foster an inclusive Westminster community? Will it encourage engagement in community activity?
<b>2. Crime reduction</b>	To reduce crime and the fear of crime (including disorder and antisocial behaviour).	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? **
<b>3. Housing</b>	To boost the supply of high quality housing of all types and tenures including affordable and specialist housing to address a range of needs.	Will it create high quality homes? ** Will it increase range of affordable housing? ** Will it reduce homelessness? ** Will it provide housing that can help people stay independent for longer? Will it reduce number of unfit homes? ** Will it provide a range of housing types and sizes?
<b>4. Health &amp; wellbeing</b>	To promote and improve quality of life and health and wellbeing of residents.	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? Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? * Will it provide access to a healthy diet? Will it create healthy homes and workplaces?
<b>5. Climate change</b>	To reduce greenhouse gas emissions and support climate change adaptation.	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? *

<b>6. Natural resources</b>	To reduce the use of limited natural resources and make efficient use of land	Will it increase resilience to climate change? * 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?
<b>7. Flood risk &amp; water quality</b>	To reduce flood risk, promote SUDs, protect surface and groundwater quality	Will it minimise flood risk from all sources of flooding? * Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? * Will it reduce combined sewer overflow events? * Will it protect water quality? *
<b>8. Biodiversity</b>	To protect, enhance and create environments that encourage and support 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? * Will it conserve and enhance species and habitats?
<b>9. Air quality</b>	To improve air quality	Will it improve air quality? * Will it reduce emissions of key pollutants? *
<b>10. Noise</b>	To reduce noise and the impact of noise.	Will it reduce noise concerns and noise complaints? Will it reduce noise levels? *
<b>11. Transport</b>	To encourage sustainable transport and major public transport improvements.	Will it reduce volumes of traffic? * Will it encourage walking and cycling? * Will it increase proportion of journeys using modes other than the car? * Will it improve public transport accessibility? *
<b>12. Waste</b>	To reduce waste production and increase recycling, recovery and re-use of 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?
<b>13. Heritage</b>	To conserve and enhance the significance of heritage assets and their settings	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?
<b>14. Public realm &amp; townscape</b>	To enhance 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? **
<b>15. Open space</b>	To protect Westminster's world class open and civic spaces, the Thames and other waterways and seek opportunities to increase open space and further greening.	Will it enhance the quality of open space? * Will it improve landscape character? Will it improve access to open space? ** Will it enhance the green infrastructure network? **
<b>16. Employment opportunities</b>	To ensure equality of opportunities, improve local opportunities and support sustainable economic growth throughout Westminster.	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? <b>Will it promote equality of opportunity across the city by tackling barriers to employment?</b>
<b>17. Economy</b>	To meet Westminster's need for workspace, shops, cultural facilities and other uses of local, London-wide and national importance to maintain economic diversity and support sustainable economic growth.	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? **



## **Appendix II: List of key plans, programmes and strategies published:**

### **City of Westminster:**

City Plan 2019 - 2040

Climate Emergency Action Plan

Environmental SPD

'Made' Neighbourhood Plans: Knightsbridge, Mayfair, Soho, Fitzrovia West, Queens Park

Fairer Westminster Strategy

### **Mayor of London:**

London Plan 2021 – updated plan

Homes For Londoners Affordable Housing And Viability Supplementary Planning Guidance (2017)

London Plan Guidance Whole Life-Cycle Carbon Assessment (2022)

The Mayor's Transport Strategy 2018

The Mayor's Housing Strategy 2018

Cultural Metropolis: The Mayor's Cultural Strategy – 2012 and Beyond and Mayor of London's Draft Culture Strategy (March 2018)

London Environment Strategy 2018

Culture and Night-Time Economy (2017)

### **Neighbouring authorities:**

RBKC Local Plan (Updated 2019)

Brent Local Plan (2022)

### **National:**

Planning practice guidance (2021)

NPPF

Energy Efficiency and Historic Buildings: Historic England (2018)

Tall Buildings: Historic England Advice Note

Business and Planning Act (2020)

25 Year Environment Plan – Department for Environment, Food and Rural Affairs 2018

Flood and Coastal Erosion Risk Management Strategy Roadmap to 2026

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<sup>i</sup> [UK local authority and regional greenhouse gas emissions national statistics - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics)

<sup>ii</sup> [Climate and weather \(data.gov.uk\)](https://data.gov.uk/collections/uk-climate-and-weather)

<sup>iii</sup> <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

<sup>iv</sup> [UK House Price Index \(data.gov.uk\)](https://data.gov.uk/collections/uk-house-price-index)

<sup>v</sup> [6b - Appendix 1.pdf \(westminster.gov.uk\)](#)<sup>v</sup>

<sup>vi</sup> [L101 Regional labour market: Local indicators for counties, local and unitary authorities - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/regions/england/l101-regional-labour-market-local-indicators-for-counties-local-and-unitary-authorities)

<sup>vii</sup>