

**CITY
PLAN
2019 – 2040**

**INTEGRATED
IMPACT ASSESSMENT**

REGULATION 19 CONSULTATION DRAFT
JUNE 2019

Non-Technical Summary

Westminster City Council is preparing a new City Plan 2019-2040 which sets out the council's vision to make Westminster a city of excellence in all areas. This Integrated Assessment has influenced the drafting of the new City Plan which will replace current adopted planning policy: City Plan (2016) and the Unitary Development Plan (2007).

Under the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) - including a Strategic Environmental Assessment (SEA) - prepared in accordance with the Strategic Environmental Assessment Directive EC/2001/42, is required for all Development Plan Documents. This stipulates that all local plans and spatial development strategies must be informed through an appraisal which considers how specific economic, social and environmental objectives will be met.

This report presents the findings of the Integrated Impact Assessment (IIA) for the Regulation 19 publication version of the City Plan. This covers assessments and appraisals that help optimise the policies and proposals in the City Plan and will help the council meet statutory requirements. It covers:

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

Consultation on the scoping report in 2017 led to updates of the information in the scoping report, including the IIA Framework, which sets out the objectives and sub-criteria that will be used to assess the likely significant effects of the City Plan.

Themes covered by this framework are:

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

IIA in the plan making process

City Plan 2019-2040 will provide a comprehensive framework for how Westminster's needs can be best met. It centres around six key policy areas: Spatial Strategy, Housing, Economy and Employment, Connections, Environment, and Design. This Integrated Impact Assessment (IIA) appraises all 45 policies in the draft plan against a broad set of criteria.

The IIA has been used during the plan making process to optimise the performance of planning policies so that the Westminster of tomorrow is a city of excellence in all areas.

An important element in optimising the strategy was the assessment of reasonable alternatives. A strategy based on speeding up housing delivery for the first 10 years of the plan period was assessed against the baseline draft London Plan housing target. The findings endorse the acceleration of growth as it delivers additional homes and investment in community facilities, infrastructure and public realm in the short term, and has wider sustainability benefits in the long term. The assessment recognises that there might be some negative impacts as a result from additional construction in the short term, but the council recognises that these can be mitigated by planning policies in the City Plan.

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

Summary of the IIA findings

The policies in each chapter of the City Plan were assessed against the IIA Framework, followed by a consideration of the plan as a whole and the consideration of the City Plan alongside other plans, policies and proposals.

Central to the plan is a 'people first' approach, with the needs of Westminster's residents, workers and visitors rooted in every policy. For Westminster's residents, that primary need is good quality, affordable housing. The challenge to deliver this is significant owing to a lack of brownfield space for new development, and property prices in the borough being among some of the highest in the UK. This is compounded by a growing – and ageing - residential population, which requires not only more housing, but more specialist housing.

A number of policies seek to promote the delivery of affordable housing (including more provision in the Central Activities Zone) and an improvement in the quality of housing stock. *Stepping up housing delivery*, sets out a revised target of 1,495 homes per annum based on revised National Planning Policy Framework standard methodology for the first ten years. This will boost the delivery of new housing across all tenures, whilst protecting existing family-sized homes. Together with *Affordable Housing*, *Housing for Specific Groups*, and *Innovative Housing Delivery*, these policies are likely to have a significant major positive impact on the provision of a range of homes which meet different needs. Overall, housing policies were found to be effective in meeting their objectives, which provides significant encouragement for the delivery of high quality homes across a range of size, type and tenure.

The provision of different types of housing will, in turn, create new communities. Thriving, vibrant communities where residents and local businesses flourish. Several policies in Westminster's spatial strategy are likely to have a major positive impact in creating communities where people come first. Communities which promote a good

quality of life, with more pedestrianised areas, a variety of shops, services and leisure facilities, and good transport links. Policy also promotes the role of markets, which will have a positive impact in encouraging social cohesion and contributing to healthier lifestyles through the provision of fresh produce. By creating these inclusive communities where people feel connected with those around them, we help mitigate against loneliness and support some of our most vulnerable. As a whole, policy direction can be seen to have a major positive impact in the health and well-being of our residential population.

City Plan 2019-2040 gives greater recognition for town centres and high streets to be multi-functional places to shop, work, relax and socialise. Policy relating to *Town centres, High Streets and the CAZ*, promotes growth and attractiveness through diversity of units, greater optimisation of space, and more flexibility of use for upper floors. This will provide greater variety for consumers and more opportunities for small businesses, which is likely to have a major positive impact on employment and economic growth.

Growth in the city will be boosted by several policies, particularly Spatial Development Priorities, which direct growth to areas which present the greatest opportunity. The *Victoria Opportunity Area*, is likely to accommodate up to 4,000 new jobs, whilst the *Paddington Opportunity Area* has capacity for up to 13,200 new jobs across a range of workspaces. The *West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area*, allow for the intensification of uses in the West End including the delivery of 5,000 new jobs. These policies will have major positive impacts on communities and health and wellbeing objectives, as well as on economy and employment opportunities. *Soho Special Policy Area*, is also likely to have a major positive impact on economic growth and diversity, with policy supporting smaller scale industries and start-ups, particularly in the cultural, creative and visitor sectors.

The *North West Economic Development Area* prioritises increased job opportunities for local residents through the protection and provision of new floorspace. This will promote equality of opportunity across the city and reduce unemployment. An increase in job opportunities and economic growth in the neighbouring Paddington Opportunity Area, is also likely to act as an economic catalyst in this area, which has historically been one of Westminster's most deprived – together these policies will have a major positive impact on employment opportunities and the economy. Policy for *Church Street/Edgware Road* and *Ebury Bridge Estate Housing Renewal Areas* recognises the potential to attract new business, and the former will create capacity for at least 350 new jobs resulting in major positive impacts. The *Harley Street, Mayfair and St. James's* and *Savile Row Special Policy Areas*, are likely to have a minor positive impact on employment opportunities and the economy.

City Plan's policy, *Supporting Economic Growth*, recognises the changing face of modern working practices, such as remote working and hot-desking. It encourages more innovative workspaces to reflect need, and restricts the loss of office floorspace within the CAZ to enable the provision of more jobs. As such, it is likely to have a major positive impact on employment opportunities and the economy. Policy directing employment and growth to *Town Centres, High Streets and the CAZ*, will also have a major positive effect in these communities. Better employment

opportunities and the provision of good quality shops and services bring a greater sense of prosperity; improved facilities which offer fresh food and active leisure are conducive to healthier lifestyles. Such improvements in our town centres can therefore be seen to be directly proportional to the health and well-being of our residents.

Retaining Westminster's position as an unparalleled city for culture, retail and leisure is pivotal to tourism and our wider economic success. City Plan's *Visitor Economy*, policy promotes new art and cultural uses, as well as supporting the entertainment sector. This will also bring major positive benefits to local communities, both in terms of leisure options and in supporting employment.

As home to one of the world's most iconic skylines, all major developments need to be sensitive to the historic fabric and character of our city. A significant positive contribution to the protection of strategic views, listed buildings, conservation areas and other heritage assets is made through policies which relate to heritage. *Building Height*, places a greater emphasis on design principles for higher buildings to ensure they enhance, and are proportionate to, the local character and skyline. This will have a minor positive impact on protecting our heritage and a major positive impact on townscapes.

Public realm, puts a stronger focus on people-centred design and improving accessibility for all users. This will make a major positive contribution to our communities and the well-being of those within it. *Design Principles* and *Energy* policies will also have a similar positive impacts, and bring major environmental benefits by encouraging sustainable design, greater energy efficiency, and through working towards zero carbon targets to reduce greenhouse gases. It also puts greater focus on assessing, and mitigating against, the likely risks and consequences of climate change. As such, it is likely to have a major positive impact on issues surrounding climate change and natural resources and therefore the health and well-being of those in the city.

Design Principles, and *Public Realm*, both look to creating a safer city, by making improvements to our everyday spaces. Design should reduce the opportunity for crime through considered layout and good lighting provision, especially in carparks. These policies are likely to have a significant positive effect on crime reduction.

Policies which protect and enhance our green infrastructure network, tackle pollution and manage air quality will not only have a positive effect on climate change, but major positive effects on health and well-being. *Managing Air Quality*, achieves this by ensuring new developments mitigate against air pollution. *Local Environmental Impacts*, protects our natural resources, manages construction impact, noise, and light pollution alongside a *Waste Management* policy. By consolidating several policies in one: *Green Infrastructure*, is likely to have an even greater impact across a range of objectives, particularly those centred around biodiversity and open space. Planting new trees and a drive towards green infrastructure will significantly offset the impact of CO2 emissions, whilst enhancing the public realm. Attractive, leafier communities with greater areas of open space will also encourage more physical activity and contribute towards healthier lifestyles.

Cleaner and more sustainable travel options is a key strategic objective of the City Plan. Policies promoting a shift from car travel to more sustainable modes will have a significant effect on our consumption of fossil fuels. *Sustainable Transport*, and *Public Transport and Infrastructure*, policies look to streamline bus services, and the relocation of standing facilities – including, potentially, Victoria Coach Station - to less intensively used areas. Improvements to public transport infrastructure will increase capacity and reliability and so encourage walking – further promoted by the *Walking and Cycling*, policy. Together these policies are likely to have a major positive impact on air quality, health and well-being and the negative effects of climate change. A minor positive effect is also likely to be seen in noise pollution and public realm benefits.

Parking, recognises instances where car free developments may be suitable and promotes a shift towards more sustainable transport modes, and protects off-street residential parking. This is especially important for disabled drivers. This policy will have a major positive effect on our transport objectives, and a minor positive effect on air quality and public realm objectives.

Our river and canals are among our city's greatest assets, and present some of our greatest opportunities. Policy to invigorate our *Waterways and Waterbodies*, will offer more sustainable transport options, and have a major positive impact on our Open Space objective. Enhancing these natural areas, will encourage more active travel and provide increased opportunities for leisure and sport. The wider community will also benefit from improvements to riverside paths and canal towpaths; hence the requirement for developments to maintain and enhance these paths, or provide them where none exists. All enhancements to the public realm benefit not just those living in our city, but the millions of visitors we welcome each year.

This report demonstrates that policies within the plan should not be assessed in isolation, but rather through their culminate contribution. Whilst many policies can be seen to have a neutral effect there are expected to be significant positive effects and together, the policies are expected to perform well against all objectives to positively support our ambitious City Plan objectives to ensure Westminster's growth and vitality for decades to come.

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1 Introduction

1.1 Westminster's City Plan

Westminster City Council is preparing a new local plan to be called City Plan 2019-2040. The City Plan will replace adopted planning policies in the current City Plan (2016) and those policies in the 2007 Unitary Development Plan that have been saved.

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

City Plan vision

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

The City Plan vision is structured along three main themes:

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

City Plan objectives

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

The objectives for Westminster 2040 are to:

1. *Increase the stock of high-quality housing and provide variety in terms of size, type and tenure to meet need and promote mixed and inclusive communities, with a clear focus on affordability and family homes.*
2. *Enable job growth across a range of sectors vital to the UK economy, and ensure those from disadvantaged backgrounds benefit from the opportunities this presents.*
3. *Enhance the West End as London's primary retail, leisure, and visitor destinations, and ensure our town centres and high streets can adapt to the challenges they face.*
4. *Broaden the city's cultural offer, while managing the impacts of clusters of uses, and of the evening and night time economies on existing residential communities.*

5. *Enhance connections by improving options for cycling, walking, leisure, sports and play whilst prioritising pedestrians, interchange between transport modes and incorporating innovative solutions to manage the highway network.*
6. *Improve quality of life, climate resilience and tackle environmental challenges by protecting, enhancing, expanding our valuable network of parks and open spaces.*
7. *Improve air quality, minimise noise and other polluting impacts, and reduce carbon and water demands by minimising detrimental impacts from development.*
8. *Promote quality in the design of buildings and public spaces, ensuring that Westminster is attractive and welcoming.*
9. *Making sure our neighbourhoods continue to thrive.*
10. *Make the most of our unique heritage and historic environment while encouraging innovations in building technology and improving sense of place.*

1.2 Requirement for IIA

This Integrated Impact Assessment (IIA) combines a number of assessments and appraisals that are either statutory requirements or are good practice to be prepared alongside a Local Plan, and presents them in an integrated way. The IIA for the City Plan was carried out 'in-house' between 2017 and 2019 concurrent with the preparation of the City Plan.

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

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

Paragraph 32 of the NPPF (2018) states that:

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

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

Equalities Impact Assessment (EqIA)

The council has a statutory duty to have regard to the equality impacts of its decisions. The public sector Equalities Duty (section 149 of the Equality Act 2010)

came into force on 5 April 2011 which extended the previous duties to cover the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

Health Impact Assessment (HIA)

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

Community Safety Assessment

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

1.3 IIA Scoping

Consultation on the IIA Scoping Report took place for a 5-week period from 25th August to 29th September 2017. All contacts on the council's consultation Planning Policy database (2,254 individuals and organisations) were consulted, including ward councillors, neighbouring boroughs, the Mayor of London, and other statutory consultees including Natural England, Historic England and the Environment Agency.

Nine respondents provided comments to the IIA Scoping Report, accounting for a total number of 68 comments. Annex II provides an overview of all comments received and how these have been considered.

Consultation responses have led to changes to the IIA Framework, the baseline data and the relevant plans and programmes. Updated baseline data can be found in Annex III. The relevant plans and programmes are listed in Annex IV.

1.4 IIA Framework

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

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

The IIA Framework takes account of specific priority objectives from the council's Equality Objectives 2016-2020 and potential impacts on persons sharing one or more of the protected characteristics. The questions that relate to equalities issues are highlighted in red in the IIA Framework.

The long-term goals set out in Westminster's Joint Health and Wellbeing Strategy (2017-2022) and the built environment factors that are most likely to influence health in Westminster have also been taken into account, and are highlighted in blue in the IIA Framework.

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

Annex V provides additional background to the IIA objectives.

City for All

The council's corporate ambitions are set out in City for All 2018/19. The council believes in creating a City for All where people are born into a supportive and safe environment, grow and learn throughout their lives, build fantastic careers in world-leading industries, have access to high quality, affordable homes and retire into the community with dignity and pride. Five dedicated programmes have been agreed to deliver these priorities:

- City of opportunity
- City that offers excellent local services
- Caring and fairer city
- Healthier and greener city
- City that celebrates its communities

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

Table 1: Integrated Impact Assessment Framework

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

		Will it increase resilience to climate change?*
6. Natural resources	To reduce the use of limited natural resources and make efficient use of land	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?
7. Flood risk & water quality	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? *
8. Biodiversity	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?
9. Air quality	To improve air quality	Will it improve air quality? * Will it reduce emissions of key pollutants? *
10. Noise	To reduce noise and the impact of noise.	Will it reduce noise concerns and noise complaints? Will it reduce noise levels? *
11. Transport	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? *
12. Waste	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?
13. Heritage	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?
14. Public realm & townscape	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? **
15. Open space	To protect Westminster's world class open and civic spaces, the Thames and other waterways and seek opportunities to increase open space and further greening.	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? **
16. Employment opportunities	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? Will it promote equality of opportunity across the city by tackling barriers to employment?
17. Economy	To meet Westminster's need for workspace, shops, cultural facilities and other uses of local, London-wide and national importance to maintain economic diversity and support sustainable economic growth.	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? **

1.5 Appraisal method

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

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

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

Table 2: IIA Assessment ratings

Scale of effect		Definition
++	Major positive effect	The proposed option/policy contributes significantly to the achievement of the objective.
+	Minor positive effect	The proposed option/policy contributes to the achievement of the objective but less significantly.
0	Neutral or no effect	The proposed option/policy does not have any effect on the achievement of the objective.
-	Minor negative effect	The proposed option/policy detracts from the achievement of the objective but less significantly.
--	Major negative effect	The proposed option/policy detracts significantly from the achievement of the objective.

2 IIA in the plan making process

This chapter sets out how the IIA process has been used during the plan making stage to influence strategy and policies in the City Plan. This includes the consideration of reasonable alternatives including the preferred option, which has been assessed against the baseline information. This was followed by the appraisal of draft policies of the City Plan, which has led to recommendations to strengthen policies.

2.1 Reasonable alternatives for the spatial strategy

2.1.1 Options considered

The London Plan (2016, consolidated with alterations since 2011) sets out a minimum housing target for Westminster of 1,068 per annum for the 10 years 2015-2025. This target is based on an assessment of available land, and seeks to meet the housing need for London. The draft London Plan (2017) sets out a minimum housing target of 1,010 for Westminster for the period 2019/20-2028/29, which is slightly lower than the current London Plan target.

The Government recently published a revised National Planning Policy Framework (NPPF), which includes a standard methodology for calculating housing need. The housing need for Westminster as a result of this method is 1,495 per annum.

The London Plan and draft London Plan annual housing targets are very similar, and will be a continuation of existing policy. The annual housing target in the draft London Plan has therefore been considered as the baseline for the appraisal of options.

An option to step up housing delivery by delivering 1,495 annually for the first 10 years of the plan period has been identified. This option is considered to be the only reasonable alternative as it maximises the potential for growth, and other options based on a higher overall housing target are not considered to be deliverable.

Baseline: London Plan housing target	Option: Accelerated growth
A minimum of 1,010 homes will be delivered annually throughout the plan period.	Housing delivery will be stepped up by delivering 1,495 homes annually for the first 10 years of the plan.

2.1.2 Appraisal of spatial strategy option

The results of the appraisal of the identified option 'Accelerated growth' against the baseline of the London Plan housing target is presented below.

1 Communities

Speeding up delivery of homes will increase demand for community facilities. This may put certain facilities that are at or close to maximum capacity at risk of being overstretched. However, it will also generate enough demand to maintain facilities that were in decline.

Accelerated development provides opportunities to speed up investment in infrastructure including community facilities through developer contributions.

Residential development competes with other land uses. Speeding up residential development might therefore put pressure on other land uses such as shops, offices, services or facilities that are important part of the daily life of communities. However, in Westminster most developments will deliver a mix of uses, providing new or replacement shops, offices, services and facilities to cater for an expanded residential community.

2 Crime reduction

Westminster's status as London's commercial heart and a major visitor and tourism destination contributes to higher crime figures here than in the rest of London. It is not envisaged that increased housing over the first 10 years of the plan will significantly affect the crime figures or perception in Westminster. However, this will make sure that more homes will be delivered and replaced in line with Secured by Design standards and that investment in the public realm can take place sooner to help design out crime.

3 Housing

Speeding up housing delivery significantly contributes to the delivery of homes, across different tenures. It will also increase the ability to secure more affordable homes through the planning system, which will help address homelessness. In theory, accelerated growth also has the potential to positively affect housing prices and affordability, but this effect will be minimum as this cannot be seen separate from the London and global context.

On the other hand, there is a risk that the pressure to deliver a higher quantum of homes per annum will affect the quality of new developments – however this is addressed by other policies in the plan requiring high quality.

4 Health & wellbeing

Homes are central to the health and wellbeing of residents, so this is positively impacted by the accelerated delivery of homes. This goes together with sped up investment in infrastructure for active travel, community facilities and open space that have a positive impact on health and wellbeing and reduce health inequalities by investment in areas associated with development.

5 Climate change

An increased rate of development means more buildings, which create emissions. However, these can be offset by the fact that new homes will need to adopt high sustainability standards including energy efficiency measures, creating benefits in the long term.

6 Natural resources

Increased levels of development over a short period of time may generate additional demand on resources. However, the use of resources can be optimised in new

development by ensuring the most up-to-date environmental standards and optimising design, resulting in long term benefits.

7 Flood risk & water quality

A sped-up delivery of homes is unlikely to impact on sewer capacity as new homes will be more water efficient and are supported by required investment. Accelerating housing delivery has the potential to provide innovative drainage solutions, improve drainage in local areas, and address other flood risk issues through careful design in the short and long term.

8 Biodiversity

Accelerated delivery of homes can increase pressure on habitats and species during construction stages. However, this also has the potential to create new biodiversity features through expansion of the green infrastructure network as part of new developments or through investment. This includes areas that are currently deficient in wildlife.

9 Air quality

Under the accelerated growth option, increased construction related transport and activities may negatively impact on air quality in the short term. However, in this scenario more homes will be delivered sooner against air quality neutral and positive standards, overall positively impacting on air quality. A quicker delivery of homes in the short term may improve air quality as more people will live locally with good access to jobs and services, reducing the need to travel, increasing the number of trips being made by sustainable transport modes and thereby decreasing emissions from fossil fuels in turn.

10 Noise

There may be increased nuisances from construction as a result of increased levels of construction. However, development has the potential to address existing noise issues through design measures, replacement of unfit homes, the orientation of buildings and management of construction impacts, creating long term positive effects.

11 Transport

The sped-up delivery of housing has the potential to promote walking and cycling through accelerated investment in public realm and transport infrastructure and the quicker delivery of car free developments. There may also be additional investment in public transport to support regeneration, although this is mainly worker/visitor driven in Westminster.

12 Waste

The accelerated delivery of homes increases the number of waste collections needed, putting pressure on services. However, there will be increased potential to deliver modern waste management facilities on site which help address existing waste management issues.

13 Heritage

It is not envisaged that the acceleration of growth has an impact on heritage.

14 Public realm & townscape

The accelerated delivery of growth has the potential to bring forward investment in the public realm, positively impacting areas across the city and enhancing access for different groups.

15 Open space

Investment to upgrade existing open spaces may be unlocked by accelerating growth. New developments will also be required to provide new open space and contribute to the greening of the city, helping to expand the green infrastructure network sooner.

16 Employment opportunities

By speeding up the delivery of homes, there will be an increase in jobs to provide the goods and services needed by residents. Construction jobs will also see an increase as a result of additional rates of development. Jobs will also be created as many developments provide a mix of uses, including commercial development. However, increased residential development may put pressure on existing businesses as land uses compete, affecting employment.

17 Economy

The higher number of residents that will live in the city as a result of sped-up delivery of homes will boost spending in the local area. This will also provide opportunities to attract new businesses. Live-work spaces and business spaces across sectors will also become available sooner as they are often delivered alongside residential development in mixed-use schemes. However, there is a risk that businesses may be priced out by residential development as land uses compete.

2.1.3 Reasons for choosing the preferred spatial strategy for the City Plan

In this section an overview of Westminster City Council's reasons for choosing the preferred spatial strategy approach are given, in light of the appraisal findings above.

The preferred option is the accelerated growth option. The appraisal finds that this option provides additional benefits to the baseline of the London Plan housing target.

An important benefit is that the preferred option boosts the delivery of homes including affordable homes. It also unlocks additional investment in community facilities, infrastructure and public realm that enhances the quality of life in Westminster. The preferred options also improve the quality of our housing stock, delivering a range of long term environmental and social benefits.

Whilst it is recognised that there may be some negatives effects in the short term due to an increased level of construction, it is considered that these will be fully mitigated or minimised by planning policies in the City Plan.

2.2 Development of planning policies for the City Plan

City Plan policies have been assessed through, and informed by, the IIA process on an iterative basis. This resulted in a number of recommendations to enhance the sustainability, equality, safety and health performance of the plan. These recommendations have led to the substantial rewriting of the plan to remove duplication, make the plan more user-friendly and improve the performance of planning policies. The main changes made to the plan at this stage that were informed by the IIA process are summarised below.

Changes made to policies:

Chapter 1 – Spatial Strategy

- Policy 1 ‘Spatial Strategy’ has been added as a new policy to provide an overview of the spatial priorities for the city contributing to housing and economic growth amongst other themes. This contributes more positively to objectives 3 Housing and 17 Economy in particular.
- Policies 2 ‘Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area’ and 4 ‘Spatial Development Priorities: Victoria Opportunity Area’ include a stronger heritage element, contributing more strongly to IIA objective 13 Heritage.
- Policies 3 ‘Spatial Development Priorities: Paddington Opportunity Area’ and 4 ‘Spatial Development Priorities: Victoria Opportunity Area’ place a stronger emphasis on delivering an inclusive and high quality public realm. This contributes more positively to a number of IIA objectives, particularly 1 Communities, 4 Health & Wellbeing and 14 Public realm & Townscape.
- Policy 7 ‘Managing development for Westminster’s people’ has been added as a new policy to place a stronger emphasis on amenity and the positive impacts that development can have on the surrounding area, resulting in a consolidated approach to managing development impacts which contributes more positively to all objectives.

Chapter 2 – Housing

- Policy 8 ‘Stepping up housing delivery’ has been made less restrictive as it no longer designates zones for family homes and allows conversion of family-sized houses as long as they remain family-sized homes. This contributes more positively to IIA objectives 1 Communities and 3 Housing.
- Policies 9 ‘Affordable housing’, 11 ‘Housing for specific groups’ and 13 ‘Housing quality’ have all been made less prescriptive whilst retaining their core purpose. These policies will contribute more positively towards objectives 1 Communities and 3 Housing as they will not unnecessarily restrict

development of high quality new housing that meets a range of housing needs.

- Policy 12 'Innovative housing' has been made more positive and welcoming to different types of housing, especially where this will result in more affordable housing being delivered. This contributes more positively to objectives 1 Communities and 3 Housing.

Chapter 3 – Economy

- Policy 14 'Supporting economic growth' makes greater reference to the needs of modern working practices to recognise the evolving work practices and connected needs for different types of spaces, e.g. hot-desking and informal meeting spaces. This contributes more positively to objective 17 Economy.
- Policy 15 'Town Centres, high streets and the CAZ' gives greater recognition for the need for town centres and high streets to be places to work and spend leisure time, as well as shop. The policy allows for greater flexibility of use of upper floors in town centres and high streets, protects essential convenience retail outside designated town centres and gives clearer support to meanwhile uses in empty spaces within the town centre hierarchy. The policy also makes stronger reference to the role of markets in encouraging social relations and engagement in the community, as well as their contribution to providing access to healthy food. This contributes more positively to objectives 1 Communities, 4 Health & wellbeing and 17 Economy.
- Policy 17 'Food, drink and entertainment' includes a new clause restricting new hot food takeaways around schools, ensuring a greater contribution to objective 4 Health & wellbeing.
- Policy 18 'Community infrastructure and facilities' consolidates a number of policies and has been redrafted to provide further incentive towards co-location and use of ancillary facilities, as well as protection of existing facilities. This ensures that the policy contributes more positively towards objectives 1 Communities, 4 Health & wellbeing, 16 Employment opportunities and 17 Economy.

Chapter 4 – Connections

- Policies 25 'Sustainable travel' and 26 'Walking and cycling' place a stronger emphasis on the promotion of active travel options, the creation of a legible public realm and the integration of different transport modes. These policies therefore make major positive contributions to a range of IIA objectives, including 4 Health & wellbeing, 11 Transport and 14 Public realm & townscape.
- Policy 28 'Parking' has been revised to incorporate updated parking requirements to promote sustainable travel, encourage the most efficient use

of land and boost the supply of housing. The policy will therefore no longer have any negative impacts (compared to the informal policy consulted on in November 2018) and contribute positively to objectives 2 Housing, 4 Health & wellbeing, 6 Natural resources and 11 Transport.

- Policy 31 'Technological innovation in transport' consolidates a range of policy objectives into one policy, helping future-proof the city and increasing the requirements for electric vehicle charging. This policy therefore contributes to a wider range of IIA objectives including 5 Climate change, 9 Air quality and 11 Transport.
- Policy 32 'Waterways and waterbodies' is a consolidation of three policies to remove duplication and ensure that interrelated objectives 4 Health & wellbeing, 11 Transport, 13 Heritage and 15 Open space are all represented in one policy.

Chapter 5 – Environment

- Policy 34 'Managing local environmental effects' brings together the issues of contaminated land, noise pollution, construction impacts and light pollution, and odour has been added as an additional effect. This consolidated policy has more positive impacts across several IIA objectives, including 4 Health & wellbeing and 10 Noise.
- Policy 35 'Green infrastructure' consolidates several policies to link the protection of open spaces, biodiversity, habitats and trees with opportunities for the provision of new green infrastructure through new development. This policy therefore has a much more positive impact on a range of IIA objectives, particularly 8 Biodiversity and 15 Open space.
- Policy 36 'Flood risk' incorporates drainage issues to ensure a more positive contribution to objective 7 'Flood risk and water quality'.
- Policy 37 'Energy' incorporates climate change adaption, renewable energy and carbon offsetting, decentralised energy networks and overheating into one policy. This will have a more positive impact on a range of IIA objectives, particularly 5 Climate change and 6 Natural resources.

Chapter 6 – Design

- Policies 39 'Design principles' and 43 'Public realm' have a stronger focus on people centred design, including through incorporation of inclusive and accessible design principles, designing for all ages and users and promoting active lifestyles and health and wellbeing. This contributes more positively to objectives 1 Communities, 4 Health & wellbeing and 14 Public realm & townscape.

- Policy 40 'Westminster's heritage' places stronger emphasis on the community benefits of heritage, the sensitive future proofing of historic buildings and the prevention of substantial harm to heritage assets, contributing more positively to objectives 4 Health and wellbeing, 5 Climate change and 13 Heritage.
- Policy 42 'Building height' sets out a more positive strategy towards building height, positively affecting townscapes and heritage, contributing more positively to objectives 13 Heritage and 14 Public realm & townscape.

3 Findings of the Westminster City Plan appraisal

This chapter presents the findings of the Publication Draft (Regulation 19) version of Westminster's City Plan. This starts with the assessment of individual policies in the plan. The results are structured by individual chapters of the City Plan as the policies in each chapter are strongly connected, and are therefore best considered together. Only the IIA themes on which an impact have been identified have been discussed.

An overview of the cumulative effects of policies and the plan as a whole is presented in section 3.7. This is followed by section 3.8, which sets out the likely cumulative effects of other plans, policies and proposals.

3.1 Chapter 1 – Spatial Strategy

The first chapter of the City Plan sets out the spatial strategy and contains policies that set out the spatial priorities for Westminster. It contains the following policies:

1. Westminster's spatial strategy
2. Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area
3. Spatial Development Priorities: Paddington Opportunity Area
4. Spatial Development Priorities: Victoria Opportunity Area
5. Spatial Development Priorities: North West Economic Development Area
6. Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas
7. Managing development for Westminster's people

Objective 1 – Communities

Several policies in this chapter are considered to make a major positive contribution to objective 1 'Communities'.

Policy 1 'Westminster's spatial strategy' promotes a balanced mix of uses including shops and facilities, protects clusters of uses, and supports town centres and high streets, contributing to improved access to local services and facilities, engagement in community activity and inclusive communities.

Policy 3 'Spatial Development Priorities: Paddington Opportunity Area' prioritises the provision of facilities for residents in neighbouring areas within the Paddington Opportunity Area, which contributes to improving access to local services, shops and facilities in the area and to creating a more inclusive community.

Policy 4 'Spatial Development Priorities: Victoria Opportunity Area' supports the provision and enhancement of social and community facilities in the Victoria Opportunity Area including libraries, facilities for children and young people and improved sports and leisure facilities, contributing to improved access to local services and community facilities in the area.

Policy 5 'Spatial Development Priorities: North West Economic Development Area' prioritises investment in new social and community infrastructure and facilities for

local communities in the North West Economic Development Area as part of its regeneration and renewal, contributing to improved access to shops and facilities.

Policy 6 'Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas' prioritises new and enhanced facilities including cultural uses within the Church Street/Edgware Road Housing Renewal Area, as well as new retail and community facilities in the Ebury Bridge Estate Housing Renewal Area, contributing to improved access to local services, shops and facilities. Engagement and consultation with residents during these regeneration projects will also contribute to strengthening participation and sense of belonging to the respective local communities.

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including through infrastructure delivery and management of amenity impacts. This includes services and facilities that benefit communities.

In addition, a minor positive contribution is made by Policy 2 'Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area' which sets out a strategy to make sure the West End remains a key retail and leisure destination. This will be achieved by supporting new and improved retail space, responding to technological trends and contributing to improved access to shops and facilities in the West End, which provide not only important national and international roles, but also to local communities.

Objective 2 – Crime reduction

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including contributing to character, improving highway conditions and improving local environmental quality, having a minor positive effect on safety and behaviour affecting the local environment.

Objective 3 – Housing

Policy 1 'Westminster's spatial strategy' contributes to delivering a significant number of new homes, 35% of which as affordable. It directs growth to different parts of the city and enables different types of development including intensification. This will boost the supply of housing, including affordable housing across a range of types and tenures, therefore making a major positive contribution to this objective.

Policies 3 'Spatial Development Priorities: Paddington Opportunity Area', 4 'Spatial Development Priorities: Victoria Opportunity Area' and 6 'Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas' are considered to make a major positive contribution towards meeting objective 3 'Housing', as they contribute to the delivery of a significant number of high quality housing across a range of tenures, including affordable homes in particular.

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including the management of local

environmental impacts, waste management and responding to local character, having a major positive contribution on the delivery of high quality homes.

In addition, Policy 2 ‘Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area’ helps boost the supply of housing by requiring the London Plan growth targets for the area are met, making a minor positive contribution towards meeting this objective.

Policy 5 ‘Spatial Development Priorities: North West Economic Development Area’ also makes a minor positive contribution to this objective by setting new residential and mixed use developments that improve housing quality and help diversify the area’s tenure mix.

Objective 4 – Health & wellbeing

All policies are considered to make a major positive contribution to this objective.

Policy 1 ‘Westminster’s spatial strategy’ supports new homes and jobs as well as the delivery of infrastructure to facilitate growth and prioritises sustainable travel and enhancements to the public realm, which have a major positive impact on health and cultural wellbeing.

Policy 2 ‘Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area’ prioritises improvements to the public realm to make the West End more walkable, contributing to improved movement and the promotion of active lifestyles. The policy also protects and supports the arts, culture and entertainment offer, which contributes to improving the mental and cultural wellbeing of the locality.

Policy 3 ‘Spatial Development Priorities: Paddington Opportunity Area’ supports the enhancements of physical links between Paddington and Church Street and through to the North West Economic Development Area, as well as improvements to the public realm throughout the area to improve dwelling and pedestrian movement, contributing to improved access and movement, encouraging physically active lifestyles and improving the overall wellbeing of local residents and workers.

Policy 4 ‘Spatial Development Priorities: Victoria Opportunity Area’ prioritises walkability and promotes public realm improvements to enhance its quality, inclusivity, capacity, legibility and accessibility for pedestrians and cyclists. This contributes to improved access for all, to encouraging physically active lifestyles and improving the overall wellbeing of local residents and workers.

Policy 5 ‘Spatial Development Priorities: North West Economic Development Area’ prioritises a greener and more walkable environment that addresses issues of severance in the area and creates opportunities for greater use of the Grand Union Canal, contributing to the overall local wellbeing through improved open spaces and enhanced access and movement in the wide area.

Policy 6 ‘Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas’ prioritises the delivery of public realm and environmental improvements and new green infrastructure to enhance accessibility,

connectivity, safety and comfort in the Church Street and Edgware Road Housing Renewal Area and the Ebury Bridge Estate Housing Renewal Area. This contributes to improved access and movement and to encouraging healthy lifestyles. The recognition of the importance of the existing antiques markets as an important feature for Church Street's identity and the support for new arts and cultural facilities in the area will contribute to the cultural wellbeing of residents in the area. The provision of a new health & wellbeing hub in the area will improve access to health facilities, addressing health inequalities.

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including the management of local environmental impacts, and the delivery of infrastructure that affects health and wellbeing.

Objective 5 – Climate change

By directing growth to sustainable locations and promoting sustainable transport Policy 1 'Westminster's spatial strategy' makes a major positive contribution to this objective.

Three policies are considered to have a minor positive impact on objective 5 'Climate change'.

Policies 3 'Spatial Development Priorities: Paddington Opportunity Area' and 4 'Spatial Development Priorities: Victoria Opportunity Area' support enhanced public realm and sustainable travel modes, which help encourage modal shift towards sustainable travel mode, which makes a minor positive contribution to reducing carbon emissions.

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including through city greening which contributes to the city's climate resilience.

Objective 6 – Natural resources

Policy 1 'Westminster's spatial strategy' supports the optimisation of densities, in relation to the increasing housing and commercial targets. This makes a major positive contribution to making the most efficient use of land.

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including through city greening and appropriate waste management, which affect the use of natural resources. This policy therefore makes a minor positive contribution to the reduction of limited natural resources.

Objective 7 – Flood risk and water quality

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including through city greening and provision of sustainable infrastructure, that can contribute to mitigation of flood risk and enhanced water quality, having a minor positive effect.

Objective 8 – Biodiversity

Policy 7 ‘Managing development for Westminster’s people’ sets out criteria to make sure that development benefits the wider area, including through city greening which has a major positive impact on the enhancement of biodiversity in the city.

Policy 5 ‘Spatial Development Priorities: North West Economic Development Area’ promotes a greener environment, including along the Grand Union Canal. Policy 6 ‘Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas’ prioritises the delivery of new green infrastructure including a new north-south green route in the Church Street/Edgware Road HRA, contributing to enhanced biodiversity and improved access to biodiversity interests. These policies thereby make a minor positive contribution towards meeting objective 8 ‘Biodiversity’.

Objective 9 – Air quality

More sustainable travel modes, which contribute to carbon reduction targets, are encouraged in Policies 1 ‘Westminster’s spatial strategy’, 2 ‘Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area’, 3 ‘Spatial Development Priorities: Paddington Opportunity Area’, 4 ‘Spatial Development Priorities: Victoria Opportunity Area’ and 6 ‘Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas’. These policies therefore make a major positive contribution to this objective.

Policy 7 ‘Managing development for Westminster’s people’ sets out criteria to make sure that development benefits the wider area, including through the improvement of sustainable transport infrastructure and the management of local environmental impacts such as air quality, making a major positive contribution to the improvement of air quality.

In addition, Policy 1 ‘Westminster’s spatial strategy’ makes a minor positive contribution to this objective by prioritising sustainable travel and public realm enhancements which contribute more pleasant and walkable spaces to reduce reliance on private motor vehicles and encourage the take up of more sustainable modes.

Objective 10 – Noise

Policy 7 ‘Managing development for Westminster’s people’ sets out criteria to make sure that development benefits the wider area, including through the management of local environmental impacts such as noise, making a major positive contribution to the management of noise in the city.

Objective 11 – Transport

All policies are considered to have a major positive impact on objective 11 ‘Transport’.

Policy 1 'Westminster's spatial strategy' seeks to make sure sufficient infrastructure is in place to accommodate additional development, contributing to the enhancement of sustainable travel modes.

Policy 2 'Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area' prioritises public transport and the pedestrian environment, whilst also seeking to better manage freight movements. The policy also prioritises improvements to the public realm to make the West End more walkable.

Policy 3 'Spatial Development Priorities: Paddington Opportunity Area' prioritises enhanced sustainable travel modes through improvements to transport interchanges and the pedestrian environment and public realm, contributing to enhanced accessibility across different modes.

Policy 4 'Spatial Development Priorities: Victoria Opportunity Area' prioritises the integration between transport modes, as well as improvements to the public realm and local environmental qualities to support a modal shift to more sustainable travel options, including walking and cycling.

Policy 5 'Spatial Development Priorities: North West Economic Development Area' addresses severance in the area, prioritises a more walkable environment, particularly through improvements to the Harrow Road District Centre, and encourages greater use of the Grand Union Canal, contributing to enhanced connectivity in the area, particularly for pedestrians.

Policy 6 'Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas' seeks to improve mobility and promote active travel, including through a north-south green route in the Church Street and Edgware Road Housing Renewal Area, and enhanced connectivity between the Ebury Bridge Estate and the wider area. This encourages walking and cycling and reducing dependency on the car.

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including through the improvement of sustainable transport infrastructure and highway conditions and ensuring the capacity of local infrastructure is sufficient, contributing to improvements in accessibility across a range of transport modes.

Objective 12 – Waste

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including through making appropriate waste management arrangements. This makes a major positive contribution to the effective management of waste.

Objective 13 – Heritage

A major positive impact on objective 13 'Heritage' is expected from three policies.

Policy 1 'Westminster's spatial strategy' makes the protection and enhancement of the city's heritage asset and townscape value a priority and requires new

development to respond positively to Westminster's context through high quality design and architecture.

Policy 2 'Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area' helps protect the character of some of central London's most distinct and iconic places, which contribute to the protection of heritage assets.

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including through positively responding to local character and the historic environment. This contributes to the conservation and enhancement of heritage assets and cultural value.

Policy 4 'Spatial Development Priorities: Victoria Opportunity Area' recommends a sensitive approach of new developments towards heritage assets, making a minor positive contribution to this objective.

Objective 14 – Public realm and townscape

All policies have a major positive impact on objective 14 'Public realm and townscape'.

Policy 1 'Westminster's spatial strategy' seeks to protect and enhance Westminster's townscape and public realm.

Policy 2 'Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area' prioritises improvements to the public realm and the protection of the character of some of central London's most distinct and iconic places, protecting and enhancing townscapes.

Policy 3 'Spatial Development Priorities: Paddington Opportunity Area' sets inclusive and high quality public realm as a priority for the area, which helps to improve the ease of movement for pedestrians, improving access and mobility for a range of groups.

Policy 4 'Spatial Development Priorities: Victoria Opportunity Area' promotes public realm and environmental improvements to strengthen the area's capacity, legibility and accessibility, contributing to an enhanced public realm and townscape.

Improvements to Harrow Road District Centre are supported by Policy 5 'Spatial Development Priorities: North West Economic Development Area' to improve the attractiveness of the physical environment. This policy also supports enhancements to the Grand Union Canal towpath, contributing to improved public realm, access and mobility in and to the NWEDA.

Policy 6 'Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas' prioritises the delivery of public realm and environmental improvements as well as green infrastructure to enhance accessibility, connectivity, safety and comfort in the two areas, contributing to an enhanced public realm and improved access and mobility for all groups.

Policy 7 ‘Managing development for Westminster’s people’ sets out criteria to make sure that development benefits the wider area, including through positively responding to local character. This contributes to enhancement of townscapes and the public realm.

Objective 15 – Open space

Three policies are considered to have a major positive impact on objective 15 ‘Open space’.

Policy 5 ‘Spatial Development Priorities: North West Economic Development Area’ seeks to improve the towpath connecting the NWEDA to Regent’s Park, increasing access to open space.

Policy 6 ‘Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas’ prioritises the delivery of new green infrastructure including a new north-south green route in the Church Street and Edgware Road Housing Renewal Area, contributing to improved open space provision, improved access to open space and an enhanced green infrastructure network. Improvements to wayfinding and streetscape quality along Marylebone Road are also supported to better connect Church Street to Regent’s Park, improving access to nearby open space from this area.

Policy 7 ‘Managing development for Westminster’s people’ sets out criteria to make sure that development benefits the wider area, including through positively responding to local character, the greening of the city, enhancing local environmental quality. This contributes to improvements in quality and quantity of open space.

A minor positive impact is made by Policies 1 ‘Westminster’s spatial strategy’ and 2 ‘Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area’ which secures enhancements to the natural environment and public realm, including the support for the delivery of a new North Bank riverfront destination.

Policy 4 ‘Spatial Development Priorities: Victoria Opportunity Area’ also makes a minor positive contribution as it requires enhanced public realm and local environmental quality, including through provision of green infrastructure.

Objective 16 – Employment opportunities

All policies in this chapter have a major positive impact on this objective.

Policy 1 ‘Westminster’s spatial strategy’ boosts growth in the city, setting targets for new homes and office-based jobs and directing growth to different areas and protecting clusters of uses that are within some of central London’s most distinct places, which help to promote job opportunities and reduce unemployment. The policy also supports town centres and high streets, which also provide job opportunities locally.

Policy 2 ‘Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area’ sets targets for growth in the Tottenham Court Road Opportunity Area, creating job opportunities across sectors,

particularly retail, leisure, arts and culture, offices and hotel uses, which potentially leads to reduced unemployment.

Policy 3 'Spatial Development Priorities: Paddington Opportunity Area' recognises the area's capacity to accommodate a significant number of new jobs across a range of workspaces. By integrating Paddington into the wider area including Church Street and the North West Economic Development Area, these jobs may be accessible for the local community and potentially contribute to reducing unemployment.

Policy 4 'Spatial Development Priorities: Victoria Opportunity Area' supports the delivery of a significant number of new jobs in the Victoria Opportunity Area, potentially contributing to a reduction in unemployment.

Policy 5 'Spatial Development Priorities: North West Economic Development Area' prioritises increased job opportunities for local residents through the protection and provision of new employment floorspace, promoting equality of opportunity across the city and potentially reducing unemployment.

Policy 6 'Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas' recognises the potential to attract new business and workspaces around Edgware Road and Marylebone Stations, with the capacity for at least 350 new jobs and opportunities to link employment opportunities in the CAZ to local communities. This contributes to promoting equality of opportunity across the city and potentially reducing unemployment.

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including through positively responding to local character, enhancing local environmental quality and improving sustainable transport infrastructure. This promotes business continuity and has a minor positive impact on the creation of jobs.

Objective 17 – Economy

All policies in this section are considered to make a major positive impact on objective 17 'Economy'.

Policy 1 'Westminster's spatial strategy' promotes economic growth in the city by directing growth to different areas and protecting clusters of uses that are within some of central London's most distinct places, which contributes to business development and resilience, including in key sectors, and promotes regeneration.

Policy 2 'Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area' sets out a strategy for increased development and intensification of uses in the West End. Through supporting significant job growth and diversifying and improving the quality of the retail and leisure experience, including supporting the evening and night-time economy, the business development and environment will be improved and businesses in key sectors promoted.

Policy 3 'Spatial Development Priorities: Paddington Opportunity Area' identifies the potential of the area to accommodate a significant number of new jobs across a

range of types to meet the needs of a range of occupiers, encouraging new and small businesses and improving the business environment.

Policy 4 'Spatial Development Priorities: Victoria Opportunity Area' supports the delivery of a significant number of new jobs in the Victoria Opportunity Area, promoting regeneration of the area and improving the business environment.

Policy 5 'Spatial Development Priorities: North West Economic Development Area' seeks to increase and broaden economic activity and employment opportunities in NWEDA. It encourages a diversity of workspaces to be delivered including spaces for small and medium enterprises, retains existing floorspace and encourages an expanded commercial sector. It also seeks to improve the retail environment in the Harrow Road District Centre. This contributes to improved economy, encourages new business start-ups, small business and opportunities for local people, promotes regeneration and improves business development.

Policy 6 'Spatial Development Priorities: Church Street/Edgware Road and Ebury Bridge Estate Housing Renewal Areas' is envisaged to have a minor positive impact on objective 17 'Economy'. This policy recognises capacity for at least 350 new jobs and opportunities in the Church Street/Edgware Road to link employment opportunities in the CAZ to existing communities and supports the redevelopment of the Ebury Bridge Centre. This encourages new business start-ups, small businesses and local opportunities and promotes the regeneration of the area.

Policy 7 'Managing development for Westminster's people' sets out criteria to make sure that development benefits the wider area, including through positively responding to local character, enhancing local environmental quality and improving sustainable transport infrastructure. This promotes business continuity and has a minor positive impact on the improvement of the business environment.

3.2 Chapter 2 – Housing

This chapter of the City Plans contains policies related to the delivery of housing and facilities necessary to build sustainable communities. It contains the following policies:

8. Stepping up housing delivery
9. Affordable housing
10. Affordable housing contributions in the CAZ
11. Housing for specific groups
12. Innovative housing delivery
13. Housing quality

No impacts have been identified for this chapter with regards to objectives 5 ‘Climate change’, 6 ‘Natural resources’, 7 ‘Flood risk’, 8 ‘Biodiversity’, 9 ‘Air quality’, 10 ‘Noise’, 11 ‘Transport’, 12 ‘Waste’, 14 ‘Public realm and townscape’, 16 ‘Employment opportunities’ and 17 ‘Economy’.

Objective 1 – Communities

All policies make a major positive contribution to objective 1 ‘Communities’.

Policy 8 ‘Stepping up housing delivery’ has a major positive impact as it contributes to fostering inclusive communities by prioritising the delivery of a substantial number of new homes over the plan period, including through optimising densities on key development sites, delivery on small sites, appropriate upward extensions and planning positively for tall buildings in certain locations. The policy also protects all existing residential uses and allows the reconfiguration of non-family-sized housing into family-sized housing and prevents change of use from residential use to temporary sleeping accommodation. In addition, it sets an upper limit of 200 sq m Gross Internal Area for all new homes, which helps encourage the delivery of housing that is not only sold as luxury products, therefore contributing to an inclusive community.

By protecting existing affordable housing and requiring that 35% of all new homes be affordable, Policy 9 ‘Affordable housing’ has major positive contribution this objective as the delivery of affordable housing contributes to achieving inclusive communities.

Policy 10 ‘Affordable housing contributions in the CAZ’ requires contributions from certain commercial developments in the CAZ and strongly prioritises the delivery of affordable housing units on-site, which contribute to ensuring a balanced mix of uses and inclusive and sustainable communities.

Policies 11 ‘Housing for specific groups’ and 12 ‘Innovative housing delivery’ seek to meet the housing needs across a range of sizes, types and tenures including affordable and specialist housing, family sized homes, older people’s homes and student accommodation. This results in a major positive impact as these policies contribute to fostering inclusive communities.

By ensuring new homes are adaptable to enable the less able-bodied and ageing residents to continue to live in them, Policy 13 'Housing quality' also makes a major positive contribution to this objective.

Objective 2 – Crime reduction

Two policies contribute towards meeting objective 2 'Crime reduction'. Policy 8 'Stepping up housing delivery' has a minor positive impact as it prevents changes of use from residential to temporary sleeping accommodation, mitigating the behaviour associated with these developments and protecting the local environment.

Objective 3 – Housing

All policies make a major positive impact to objective 3 'Housing'.

Policy 8 'Stepping up housing delivery' seeks to deliver a substantial amount of new homes over the plan period and steps-up delivery over the first 10 years of the plan including through optimising densities on key development sites, delivery on small sites, appropriate upward extensions and planning positively for tall buildings in certain locations. The policy also allows the reconfiguration or redevelopment of supported or affordable housing to better meet need, the reconfiguration of non-family-sized housing to family-sized housing and sets a 200 sq m Gross Internal Area limit on all new homes. This contributes to boosting housing provision across types and tenures to meet different needs, reduce homelessness and the number of unfit homes.

Policy 9 'Affordable housing' boosts the supply of affordable housing of different tenures, including 'intermediate' housing for rent and sale across a range of household income levels, increasing the range of provision and contributing to reducing homelessness and increasing independence.

Policy 10 'Affordable housing contributions in the CAZ' makes a major positive contribution to this objective by requiring affordable housing contributions from certain commercial developments in the CAZ as it helps boost the supply of affordable homes and reduce homelessness.

Policies 11 'Housing for specific groups' and 12 'Innovative housing delivery' contribute to meeting housing needs, including for family sized homes, non-self-contained housing, specialist housing, older people's housing and student housing. This has the potential to reduce the number of unfit homes, allow people to live independently for longer and deliver a mix of homes. Policy 12 'Innovative housing delivery' also contributes to this objective by promoting innovative models of housing (particularly where the new homes are provided at more affordable rental levels) as well as modern methods of construction that can contribute to delivering new homes quicker.

Finally, Policy 13 'Housing quality' requires that all residential development is well-designed and provides a high quality living environment, contributing towards the creation of high quality homes.

Objective 4 – Health & wellbeing

Several policies make a major positive contribution towards meeting objective 4 'Health & wellbeing'.

By protecting existing residential uses and setting targets for the delivery of a substantial number of new homes, protecting existing affordable housing and requiring that 35% of all new homes be affordable, and requiring additional affordable housing contributions from certain commercial developments in the CAZ, in addition to housing developments, Policies 8 'Stepping up housing delivery' helps reduce health inequalities and improve the physical and mental health and wellbeing of residents, 9 'Affordable housing' and Policy 10 'Affordable housing contributions in the CAZ' respectively contribute to reducing health inequalities and improve the physical and mental health and wellbeing of residents.

Policy 11 'Housing for specific groups' supports adaptations and alterations to homes occupied by older residents enabling them to remain in their homes for longer, maximising independence for older people and creating healthy homes. The policy also requires new student accommodation to include a sufficient proportion of adaptable units to meet specialist needs, which contributes to improving access and creating healthy homes.

Policy 13 'Housing quality' requires all residential developments to be designed to a standard that ensures the health and wellbeing of their occupants, promoting healthy homes, independence for older people and improved access and movement. In addition, this policy requires the provision of amenity space, encouraging healthy and physically active lifestyles.

Objective 13 – Heritage

A minor positive impact towards objective 13 'Heritage' is made by Policy 8 'Stepping up housing delivery' as it requires development to be of appropriate density and exemplary design taking account of context, character and setting and thereby being responsive to heritage assets and their settings, including views. The policy also supports bringing homes back into residential uses, particularly those on Historic England's 'Heritage at Risk' register, providing viable uses for heritage assets and thereby protecting these assets and their values from being lost.

Objective 15 – Open space

Policy 13 'Housing quality' has a minor positive impact on objective 15 'Open space', as it requires residential development to provide sufficient amenity space, contributing towards improving access to open space.

3.3 Chapter 3 – Economy

This section of the City Plan covers policies related to Westminster’s economic role, character and function. It contains the following policies:

14. Supporting economic growth
15. Town centres, high streets and the CAZ
16. Visitor economy
17. Food, drink and entertainment uses
18. Community infrastructure and facilities
19. Education and skills
20. Digital infrastructure and information and communications technology
21. Soho Special Policy Area
22. Mayfair and St. James’s Special Policy Area
23. Harley Street Special Policy Area
24. Savile Row Special Policy Area

No impacts have been identified on objectives 5 ‘Climate change’, 7 ‘Flood risk’, 8 ‘Biodiversity’, 12 ‘Waste’ and 15 ‘Open space’.

Objective 1 – Communities

Five policies in this section make a major positive contribution towards meeting objective 1 ‘Communities’.

Policy 15 ‘Town centres, high streets and the CAZ’ ensures local town centres continue to provide a range of shops and services including community uses for their local communities. In addition, it supports new and extended markets in town centres and the CAZ, which can improve access to fresh food locally and contribute to a sense of community. The policy also protects essential A1 convenience stores in residential areas that are not well served by the town centre hierarchy and provides support in principle for residential uses on upper floors in town centres. This helps improve access to local services and shopping.

Policy 16 ‘Visitor economy’ supports events in the public realm that are beneficial to the city, its people and enterprises, providing opportunities for events that benefit local communities. The policy also ensures publicly accessible toilets are provided as part of new schemes that generate large amounts of visitors, which contributes to improved access to services and a more inclusive Westminster as publicly accessible toilets provide an important amenity for residents, workers and visitors and are especially important for some groups, such as the elderly and those with certain health conditions.

Policy 17 ‘Food, drink and entertainment uses’ protects public houses, which can play an important role as social hubs within a community and make a positive contribution towards local identity. The policy also requires new entertainment uses to demonstrate how they will generate wider benefits for the local community. This could include discounted access to space for community functions, or the provision of learning and training for the local community.

Policy 18 'Community infrastructure and facilities' protects existing community facilities and supports the delivery of new facilities that meet needs and demands. It also promotes the co-location of facilities, expanding the function of individual premises. The policy contributes to improving access to community facilities and making communities more inclusive by promoting stronger links between local residents and training and work opportunities in Westminster.

By supporting the provision of new or expanded primary and secondary schools and further education facilities, Policy 19 'Education and skills' enhances education provision. In addition, the policy supports the use of new and additional educational facilities for community or recreational use outside of core operation hours.

In addition, a number of policies make a minor positive contribution towards this objective.

Policy 14 'Supporting economic growth' supports the re-purposing of office stock within the CAZ at the end of its life cycle to community uses such as health facilities, which improves access to local services and supports growing communities.

Policy 20 'Digital infrastructure and information and communications technology' makes a minor positive contribution through encouraging engagement in the local community, fostering an inclusive Westminster community, and contributes to improving access to digital and local services.

Policy 21 'Soho Special Policy Area' supports social infrastructure uses and LGBTQI+ venues, which contributes to improving access to local community facilities and to fostering an inclusive community.

Policy 23 'Harley Street Special Policy Area' contributes to improving access to local services by protecting and encouraging medical and complementary facilities.

Objective 2 – Crime reduction

Three policies from this section make a major positive contribution to this objective.

Policy 15 'Town centres, high streets and the CAZ' makes a major positive contribution to this objective as it requires active frontages within designated centres and supports meanwhile use in vacant spaces. Supporting activation of town centres in this way will increase eyes on the street and discourage crime.

Policy 16 'Visitor economy' supports events that are managed in a way that minimises the impact on the amenity of residents, businesses and others, preventing potential safety issues associated with events. The policy also seeks to make provision of safe, secure and publicly accessible toilets in proposals that generate large amounts of visitors, contributing to reducing the risks of anti-social behaviour with people urinating in the street which creates a poor street environment which can deter people from using public areas.

Policy 17 'Food, drink and entertainment uses' ensures any negative impact from new food, drink and entertainment uses are minimised and responsibly managed. This helps to avoid an unacceptable increase of disturbance, anti-social behaviour, crime and fear of crime.

Objective 3 – Housing

Three policies make a minor positive contribution to this objective:

Policy 14 ‘Supporting economic growth’ contributes to the supply of homes through the reconversion of outdated office stock to its original residential use.

Policy 15 ‘Town centres, high streets and the CAZ’ supports residential use on upper floors above town centre uses across the town centre hierarchy (with the exception of the International Centres), which contributes to providing additional homes in Westminster.

Policy 21 ‘Soho Special Policy Area’ supports housing that meets the needs of those working in the area. This contributes to boosting the supply of housing to address a range of needs.

Objective 4 – Health & wellbeing

Six policies from this section make a major positive contribution to this objective.

Policy 14 ‘Supporting economic growth’ supports job creation by enabling the creation of a range of workplaces suited to different sectors, including SMEs and creative businesses. Enhanced job opportunities contribute to improving quality of life and health and wellbeing. The policy also ensures Westminster’s office stock is up-to-date, which contributes to healthy workplaces. Furthermore, by allowing the loss of floorspace to renew outdated office stock to deliver a high quality office environment with ancillary facilities such as cycle parking and changing facilities, the policy encourages active mobility and physical activity, which contributes to improved health and wellbeing.

Requiring proposals in town centres to enhance vitality and viability under Policy 15 ‘Town centres, high streets and the CAZ’, will help avoid the proliferation of uses which may negatively impact on public health (e.g. hot food takeaways, betting shops, and shisha bars). This, in conjunction with the support given by the policy to local markets, contributes to access to fresh and healthy food, meeting local resident day to day needs, and can play a role in connecting people and minimising loneliness. Well-functioning town centres and high streets, as well as co-location of residential uses on upper floors in town centres, can also help counter the need for residents to travel further for their shopping needs, which would negatively impact on the independence of people with mobility issues. The policy also encourages a range of complementary uses in town centres including leisure and community uses, which can contribute to the cultural wellbeing of communities.

Policy 16 ‘Visitor economy’ protects existing art and cultural uses which are an important amenity for local residents and Londoners and supports new arts and cultural uses in the Strategic Cultural Areas, the town centre hierarchy and commercial areas of the CAZ. Outside of the CAZ, the policy allows new art and cultural uses where they can demonstrably benefit the local community. This strongly contributes to the cultural wellbeing of communities. The policy also seeks to provide safe, secure and publicly accessible toilets, which contribute to maximising

independence and improving the physical wellbeing of older people and of those with special health conditions.

Policy 17 'Food, drink and entertainment uses' seeks to control and minimise the health impacts of shisha smoking on local residents by resisting shisha smoking under or adjacent to windows of existing residential premises and requiring proposals for new shisha uses to demonstrate how any potential negative impacts will be mitigated through detailed management plans for the premises. This contributes to healthy homes and workplaces. The policy also restricts new hot food takeaways around schools, which impacts on access to healthy food. This policy also protects public houses, which can play an important role in supporting the local community, including contributing to minimising loneliness and cultural wellbeing. However, the negative health implications of alcohol consumption are also recognised.

Policy 18 'Community infrastructure and facilities' makes a positive contribution towards achieving healthy lifestyles, health inequalities and cultural wellbeing through the protection and provision of social and community facilities. New facilities meet identified needs, reducing inequalities in provision across the city.

Policy 19 'Education and skills' contributes to improving quality of life and cultural wellbeing through the protection and support for expanded provision of educational facilities and the requirement for major developments to contribute to improved employment prospects for local residents.

Policy 20 'Digital infrastructure and information and communications technology' makes a minor positive contribution to this objective by supporting digital connectivity, which can help minimise loneliness and maximise independence.

By supporting LGBTQI+ venues, Policy 21 'Soho Special Policy Area' ensures Soho remains a centre for the LGBTQI+ community. This makes a minor positive contribution to improving the quality of life and cultural wellbeing of residents.

Objective 6 – Natural resources

Two policies in this section make a minor positive contribution to this objective:

Policy 14 'Supporting economic growth' enables a more efficient use of space both through the redevelopment of dated office stock that does not meet the need of modern work practices and by facilitating new jobs in growth sectors, many of which are not likely to require a traditional fixed desk and therefore contribute to 'spaceless growth'.

By encouraging multiple purpose use of educational facilities for public use, Policy 19 'Education and skills' contributes to making efficient use of space.

Objective 9 – Air quality

Policy 17 'Food, drink and entertainment uses' makes a minor positive contribution to this objective as they contribute to improved air quality by requiring mitigation of the negative impacts of shisha smoking, and preventing shisha smoking under or adjacent to windows of existing residential premises.

Objective 10 – Noise

Two policies from this section have a minor positive impact to this objective as they contribute to reducing noise and the impacts of noise.

Policy 16 ‘Visitor economy’ ensures that events in the public realm are organised in ways that minimise the impact on the amenity of residents, which includes noise. The policy also directs new hotels to areas that are not predominantly residential and controls amenity impacts connected with existing hotel operations. This helps reduce adverse noise impacts on local residents.

Policy 17 ‘Food, drink and entertainment uses’ requires mitigation of the negative impacts from any proposed new food, drink, entertainment and shisha smoking uses, which may include noise issues.

Objective 11 – Transport

Two policies make a major positive contribution to this objective.

Policy 14 ‘Supporting economic growth’ directs offices to the areas which are most accessible by public transport, reducing the need to travel by car.

Policy 15 ‘Town centres, high streets and the CAZ’ directs new A1 retail and town centre uses to the town centre hierarchy and the CAZ, which generally have a high level of public transport accessibility. Directing retail and complementary uses to highly accessible areas supports the use of sustainable modes of transport and plays a positive role in aiding the independence of people with mobility issues. In addition, protecting existing isolated convenience stores outside the town centre hierarchy can help avoid unnecessary trips by car.

Policy 18 ‘Community infrastructure and facilities’ also makes a minor positive contribution by protecting existing community facilities and supports the co-location of facilities, reducing the need to travel. It also supports the provision or expansion of new facilities where they meet need or demand, again reducing the need for residents to travel within or outside the city to access such facilities.

Objective 13 – Heritage

Three policies make a minor positive contribution to this objective as they contribute to the conservation and enhancement of heritage assets.

Policy 16 ‘Visitor economy’ ensures any permanent adverse effect of events in the public realm on the built environment is avoided. This includes protection from adverse impacts on Westminster’s heritage assets.

Objective 14 – Public realm & townscape

Six policies from this section make a minor positive contribution to this objective.

Policy 14 ‘Supporting economic growth’ supports the redevelopment of outdated office stock, which can support an enhanced townscape.

Policy 16 ‘Visitor economy’ ensures that the quality of the public realm is maintained when events in the public realm are organised.

Policy 20 'Digital infrastructure and information and communications technology' ensures that any telecommunication apparatus that is no longer necessary is removed from the highway or public places in order to improve pedestrian accessibility, the quality of the public realm and townscapes.

Policy 21 'Soho Special Policy Area' requires development proposals to explore opportunities to improve the public realm.

Objective 16 – Employment opportunities

Five policies have a major positive impact on objective 16 'Employment opportunities'.

Policy 14 'Supporting economic growth' enables the provision of new and improved office floorspace and supports the clustering of new office and SME space in appropriate locations in Westminster, including not just the core office markets of the CAZ, but also the NWEDA, housing renewal areas and existing town centres. The provision of new, replacement and refurbished office and B1 space over the plan period, that meets the needs of key economic growth sectors, will provide a diverse range of employment opportunities for residents and commuters.

Policies 15 'Town centres, high streets and the CAZ' will encourage further job opportunities as a result of supporting a wider range of retail and complementary town centre uses throughout the town centre hierarchy.

Policy 16 'Visitor economy' ensures that Westminster continues to make a significant contribution to London's visitor economy which is an important provider for jobs in Westminster, contributing to job growth.

Policy 17 'Food, drink and entertainment uses' supports growth in the food, drink and entertainment sectors, contributing to job growth. The policy also protects public houses which can contribute to supporting local employment opportunities.

By supporting the provision of new or expanded primary and secondary schools and further education facilities, as well as the improvement and expansion of Westminster's world-class higher educational institutions, Policy 19 'Employment and skills' contributes to improving qualifications, skills and training. The policy also requires major development to contribute to improved employment prospects for local residents. This encourages stronger links between businesses in Westminster and local residents and promotes equality of opportunities by tackling barriers to employment by requiring all major developments to contribute towards employment, training and skills initiatives for local residents and communities.

Three policies from this section make a minor positive contribution to this objective.

Policy 20 'Digital infrastructure and information and communications technology' supports digital connectivity in all new developments, which contributes to improving local opportunities.

Policies 21 'Soho Special Policy Area', 22 'Mayfair and St. James's Special Policy Area' and 23 'Harley Street Special Policy Area' support a variety of local jobs linked to the arts and medical sector respectively, contributing to job growth.

Policy 24 'Savile Row Special Policy Area' seeks to maintain and enhance the existing cluster of bespoke tailoring establishment, which is important for supporting specialist skills and training for apprentices.

Objective 17 – Economy

Several policies from this section make a major positive contribution to this objective.

Policy 14 'Supporting economic growth and employment' promotes economic growth in key sectors to ensure Westminster's role as a global office centre at the heart of London's economy is maintained. While the majority of growth is anticipated in the CAZ and the Opportunity Areas, new office and B1 developments are also directed to the Church Street/Edgware Road Housing Renewal Area and the North West Economic Development Area (NWEDA). The lower land values in the NWEDA and the Church Street/Edgware Road Housing Renewal Area particularly can support employment development of a different type to more central areas, which can help complement regeneration schemes, enhance job opportunities in areas of deprivation, provide more affordable space for start-up businesses, and contribute to a diverse and balanced supply of employment space in the city. This policy also restricts the loss of office floorspace within the CAZ, protects workspace suitable for small and medium enterprises and encourages the provision of a range of new and improved business workspaces within commercial developments to meet the needs of Westminster's enterprises. This contributes to improving business development and environment, and to encouraging new business start-ups, small and creative businesses, which in turn help to diversify Westminster's economy and positively contribute to its resilience

Policy 15 'Town centres, high streets and the CAZ' promotes the growth and attractiveness of town centres as multifunctional places as part of the city's economic development and provides for new units of different size to encourage variety in the town centre offer and provide opportunities for small businesses and new business start-ups. The policy also supports new and existing markets that add to the variety of shopping options. This contributes to providing opportunities for small businesses and to the overall success of the local economy. While business resilience is sought by allowing town centres a degree of flexibility to innovate and adapt to the challenges facing the retail sector, particularly within the WERLSPA, the policy ensures the cumulative loss of A1 units do not undermine the viability and vitality of Westminster's town centres.

Policy 16 'Visitor economy' ensures that Westminster continues to make a significant contribution to London's visitor accommodation and supports Westminster's global business role.

Policy 17 'Food, drink and entertainment uses' supports growth in the entertainment sector which plays a vital role in maintaining Westminster's economy. The policy also protects public houses across Westminster. Public houses can positively support the economy by providing direct employment, supporting food suppliers and brewing industries, and helping make Westminster a desirable place to do business.

Policy 18 'Community infrastructure and facilities' supports business continuity and growth through the co-location of community facilities and by allowing for ancillary commercial uses within the same premises.

Policy 19 'Education and skills' supports the city's world-class higher educational institutions, which constitute a key sector in Westminster and contribute towards a highly skilled workforce, support the clustering of the knowledge economy, contributing to strengthening London's economy and business environment.

Policy 21 'Soho Special Policy Area' supports uses by smaller scale industries, particularly the cultural, creative and visitor sectors and SMEs. By encouraging new business start-ups, small businesses and opportunities for local people this policy contributes to the area's economic diversity.

A number of policies from this section make a minor positive contribution to this objective.

Policy 20 'Digital infrastructure and information and communications technology' ensures that new buildings and infrastructure will have the capability to install and upgrade digital technologies to ensure they are kept up-to-date. This will help ensure business continuity and means that fewer businesses will feel they need to relocate due to outdated buildings or infrastructure.

The Special Policy Area policies contribute to promoting business in key sectors.

Policy 22 'Mayfair and St. James's Special Policy Area' seeks to protect and enhance specialist and niche uses, which are of economic and cultural significance.

Policy 23 'Harley Street Special Policy Area' seeks to protect and enhance the cluster of specialist medical and connected uses which add to the economic diversity of the city. Policy 24 'Savile Row Special Policy Area' supports a clustering of bespoke tailoring uses, which contribute to a diverse economy within the city.

3.4 Chapter 4 – Connections

This section of the City Plan contains policies related to the delivery transport infrastructure and their incorporation in the design of developments. It contains the following policies:

25. Sustainable travel
26. Walking and cycling
27. Public transport and infrastructure
28. Parking
29. Highway access and management
30. Freight, servicing and deliveries
31. Technological innovation in transport
32. Waterways and Waterbodies

No impacts have been identified on objectives 3 'Housing', 7 'Flood risk and water quality', 8 'Biodiversity' and 12 'Waste'.

Objective 1 – Communities

Two policies were found to have a major positive impact on objective 1 'Communities'.

Policy 25 'Sustainable travel' promotes the London Plan's *Healthy Streets* approach to reduce private motor vehicles dominance and congestion, improve air quality, improve walking and cycling routes and deliver high quality public realm to encourage people to choose to walk or cycle as part of their everyday life. By influencing behaviour towards higher levels of walking particularly, interaction and community activity will be encouraged and access to local services improved.

Policy 27 'Public transport and infrastructure' supports improved connectivity, legibility, quality, usability and capacity in public transport, which contributes to improving access to local services and to a more inclusive community.

Policy 26 'Walking and cycling' supports development which prioritises walking and cycling. By doing so, it makes a minor positive contribution to local services, shops and facilities and promotes an inclusive community.

Objective 2 – Crime reduction

Policy 25 'Sustainable travel' supports the creation of a safe pedestrian and cycling environment in Westminster by incorporating the Mayor's *Healthy Street* approach. This makes a major positive contribution to reducing crime and fear of crime.

Objective 3 – Housing

Policy 28 'Parking' advocates car free development in most parts of the city thereby releasing more development space for housing. This makes a major positive contribution to this objective.

Objective 4 – Health & wellbeing

Three policies from this section make a major positive contribution to objective 4 'Health & wellbeing'.

Policy 25 'Sustainable travel' supports the creation of convenient, attractive, accessible, healthy and safe places in Westminster. This policy therefore contributes to improved access and improved independence for older people. Healthy lifestyles are also encouraged by enhancing opportunities for physical activity and active travel. This contributes to improving health and wellbeing by enabling a physically active lifestyle

Policy 26 'Walking and cycling' requires development to prioritise walking and cycling and to improve the environment for these modes of transport. This enables more people to walk or cycle as part of their daily commute and for pleasure, contributing to healthy lifestyles, improved wellbeing and enhanced access and movement.

By supporting investment in strategic transport infrastructure to expand its capacity and reliability and by improving accessibility to and legibility of existing and proposed public transport, Policy 27 'Public transport and infrastructure' contributes to improved access to public transport and to maximising independence. The policy also seeks to streamlining bus services, effectively managing coach routes stops and stands, and promoting walking and cycling as well as other sustainable transport initiatives. All these contribute to creating a less polluted and more welcoming public realm which further enhances access and the overall quality of life and wellbeing of residents.

Policy 28 'Parking' sets out a framework for effectively managing parking in Westminster, which is aimed to encourage a progressive shift to more sustainable transport modes. This is expected to positively contribute to health and wellbeing because of the reduction on noxious emissions from private motor vehicles and as a result of the expected take up of active mobility modes. The policy also supports off-street parking in parking zones B&F, where parking stress is high. The policy aims to strike the balance between improving the public realm and providing off street parking where growth is anticipated. This can be particularly important for disabled drivers and can help prevent further congestion linked with additional levels of on-street parking. By requiring the design of all outdoor and open car parking areas to ensure vehicle and pedestrian safety, the policy further contributes to access and movement.

Policy 32 'Waterways and waterbodies' encourages the use of Westminster's waterways and waterbodies for sport, leisure, recreational and educational uses as well as for pedestrians, cyclists and water-based transportation. This contributes to the encouragement of healthy lifestyles by contributing to improved access and movement and the encouraging physically active lifestyles by supporting and enhancing the use of riverside paths and canal towpaths.

Policy 31 'Technological innovation in transport' makes a minor positive contribution to this objective. The policy supports the development of a network of electric vehicle charging points and opportunities for new technology such as hydrogen refuelling in

the interest of promoting a shift from fossil fuels to cleaner alternatives. Reducing noxious motor vehicle emissions has direct positive health benefits as it helps improve air quality and thereby leads to a potential reduction in pollution related deaths.

Objective 5 – Climate change

A number of policies in this chapter make a major positive contribution to this objective.

Policy 25 'Sustainable travel' contributes to the reduction of greenhouse gas emissions by reducing car dependency through the promotion of sustainable travel modes, particularly walking and cycling.

By requiring developments to prioritise walking and cycling and to improve the environment and ease for these modes of transport, Policy 26 'Walking and cycling' supports the take up of these more sustainable modes, contributing to reducing the reliance on private motor vehicles and connected greenhouse gas emissions.

By supporting improved public transport efficiency, usability and capacity, and encouraging walking and cycling and sustainable transport initiatives, Policy 27 'Public transport and infrastructure' contributes to reducing greenhouse gas emissions from private motor vehicles, buses and coaches.

By setting out a framework to help reduce dependency on private motor vehicles and encourage the shift to more sustainable travel modes, Policy 28 'Parking' makes a major contribution to minimising greenhouse gas emissions.

Policy 31 'Technological innovation in transport' makes a minor positive contribution to this objective as it supports opportunities for new technology such as hydrogen refuelling and/or electric vehicle charging points, which encourages a shift to cleaner fuel alternatives which helps reduce greenhouse gas emissions.

Objective 6 – Natural resources

Policy 28 'Parking' makes a major positive contribution to a more efficient use of land as it promotes car free developments and further encourages a shift to more sustainable travel options by setting out requirements for new developments to provide electric vehicle charging points. This encourages a reduction in car dependency and a reduced reliance on fossil fuels.

Several policies make a minor positive contribution to this objective as they help reduce the consumption of fossil fuels.

Policy 25 'Sustainable travel' encourages sustainable travel modes, providing alternatives for the car thus contributing to reducing natural resources.

Policy 26 'Walking and cycling' requires developments to prioritise and enable walking and cycling and Policy 27 'Public transport and infrastructure' supports improved public transport efficiency, usability and capacity, and encourages walking and cycling and sustainable transport initiatives. These contribute to a reduced reliance on fossil fuels and a more efficient use of land.

Policy 30 'Freight, servicing and deliveries' requires provisions for servicing, collection and deliveries within developments to be capable of being shared with other businesses as to ensure the most efficient use of scarce space and reduce congestion.

Policy 31 'Technological innovation in transport' supports opportunities for new technology such as hydrogen refuelling and/or electric vehicle charging points in the interest of a shift from fossil fuels towards more sustainable alternatives.

Objective 9 – Air quality

A number of policies from this section make a major positive contribution to objective 9 'Air quality' by improving air quality and reducing emissions.

By enabling sustainable travel modes, Policy 25 'Sustainable travel' aims to reduce dependency on private motor vehicles and support a modal shift to cleaner and more sustainable transport options. This contributes to reducing noxious emissions and improving air quality.

By prioritising and enabling walking and cycling as transport options, Policy 26 'Walking and cycling' supports the take up of sustainable transport modes and contributes to reducing pollution and improving air quality.

By supporting improved public transport efficiency, usability and capacity, and encouraging walking and cycling and sustainable transport initiatives such as electric vehicle charging points and car clubs, Policy 27 'Public transport and infrastructure' contributes to reducing polluting emissions and improving air quality.

Policy 30 'Freight, servicing and deliveries' ensures servicing, collection and delivery needs originating from new developments are met on site and do not result in additional road congestion and air pollution.

A number of policies from this section make a minor positive contribution to this objective as they contribute to improved air quality and a reduction in emissions.

Policy 31 'Technological innovation in transport' supports opportunities for new technology such as hydrogen refuelling and/or electric vehicle charging points in the interest of a shift from fossil fuels towards more sustainable and cleaner alternatives.

By promoting car free developments, Policy 28 'Parking' contributes to ensuring the most efficient use of land and supports a modal shift away from private motor vehicles, which helps reduce car dependency, reduce noxious emissions and improve air quality.

Objective 10 – Noise

Three policies from this section make a minor positive contribution to this objective as they reducing noise levels and the impact of noise.

By promoting a shift away from private motor vehicles, Policy 25 'Sustainable travel' has a minor positive impact on noise reduction.

Policy 27 'Public transport and infrastructure' supports the streamlining of bus services. This will likely lead to a reduction in the number of buses where the level of service gives rise to significant adverse noise impacts on public health or well-being.

Policy 30 'Freight, servicing and deliveries' supports and encourages provision of off-site freight consolidation centres, shared delivery and loading arrangements and other traffic management measures to restrict delivery vehicles and/or facilitate the retiming of deliveries. The policy also requires servicing, collection and delivery needs linked to a development site to be either met within the site itself or, where this is not possible, to be carried out in such a way that minimises adverse effects on other users, and other residential and commercial activity. This contributes to minimising negative amenity impacts, including noise.

Objective 11 – Transport

All policies from this section are considered to positively contribute to this objective.

Four policies were found to have a major positive impact as they promote walking and cycling, reduce volumes of traffic, reduce reliance on the car and improve public transport accessibility.

Policy 25 'Sustainable travel' seeks to maximise trips made by sustainable modes, encourage active mobility and create healthier and safer streets for all. This contributes to reducing volumes of private motor traffic, improve public transport accessibility and encourage walking and cycling.

By prioritising and enabling walking and cycling as transport options, Policy 26 'Walking and cycling' contributes to encouraging sustainable transport options, reducing traffic and the reliance on private motor vehicles.

Policy 27 'Public transport and infrastructure' contributes to encouraging sustainable transport patterns by supporting improvements to public transport infrastructure and accessibility to and legibility of public transport through improved public realm as well as walking and cycling links to stops or stations.

Policy 30 'Freight, servicing and deliveries' seeks to ensure that servicing, collection and delivery needs originating from new developments are met on site and do not result in additional road congestion. The policy also protects against the loss of existing off-street freight, servicing and delivery facilities. This helps prevent additional traffic and congestion caused by on-street operations.

Policy 31 'Technological innovation in transport' requires all new developments to provide electric vehicle charging points and supports on-street electric charging points across Westminster. The policy also supports opportunities for new technology such as hydrogen refuelling and/or electric vehicle charging points. Despite not directly contributing to reducing the use of private motor vehicles altogether, this policy contributes to limiting their environmental impact by ensuring a number of refuelling or recharging stations are located within the borough. Keeping refuelling trips short helps to avoid unnecessary detours causing additional traffic and congestion.

Policy 28 'Parking' promotes car free developments except in Parking zones B & F and ensures no new off-street car parking for use by the public is developed unless it is replacing an existing facility or is essential to the function to the development (e.g. hospitals). This helps support a modal shift away from private motor vehicles to more sustainable travel modes. This helps discourage the use of private motor vehicles and prevent further traffic congestion.

A number of policies make a minor positive contribution to this objective:

Policy 29 'Highway access and management' ensures that new highway accesses do not impede pedestrian flows and safety. The policy seeks to contain the number of new direct access points onto the strategic parts of the road network from new developments, in order to avoid increased congestion that would compromise the function of the network and to ensure pedestrian flow is not affected. This contributes to a reduction of traffic volumes.

Policy 32 'Waterways and waterbodies' seeks to promote access and use of waterways and waterbodies for pedestrians and cyclists. It encourages water transport, which is a more sustainable mode than cars and goods vehicles on the road. The policy seeks to deliver improved pier facilities, which will encourage a modal shift to more sustainable transport options.

Objective 13 – Heritage

Two policies from this section make a minor positive contribution to this objective as they conserve and enhance heritage assets and their settings.

Policy 32 'Waterways and waterbodies' requires new development proposals affecting Westminster's waterways and waterbodies to protect and enhance the heritage value of the waterways and waterbodies and their setting. The policy also encourages the use of the Embankment Wall in developing pier facilities, which should serve to preserve and enhance this important asset.

Objective 14 – Public realm & townscape

Policy 30 'Freight, servicing and deliveries' makes a major positive contribution to this objective by improving access and mobility for all equality group strands. This policy ensures servicing, collection and delivery needs are fully met within a development site or, where this is not possible, that they are met in such a way that minimises adverse effects on other highway and public realm users, including vulnerable road users such as pedestrians or cyclists.

Five policies from this section make a minor positive contribution to this objective.

Policy 25 'Sustainable travel' seeks to make Westminster's places greener, healthier and more attractive through improving its public transport nodes, reallocating road and development space towards sustainable transport modes and enhancing the pedestrian environment. This is expected to have an overall benefit to the built environment and Westminster's world class townscape.

Policy 29 'Highway access and management' seeks to improve the pedestrian environment by limiting the number of new highway accesses onto the strategic road network and ensuring pedestrian flow and safety is not compromised.

By enabling walking and cycling, Policy 26 'Walking and cycling' contributes to improving access to and the enjoyment of the public realm.

By supporting the streamlining of bus services and the relocation of standing facilities Policy 27 'Public transport and infrastructure' contributes to enhancing the quality of public realm.

By requiring the application of the parking standards in Appendix 2 of the City Plan, Policy 28 'Parking' requires all parking areas in new developments to allocate adequate accessible space for disabled blue or white badge holders, contributing to enhanced access and mobility for specific groups.

Objective 15 – Open space

Policy 32 'Waterways and waterbodies' makes a major positive contribution to objective 15 'Open space'. This policy requires new development proposals affecting Westminster's waterways and waterbodies to protect and enhance the character, appearance and landscape value of the waterways and waterbodies and their setting. The policy also ensures new or replacement river crossings do not adversely impact on open spaces. The policy requires new developments to maintain or enhance existing paths or providing for them where no such paths exist. It supports improvements to riverside paths and canal towpaths that enhance the accessibility and attractiveness of open spaces. This contributes to improved access of open space.

Objective 16 – Employment opportunities

Policy 27 'Public transport and infrastructure' seeks to improve connectivity, usability and capacity in public transport. This makes a minor positive contribution to removing barriers to accessing work opportunities.

Objective 17 – Economy

All policies from this chapter make a major positive contribution to this objective.

Policy 25 'Sustainable travel' helps strengthen business resilience and support business growth through improvements to the pedestrian environment, encouraging active travel and the uptake of sustainable transport modes. Improving the pedestrian environment while reducing traffic dominance and congestion will impact positively on retail growth as improved local environment will contribute to more attractive places increasing customer dwell time. This makes a major positive contribution to this objective.

By requiring development to prioritise and improve the pedestrian environment, Policy 26 'Walking and cycling' encourages the delivery of pleasant and welcoming places which people choose as preferential routes and as areas to dwell in. This enhances the business potential of these locations.

Policy 27 'Public transport and infrastructure' supports sustainable transport modes and key investment to improve public transport. This contributes to enhancing accessibility and helps achieve a better connected transport network that is more reliable, which helps support existing business operations and unlock further opportunities for business and regeneration.

Policy 28 'Parking' sets a balanced approach to parking requirements for new developments that can help meet essential and commercial need while promoting more sustainable transport solutions. This contributes to supporting sustainable growth.

By protecting the function of Westminster's road network, Policy 29 'Highway access and management' helps meet the mobility needs of residents, businesses and visitors, supporting sustainable economic growth.

Policy 30 'Freight, servicing and deliveries' makes a minor positive contribution to this objective as it will improve delivery and servicing arrangements through consolidation, re-timing and re-modelling of freight traffic. Shared arrangements will likely be more economical for SME businesses, thereby supporting business growth.

Policy 31 'Technological innovation in transport' supports technological innovation in transport designed to improve mobility, reduce congestion and improve air quality. This contributes to improving business environment.

Policy 32 'Waterways and waterbodies' protects and enhances the function of Westminster's waterways and waterbodies including by promoting their function for recreational and transport activities and by supporting commercial moorings in appropriate locations. This contributes to meeting the need for commercial and other uses of local and international relevance that can help diversify Westminster's economy.

3.5 Chapter 5 – Environment

This section of the City Plan contains policies on improving air quality, making an efficient use of natural resources and protecting and enhancing the natural environment. It contains the following policies:

- 33. Air quality
- 34. Managing local environmental effects
- 35. Green infrastructure
- 36. Flood risk
- 37. Energy
- 38. Waste management

No impacts have been identified for this section on objective 2 ‘Crime reduction’.

Objective 1 – Communities

By protecting the city’s green infrastructure including open spaces, Policy 35 ‘Green infrastructure’ ensures communities have access to open space. The policy requires developments to incorporate inclusive accessible public open space as part of the wider development scheme and of play facilities, particularly in areas of play space deficiencies. Thereby these policies enhance access to public open space including play space as important local services, and contribute to an inclusive of Westminster community. This makes a major positive contribution to objective 1 ‘Communities’.

Policy 38 ‘Waste management’ makes a minor positive contribution to this objective by protecting all existing waste management and recycling sites, which constitute community facilities, contributing to access to local services and facilities. The policy also ensures all developments follow Westminster’s Code of Construction Practice (CoCP). The CoCP requires developers to develop and maintain good relations with the local community by keeping neighbours informed of progress and by responding to complaints quickly, fairly and effectively, contributing to local decision making of neighbourhoods.

Objective 3 – Housing

Policy 34 ‘Managing local environmental effects’ has a minor positive impact on this objective as it ensures that appropriate mitigation measures are put into place when new homes are being located near noise generating uses and other sources of nuisance, contributing to the delivery of high quality homes.

Policy 37 ‘Energy’ makes a minor positive contribution to this objective by requiring the adoption of sustainable building design and technological measures in order to maximise energy efficiency in new developments. This contributes to the delivery of high quality homes.

Objective 4 – Health & wellbeing

A number of policies from this section make a major positive contribution to this objective.

Policy 33 'Air quality' ensures new development does not have any adverse impact on air quality and seeks to improve air quality, which contribute to the creation of healthy homes, improving quality of life and addressing health inequalities.

Policy 34 'Managing local environmental effects' ensures exposure to a range of environmental effects are minimised, contributing to the creation of healthy homes and improving quality of life. The policy also contributes to improving the health and wellbeing of residents by ensuring that any health risks associated with contaminated land are minimised.

Policy 35 'Green infrastructure' ensures existing green infrastructure is protected from development, including open spaces. This contributes to ensuring access to and protecting open space, which provide opportunities for sport and physical activity contributing to healthy lifestyles. The policy also protects existing trees and encourages new tree planting in new developments. Trees have great amenity value as they add to the existing green infrastructure, provide shading, prevent overlooking, provide noise screening and contribute to cultural wellbeing. The policy also protects existing biodiversity by ensuring new development does not negatively impact on designated SINCs, trees, and priority species and/or habitat. These support the city's green infrastructure which provides air quality and amenity benefits that contribute to residents and visitors' health and encourage healthy lifestyles.

The policy also requires key developments to incorporate inclusive, accessible public open space as part of the wider development scheme. The policy also encourages the creation of new green infrastructure that connect existing open spaces and of play facilities for developments in areas of play space deficiency. This positively contributes to encouraging healthy lifestyles through increased participation in physical activity and improving mental wellbeing.

Two policies from this section have a minor positive impact on this objective:

Policy 36 'Flood risk' requires developments to be safe for their lifetime from the risk of flooding by managing vulnerable uses, making sure flood management infrastructure is in place and setting out requirements for sustainable drainage This contributes to the creation of healthy homes and workplaces by minimising property damage due to flooding.

Policy 37 'Energy' requires development proposals to demonstrate how they will reduce energy demand and carbon emissions and sets energy efficiency standards for developments. This policy contributes to reducing carbon emissions which are harmful to the environment and can have adverse impact on health, addressing health inequalities.

Objective 5 – Climate change

Two policies make a major positive contribution to his objective.

Policy 35 'Green infrastructure' protects the city's open spaces and other green infrastructure features which are an important asset that contributes to carbon reduction. The policy also protects existing trees and encourages additional tree provision. Trees positively contribute to reducing greenhouse gas emissions and

supporting climate change resilience. By encouraging further greening and the provision of additional green infrastructure, the policy also helps reduce greenhouse gas emissions and improve resilience to climate change thanks to the contribution multifunctional green infrastructure brings to absorbing carbon dioxide emissions, improving drainage and fighting the urban heat island effect.

Policy 37 'Energy' requires new developments to reduce their carbon emission in accordance with the Mayor of London's energy hierarchy and sets out energy efficiency standards. This contributes to reducing greenhouse gas emissions and to maximising resilience to future changes in climate. By supporting a more efficient on-site energy provision, the policy contributes to minimising greenhouse gas emissions associated with providing energy from off-site locations.

Policy 33 'Flood Risk' makes a minor positive contribution to this objective as it sets out the strategy to manage flood risk including the incorporation of drainage and resilience measures, improving resilience to climate change from flood related events.

Objective 6 – Natural resources

Policy 35 'Green infrastructure' makes a major positive contribution to this objective as it protects valuable open spaces and biodiversity sites from development, and promoting the incorporation of multifunctional green infrastructure in developments, thereby making the most efficient use of land.

Policy 37 'Energy' contributes to minimising the use of natural resources by promoting energy efficiency measures, making a major positive contribution to this objective.

Objective 7 – Flood risk & water quality

Several policies from this section make a major positive contribution to this objective.

Policy 34 'Managing local environmental effects' makes sure that any land contamination is appropriately mitigated and prevents any contamination to impact on ground water or water quality. It also requires all developments to follow Westminster's Code of Construction Practice (CoCP), which seeks to protect surface and groundwater. This contributes to minimising flood risk and protects water quality.

Policy 35 'Green infrastructure' protects all existing green infrastructure from development and promotes the further greening of the city. Open spaces and other green features provide an important drainage and flood management function as part of the multifunctional green infrastructure network. This policy thereby contributes to minimising of flood risk and improving flood resilience.

Policy 36 'Flood risk' requires all development proposals to incorporate measures to mitigate flood risk, including through the incorporation of Sustainable Drainage Systems (SuDS) to manage surface water flooding. The policy also safeguards existing flood risk infrastructure and seeks contributions to enhance this. This contributes to minimising the risk of flooding and to an increased flood resilience.

Objective 8 – Biodiversity

Policy 35 'Green infrastructure' makes a major positive contribution to objective 8 'Biodiversity'. The policy protects all existing green infrastructure including biodiversity sites and features such as Sites of Nature Conservation Importance, priority habitats and species and trees. The ecological value of open spaces is also specifically protected. The policy also promotes further greening of the city via the incorporation of biodiversity features in new developments. By doing so, this policy contributes to the protection and enhancement of biodiversity.

Two policies make a minor positive contribution to this objective.

Policy 34 'Managing local environmental effects' contributes to protecting biodiversity by protecting tranquillity in and around open spaces and by recommending to avoiding the negative effects of light pollution around sensitive receptors. The policy ensures all developments follow Westminster's Code of Construction Practice (CoCP). The CoCP ensures disturbance to areas of nature conservation interest, protected species and priority species is controlled and limited as far as practicable.

Policy 36 'Flood risk' requires developments to incorporate Sustainable Drainage Systems (SuDS). As SuDS are a type of green infrastructure, multiple benefits can be achieved from this policy, including an enhancement in biodiversity.

Objective 9 – Air quality

Two policies from this section make a major positive contribution to this objective.

Policy 33 'Air quality' contributes to improved air quality as it requires all major developments to be Air Quality Neutral, and all development schemes in the key growth areas identified in the plan to be Air Quality Positive. The policy also sets out requirements for Air Quality Assessments that as well as major developments, covers developments that could be particularly impacted by, or generate poor air quality. This policy thereby contributes to improving air quality.

Policy 35 'Green infrastructure' protects trees and encourages new planting. Trees and other green features can capture and absorb carbon dioxide and other pollutants, which positively contributes to improving air quality.

In addition, two policies have a minor positive impact on this objective.

Policy 34 'Managing local environmental effects' ensures all developments follow Westminster's Code of Construction Practice (CoCP). The CoCP ensures emissions vehicles and plants used on site and dust from construction activities are controlled and limited. This helps reduce negative impacts on local air quality, thereby also reducing negative health impacts and the numbers of complaints received.

By requiring new developments to reduce carbon emissions, Policy 37 'Energy' seeks to reduce greenhouse gas emissions that contribute to worsening air pollution. The policy also helps avoid exacerbating the urban heat island effect, which contributes to worsening air quality in the city by negatively impacting on the dispersion of pollutants.

Objective 10 – Noise

Policy 34 'Managing local environmental effects' makes a major positive contribution to reducing noise and noise impact on residents. The policy requires all developments to minimise noise from activities including servicing and delivery operations, prevent noise intrusion to residential development, as well as to protect tranquillity in and around open spaces. The policy also ensures all developments follow Westminster's Code of Construction Practice (CoCP). The CoCP ensures noise and vibration levels are controlled and limited, so as to protect dwellings and other sensitive receptors from adverse impact.

Policy 35 'Green infrastructure' also makes a minor positive contribution to this objective by protecting and encouraging new green infrastructure, which can positively contribute to noise attenuation. The policy also protects trees and encourages new planting. Trees contribute to filtering out noise, which helps minimise noise impacts on residents and visitors.

Objective 11 – Transport

Policy 35 'Green infrastructure' has a minor positive impact on this objective as it promotes the improvement of green infrastructure network, and specifically the green corridors, which encourage people to walk and cycle.

Objective 12 – Waste

Policy 37 'Waste management' makes a major positive impact on this objective by requiring developments to provide adequate waste management facilities. It also requires new major developments and uses generating particular types of waste to provide on-site recycling waste management facilities. This contributes to increased recycling, recovery and re-use and reduced household waste.

Policy 34 'Local environmental impacts' makes a minor positive impact on this policy as it requires all developments to follow Westminster's Code of Construction Practice (CoCP) which ensures spoil and waste from construction is appropriately managed and encourages opportunities for re-using or recycling construction and demolition waste be explored and implemented. This contributes to a reduction in the consumption of materials and a reduction of construction waste.

Objective 13 – Heritage

A minor positive contribution is made by a number of policies.

Policy 34 'Managing local environmental effects' requires that all developments follow Westminster's Code of Construction Practice (CoCP). The CoCP ensures archaeological remains are not destroyed during construction and that no harm is caused heritage assets as a result of construction works.

Policy 35 'Green infrastructure' protects trees and encourages new planting in new developments to provide optimum canopy cover. Trees can positively contribute to enhancing heritage assets and their settings. The policy also protects open spaces including their heritage value, and supports the city's overall green infrastructure, which can play a positive role in enhancing heritage assets and their settings.

Policy 36 'Flood risk' ensures flood risk is minimised. As many of Westminster's heritage assets are located in flood zones 2 and 3, including Westminster's World Heritage Site, this contributes to preserving heritage assets and their settings.

Objective 14 – Public realm & townscape

Policy 35 'Green infrastructure' protects the city's open spaces, which contribute to enhancing the quality of public realm and townscape. The policy also protects trees and encourages planting in new developments. Trees can positively contribute to enhancing public realm and townscape. This policy makes a major positive contribution to this objective.

Policy 34 'Managing local environmental effects' has a minor positive impact to this objective as it contributes to enhancing the quality of the public realm by preventing excessive noise impacts, light pollution and other impacts.

Objective 15 – Open space

Policy 35 'Green infrastructure' makes a major positive contribution to this objective. It protects all existing open space in the city and their qualities. The policy also requires development to provide new open space and play space, seeking to open up private open spaces, and promote further greening of the city. Thereby, it contributes to improving access to open space, enhancing the quality of open spaces and enhancing the green infrastructure network.

Policy 34 'Managing local environmental effects' makes a minor positive contribution to enhancing the quality of open space by ensuring developments protect the tranquillity of open spaces and mitigate any other potentially negative impacts upon them including light spill.

A minor positive contribution to this objective is also made by Policy 36 'Flood risk' as it requires development to incorporate Sustainable Drainage Systems (SuDS), which contribute to the enhancement of the green infrastructure network.

Objective 16 – Employment opportunities

Policy 34 'Managing local environmental effects' ensures all major and basement developments follow Westminster's Code of Construction Practice (CoCP). The CoCP helps promote the provision of employment, training and skills development for local residents through construction projects. This particularly contributes to supporting the long-term unemployed and other priority groups into sustainable employment. The policy thereby makes a minor positive contribution to this objective.

Objective 17 – Economy

A number of policies from this chapter make a minor positive contribution to this objective.

Policies 32 'Managing air quality' ensure new developments do not negatively impact on Westminster air quality. Reducing air pollution positively support Westminster's business environment.

Policy 35 'Green infrastructure' protects and enhances Westminster's green infrastructure network, which also plays a role in supporting Westminster's economy.

Policy 36 'Flood risk' ensures new development do not increase Westminster's flood risk. This helps make sure the risk of flooding to existing and future businesses and services are managed, helping business resilience.

Policy 37 'Energy' sets out energy efficiency standards and promotes energy networks. The policy thereby helps business resilience by future proofing energy provision.

3.6 Chapter 6 – Design

Chapter 6 of the City Plan covers policies to manage design of developments including heritage assets and the public realm. It contains the following policies:

- 39. Design principles
- 40. Westminster’s heritage
- 41. Townscape and architecture
- 42. Building height
- 43. Building height in the Housing Renewal Areas
- 44. Public realm
- 45. Security measures in the public realm
- 46. Basement development

No impacts have been identified on objectives 9 ‘Air quality’, 10 ‘Noise’ and 12 ‘Waste’.

Objective 1 – Communities

Three policies in this chapter are considered to have a major positive impact on objective 1 ‘Communities’.

Policy 39 ‘Design principles’ requires development to place people at the heart of the design process, including by incorporating inclusive design principles. This contributing to a more inclusive Westminster community.

Policy 44 ‘Public realm’ sets out the principle for an accessible public realm, prioritising pedestrian movement including the needs for elderly and people with mobility requirements, fostering an inclusive community.

Objective 2 – Crime reduction

A major positive impact on Objective 2 ‘Crime reduction’ is made by three policies.

Policy 39 ‘Design principles’ requires development to incorporate design measures to reduce the opportunity for crime and anti-social behaviour, contributing to the reduction of fear of crime, disorder and antisocial behaviour as well as other behaviour adversely affecting the local environment.

Policy 44 ‘Public realm’ sets out the principles for a safe public realm, designing out crime or reducing opportunities for anti-social behaviour.

Policy 45 ‘Security measures in the public realm’ requires development to provide an integrated approach to security of the site, including buildings and any associated public or private spaces. The policy also set the requirement for developments and/or public realm improvements that may be vulnerable to terrorism to incorporate appropriate security measures in the design, improving the resilience for terrorism related crime.

Objective 3 – Housing

Several policies in this chapter have a major positive impact on objective 3 ‘Housing’.

Policy 39 'Design principles' sets out design standards, which ensure all developments, including housing, are of high quality standards, contributing to the creation of high quality homes.

Policy 41 'Townscape and architecture' positively sets out the design requirements for different types of development, including extensions and alterations, contributing to the provision of housing of different types and sizes and to the reduction of unfit homes, helping people stay independent for longer and creating high quality homes.

Policies 42 'Building height' and 43 'Building height in the Housing Renewal Areas' identify locations where tall buildings may be appropriate, and set out design principles for such developments. This contributes to the delivery of high quality homes.

Objective 4 – Health & wellbeing

A major positive impact on objective 4 'Health & wellbeing' is made by several policies.

Policy 39 'Design principles' requires development to place people at the centre of the design process including through the incorporation of design principles that promote inclusive, accessible spaces that encourage healthy and active lifestyles and provide high standards of amenity for occupiers. This contributes to enhancing residents' health and wellbeing and improved access.

Policy 40 'Westminster's heritage' encourages development to optimise the positive role of the historic environment including public enjoyment and awareness of the city's heritage, contributing to cultural wellbeing.

Policy 44 'Public realm' sets out the principle for an accessible public realm, prioritising pedestrian movement including the needs for elderly, those with dementia and people with mobility requirements, which improves access and movement, healthy lifestyles and maximises independence of older people. The policy also encourages the provision of public art, which contributes to cultural wellbeing.

By ensuring security is an integral consideration in the design of new developments, Policy 45 'Security measures in the public realm' makes a minor positive contribution to this objective, as it ensures public spaces are safe for people to use, which helps improve wellbeing and quality of life.

Policy 46 'Basement development' makes a minor positive contribution to this objective as it requires basement developments to be designed and constructed to minimise the impact at construction and occupation stages on the surrounding area, and to incorporate measures recommended in the structural statement to safeguard structural stability. This helps improve the quality of life and wellbeing of local residents.

Objective 5 – Climate change

Two policies make a major positive impact to this objective.

Policy 39 'Design principles' expects development to adopt sustainable design principles and to incorporate measures to improve environmental performance and mitigate and adapt to climate change. The policy also requires proposals for substantial demolition and reconstruction to be fully justified on the basis of whole-life carbon impacts, resource and energy use, when compared to the existing building.

Policy 40 'Heritage' contributes to reducing carbon impacts by requiring retention of existing historic buildings in most circumstances thereby preserving their inherent embodied energy.

Objective 6 – Natural resources

A major positive impact on objective 6 'Natural resources' is made by Policy 39 'Design principles' as it requires the incorporation of sustainable design principles in development, particularly by ensuring high standards of resource efficiency by minimising energy use and through the reduction, reuse or recycling of resources and materials, and the use of high quality and durable materials. The policy also requires considerations over sensibly refurbishing or retrofitting buildings prior to demolition to reduce natural resource and energy use.

Objective 7 – Flood risk & water quality

By ensuring basement developments incorporate measures recommended in flood risk assessments, Policy 46 'Basement development' seeks to minimise floor risk, making a major positive contribution to this objective.

Objective 8 – Biodiversity

Two policies in this chapter have a minor positive impact on objective 8 'Biodiversity' as they are seeking to protect and enhance biodiversity.

Policy 39 'Design principles' requires development to enhance its context having regard to the ecological value of parks, gardens and other open spaces.

Policy 44 'Public realm' requires developments to incorporate high quality soft landscaping into public realm schemes, which contributes to the greening of the city.

Objective 11 – Transport

Policies 42 'Building height' and 43 'Building height in the Housing Renewal Areas' make a major positive contribution to this objective as it set out a positive strategy for tall buildings which can play a role in enhancing legibility. By directing tall buildings to significant places, such as transport nodes, sustainable travel will be promoted.

Policy 44 'Public realm' makes a major positive contribution to this objective as it seeks to improve accessibility and to design out conflicts between transport modes, whilst improving the connectivity and legibility of different transport modes and pedestrian access in particular.

Objective 13 – Heritage

Several policies have a major positive impact on objective 13 'Heritage'.

Policy 39 'Design principles' requires all development to be of high quality befitting Westminster's heritage. Contemporary architecture and use of innovative building techniques are encouraged where they respect and enhance their surroundings and Westminster's heritage, contributing to the conservation and enhancement of the historic environment.

Policy 40 'Westminster's heritage' protects Westminster's designated and non-designated heritage assets and encourages development to optimise the positive role of the historic environment including public enjoyment and awareness of the city's heritage, contributing to the protection of heritage assets and cultural value. This includes Westminster's World Heritage Site, archaeology, conservation areas, historic parks and gardens, listed buildings and other designated and non-designated heritage assets.

Policy 41 'Townscape and architecture' sets out the general and specific design principles for development which ensure that spaces and features that contribute to the significance of a heritage assets are conserved, enhanced and sensitively integrated within new development and, where possible, lost or damaged features reinstated or restored. The policy also requires new development affecting strategic and local views to contribute positively to their characteristics, composition and significance and to remedy past damage to these views, where possible.

Policies 42 'Building height' and 43 'Building height in the Housing Renewal Areas' have a minor positive impact on this objective. The policies direct tall buildings to certain areas in the city and set out design principles which consider their impact on the setting of heritage assets, views and the World Heritage Site, ensuring heritage assets are protected and any harm caused by the impacts of large-scale development is mitigated or avoided.

Policy 44 'Public realm' restricts additional semi-permanent kiosks or structure to existing markets. The policy requires the replacement and relocation of existing structures to respect their context and not detract from any heritage asset.

Policy 46 'Basement development' protects heritage assets and the significance of listed buildings.

Objective 14 – Public realm & townscape

Several policies are considered to have a major positive impact on objective 14 'Public realm & townscape'.

Policy 39 'Design principles' sets out design criteria to ensure development positively responds to the character of Westminster's diverse and distinct neighbourhoods and builds upon the high-quality architecture in the city. This contributes to the enhancement of the quality of the public realm and townscapes.

Policy 40 'Westminster's heritage' seeks to protect and enhance Westminster's designated and non-designated heritage assets, making a major contribution to maintaining and enhancing the city's townscape.

Policy 41 'Townscape and architecture' requires development to be sensitively designed having regard to the surrounding townscape and particularly conserving, enhancing and sensitively integrating important townscape features and spaces within the new development. The policy also requires extensive developments to maximise opportunities to enhance the character, quality and functionality of the site and its surrounding, including new compositions and points of interest, high quality new streets and spaces, linked to the surrounding townscape. This contributes to the enhancements of townscapes, public realm and accessibility.

Policies 42 'Building height' and 43 'Building height in the Housing Renewal Areas' set out the design principles for tall buildings which should make a positive contribution to the townscape and enhance the public realm, positively impacting on the quality of the public realm and townscape.

Policy 44 'Public realm' advance the development of a more legible, permeable and connected public realm. Through the encouragement and the provision of public art, and sets out the principles for a safe, attractive and accessible public realm. It also promotes the development of defined frontages and high quality lighting and paving materials which contributes to the creation of a high quality public realm and improves access and mobility for all groups.

Several other policies have a minor positive impact on objective 14 'Public realm & townscape'.

Policy 45 'Security measures in the public realm' requires security measures to be incorporated in the design of developments or public realm improvements that might be sensitive to terrorism, which must as far as practicable take account of the needs of all users in the area, maintaining access and movement for different groups.

Policy 46 'Basement development' makes sure that basements protect local character and respect existing townscape, contributing to enhanced townscapes.

Objective 15 – Open space

Policy 41 'Townscape and architecture' seeks to protect important townscape features such as parks, gardens and squares, which include London Squares. This contributes to the enhancement of the quality of open space and landscape character, and maintains access to open space. The policy also supports the creation of high quality new streets and spaces in new extensive developments, to be linked to the surrounding townscape to maximise accessibility. This makes a major positive contribution to enhancing the quality of open space.

Two policies have a minor positive impact on this objective.

Policy 39 'Design principles' requires development to have regard to its context, including important open spaces such as squares and parks. This contributes to the enhancement of the quality of open space and landscape character.

Policy 40 'Westminster's heritage' seeks to protect and enhance historic parks and gardens, which are important open spaces. This contributes to the enhancement of

the quality of open space and landscape character, and maintains access to open space.

Objective 16 – Employment opportunities

Policy 40 'Westminster's heritage' has a major positive impact on objective 16 'Employment opportunities' as it protects and enhances Westminster's heritage, which is an important driver for Westminster's visitor economy, supporting the creation of jobs.

Objective 17 – Economy

Policy 40 'Westminster's heritage' has a major positive impact on objective 17 'Economy' as it protects and enhances Westminster's heritage, which is an important driver for Westminster's visitor economy, supporting economic growth in key sectors.

Policies 42 'Building height' and 43 'Building height in the Housing Renewal Areas' identify locations where tall buildings may be appropriate, and set out design principles for such developments. This positive strategy for tall buildings helps business development and supports economic growth.

3.7 Likely significant effects of the City Plan

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

Annex I provides a cumulative summary of the City Plan policies.

Objective 1 – Communities

The spatial strategy of the City Plan supports and encourages community facilities, shops and services in the key growth areas. This is supported by policies in the plan that seek to protect and provide community facilities, seek to maintain the network of town centres or particular uses within it, deliver infrastructure and ensure services and facilities are well served by public transport, and improve the pedestrian environment. Therefore, the plan as a whole has a significant positive effect on enhanced access to shops, services and facilities.

The policies around the provision of different types of housing have a significant effect on the creation of inclusive communities. This is strengthened by policies on inclusive employment, improved and inclusive transport, co-location and improved access to community facilities, inclusive and accessible public realm and further provision of public open space including play space.

Increased engagement in community activity is significantly affected by the promotion of events, protection of public houses, and increased levels of walking.

Likely significant effects identified	Effect dimensions
Improved access to shops, services and facilities	Direct, long-term, permanent and positive
Increased inclusivity in Westminster's communities	Direct, long-term, permanent and positive
Increased engagement in community activity	Direct and indirect, long-term, permanent and positive

Objective 2 – Crime reduction

The policy setting out design principles for a secure and safe Westminster has a significant effect on reducing the fear of crime. An additional contribution is made by the policies that seek to manage adverse effects of the over-concentrations short-term letting, leisure and entertainment uses and by those that require active frontages in town centres and encourage meanwhile use of vacant land or buildings.

Safety in the public realm is significantly enhanced by policies managing events in the public realm and setting out design requirements for a safe public realm, including against terrorism.

Likely significant effects identified	Effect dimensions
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Creation of safe communities	Direct, long-term, permanent and positive
Enhanced safety in the public realm	Direct, long-term, permanent and positive

Objective 3 – Housing

The spatial strategy seeks to promote housing delivery in Westminster, which is reflected in several of the policies on growth areas and housing delivery. This includes regeneration projects which aim to improve the quality of the housing stock and reduce the number of unfit homes. Together with the policies setting out housing quality and design principles, this provides significant encouragement to the delivery of high quality homes.

A number of policies seek to promote the delivery of affordable housing, including in the Central Activities Zone - having a significant effect on the increased delivery of affordable housing and reduction of homelessness.

The policies that seek to deliver specific types and tenures of housing have a significant effect on the provision of a range of homes to meet needs of different groups and help people stay independent for longer.

Likely significant effects identified	Effect dimensions
Delivery of high quality homes and reduction of the number of unfit homes	Direct, long-term, permanent and positive
Increased delivery of affordable housing and reduction of homelessness	Direct, long-term, permanent and positive
Provision of a range of homes to meet the needs of the population and help people stay independent for longer	Direct, long-term, permanent and positive

Objective 4 – Health & wellbeing

A significant effect on improvements to health inequalities is made by policies seeking to deliver social and community facilities, including in growth areas across the city. This includes policies that protect and enhance the green infrastructure network and is strengthened by those tackling pollution, supporting local markets (which can provide access to fresh, healthy food) and managing uses in town centres that may have an adverse health impact.

Access and movement is significantly affected by policies seeking to make the public realm welcoming and accessible for different mobility groups, improve connectivity across different transport modes.

Policies that promote walking and cycling, reduce reliance on the private car, address air pollution and environmental impacts from construction, protect and enhance the network of green and open spaces, support movement in the public realm and provide opportunities for sports and recreation significantly enhance opportunities to live healthy lifestyles.

Cultural wellbeing is significantly improved by policies protecting and supporting arts, leisure and cultural facilities, and the provision of public art.

A significant improvement on social and community wellbeing is made by policies protecting and supporting provision of facilities and uses that can play a role in connecting people and minimising loneliness, as well as those making an important contribution to the character of local areas.

The physical wellbeing of older people and of those with special health conditions is addressed by policies supporting specialist and adaptable housing and those seeking to provide publicly accessible toilets, which significantly contribute to helping older people and those with special requirements to stay independent. This is supported by policies seeking to transform the pedestrian environment and public realm.

A number of policies set design standards, protect amenity and manage negative environmental impacts, which significantly affects the delivery of healthy homes and workspaces. This is supported by policies contributing to flood risk mitigation.

Likely significant effects identified	Effect dimensions
Improvements to health inequalities	Direct and indirect, long-term, permanent and positive
Improved access and movement	Direct, long-term, permanent and positive
Enhanced opportunities to live healthy lifestyles	Direct and indirect, long-term, permanent and positive
Improved cultural wellbeing	Direct and indirect, long-term, permanent and positive
Enhanced social and community wellbeing	Direct and indirect, long-term, permanent and positive
Maximised independence for older people	Direct, long-term, permanent and positive
Creation of healthy homes and workplaces	Direct and indirect, long-term, permanent and positive

Objective 5 – Climate change

A significant effect on reduction in greenhouse gas emissions through reducing the need to travel is made by the spatial strategy which locates development in the most sustainable locations, supported by policies seeking to maintain the network of town centres. In addition, the policies that promote sustainable modes of transport contribute to this impact.

A reduction in energy consumption and zero carbon contributing to a reduction in greenhouse gas emissions are significantly affected by policies that set out design principles, energy efficiency, local heat networks and zero carbon requirements.

The generation of renewable energy contributing to a reduction in greenhouse gases is significantly affected by policies seeking to reduce energy demand, promote low carbon energy sources and require sustainable design principles.

Climate change resilience is significantly affected by policies seeking to provide durable and adaptable developments, the provision of green infrastructure, and the management of flood risk.

Policies that seek to manage overheating and provide green infrastructure have a significant effect on the reduction of heat islands.

Likely significant effects identified	Effect dimensions
Reduction in greenhouse gas emissions through reducing the need to travel	Direct and indirect, long-term, permanent and positive
Reduction of greenhouse gas by reducing energy consumption and zero carbon	Direct and indirect, long-term, permanent and positive
Reducing greenhouse gas emissions by generation of renewable energy	Direct, long-term, permanent and positive
Increased resilience of the city to the effects of climate change	Direct and indirect, long-term, permanent and positive
Reduction of heat islands	Direct and indirect, long-term, permanent and positive

Objective 6 – Natural resources

A significant effect on the reduction of water consumption and improved water efficiency is made by policies seeking to improve resource efficiency.

Policies that seek to embody high standards of environmental sustainability and consider the choice of materials significantly contribute to minimising the use of natural resources.

A significant effect on the reduced consumption of fossil fuels is made by policies promoting alternatives modes of travel from the car including through walking, cycling and electric vehicles and by those promoting low carbon energy sources for new developments.

The spatial strategy promotes regeneration of already built up areas, which has a significant effect on optimising the efficient use of land. This is supported by policies that seek the co-location of land uses and community facilities, that protect green infrastructure, and that set out principles for intensification and optimising density.

Likely significant effects identified	Effect dimensions
Reduced water consumption and improved water efficiency	Direct, long-term, permanent and positive
Minimised use of natural resources	Direct and indirect, long-term, permanent and positive
Reduced consumption of fossil fuels	Direct and indirect, long-term, permanent and positive
Optimised the efficient use of land	Direct and indirect, long-term, permanent and positive

Objective 7 – Flood risk & water quality

Minimising flood risk from all sources of flooding is significantly affected by the spatial strategy which directs development to the least sensitive areas and policies that manage flood risk. This is strengthened by policies on flood risk management.

By setting out sustainable design principles and promoting measures to alleviate and manage surface water flooding, increased flood resilience is significantly affected. This is supported by policies protecting and enhancing green infrastructure, contributing to drainage.

Water quality is significantly affected by policies protecting surface and groundwater quality and tackling pollution.

Likely significant effects identified	Effect dimensions
Minimised flood risk from all sources of flooding	Direct, long-term, permanent and positive
Increased flood resilience	Direct and indirect, long-term, permanent and positive
Protection of water quality	Direct and indirect, long-term, permanent and positive

Objective 8 – Biodiversity

An increase in quantity and quality of biodiversity assets is significantly impacted by policies protecting the green infrastructure network and those seeking to promote the greening of the city, including by addressing deficiency in access to nature.

Biodiversity policies seek to protect and enhance SINC's, having a significant effect on the protection of SINC's.

Habitats and species continue to be protected by policies seeking their conservation, leading to a significant effect.

Policies seeking to manage potential local environmental effects of development also contribute to the continued preservation of biodiversity.

Likely significant effects identified	Effect dimensions
Increase in quantity and quality of biodiversity assets	Direct, long-term, permanent and positive
Continued protection of SINC's	Direct, long-term, permanent and positive
Continued conservation of species and habitats	Direct, long-term, permanent and positive

Objective 9 – Air quality

The spatial strategy directs growth to the most accessible locations, reducing the need to travel. In addition, sustainable modes of transport are promoted, having a significant positive effect on the reduction of emissions from transport.

Policies seeking to reduce exposure to poor air quality, improve air quality locally, support air quality neutral and positive developments and green infrastructure

significantly contribute to minimising the negative air quality impacts connected with growth. This is supported by policies addressing transport impacts and those that help contain the urban heat island effect which negatively impacts on the dispersion of pollutants.

In addition, policies protecting and enhancing green infrastructure and encouraging new planting can help absorb pollutants and positively contribute to improving air quality.

Likely significant effects identified	Effect dimensions
Reduction of emissions from transport	Direct and indirect, long-term, permanent and positive
Limitation of the effects of growth on air quality	Direct and indirect, long-term, permanent and positive
Promotion of measures to improve air quality	Direct and indirect, long-term, permanent and positive

Objective 10 – Noise

Noise impacts and potential noise issues connected with growth are significantly minimised by policies introducing the agent of change principle, protecting the local environment where uses such as hotels and entertainment uses are located, encouraging the provision of green infrastructure, managing impacts from construction activity, and reducing transport related noise.

Likely significant effects identified	Effect dimensions
Limitation of the effects of growth on noise	Direct, long-term, permanent and positive
Reduction in potential noise issues	Direct, long-term, permanent and positive

Objective 11 – Transport

The spatial strategy directs growth to locations in the city which are most accessible via public transport. This is also supported by the policies that seek to maintain the network of town centres and those that protect existing community facilities and promote their co-location, limiting the need to travel and having a significant effect on the limitation of traffic growth resulting from additional development. City Plan policies also ensure that new servicing, collection and delivery needs originating from development do not result in additional road congestion.

Several policies seek to promote and significantly contribute to enhancing walking and cycling networks and opportunities, including through the improvement of routes along towpaths and the provision of green infrastructure.

In addition, policies requiring new developments to provide electric vehicle charging points and supporting a growing on-street electric charging point network have a significant effect in promoting sustainable travel options and preventing additional traffic and congestion linked to refuelling trips.

It is considered that the City Plan as a whole has a significant positive effect on reducing the reliance on private motor vehicles through policies that promote improved accessibility by public transport and sustainable travel modes including walking and cycling, car clubs and sharing schemes, and car-free developments.

Likely significant effects identified	Effect dimensions
Limitation of traffic growth resulting from additional development	Direct and indirect, long-term, permanent and positive
Enhancements to walking and cycling networks and opportunities	Direct and indirect, long-term, permanent and positive
Reduced reliance on private motor vehicles and enhanced accessibility by public transport	Direct and indirect, long-term, permanent and positive

Objective 12 – Waste

Policies on the consideration of materials, the management of waste in developments and the management of construction impacts have a significant impact on the limitation of household and construction waste and the promotion of recycling.

Likely significant effects identified	Effect dimensions
Limitation of household waste	Indirect, long-term, permanent and positive
Limitation of construction waste	Direct and indirect, long-term, permanent and positive
Increased recycling	Indirect, long-term, permanent and positive

Objective 13 – Heritage

It is recognised that growth including high density development could impact on the historic environment. However, through appropriate mitigation in policies on design and the historic environment, it is considered that the conservation and enhancement of heritage assets and cultural value is significantly positively affected.

The conservation and enhancement of heritage assets and cultural value is further supported by policies protecting uses of specific value, supporting the city's green infrastructure, protecting local character, setting out design principles for different types of development and the protection of specific types of heritage assets.

A significant contribution to the protection of strategic views is made through policies on the World Heritage Site, growth areas and policies affecting townscapes.

Heritage policies set out detailed considerations for developments affecting listed buildings, having a significant effect on the protection of listed buildings and their settings.

Policies protecting archaeological sites and considering how deposits should be preserved during ground works significantly contribute to the preservation of archaeological features and their settings.

Protection of the Westminster World Heritage Site is significantly affected by heritage policies seeking to protect the site and its setting.

Likely significant effects identified	Effect dimensions
Conservation and enhancement of heritage assets and cultural value	Direct and indirect, long-term, permanent and positive
Protection of strategic views	Direct, long-term, permanent and positive
Protection of listed buildings and their settings	Direct, long-term, permanent and positive
Preservation of archaeological features and their settings	Direct, long-term, permanent and positive
Protection of the World Heritage Site	Direct, long-term, permanent and positive

Objective 14 – Public realm & townscape

By directing development to different growth areas in the city, the spatial strategy has the potential to significantly enhance the public realm and local distinctiveness. This is strengthened by policies seeking to enhance the public realm, provide public art, make enhancements as part of highway works, set out specific proposals for growth areas, and ensuring development positively responds to local character.

Policies on building heights, Special Policy Areas, heritage assets and green infrastructure have a significant effect on protecting and enhancing townscape and local character.

Access in the public realm for all equality group strands is significantly improved by policies seeking to transform the pedestrian environment and setting out inclusive design principles.

Policies on design and housing quality, including for specific types of development, have a significant impact on the delivery of high quality urban design.

Likely significant effects identified	Effect dimensions
Enhanced public realm and local distinctiveness	Direct and indirect, long-term, permanent and positive
Protected and enhanced townscapes	Direct and indirect, long-term, permanent and positive
Improved access in the public realm for all equality group strands	Direct, long-term, permanent and positive
Delivery of high quality design	Direct, long-term, permanent and positive

Objective 15 – Open space

The spatial strategy directs a proportion of growth to areas deficient of open space and other sections of the plan require developments to address that deficiency. Through policies seeking to protect and enhance green infrastructure and historic open spaces, both improvements to open space and its landscape character and access to open space are positively addressed.

Policies seeking to protect and enhance green infrastructure including on specific features significantly enhance the green infrastructure network and open space specifically.

Likely significant effects identified	Effect dimensions
Improvements to open space, its quality and landscape character	Direct and indirect, long-term, permanent and positive
Improved access to open space	Direct and indirect, long-term, permanent and positive
Enhancement of the green infrastructure network	Direct and indirect, long-term, permanent and positive

Objective 16 – Employment opportunities

Policies on inclusive employment significantly improve opportunities for qualifications, skills and training and contribute to making these available to the local population. Other policies also ensure specialist uses are protected, which help support specialist skills and training for apprentices.

The spatial strategy seeks to create jobs in the growth areas, including in some of the more deprived areas of the city, significantly affecting the creation of new jobs including for those most in need. This is complemented by policies improving connectivity and supporting the visitor economy, the food, drink and entertainment sectors, and a wider range of retail and complementary uses throughout the town centre hierarchy, which contribute to job growth.

These spatial policies thereby also significantly affect the promotion of equality of opportunity across the city, which is strengthened by policies on inclusive employment.

Likely significant effects identified	Effect dimensions
Improved opportunities for qualifications, skills and training	Direct and indirect, long-term, permanent and positive
Creation of new jobs including for those most in need	Direct and indirect, long-term, permanent and positive
Promoting equality of opportunity across the borough	Direct and indirect, long-term, permanent and positive

Objective 17 – Economy

Business development and environment are significantly improved by policies promoting the expansion of key sectors, including in growth areas, and through digital communications. This is further supported by policies controlling amenity aspects and supporting greater accessibility and transport infrastructure, improved air quality and green infrastructure, and reduced flood risk.

Business resilience is significantly affected by policies that provide flexibility to respond to future changes in retail and emerging sectors.

Several policies promote opportunities for start-ups, small and medium businesses including in growth areas and town centres and as meanwhile uses in vacant

properties. Together with policies on local and inclusive employment, this significantly increases opportunities for start-ups, small and medium businesses and opportunities for local people. This also contributes to a diverse economy within the city.

Key sectors of Westminster's economy are significantly promoted by policies supporting the visitor economy, food, drink and entertainment sector, retail and leisure in the West End, education and specialist uses in the Special Policy Areas.

Regeneration is significantly promoted by the spatial strategy and by policies that direct new office developments to areas that can support employment development of a different type to more central areas, which helps complement regeneration schemes.

Likely significant effects identified	Effect dimensions
Improved business development and environment	Direct and indirect, long-term, permanent and positive
Improved economy and business resilience	Direct and indirect, long-term, permanent and positive
Increased opportunities for start-ups, small and medium businesses and opportunities for local people	Direct and indirect, long-term, permanent and positive
Promotion of business in Westminster's key sectors	Direct and indirect, long-term, permanent and positive
Promoting regeneration	Direct and indirect, long-term, permanent and positive

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

The City Plan has the potential to combine with other planned and on-going activities in the vicinity of Westminster to result in cumulative effects. The effects of the plan in combination with other plans, policies and proposals are known as intra-plan effects.

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

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

Additional cumulative effects may arise from:

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

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

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

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

4 Monitoring the IIA

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

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

5 Next steps

This IIA accompanies the Regulation 19 Publication Draft of Westminster's City Plan 2019-2040. The consultation will run between 19th June and 31st July 2019. Details on how to respond to the consultation are provided below.

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

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

Once the Inspector finds the plan to be 'sound', the plan will be formally adopted by the council. This will be supported by an IIA Statement that sets out the monitoring approach. There is a statutory duty to monitor the significant environmental effects of implementing the City Plan. The monitoring framework is set out in the City Plan. The council's Authority Monitoring Report will report on the monitoring results. At adoption of the City Plan, an IIA Statement will be published setting out the monitoring approach.

How to comment on the IIA Report

We welcome your views on this report, and would particularly like to hear your views as to whether you think there are any significant effects of the draft City Plan policies which have not been considered as part of the IIA process.

Please provide your comments by 5pm on 31st July 2019. Comments should be sent to:

By email: planningpolicy@westminster.gov.uk

By post: Policy & Strategy, Westminster City Council, 17th floor, 64 Victoria Street, London SW1E 6QP

Annex I – Effects of City Plan policies

Table 3: Effects of City Plan policies

Westminster's City Plan policies	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Chapter 1 – Spatial strategy																	
1. Westminster's spatial strategy	+	0	++	++	++	++	0	0	++	0	++	0	++	++	0	++	++
2. Spatial Development Priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area	++	0	++	++	0	0	0	0	++	0	++	0	++	++	0	++	++
3. Spatial Development Priorities: Paddington Opportunity Area	++	0	++	++	0	0	0	0	++	0	++	0	0	++	++	++	++
4. Spatial Development Priorities: Victoria Opportunity Area	++	0	++	++	++	0	0	0	++	0	++	0	+	++	+	++	++
5. Spatial Development Priorities: North West Economic Development Area	++	0	+	++	0	0	0	+	0	0	+	0	0	++	++	++	++
6. Spatial Development Priorities: Church Street / Edgware Road and Ebury Bridge Estate Housing Renewal Areas	++	0	++	++	+	0	0	+	++	0	+	0	0	++	++	++	++
7. Managing development for Westminster's people	++	+	++	++	+	+	+	++	++	++	++	++	++	++	++	+	+
Chapter 2 – Housing																	
8. Stepping up housing delivery	++	+	++	++	0	0	0	0	0	0	0	0	0	+	0	0	0
9. Affordable housing	++	0	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0
10. Affordable housing contributions in the CAZ	++	0	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0
11. Housing for specific groups	++	0	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0
12. Innovative housing delivery	++	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13. Housing quality	++	0	++	++	0	0	0	0	0	0	0	0	0	0	+	0	0
Chapter 3 – Economy																	
14. Supporting economic growth	+	0	+	++	0	+	0	0	0	0	++	0	0	+	0	++	++
15. Town Centres, high streets and the CAZ	++	++	++	++	0	0	0	0	0	0	++	0	0	0	0	++	++
16. Visitor economy	++	++	0	++	0	0	0	0	0	+	0	0	+	+	0	++	++
17. Food, drink and entertainment uses	++	++	0	++	0	0	0	0	+	+	0	0	0	0	0	++	++
18. Community infrastructure and facilities	++	0	0	++	0	0	0	0	0	0	+	0	0	0	0	0	++

Westminster's City Plan policies	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
19. Education and skills	++	0	0	++	0	+	0	0	0	0	0	0	0	0	0	++	++
20. Digital infrastructure and information and communications technology	++	0	0	+	0	0	0	0	0	0	0	0	0	+	0	+	++
21. Soho Special Policy Area	+	0	+	+	0	0	0	0	0	0	0	0	0	+	0	+	++
22. Mayfair and St. James's Special Policy Area	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+
23. Harley Street Special Policy Area	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+
24. Savile Row Special Policy Area	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+
Chapter 4 – Connections																	
25. Sustainable transport	++	++	0	++	++	+	0	0	++	+	++	0	0	+	0	0	++
26. Walking and cycling	+	0	0	++	++	++	0	0	++	0	++	0	0	+	0	0	++
27. Public transport and infrastructure	++	0	0	++	++	++	0	0	++	+	++	0	0	+	0	+	++
28. Parking	0	0	++	++	+	++	0	0	+	0	++	0	0	+	0	0	++
29. Highway access and management	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0	++
30. Freight, servicing and deliveries	0	0	0	0	0	+	0	0	++	+	++	0	0	++	0	0	++
31. Technological innovation in transport	0	0	0	+	+	+	0	0	+	0	++	0	0	0	0	0	++
32. Waterways and Waterbodies	0	0	0	++	0	0	0	0	0	0	+	0	+	0	++	0	++
Chapter 5 – Environment																	
33. Air quality	0	0	0	++	0	0	0	0	++	0	0	0	0	0	0	0	+
34. Managing local environmental effects	+	0	+	++	0	0	++	+	+	++	0	0	+	+	+	+	0
35. Green infrastructure	++	0	0	++	++	++	++	++	++	+	+	0	+	++	++	0	+
36. Flood risk	0	0	0	+	+	0	++	+	0	0	0	0	+	0	+	0	+
37. Energy	0	0	+	+	++	++	0	0	+	0	0	0	0	0	0	0	+
38. Waste management	+	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0
Chapter 6 – Design																	
39. Design principles	++	++	++	++	++	++	0	+	0	0	0	0	++	++	+	0	0
40. Westminster's heritage	0	0	0	++	+	0	0	0	0	0	0	0	++	++	+	++	++
41. Townscape and Architecture	0	0	++	0	0	0	0	0	0	0	0	0	++	++	++	0	0
42. Building height	0	0	++	0	0	0	0	0	0	0	++	0	+	++	0	0	+
43. Building height in the Housing Renewal Areas	0	0	++	0	0	0	0	0	0	0	++	0	+	++	0	0	+

Westminster's City Plan policies	IIA Objectives																
	Communities	Crime reduction	Housing	Health & wellbeing	Climate change	Natural resources	Flood risk & water quality	Biodiversity	Air quality	Noise	Transport	Waste	Heritage	Public realm & townscape	Open space	Employment opportunities	Economy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
44. Public realm	++	++	0	++	0	0	0	+	0	0	++	0	+	++	0	0	0
45. Security measures in the public realm	0	++	0	+	0	0	0	0	0	0	0	0	0	+	0	0	0
46. Basement development	0	0	0	+	0	0	++	0	0	0	0	0	++	+	0	0	0

Annex II – Consultation responses to IIA Scoping Report

Ref.	Subject Area	Comment	How comments have been taken on board
Port of London Authority			
IIA1.1	Open Space	The section on Open Space includes reference to the River Thames and the Blue Ribbon Network, and the important role these play for Westminster's character and environmental qualities. In line with the PLAs Thames Vision (July 2016) document increased access and usage of the River Thames should continue to be encouraged, including to join up the Thames Path from source to sea.	Noted. Access to open space, which includes the Blue Ribbon Network, is already covered in the IIA Framework.
IIA1.2	Transportation and pedestrians	<p>The report highlights an overall aim to promote sustainable transport options (encouraging walking and cycling) but does not mention river transport, which is disappointing. River-based transport should be encouraged through the City Plan, which would accord with the PLAs Thames Vision document and TfL's River Action Plan (February 2013). A key goal for the Thames Vision is to double the amount of people travelling by river by 2035, reaching 20 million commuter and tourist trips every year, and also to encourage more people to enjoy/use the River Thames and its banks. The River Action Plan outlines a number of specific measures to be taken by Transport for London (TfL) and other stakeholders to help boost the number of river trips, and should form part of this scoping report.</p> <p>Paragraph 3.180 of the scoping report also includes proposals on the opportunities and challenges for servicing and freight for Westminster's commercial properties. Making use of the river where possible must also be considered as part of the potential opportunities to reduce HGV traffic, and minimise air & noise disturbance within the borough. Although there are no safeguarded wharves in Westminster, encouraging the use of the river for freight and servicing should be considered, in line with</p>	Noted. The IIA Framework has been updated to include public transport as part of sustainable travel options. The potential of river transport to contribute to IIA objectives has been considered during the assessment process.

		the PLAs Thames Vision document. This must also be encouraged for the movement of waste and materials into and out of the borough. This would feed into some of the wider objectives of the scoping report, such as the need to improve air quality.	
IIA1.3	Relevant plans, programmes and strategies	In regards to the comments above, within the Relevant Plans, Programmes and Strategies chapter the PLA consider that the following to documents should be added, under the 'regional' part of this chapter. <ul style="list-style-type: none"> - The Vision for the Tidal Thames (2016) <i>Port of London Authority</i> - The River Action Plan (2013) <i>Transport for London</i> 	As suggested, these documents have been added to the list of Relevant Plans, Programmes and Strategies.
IIA1.4	Key sustainability issues and setting objectives	Again in regards to the above comments, the PLA consider that IIA objective 11 (To encourage sustainable transport and major public transport improvements) must be amended to reflect the role that river-based transport can play in encouraging more sustainable transport options in Westminster. This must also be reflected in the table 3 (Integrated Impact Assessment Framework) as part of the sub criteria for assessment for this objective.	Noted, however there is limited capacity to promote river-borne freight in Westminster, and doing so would be likely to increase vehicle traffic into the neighbouring boroughs. As mentioned above, river freight has the potential to impact on various objectives including the newly added public transport criterion.
Transport for London			
IIA2.1	Crossrail 2	Crossrail 2 is covered by paragraph 3.184. Just before publication of the IIA Scoping report the Mayor of London met with Chris Grayling, Secretary of State for Transport. Their meeting was very positive and the two subsequently released the following statements: Chris Grayling: <i>I am a supporter of Crossrail 2 but given its price tag we have to ensure that we get this right. The Mayor and I have agreed to work together on it over the coming months to develop plans that</i>	This paragraph has been amended to reflect the outcomes of the meeting between the Transport Secretary and the Mayor of London.

		<p><i>are as strong as possible, so that the public gets an affordable scheme that is fair to the UK taxpayer. Following a successful outcome being reached I am keen to launch a fresh public consultation to help gather views to improve the scheme and clarify the position around the safeguarded route.</i></p> <p>Sadiq Khan: <i>Crossrail 2 is essential for the future prosperity of London and the southeast, so I'm pleased that the Transport Secretary and I have reached an agreement to take this vital project forward. We will continue to work together to ensure the project is value for money and provides the maximum benefits for jobs and growth in the region over the coming decades. I look forward to moving to the next stage of consultation.</i></p> <p>We feel it would be appropriate to amend the text of paragraph 3.184 to reflect this very positive meeting and public statement.</p>	
IIA2.2	Transport objectives	<p>The text of some objectives in Section 5 of the report varies considerably from that included in Table 3 within Section 6. With respect to transport, Objective 11 in Section 5 of the report is “to encourage sustainable transport and major public transport improvements”.</p> <p>Within Table 3 that objective is recorded as: <i>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.</i></p> <p>This latter text is more appropriate and more in line with the consultation draft of the Mayor’s Transport Strategy. Inclusion of “encourage major public transport improvements” from the Section 6 objective text would also be welcome. Text of the objective amended in this way would be strongly supported.</p>	Noted. IIA Objective 11 has been updated to take account of these comments. An additional criterion has also been added to assure public transport is considered in the assessment process.

IIA2.3	Transport objectives	<p>Assessment</p> <p>In the context of the assessment against this transport objective, the text in paragraph 3.182 is very light and we feel that considerably greater detail should be provided. The existing London Plan and the consultation draft Mayors Transport Strategy should be considered in this context, the latter stating (in support of Proposal 75):</p> <p>As future developments will be planned around active and sustainable transport modes, they should also be planned to discourage car use, and car-free and car-lite places must become the first option across London. ... Provision for car parking should be minimised and designed for alternative uses in the future as car dependency decreases. In those areas of London most accessible and well connected by public transport, there is already a tendency towards car-free developments, especially in central London and town centres. This trend needs to continue and spread, with car-free development becoming the starting point for all development in well-served places.</p>	Noted. We consider that the IIA Framework considers the need to move to sustainable transport modes in sufficient detail. The latest GLA Transport Strategy has been added to the plans and programmes.
IIA2.4	Resident's parking	<p>We will be interested to see a full assessment of the impact of residents' parking within new developments against Objective 11 (as amended in line with the above comments).</p> <p>We would also expect the City's policy on residential parking to have an impact on the viability of developments and, as a result, on the provision of affordable homes. Therefore this issue should be included in the assessment against Objective 3 covering housing mix.</p>	Noted. We are preparing a separate viability assessment to test if the policies in the City Plan are viable. We recognise that there are crossovers between policies and objectives, which will be addressed in the assessment process.
Royal Borough of Kensington and Chelsea			
IIA3.1	Baseline information	Kensington and Chelsea is able to share any data, GIS data files or information Westminster requires to assist in any forthcoming assessment of significant environmental effects (including with Kensington and Chelsea) arising from the preferred policies and reasonable alternatives considered in drafting the Westminster City Plan, in line with our Duty to Co-operate.	Noted. We continue to co-operate with RBKC during the preparation of the City Plan.

IIA3.2	Policies Plans, Programmes, Strategies and Initiatives	The Council welcomes the inclusion of the Consolidated Local Plan (CLP) within the PPPSI section of the Scoping Report. The emerging policies and evidence base relating to the Council's Local Plan Partial Review (LPPR) will, subject to being found sound at the current examination and being adopted by Full Council, supersede parts of the CLP within the Council's Development Plan.	Noted. We will update the plans and programmes section when the plan is adopted.
IIA3.3	Flooding	Flood risk is considered a strategic issue due to the proximity of both boroughs. The main issue for our Borough is sewer flooding which can be exacerbated by development occurring outside our boundary. Our flooding documents and policies can found on the Council's webpage : Of particular importance to the planning process are the Strategic Flood Risk Assessment , the Surface Water Management Plan and the Local Flood Risk Management Strategy .	Noted. We are updating the Strategic Flood Risk Assessment to support the City Plan and will continue to engage with RBKC on this issue.
IIA3.4	Kensal Canalside Opportunity Area SPD	The Council is currently producing a Supplementary Planning Document for the Council's largest brownfield site allocation in the north of the Borough close to the boundary with Westminster. The construction of a new Elizabeth Line station, if delivered at the site, has the potential for wider positive regeneration effects. The published Issues and Options document has been published on the Council's website along with the relevant evidence base documents supporting the Kensal site allocation.	Noted.
IIA3.5	Infrastructure Delivery Plan	The Council has prepared an Infrastructure Delivery Plan which sets out the infrastructure needs of the borough to support the RBKC Local Plan Partial Review. The Council has also prepared a Development Infrastructure Funding Study for Kensal Canalside Opportunity Area which identifies the specific infrastructure requirements to support development at the site. It is essential that the infrastructure needs of Westminster are met in full by new facilities proposed in the WCC City Plan to ensure that there is no drain on the existing infrastructure in RBKC.	Noted. We are preparing an Infrastructure Delivery Plan to demonstrate the deliverability of the plan.

IIA3.6	IIA	RBKC’s most recent IIA Report assesses the effects of the Council’s policy options and reasonable alternatives for the LPPR.	Noted.				
IIA3.7	Sustainability Issues and Problems	Kensington and Chelsea and Westminster have similar pressures and this is reflected in the Key Sustainability Issues outlined in the IIA Scoping Reports for both boroughs. We look forward to working together constructively on these issues.	Noted. We are committed to working with RBKC and other neighbouring boroughs during the preparation of the City Plan.				
Natural England							
IIA4.1	No comment	Natural England does not consider that this Integrated Impact Assessment Scoping Report for Westminster’s City Plan – Full revision poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.	Noted.				
London Parks & Gardens Trust (LPGT)							
IIA5.1	Table 3 Integrated Impact Assessment Framework	<p>Objective 13 should include sites on the Register of Parks and Gardens. Sites on the Register have the same weight in policy terms as listed buildings and are collectively referred to in the NPPF as “designated heritage assets”.</p> <table border="1" data-bbox="642 842 1473 1385"> <tr> <td data-bbox="642 842 1001 978">SA (SEA)EQIA/HIA Objective</td> <td data-bbox="1005 842 1473 978">sub criteria for assessment Including EQIA/HIA considerations:</td> </tr> <tr> <td data-bbox="642 981 1001 1385">13) To protect and enhance the historic environment and architectural, archaeological and cultural heritage</td> <td data-bbox="1005 981 1473 1385"> <p>Will it protect heritage sites and cultural value?</p> <p>Will it protect strategic views?</p> <p>Will it protect listed buildings and their settings?</p> <p>Will it help preserve, enhance and record archaeological features and their settings?</p> </td> </tr> </table>	SA (SEA)EQIA/HIA Objective	sub criteria for assessment Including EQIA/HIA considerations:	13) To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<p>Will it protect heritage sites and cultural value?</p> <p>Will it protect strategic views?</p> <p>Will it protect listed buildings and their settings?</p> <p>Will it help preserve, enhance and record archaeological features and their settings?</p>	Noted. The IIA framework considers all heritage assets as part of the heritage objective. The landscape value of open spaces is also considered under the open space objective. We therefore consider that registered parks and gardens are sufficiently covered in the IIA.
SA (SEA)EQIA/HIA Objective	sub criteria for assessment Including EQIA/HIA considerations:						
13) To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<p>Will it protect heritage sites and cultural value?</p> <p>Will it protect strategic views?</p> <p>Will it protect listed buildings and their settings?</p> <p>Will it help preserve, enhance and record archaeological features and their settings?</p>						

		<i>Insert: Will it protect and enhance the landscape, design, setting and views into and from registered parks and gardens.</i>	
Canal and Rivers Trust			
IIA6.1	No comment	We are pleased to be involved in the consultation for reviewing the Westminster City Plan. I can confirm that we have no comments to make on the IIA Scoping Report	Noted.
Belgravia Society			
IIA7.1	Previous consultations	<p>The Scoping Process</p> <p>We do request that matters covered by our previous submissions should be considered carefully by WCC as the “next steps” are carried out. These submissions are attached to this response; they are:</p> <p>Annex A – response to Revision of Westminster City Plan (November 2016) – request for comments by letter dated 16th June 2017; submitted 28th July 2017</p> <p>Annex B – Response to discussions and consultations with Westminster City Council in relation to taller and higher buildings; submitted 21st May 2017</p> <p>Annex C - Basement Report response to the Government’s Call for Evidence on Basements developments; submitted 16th December 2016</p>	Noted. We will consider comments received during previous consultations to inform the approach in the revised City Plan. The consultation statement accompanying the City Plan will set out how issues raised during previous consultations have been taken into account.
IIA7.2	Brexit vs Growth	A considerable amount of analysis data has been provided that seems to lead to a conclusion, as stated in paragraph 3.36, that not only that growth is inescapable but it is “vital to Westminster’s future success”. This conclusion is reflected throughout the Key Objectives. It has to be questionable as whether continuous growth is a correct interpretation of the presented data and is unduly optimistic considering the uncertainty coming from Brexit and other business issues.	Noted. The City Plan has to be prepared within the context of national and London policy, both seeking to significantly boost the supply of housing. We will monitor progress in the Authority Monitoring Report.

		Certainly, the accuracy of the forecast has to be closely monitored.	
IIA7.3	Data and forecasting	The Society recognises that interpreting past data and projecting it will always involve a great deal of uncertainty as to its accuracy. Indeed, much of the statistics and information relied on are already 3 to 4 years old and many of the projections are based on information somewhat older than that, including the census of 2011. Unfortunately, so many of the forecasts and computer models upon which they have been made have proved completely wrong. As such, it is essential that short term trends (which can have impact on longer term investment) should be studied and analysed as part of the Plan Management discipline, at least annually. We draw your attention to paragraphs 2.9 and 2.11 of Annex A.	Noted. We seek to make use of the latest available data and have updated the baseline information where possible. We aim to publish an Authority Monitoring Report on an annual basis, reporting on the progress of the plan.
IIA7.4	Review of outcomes against the plan's key objectives	The Society strongly recommends that the Scoping process should ensure that much stronger procedures are put in place to report on the achievement of the plans prepared to meet the defined Key Objectives. It is a fact that previous WCC Plan updates do not start with a review of the success in achieving the Key Objectives, together with reasons for departures from Plan. The Scoping Report makes limited reference to monitoring and reporting back but it really should be considered a key objective. New systems are required to achieve a fundamental change to the whole process of future Plan management.	Noted. We aim to publish an Authority Monitoring Report on an annual basis, reporting on the progress of the plan. The City Plan will set out the monitoring framework.
IIA7.5	Key stakeholders/local residents	In paragraph 2.14 of the Report, WCC plan the civic leadership to ensure that everybody believes they have a stake and future in the City. The linkage of this intent to "key stakeholders" is not clear but the Society believes that WCC should ensure that appropriate consultation with residents is a vital part of the whole Plan process. Realistic times for this consultation must be allowed.	Noted. Our consultations will take place within statutory requirements and in line with our Statement of Community Involvement.
IIA7.6	Consultation period	The Society has responded twice this summer, at very short notice, and this has proved very difficult. The next stage will represent the "fleshing out" of the Key Objectives and Priorities	Noted. Our consultations will take place within statutory requirements and in line with our Statement of Community Involvement. Three months will be too

		and far more time should be allowed for this review stage. We would suggest three months for that forthcoming review.	onerous as this will significantly delay the plan process.
IIA7.7	Tall buildings consultation	Reference is made in paragraph 3.40 of the Report to the outcome of the consultation on building heights that will be used in the Plan preparation. The Belgravia Society requests sight of these conclusions when they become available. Annex B of this submission was the Society's input to this consultation.	Noted. The consultation statement supporting the City Plan will summarise the conclusions of the building height consultation.
IIA7.8	Key objectives	The objectives The Belgravia Society supports the Key Objectives. The Society appreciates that a planned scoping approach, as set out in your Report, can only be very general in the aims and proposed implementation plans. At the next stage, the precise actions to achieve the stated priorities will become clearer. We consider that Annex A, already in your possession, has provided the Society's views on both these objectives and the key matters that impact on Belgravia. In consequence, any additional views in this submission are largely a matter of emphasis rather than new items.	Noted.
IIA7.9	Deviation from policy when granting permission (Nova Victoria, Newson's Yard)	As a general point, we do wish to re-emphasise the importance of putting in place processes, particularly referring to planning, that are followed and not, without proper review and the involvement of affected residents, modified during the project execution phase. This was an important point in the Annex A submission. There are two immediate items that come to mind. The first is the view of Victoria Square from the Beeston Place now utterly overshadowed by the new building that is part of the Nova development. The other is the disregard for the heritage of Newson's yard and WCC failure to protect it and also the jobs and apprenticeships that the present operators of the yard give to the local community.	Noted. It is not possible to respond to individual cases as part of this consultation.
IIA7.10	People movement	Traffic congestion and the apparent failure of TfL to consult with all parties prior to the implementation of significant change to road arrangements. The Society believes that much more consideration should be given to the needs of "people movement" in WCC planning; at present the planning and	Noted. Transport impacts have been considered as part of the IIA process.

		implementation of improvements to the essential networks only occur when the existing systems are beyond comfortable utilisation. Whilst the Elizabeth Line will change travelling patterns in some parts of Westminster, the potential changes / benefits coming from Crossrail 2 are unlikely to apply within the planning period.	
IIA7.11	Favouring businesses over protecting Belgravia as a residential area	It also seems to the Belgravia Society that there is a great deal of emphasis on material structures and that there is an assumption that various other policies which benefit some of the objectives forget that Belgravia is a residential area, and has a strong community sense. Despite being in central London it is a residential area. It is very much like any suburban residential area. However, planning consents are being given in Belgravia where such changes that would not be acceptable to similar areas elsewhere. This is simply because of its proximity to central London. That includes granting licenses to sell alcohol beyond core hours to the detriment of surrounding residents or granting changes of use. There is no excuse for favouring businesses which perhaps might have unsocial hours for their operations or be granted a change of use when residents are adversely affected.	Noted. The impact on townscape has been considered as part of the IIA process. Licensing issues are beyond the remits of the City Plan.
IIA7.12	Rough sleeping	Policies to tackle the growing problem of rough sleepers, linked often to serious drug distribution. This should receive greater priority in the Scoping. We suggest that health and hygiene considerations need to be added in this context.	Noted. Rough sleeping has been considered as part of the IIA process. However, rough sleeping is largely beyond the remits of the City Plan.
IIA7.13	Rubbish bins	We note the reference to “De-cluttering” of the streets, and providing greater cleanliness of the streets. Little progress will be achieved without greater use of street rubbish bins. It is an essential point to emphasise for the parts Westminster that have major transport hubs; Victoria with its station and coach station, and surrounding residential areas cry out for such action. We recognise that the absence of rubbish bins may be associated with potential terrorism. However, proper design could make these available to avoid the litter which is the inevitable outcome of not having them at all.	Noted. Littering and waste have been considered as part of the IIA process.

IIA7.14	Noise in residential areas (suggesting planning conditions)	Unacceptable noise levels, that will become an increasing problem as growth continues. Whilst this problem cannot be eliminated, it must be a priority to seek ways to reduce the impact in largely residential areas. This is particularly so when work is being carried out to properties which adjoin. In granting any planning consents due consideration should be given to the residents in close proximity and noise should be restricted to very limited hours so as to spare occupiers the nuisance and damage to daily life. Suitable conditions should be imposed in the consent.	Noted. Noise has been considered as part of the IIA process.
IIA7.15	Pollution	The subject of “pollution” needs a high level of emphasis in its many aspects. The Society has made this point clearly in Annex A, section 11.	Noted. Air quality and other nuisances have been considered as part of the IIA process.
IIA7.16	Monitoring and reviewing	The Society believes that a “key objective” should be addressed so that a programme of review is put in place to monitor assumptions and test them against actual progress and build in flexibility for change where it would better deliver the key objectives. However, material changes must be reported on and consulted on as well.	Noted. We aim to publish an Authority Monitoring Report on an annual basis, reporting on the progress of the plan.
Historic England			
IIA8.1	Tall buildings	Among the issues raised our key concern is the lack of a robust evidence base to inform the review of the Council’s tall buildings policy. This evidence is essential to underpin the SA/SEA process so that the local plan is on a firm foundation, and can be found sound.	Noted. We will consider the need for evidence to support the approach in the City Plan.
IIA8.2	General	These comments make recommendations and suggestions for improving consideration of the historic environment within the SA/SEA process. Westminster’s highly significant and extensive historic environment contributes positively to economic, social and environmental objectives, and quality of life. There is scope for more recognition of this across the topic areas, due to its broad and highly positive contribution.	Noted.
IIA8.3	Growth and future development	As identified here, economic and population growth are inescapable. The preparation of a new local plan reviewing both strategic and development management policies is the key	Noted

		opportunity to assess the capacity of Westminster to absorb necessary change without harm to its unique attributes, including its world-class historic environment.	
IIA8.4	Alternative growth scenarios	At the most fundamental level, it will be important for the SA/SEA to consider how the projected growth figures would translate in terms of new floorspace and built form. What are the implications of different spatial distributions? Are there alternative growth scenarios to consider in the light of such analysis? Such assessment must take into account both the need to avoid harm to the historic environment as set out in the NPPF (paras 8 and 152) and the strategic requirement for plans to contain 'a clear strategy for enhancing the natural, built and historic environment' (para 157(8)).	Noted. Reasonable alternatives for the spatial strategy have been considered as part of the IIA process.
IIA8.5	Evidence base for growth policies, EDAW report	<p>The evidence base for assessing the policies for accommodating growth is a key area of concern to Historic England. Para 3.40 refers to the recent public survey on building heights. The scoping report suggests considerable reliance on results of the survey. However, these are not included in the references at the back of this report and we have not been able to find the results on your website. Making background information publicly available early on, as part of the process, is recommended in the NPPF (para 158) and accompanying PPG (ID:12-014-20140306). We would be grateful if you could supply this information and we would welcome the opportunity to discuss it with you.</p> <p>For the Council to change its policy on tall buildings we would expect to see an evidence-based approach. We have yet to see any evidence that supports a departure from the existing policy. We consider the EDAW report commissioned by the Council in 2000 remains valid and should be included in the evidence base used to assess the options for accommodating growth sustainably. The survey on building heights carried out in May this year does not substitute for a robust tall buildings study.</p>	Noted. We will consider the need for evidence to support the approach in the City Plan. The Consultation Statement which will be published alongside the City Plan will summarise the results of the building height consultation.

IIA8.6	Historic environment	The baseline for the historic environment is helpful but we recommend that it is augmented to better reflect the significance of Westminster's historic environment, current issues and trends, and the relevant evidence base, including any gaps.	Noted. The baseline information will be reviewed and, where necessary, updated.
IIA8.7	Conservation Area Audits	These are a key part of the evidence base in terms of setting out heritage interest/significance and proposals for positive management. We note that the number of audits has not been increased in the last few years. Given the development pressure in Westminster we hope very much that the programme of preparation can be resumed. The scoping report should refer to the gaps in the current set of audits which, from your website, appear to be for the conservation areas of Adelphi, Covent Garden, Dorset Square, Haymarket, Leicester Square, Maida Vale, Regent Street, Regent's Park and Royal Parks.	Noted. We are committed to bringing the conservation area audits up-to-date.
IIA8.8	Heritage assets at risk	We recommend the text refers to the 2016 Heritage at Risk Register which includes 22 listed buildings at risk, of which ten are grades I or II*. The new 2017 register will be available from late October.	Noted. The text has been updated to refer to the latest register.
IIA8.9	Westminster World Heritage Site (WHS)	The Palace of Westminster and Westminster Abbey, including St Margaret's Church World Heritage Site requires greater consideration. The supporting evidence base for the site's protection includes the Management Plan (currently under review). Recent modelling to understand the potential for tall buildings to impact on its setting is an important and developing area of work, including cross-boundary effects. The issues section should refer to the threat from tall buildings to the setting of the WHS, and the report from the UNESCO/ICOMOS Mission in February 2017.	The WHS has been given added consideration in the IIA. A further IIA sub-criterion has been added to IIA objective 13 Heritage. The impact on tall buildings on the WHS has been considered as a key issue. We are also working on an update of the WHS management plan.
IIA8.10	Views	We suggest that para 3.87 should refer to views identified by Westminster Council relating to specific heritage assets, or and recognised within conservation audits.	Noted. We will consider the approach to local views in the City Plan.
IIA8.11	Archaeological Priority Areas (APAs)	We welcome the reference to the additional APAs.	Noted. Suggested amendments have been incorporated.

		A further sentence could be added to explain the new tiers: <i>'The APAs are identified in four tiers of significance, with Tier 1 (of national significance) representing 8% of Westminster.'</i>	
IIA8.12	Registered Historic Parks and Gardens and historic open spaces	The references to registered parks and gardens in Westminster should include the Royal Parks which we note are presently referred to in the section on open space. It is important the historic significance of these exceptional parks is clearly identified here and we suggest that you review this in the final scoping report.	Noted. Suggested amendments have been incorporated.
IIA8.13	Design	The baseline information relating to design covers relatively small scale issues. This topic requires more consideration in the final scoping report due to the significant effects that can result from poor design, especially in sensitive historic environments. The treatment should be in line with NPPF, section 7, paras 58-61, and the PPG on design and local character (ref ID: 26-007-20140306).	Noted. Design strongly links in with other subjects such as heritage, environment and transport. We consider that additional design issues are sufficiently covered under other subjects.
IIA8.14	Issues and problems section	While welcoming the recognition of the significance of Westminster's heritage, we are concerned that the issues and problems section (p35) fails to identify key issues. The impact of development particularly in the form of tall buildings on the setting of heritage assets should be identified, and linked to the need for a robust analysis to inform the SA/SEA process and local plan policy approach.	Noted. The impact of development and tall buildings in particular has been recognised as a key issue.
IIA8.15	UNESCO/ICOMOS Mission visit	Related to this and the above comments, we would expect reference to the UNESCO/ICOMOS Mission visit, and subsequent report, outlining the threat to the World Heritage Site and the work to be undertaken to rectify gaps in current analysis, and to resolve cross-boundary issues.	Noted. The report has been referenced in the report.
IIA8.16	Including information from planning applications and permissions	In order to reflect known pressures, information from planning applications received, and permissions given could be included. For instance, the loss of historic fabric and historic grain in major development proposals which both individually, and cumulatively, may affect significance. In respect of historic parks, the potential for harmful impacts from tall buildings in adjoining areas, or in identified views, could be highlighted.	Noted. The Authority Monitoring Report will provide more detail on this issue, which will be published alongside the City Plan.

IIA8.17	Potential for enhancing the character/appearance of an area	The potential for enhancement is currently missing. The Council's conservation area audits provide useful information on sites that do not contribute to, or detract from, the character or appearance of the area.	Noted. More focus on enhancing heritage sites, listed buildings and their settings has been added to the IIA framework.
IIA8.18	Likely future conditions	We note that this section (p35) is based on the situation if current policies were to be continued. We welcome the reference to bringing Conservation Area Audits up-to-date but suggest that the completion of the audits should have priority. We also recommend that the role of the EDAW report is identified as having continuing relevance.	Noted. The council is committed to updating the conservation area audits.
IIA8.19	Assessing local capacity	Assessment of the capacity of local areas and sites is needed to understand the full implications of future development for the historic environment.	Noted. The capacity of sites has been considered as part of the London SHLAA and will be design led.
IIA8.20	Relevant Plans and Programmes	We suggest the following additions: <i>'The Historic Environment in Local Plans'</i> - Historic Environment Good Practice Advice in Planning (GPA1) <i>'Managing Significance in decision-taking in the Historic Environment'</i> – Historic Environment Good Practice Advice in Planning (GPA2)	Although they are not plans and programmes, we will consider these documents during the preparation of the City Plan.
IIA8.21	Key Sustainability Issues and Setting Objectives	IIA Objective 13 We recommend that this objective is re-worded to read: <i>'To conserve and enhance the significance of heritage assets and their settings'</i> . This is to ensure that it aligns fully with the NPPF. It is important that the objective provides for conservation of heritage assets as an aim (as for the natural environment) as well as encompassing how new development responds to it. We recommend that the text below the objective is amended to '... which will respect, conserve and enhance this inheritance ..' IIA Objective 14 We suggest that this objective should take a broader view of Westminster's built environment and townscape and encompass an aspiration to raise design standards in all areas.	Objective 13 – This has now been amended as suggested. Objective 14 – This has now been amended as suggested.

IIA8.22	The IIA Assessment Framework	<p>Table 3 Integrated Impact Assessment Framework We have the following suggestions:</p> <p>IIA objective 13 - amend as above. To bring the sub-criteria into alignment with the amended objective we suggest:</p> <ul style="list-style-type: none"> - Replace 'protect' with 'conserve or enhance' - Amend sub-criterion 3 to refer to all heritage assets and their settings - Amend sub-criterion 3 to include strategic and locally-identified views. <p>Historic England's Advice Note 8 provides examples of possible decision-making subcriteria (para 2.12). Suggestions here could assist with integrating heritage into other topic areas.</p> <p>IIA objective 14 - amend to the wording on page 67, and include a sub-criterion 'Will it enhance the sense of place and local character?'</p> <p>IIA Objective 15 – add a new sub-criterion 'Will it maintain or enhance the experience of the open space, including views out and public enjoyment of its setting?'</p>	The sub-criteria of objective 13, 14 and 15 have been amended to reflect suggestions, whilst maintaining the style and level of detail of other objectives.
Environment Agency			
IIA9.1	Flooding and tidal defences	<p>We support the baseline topics you have scoped in, including climate change, flooding and water. However, we have some specific comments on this section.</p> <p>The section on 'Flooding' (paragraph 3.137) indicates that the greatest risk is surface water and that there is an extremely high protection from tidal flooding by the Thames flood defences. Whilst this is true there should be recognition of the residual risk that exists from a breach of the flood defences. For 'likely future conditions' the future performance of the Thames tidal defences will very much depend on Westminster's participation as a partner in delivering the aims of the Thames Estuary 2100 Plan. This plan sets out the options to raise the flood defences and to</p>	Support has been noted. Clarifications and amendments have been made to reflect residual flood risk and respond to the latest SFRA.

		safeguard existing and new developments against future climate change impacts. The ability of the flood defences to provide that protection is also important. Future protection is dependent on the protection, maintenance, repair and replacement of the flood defence walls to ensure continued protection for the lifetime of developments. This section should be updated based on the outcomes of the Strategic Flood Risk Assessment and Flood Risk Sequential Test when available.	
IIA9.2	References (TE 2100)	Paragraph 3.139 references the Thames Flood Risk Management Plan and the requirements. It should also reference the Thames Estuary 2100 Plan.	Noted. Suggested amendment has been made.
IIA9.3	Reference to London Water Resource Zone as 'seriously water stressed'	The section on 'Water' refers to data on water usage but should also reference that Westminster is located within Thames Water's London Water Resource Zone classified as 'seriously water stressed.'	Noted. Suggested amendment has been made.
IIA9.4	Wastewater management, working together with Thames Water	Paragraph 3.143 refers to water pollution incidents and the Thames Tideway Tunnel to relieve the impact of sewerage discharges into the Thames. In our recent response to the City Plan regulation 18 consultation, we highlighted the need to evidence that the current waste water infrastructure has the capacity to accommodate future growth. This will require working with Thames Water (and adjacent boroughs) to assess the quality and capacity for managing waste water and its treatment. If there are constraints in the sewer network, additional capacity and future upgrades may be required to serve future developments and this should inform the IIA to ensure that the Local Plan is proposing sustainable development and an appropriate plan of action should future interventions be required.	Waste water will be considered as part of the Infrastructure Delivery Plan. Thames Water has confirmed that no further infrastructure is needed to manage waste water.
IIA9.5	Water quality, baseline evidence and data	There is also Water Framework Directive (WFD) baseline evidence and data for Westminster from the Thames River Basin Management Plan which is not referred to here. There is relevant WFD data for the River Thames, Grand Union Canal and New River, and provides the latest baseline evidence for water quality of both surface water and groundwater. The	Noted. WFD data from the Thames River Basin Management Plan has been added to take account of comments.

		<p>Thames River Basin Management Plan updated by us in 2015 provides evidence on how all waterbodies in the Thames catchment are currently performing (under the Water Framework Directive) and specifies objectives and measures to improve water quality in rivers, canals, groundwater and surface water bodies. The River Thames, Grand Union Canal (GUC inclusive of Regents Canal) and the New River are recognised in the Thames RBMP and the aim is with the help of our partners for all waterbodies to achieve “good status or good ecological potential” by 2027. Our Catchment Data Explorer (http://environment.data.gov.uk/catchment-planning/) is a web-based tool useful for Local Authorities to get data on specific waterbodies in their area and download information about the water environment. It is built upon the information within the River Basin Management Plans. To briefly summarise the waterbodies in Westminster are classified as follows:</p> <ul style="list-style-type: none"> ▣ Grand Union Canal (Uxbridge to Hanwell Locks, Slough Arm, Paddington Arm) reference: GB70610078. Type: canal. Overall cycle 2 status: Moderate. ▣ New River reference: GB806100111. Type: surface water carrier. Overall cycle 2 status: Good. ▣ Thames Middle, reference GB530603911402. Type: transitional. Overall cycle 2 status: Moderate. <p>For each waterbody actions have been identified which would assist in the waterbody achieving good status or potential. Although the New River is currently classified as having ‘good’ ecological potential there is an action measure identified to manage vegetation and invasive species.</p>	
IIA9.6	List of plans, programmes and strategies	We support the inclusion of the Thames Estuary 2100 Plan (TE2100), Thames River Basin District Flood Risk Management Plan and Thames River Basin District River Basin Management Plan (2015). These three are listed under National Plans (page 58) and would perhaps fit better as ‘Regional’ Plans given their Thames geographical extent. In addition, the latter two plans are	These have been moved under the list of Regional plans and the names have been corrected.

		more accurately entitled Thames Flood Risk Management Plan and Thames River Basin Management Plan.	
IIA9.7	SFRA	We support the reference to the emerging Strategic Flood Risk Assessment (2016). We would be interested to hear more about the work on this document. This section will also need to reference the Sequential Test and any further SFRA work (e.g. Level 2) to support strategic sites.	Noted. We will continue to engage with the EA on the update of our SFRA.
IIA9.8	IIA Objective 6 (use of natural resources)	Whilst we support IIA Objective 6 to reduce the use of natural resources (which links to water resources and the need for water efficiency), given the earlier baseline information, we strongly recommend this is broadened or an IIA objective is included that aims to improve water quality. Westminster forms part of an overall river catchment area, with the Grand Union Canal, New River and a significant Thames frontage. The Thames River Basin Management Plan has outlined the need for improvement for these waterbodies. Although the Thames Tideway Tunnel will be a significant contributor to improving the water quality in the Thames, there is further action that can be taken at a borough level to improve water quality in the Thames and the canals. An assessment of waste water capacity through liaison with Thames Water and tackling the quality of surface water runoff at source by championing sustainable drainage measures in developments will be a part of this.	Noted. Water quality has been added as a sub-criteria in the IIA framework.
IIA9.9	IIA Objective 7 (flood risk)	We support IIA Objective 7 to reduce flood risk. The NPPF is clear (paragraph 100) that inappropriate development in areas of risk of flooding should be avoided by directing development away from high risk areas, but where it is necessary making it safe without increasing flood risk elsewhere. It would be useful if this section highlights the Councils intention to apply to the Sequential Test to ensure that the strategic objectives and direction of the Local Plan are compliant with national planning policy and guidance on flood risk. The IIA's appraisal of the Local Plan can also play an important role in ensuring the requirements of national policy have been met, and that there is a clear strategy in Westminster to reduce the risks and impacts	Noted. We do not consider that the IIA is a means to test legal requirements outside of its scope. However, the application of the sequential test will be considered as part of the assessment against this objective in general terms.

		of flood risk taking into account climate change. Although flood risk can be reduced on a site by site basis through mitigation, resistance and resilience measures, it should also be addressed through strategic approaches which may mean investing in partnership projects and other initiatives. Helping to deliver the Thames Estuary 2100 Plan to ensure our flood defence infrastructure is fit for the future will also be a part of that.	
IIA9.10	IIA Objective 8 (biodiversity)	We support IIA Objective 8 to protect and enhance biodiversity. The commentary should also acknowledge the link between Westminster’s waterways (including Thames) and biodiversity. There is an opportunity to improve biodiversity habitats in tandem with development adjacent to the waterways and the upgrading/raising of flood defences, and using evidence from the Thames River Basin Management Plan to monitor the progress of this.	Noted. The IIA process will consider the biodiversity impacts of waterways, and indicators to monitor biodiversity benefits will be included.
IIA9.11	IIA Objective 9 (air quality), IIA Objective 12 (waste)	We support IIA Objective 9 (to improve air quality) and IIA Objective 12 to reduce waste.	Support has been noted.
IIA9.12	IIA Assessment Framework – objective 7 (flood risk) and 8 (biodiversity)	For objective 7 ‘To reduce flood risk, promote SUDs, etc’ we suggest the sub criteria question ‘Will it minimize flood risk from all sources of flooding?’ to ‘will it reduce flood risk from all sources of flooding?’ This maintains the stronger approach of reducing rather than minimizing which is not as robust. To aid the Sequential Test process there should be a sub criteria question to ask ‘Will it ensure vulnerable developments are located away from areas at high risk by carrying out the Flood Risk Sequential Test?’ We also recommend the following sub criteria questions to reflect our previous comments on water quality: <input type="checkbox"/> Will it ensure there is adequate sewerage capacity for developments, and ensure constraints and capacity issues are planned for? <input type="checkbox"/> Will it prevent further deterioration of waterbodies and help to improve WFD status? <input type="checkbox"/> Will it improve water quality in surface and groundwater?	Noted. We will consider suggested changes having regard to the style and level of detail of the other objectives and sub-criteria.

		<p><input type="checkbox"/> Will it promote SUDs in all developments to reduce flood risk and improve water quality?</p> <p>For objective 8 'To protect, enhance and create environments that encourage and support biodiversity' we recommend the following sub criteria questions are included:</p> <p><input type="checkbox"/> Will it protect and enhance the biodiversity of the River Thames and other watercourses?</p> <p><input type="checkbox"/> Will it help to eradicate invasive species?</p>	
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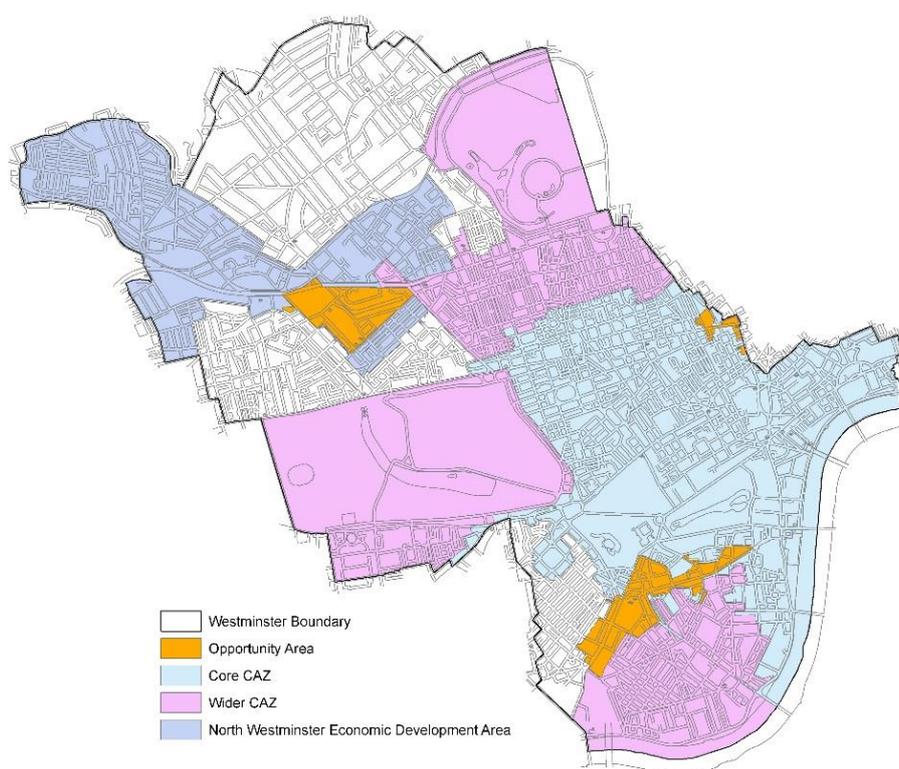
Annex III – Baseline data

The requirement for Baseline Information

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

Economic conditions

Figure 3.1 – Map of Westminster showing key economic designations



Employees

- 3.2 Westminster functions as a national and international centre for business; shopping; arts, culture and entertainment. It accommodates 697,400 jobs (2015)ⁱ, 14% of London's employee total. It contains the most workplace jobs

of any London borough by some distance, and more than the City of London and Canary Wharf combined.ⁱⁱ Approximately one million people set foot in Westminster every day for work, study and leisure purposes.ⁱⁱⁱ

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

Businesses

- 3.4 Westminster has the single largest number of businesses of any London borough, with 54,600 businesses currently in the city, around 10% of London's total. The number is increasing.^{iv} These businesses contribute £55 billion or 4.3% to National Output.^v
- 3.5 The majority of Westminster's businesses are small, with 80% of local business units having fewer than ten employees.^{vi} There are also a number of multi-national corporations, headquarters and large companies located in Westminster; nearly 940 enterprises have over 100 employees, about half of which are in areas such as the Paddington and Victoria Opportunity Areas, where most of the larger office spaces and floorplates are located.^{vii}
- 3.6 As part of an assessment of business competition in 2013, Westminster was ranked top across London in terms of wellbeing, costs, connectivity, talent and enterprise.^{viii} In conjunction with the size of Westminster's economy, one of its key features is its diversity in terms of industrial sectors and the range of occupations on offer to employees. The largest employment sector is business services and financial intermediation, which have been the main drivers of the economy in recent times, and are expected to be so for the next twenty years.

Beyond the services, Westminster is the centre of national government, which is reflected in the number of public sector employees in the city. Tourism and entertainment related industries are also significant employers and drivers of the economy, as is the world renowned retail sector in the West End. Further key sectors of interest include creative industries and the knowledge economy, where Westminster is a world leader.

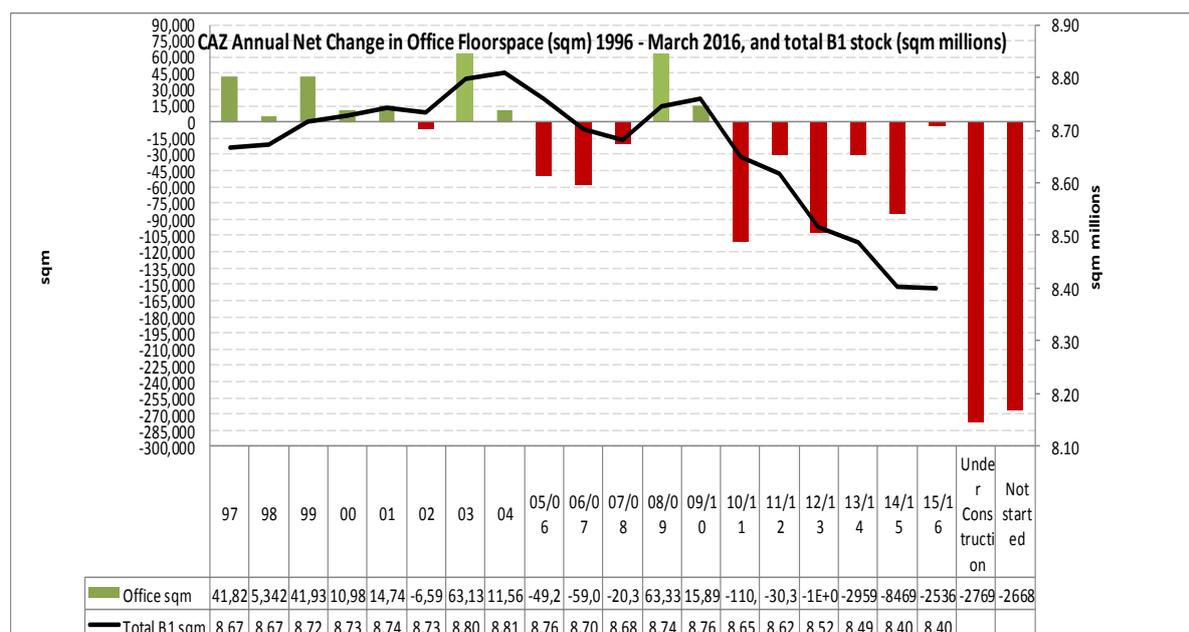
Offices

- 3.7 Offices are the second largest land use in Westminster, making up 25% of all floorspace. Westminster's office stock accommodates over 18,530 businesses and has a rateable value of over £2.4 billion.^{ix} The Central Activities Zone (CAZ) designated in both the London Plan and City Plan is home to most of Westminster's office floorspace.
- 3.8 There are three Opportunity Areas in Westminster: Paddington, Victoria and Tottenham Court Road (part of which is within the London Borough of Camden). These are designated in the London Plan and in Westminster's City

Plan. The Paddington Opportunity Area is the only opportunity area to see significant office gains between 1997-2016 with over 132,000 sqm.

- 3.9 However, Westminster’s office floorspace has witnessed a decline over the past years of over -300,000 sqm with further losses of -293,000 sqm under construction and -282,000 with planning permission (see figure below).

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



With reference to the CAZ in particular, from 2010/11 there has been sustained office loss mostly driven by the change of use from office to residential use. The rate of loss does seem to be abating, following a change in Westminster planning policy in November 2016 on office to residential changes, but there is still significant loss in the pipeline with over -276,000 sqm under construction and a further -267,000 sqm yet to start.

- 3.10 In March 2017 the West End was recognised as the fifth most expensive office market in the world (behind two markets in Hong Kong and two in Beijing) with highest achieved rents of £127 per square foot.^x
- 3.11 The demand for new space has come from occupiers including hedge funds, private equity and wealth management businesses, which is reflected in the high rents being paid, with deals in excess of £127 per sq ft recorded for the very best space in Mayfair.^{xi} Across the West End vacancy rates are low at 4.5%.
- 3.12 A further indicator of diversity is in the size of businesses, as Westminster contains both large multinational corporations and small businesses. This is reflected in the office floor space available which is flexible and responsive to need in different parts of the city.

3.13 Westminster is at the heart of the creative sector and contains the highest number of creative industry jobs (89,751) in London and 8% of all creative jobs in the UK.^{xii} The majority of creative industries operate from B1 office floorspace, with only 1% actually operating within the B1c light industrial floorspace use class.^{xiii} These uses are clustered in parts of Westminster, such as Soho^{xiv}

3.14 There are no Strategic Industrial locations in Westminster.

Westminster a Global Economy

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

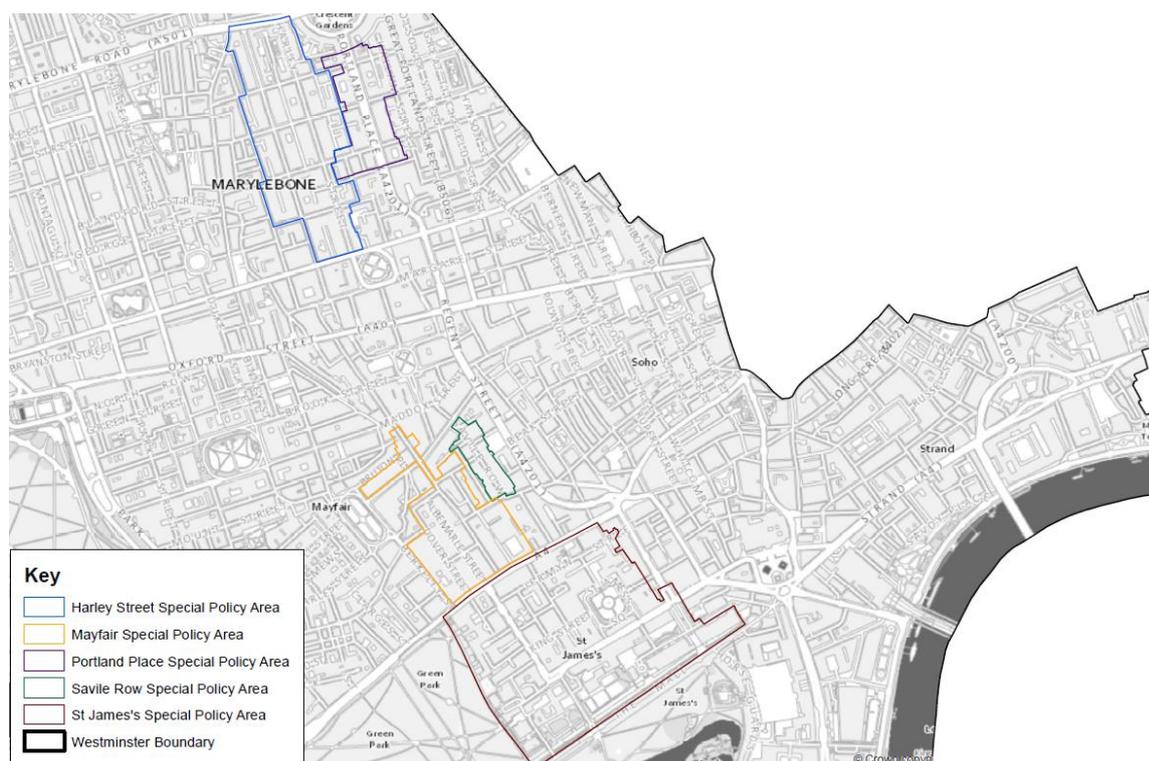
3.16 This status is reflected in the global nature of its local economy. Of the 29 'Global 500' companies headquarters in the United Kingdom, six are in Westminster, including BP, BAE Systems and the Rio Tinto Group^{xvi}.

3.17 Higher Education employs over 20,000 people in Westminster, this category includes universities, language schools, and arts related colleges.^{xvii}

3.18 There are 96 embassies/high commissions in Westminster. The majority of these (83) are inside the Central Activities Zone.^{xviii}

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

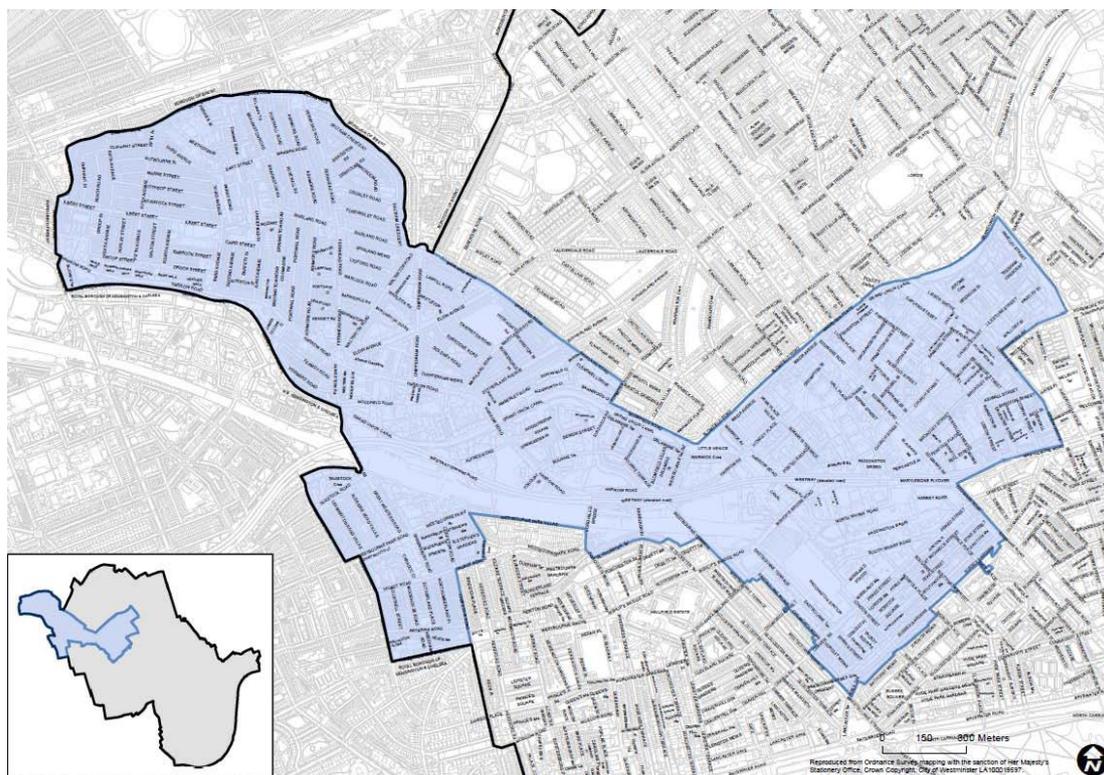
- Harley Street - medical facilities;
- Portland Place - institutional uses;
- Savile Row - tailoring;
- St. James's - private member's clubs, art galleries, and niche retail;
- Mayfair - art galleries, antique traders.

Figure 3.3 – Map of Special Policy Areas

The North West Westminster Economic Development Area (NWEDA)

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

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



Retail

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

neighbourhood centres providing convenience and some comparison retail alongside other town centre uses and local services. In addition there are 39 Local Centres across Westminster which provide convenience shopping focused centres providing essential accessible locations for local residents.^{xxiii}

Westminster has made an Article 4 Direction to remove permitted development rights for changes of use from A1 (shops) to A2 (financial and professional services) in the Core CAZ and the designated shopping centres throughout the city. While financial services like banks provide a valuable local service, it is important for the council to be able to use its planning powers to protect variety and vitality, preventing particular industries from dominating retail space in shopping centres. The Article 4 direction came into force on 1 January 2017.

- 3.24 The Council regularly commissions health checks of its town centres the most recent detailed results of which can be found [here](#).

Arts, Culture, Tourism, Entertainment, Food and Drink

- 3.25 The attractive, historic environment of Westminster is a desirable place to live, work and locate new businesses. Westminster is also a national and international destination for tourism of all types, from daytrips based around its important heritage and popular tourist attractions, shopping and the evening and night-time economy, to longer international stays. In addition to having a number of the most popular individual visitor attractions in the country, whole areas in Westminster act as magnets for visitors, such as Theatreland and the West End for its evening and night-time economy; the area around Parliament for its heritage; Oxford and Regent Street for comparison retail trips; and Bond Street and Mayfair and St. James's for luxury retail. The vast tourist economy is reflected in the number and range of uses such as restaurants, bars, hotels, shops, galleries, theatres, cinemas and other uses present throughout the central part of Westminster.

Westminster has a daytime population of over 1 million people. In terms of daily visitor numbers, Westminster far outstrips any other borough – on a normal working day, Westminster has nearly 200,000 visitors (this may be higher at weekends and at certain parts of the year), which equates to nearly 70 million visits per year. Westminster has around a third of London's overseas visitor overnight stays, illustrating both its popularity and reflected in its dominance in terms of hotel provision. On an average day there are over 95,000 overseas visitors staying in Westminster, compared to 201,000 for all other boroughs combined (RBKC is second with 31,500).^{xxiv}

Westminster has seven of the top 50 paid attractions in London, attracting a total of around 5.8 million visitors per year. Westminster also has four of the top 50 free attractions in London, totalling almost 9.8 million visitors per annum.^{xxv}

Westminster hosts a number of high profile and internationally recognised events throughout the year such as international film premieres, the Proms at

the Royal Albert Hall, the BAFTAs and London Fashion Week. Westminster also has a national-level sporting presence as the home of international Cricket at Lords Cricket Ground. The city hosted several sports events during the 2012 Olympics e.g. beach volleyball and cycling events.^{xxvi}

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

Issues and problems

- 3.32 So many people coming into Westminster including workers, visitors and tourists, puts pressure on existing infrastructure, local services, transport and the public realm. Such intense activity is part of what makes Westminster exciting and vibrant and of economic significance, but is also one of its greatest challenges.
- 3.33 This experience is felt perhaps most acutely in the Evening and Night Time Economy (ENTE). Westminster City Council strongly believes that a truly resilient and diverse ENTE requires a mix of activity ranging from those

activities that have traditionally formed part of people's perception of the ENTE (e.g. drink-led activity in bars, pubs and clubs) to expansion in other types of 'softer' activity which currently span the day time and evening hours. These include food-led activity in both restaurants and takeaways, later opening of theatres, museums and art galleries as well as proper consideration of the role that can be played by retail later into the night time. This is an aspect of policy that needs to be considered in the light of the introduction of weekend Night Tube services from the summer of 2016.^{3.34} The high level of activity and 24 hour nature of some parts of the city can detrimentally affect quality of life for residents, reduce air quality and lead to heightened crime levels. During 2016/17 51,103 crimes were reported in Westminster, which equates to a 21.1 crimes per 100 people^{xxxiv}. This is much higher than the London average of 10.0 crimes per 100 people. However, this does not necessarily indicate how likely residents are to become victims of crime and crime in Westminster is heavily skewed by having major tourist attractions, shops and a thriving night time economy.^{xxxv} Furthermore crime in Westminster, as across London and the wider UK, is on a general downward trend, although serious crimes such as sexual offences and violence against the person are seeing increases.

- 3.34 The high volume of people, nationally important buildings, visitor attractions and government-related functions also give rise to particular security risks, and specific concerns in relation to terrorism.

Growth and future development

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

Issues and problems

- 3.36 Future economic growth is both inescapable and vital to Westminster's future success. London's – and Westminster's – population and economy continue to grow, which means that demands and targets for residential and commercial growth increase in parallel.
- 3.37 Westminster's population is projected to grow from 262,000 to 266,000 by 2036, which means that 21,000 new homes have to be delivered to meet this new demand in addition to the need to address existing backlog demand.
- 3.38 An additional two million square meters of business floor space also have to be created to accommodate 77,000 new jobs in the new plan period and to make up for the significant amount of office space lost to housing since 2005.

- 3.39 The loss of office floorspace to residential since 2005 (see para 3.9) is a cause for concern and would need to be addressed at a strategic level. Westminster City Council can help to meet this need through its approach to planning and development. Although space for new very large regeneration schemes may be limited, there may be opportunities for mid and small scale developments. Careful adaptations across individual properties and modest property holdings will still be very important for the delivery of future growth in Westminster.
- 3.40 To help inform a plan-led approach to growth, the City Council has undertaken consultation on growth and building height during spring/summer of 2017. The “Building height: Getting the right kind of growth for Westminster” consultation initiated a dialogue on the best way forward to accommodate future growth in Westminster and to engage with people who work, visit and live in Westminster on options for making the most efficient use of the City’s scarce land resources, including increasing building height. The initial survey was followed up by face to face interviews across the borough and a pan-London online tall buildings survey.
- 3.41 In order to improve the local economy and the skills and prospects of residents in NWEDA a key priority is to maximise opportunities that promote sustainable economic growth and create employment.
- 3.42 The economy of Westminster was not immune from the 2008/09 recession. However, research^{xxxvi} shows that the mix of uses in Westminster means it has been better protected and more resilient to the economic downturn than other locations dominated by one commercial main use.

Likely future conditions

- 3.43 The working population of Westminster is projected to increase from 697,000 in 2017 to 750,000 in 2036.^{xxxvii}
- 3.44 The UK has given notice under Article 50 of the Treaty of the European Union (EU) to withdraw from the Union. This is likely to happen during the period of this Plan. The exact impact of Brexit on the Westminster economy and its labour market is currently unknown, but it should be noted that the City of Westminster is home to around 33,000 EU nationals, some 13.6% of our resident population. Some 15% of the workforce in Westminster are EU nationals. They are particularly represented in some specific sectors – 44% of those employed in the accommodation and food industry, 19% of construction and 14% of finance and insurance sector employees are drawn from the EU national workforce.^{xxxviii} Overall, in the last five years, the proportion of EU workers has grown by more than a third, and research for the City Council suggests that this may reflect a lack of the kinds of skills amongst UK nationals that the local labour market requires. In practice, of course, it is extremely difficult to estimate the potential impact of Brexit, which will happen over an extended period during which many other factors (national and

international) will arise affecting levels of employment and how these feed into demand for space. This is of course a broader debate which the country needs to have, but could potentially be a significant issue for the future of the Westminster's economy in coming years.

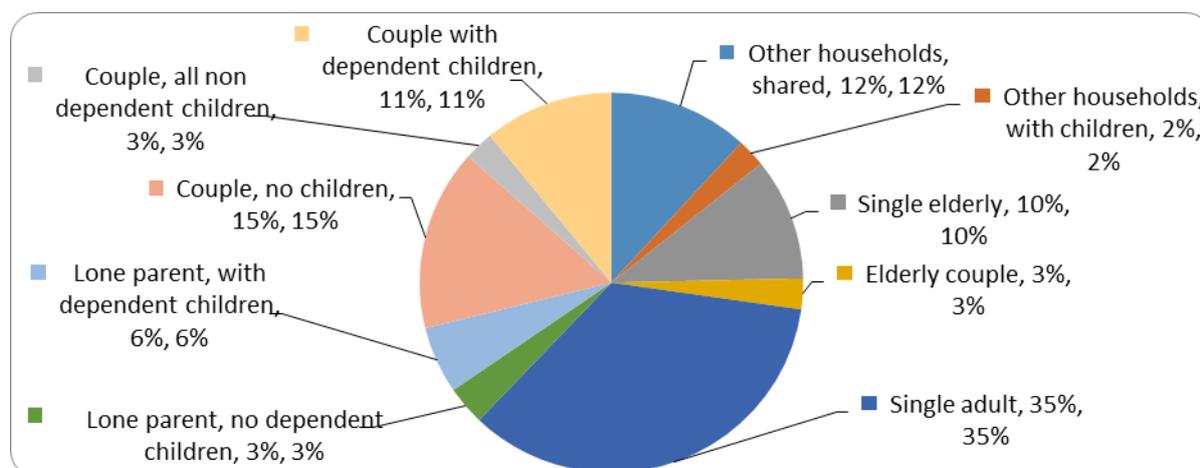
- 3.45 It is increasingly clear that businesses and other organisations have changing expectation about the types of workspace they occupy. Increasingly, they are looking for accommodation giving greater scope for interaction and collaboration, with greater attention to design and public realm to provide workspaces attractive to workers with key skills. There is also likely to be increasing demand for co-working and other flexible workspaces, particularly for start-up, micro- and small businesses.
- 3.46 Overcrowding on the existing public transport system may impact on the desire of new businesses to locate in Westminster and may be off-putting for visitors who come to shop and use the entertainment facilities. While overcrowding may be partly addressed by the Elizabeth Line opening in 2018, growth is likely to increase pressure on the transport network, requiring further investment to ensure the most is made of existing infrastructure and additional capacity is brought forward.
- 3.47 The impact of the Night Tube on Westminster is currently being monitored but it has not currently led to any obvious or consistent changes in patterns of crime, anti-social behaviour/noise or service requests.

Social Conditions

Westminster's Residents

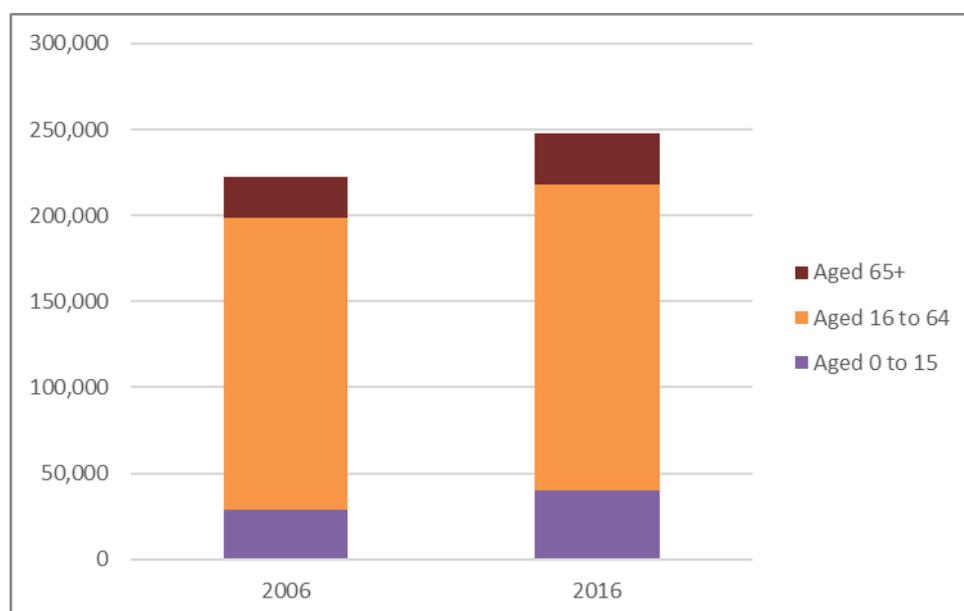
- 3.48 Westminster has experienced significant population growth and diversification over the past 10 years, with some of the highest rates of international migration in the UK. According to 2016 mid-year estimates Westminster has an estimated population of 247,614.^{xxxix}

Figure 3.5 – Make up of Households (2011 Census)



- 3.49 Single adults make up the largest proportion of households in Westminster, although there is a wide variety of household composition, with a cumulative total of 22% families with children^{xi}. Westminster has proportionally more working age people than London or England, a similar percentage of elderly population (29,228 over 65s) and fewer children (49,421 under 19s).^{xii} The city contains 6,900 short-term migrants, which is highest number of any local authority in England.^{xiii} The population of Westminster ‘churns’ at approximately 30% each year and even more in some parts of the city.
- 3.50 The 2011 Census showed that the number of households has increased by 16% since that conducted in 2001.
- 3.51 The majority of residents have lived in Westminster between 3-10 years. Just over half (51%) were born outside the UK, which is the fifth highest proportion in London^{xiii} (the London average is 37% and England 14%^{xiv}). Westminster is more ethnically diverse than most other London boroughs: 38% of residents are from non-white ethnic groups. The three main places outside the UK where residents were born are: EU countries (14%), the Middle East (7%) and North America (4%).^{xv} At least 140 different languages are spoken by residents of Westminster.^{xvi} Other than English which is spoken as a first language by 69% of the population, the other main languages are: Arabic, Bengali, Albanian, Portuguese, Somali and French.^{xvii}

Figure 3.6 – Age Distribution



- 3.52 Figure 3.6 shows that the number of under 15 year olds has increased in Westminster in the past 10 years.^{xviii}
- 3.53 In common with the rest of England, Westminster’s population of older residents is likely to increase over coming years. The number of residents aged 65 or over is forecast to rise from 29,216 (2016) to 36,663 by 2024, and to 45,206 by 2031, representing an increase in the proportion of the population from 11.8%

to 15.6% This represents a 55% increase of 65s or older by 2031. The number of more elderly residents (85 or older) is forecast to increase from 3,807 in 2016, to 5,344 in 2024, and to 6,973 in 2031. This is an increase in their proportion in the population from 1.5% to 2.4%. The figures increase most particularly after 2021. In terms of the actual numbers, this represents an 83% increase of 85+ residents in Westminster.^{xlix}

- 3.54 With the ageing of the population, people from Black Asian and Minority Ethnic communities are likely to account for an increasing proportion of people aged 65 and over.ⁱ
- 3.55 The 2011 Census figures show that the proportion of residents specifying their religion as Christian has decreased since 2001 from 55% to 45%. Islam is the second largest religion recorded by Westminster residents, with the proportion of residents specifying this religion increasing from 12% in 2001 to 18% in 2011. Some 20% of Westminster residents stated they had no religion, which has increased from 16% in the 2001 Census.
- 3.56 It is difficult to estimate the size of the Lesbian, Gay, Bisexual and Transgender (LGBT) population and this matter was not addressed in the 2011 Census. Research carried out by Sigma and applied to Westminster suggests that some 10,165 LGBT people live in Westminster.ⁱⁱ This, however is a conservative estimate; it also does not consider the large LGBT population who work in and visit the city.

Issues and problems

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

Likely future conditions

- 3.58 The estimated population of Westminster in 2036 is predicted to be 290,585 by 2031 and 308,055 by 2041.^{liv} Population growth and household size and type has an impact on a wide range of policy matters including housing, social infrastructure, transport, waste and the environment. In particular, the likely increase in older residents means that there is likely to be more housing

provided to meet their needs specifically, supported by appropriate social infrastructure.

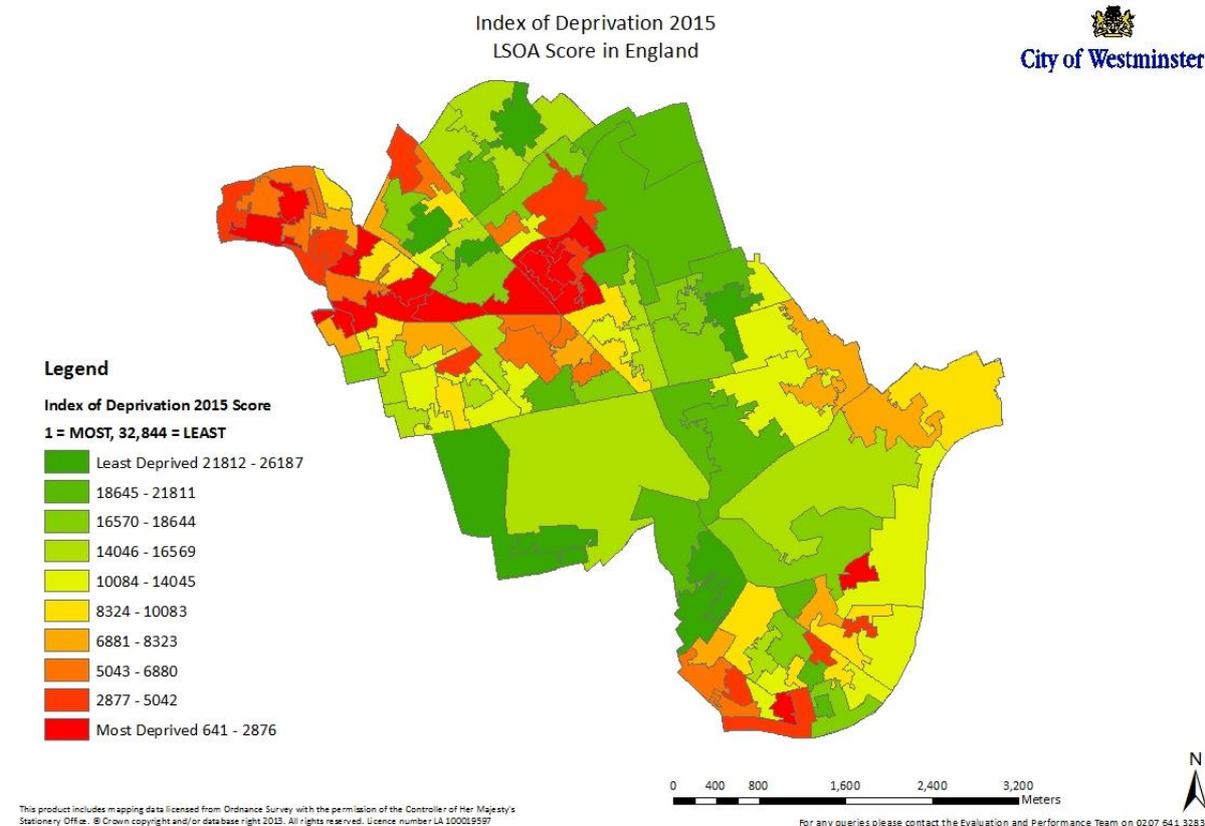
- 3.59 A comparison of recent census data shows that the number of children in Westminster has increased. This is likely to place additional demand for certain types of services, and in particular school places.

Health and Wellbeing

- 3.60 The Index of Multiple Deprivation (2015) identifies Westminster as the 57th most deprived of the 326 districts in England¹, from being the 87th most deprived Local Authority in 2010.
- 3.60a Seven Westminster wards have at least one Census lower super output area (or LSOA, the Census reporting area covering around 1,000-1,200 households) in the worst 20% deprived in England – in 2015, 35 (or 27%) of LSOAs here were in the most deprived 20% in England, compared to 19% in 2010. In Westminster 18 (or 14%) of LSOAs are in the top 10% (15 in 2007 and 12 in 2010) most deprived in England.
- 3.60b The combined index shows that at the LSOA level, deprivation is mainly confined to the wards in the north-west of the City, Church Street and to small pockets within the South.^{iv} In 2015 the electoral constituency of Westminster North had 38% of children living in poverty; this was as high as 50% in Westbourne Ward.^{vi}

¹ The lower the score given, the higher the level of deprivation. So, for example, 1 = most deprived and 326 = least deprived.

Figure 3.7 – Index of Multiple Deprivation score per LSOA in Westminster (2015)



- 3.61 In 2016 the median household income for Westminster was £42,377, with an average and lower quartile of £27,400. The ward with the lowest median household income is Church Street with £25,800 and the highest are Knightsbridge and Belgravia with £51,000.^{lvii}
- 3.62 Westminster’s adult obesity rate is 15%. This is lower than the London average (21%), but the rate is likely to be almost double in deprived areas compared to affluent areas. In addition, the obesity rate among primary school children (year 6) is 25% which is higher than the average for London.^{lviii}
- 3.63 Life expectancy for men in Westminster is 82 years, compared to 80 for London as a whole. For women the figures are 86 in Westminster and 84 for London as a whole.^{lix} However, life expectancy is 16.9 years lower for men and 9.7 years lower for women in the most deprived areas compared to the least deprived areas.^{lx}
- 3.64 In November 2016 there were 9,510 Employment Support Allowance/Incapacity Benefit (ESA/IB) claimants across the city. The claimant rate is 5.4% of the population, which is similar to the London average of 4.8%.^{lxi}
- 3.65 The 2011 Census showed that Westminster has the second highest proportion in England of lone parent households not in employment (57.7%).

- 3.66 At the time of the 2011 Census, 69% of Westminster residents were economically active, which was lower than the London rate of 72%, and the England average of 70%. Of the economically inactive residents, the majority were students.^{lxii} Over half of Westminster's residents are educated to at least degree level, with over two thirds educated to A-level and beyond. This is 59% above the average for England and 36% above the average for London.^{lxiii}
- 3.67 Over a third of adults are recorded as taking part in one or more 30 minute plus sessions of exercise at least moderate intensity once a week. This is similar to the London participation rate of 36% and the England rate of 35%.^{lxiv}

Issues and problems

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

Likely future conditions

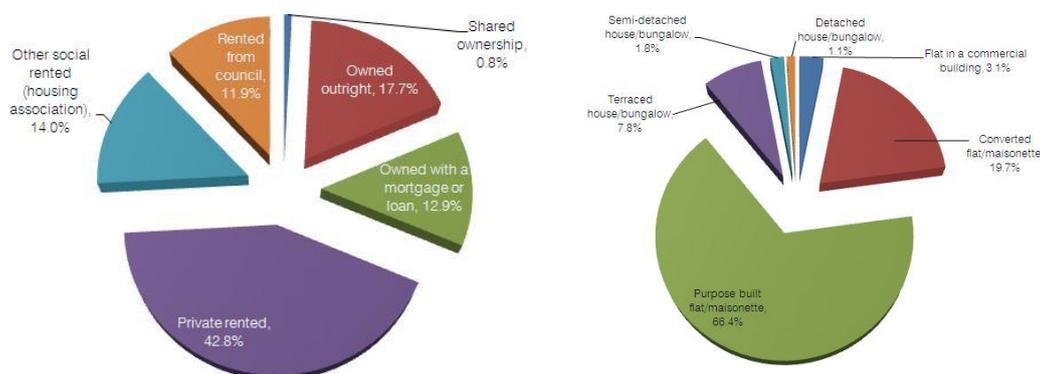
- 3.70 The built environment is a contributing factor affecting the health and well-being of a local population. For example access to play space, open space, education, shopping and transport choices (e.g. healthy food and safe pedestrian environments), safe and healthy working environment and low pollution all combine to contribute to good health. Access to housing with high sanitation levels and access to healthcare also contribute to a high standard of healthy living. Planning policy may be able influence these matters, in particular where there are significant spatial disparities as evident in Westminster.

Westminster has developed a Joint Health and Wellbeing Strategy (2017-2022) setting out long term goals to improve the health and wellbeing of Westminster's residents, workers and visitors.^{lxv}

Westminster's Housing

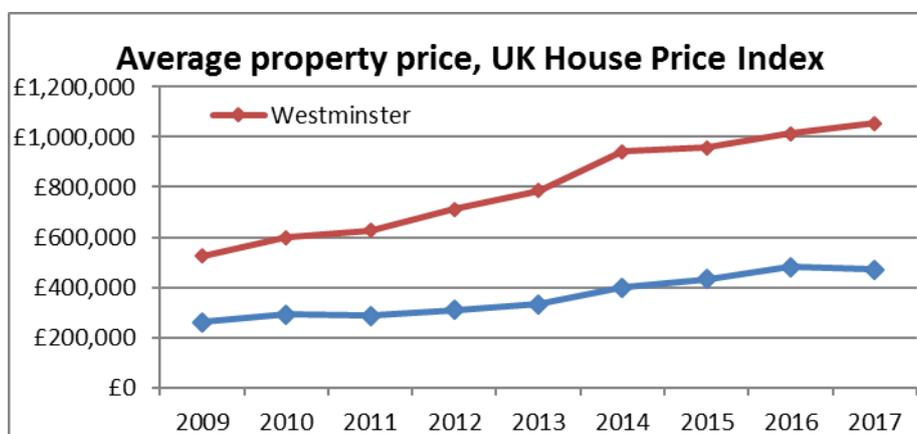
- 3.71 Westminster has approximately 122,020 residential properties; the majority of these are purpose built privately rented flats/maisonettes.^{lxvi}

Figures 3.8 and 3.9 – Household Tenure^{lxvii} and Type of Dwelling



3.72 Westminster’s housing sector differs markedly from other areas of London and in part reflects Westminster’s role at the centre of a world city. Average house prices in Westminster are the second highest in the country. In July 2013, average weekly rents for 1 and 2 bedroom flats (£425 and £610 respectively) were significantly more expensive than the London average (£295 and £365)^{lxviii}. Between 2003 and 2012 there were 3,335 sales of property valued at more than £2 million, which represents 8% of the total number of transactions in Westminster but accounted for more than 40% of value^{lxix}.

Figure 3.10 – Average property price in Westminster and the UK (2009-2017)



3.73 The 2011 Census showed that 30.5% of Westminster’s households owned their home (3.7% less than in 2001) while 39.7% lived in private rented housing (up 7.4% since 2001); 25.9% lived in public rented housing (a reduction of 3.1% over 2001) and 0.8% in shared ownership (an increase of 0.1% over 2001).

3.74 34,721 people whose main home is located in Westminster have a second address elsewhere in the UK or abroad, this represents 16% of all residents and is some indication of part-time occupation. This is higher than the London average of 11%.^{lxx} In September 2015 Council Tax records show that 1% of properties in Westminster were long term empty or vacant.^{lxxi}

- 3.75 In September 2015, older people/physical disability services supplied by the council supported 4,480 people in the community.^{lxxii} Some 40% of older people aged 65 plus live alone in Westminster.^{lxxiii}
- 3.76 The current tenure profile of Westminster's older population shows a very balanced split between the principal tenures of social rented, private rented and owner occupied. Westminster differs from many other authorities, in that it has high levels of older residents in the private rented rather than in the owner-occupier sector. It is, perhaps, particularly significant that nearly a third of residents aged over 85 are in the private rented sector, as are a quarter of those aged between 65 and 84.^{lxxiv}
- 3.77 The Westminster Housing Market Analysis 2014 showed demand for all sizes of units in the private market (34% one bed, 36% two bed and 30% family sized units (3+ bedrooms)). The 2011 Census revealed that there is still an overcrowding problem, mainly focused in the north-west of Westminster. Those parts of Westminster with the highest concentrations of social housing and overcrowding are also those which suffer from deprivation.
- 3.78 There are 363 Houses in Multiple Occupation in Westminster, accommodating around 3,500 people.^{lxxv} It is estimated that there are 2,900 purpose built student rooms and between 1,300 and 3,000 properties privately rented by students in Westminster.^{lxxvi}

Issues and problems

- 3.79 Westminster's central residential market attracts interest from global investors as well as prime/super prime investors based in the UK. This helps enhance Westminster's global city role and the owners of these premises may help make a significant positive contribution to London's economy and by implication the UK as a whole.
- 3.80 Westminster has the second highest house prices in the country (the average price in June 2017 was over £1 million) and with a median household income in Westminster standing at £42,377^{lxxvii}, average house prices are 24 times the average Westminster household income. This makes provision of housing available at sub-market rents or prices particularly important. There is typically a waiting list of about 4,500 households 'in priority need' for social housing and a further 40,000 households who do not qualify for social housing and cannot afford market housing who are catered for by what planning policy terms "intermediate" housing.^{lxxviii} At present there is little provision meeting the needs of this very large group, which raises the particular risk of social polarisation and negative impacts on the local economy as people working here on average incomes increasingly cannot afford to live here. Providing affordable housing raises particular difficulties in Westminster, given its lack of surplus industrial or other vacant land that can be 'released' for housing, reflected in the relatively small number and size of strategic sites identified in the City Plan. This also means that what land is available is very expensive.

Residential development within Westminster is therefore typically small-scale and achieved through the sensitive redevelopment of smaller sites and refurbishment of existing buildings. However, in recent years there has been an increase in residential floorspace resulting from a change of use from existing office accommodation following introduction of permitted development rights to change from office to residential use for which Westminster's Central Activities Zone obtained an exemption in 2013. There have been 42 prior approvals granted for office to residential conversions outside of the CAZ since the introduction of these permitted development rights. Of these 42 prior approvals, five would have potentially triggered the affordable housing policy in the City Plan resulting in a requirement for approximately 31 new affordable homes had planning permission been required.

- 3.81 Housing plays an important role in the wellbeing of individual households and communities and in the shaping of neighbourhoods. This is reflected in the particularly high priority being given by the City Council to increase delivery of housing, and of affordable housing in particular.^{lxxix}
- 3.82 There is no identified need for provision of gypsy and traveller accommodation in Westminster.

Likely future conditions

- 3.83 The growth trends identified in this report suggest that there will continue to be a high level of demand for housing of all kinds in Westminster. The need for housing available at sub-market prices and rents is likely to remain high as those on even average incomes are likely to continue to find market housing unaffordable. At present, those on low and average incomes are poorly catered for and if left unaddressed this trend is likely to continue, with implications for the City's social cohesion, the success of its economy and provision of local services, as those working here increasingly cannot afford to live here.
- 3.84 The London Plan (January 2016) sets a minimum 10 year target for Westminster of 10,677 new homes for the period 2015- 25, an average of 1,068 per year.
- 3.85 Westminster's population is aging at a similar or slightly faster rate than the London average. If the existing trend continues in terms of the type of housing occupied by the older population there will be a need for more privately rented accommodation suitable for elderly residents including that need wheelchair-accessible accommodation. There are expected to be between 469 and 777 people requiring community supported housing in Westminster by 2030^{lxxx}. The London Plan has set an indicative strategic benchmark for Westminster to deliver 110 specialist housing units for older people each year between 2015 and 2015 (with a tenure split of 64% private sale, 18% intermediate sale and 18% affordable rented).^{lxxxi} The council has recently made clear its strong commitment to expanding housing provision, both through its renewal of

housing estates and through use of its planning powers. The policies in the new City Plan will provide a basis for implementing this commitment.

Environmental Conditions

Heritage, Design and Public Realm

- 3.86 Westminster has in excess of 11,000 listed buildings and structures. Its cultural heritage is unique also in a national perspective with regards to the exceptional quality of the heritage. Some 77% of its land area falls within its 56 conservation areas; of these, 46 have adopted conservation area audits. Westminster has 21 listed historic squares and gardens as set out in “Registered Parks and Gardens of Special Historic Interest”, which include the Royal Parks. Westminster’s 85 London Squares enjoy protection under the London Squares Preservation Act 1931. 20 listed buildings and places of worship in Westminster are currently on Historic England’s Heritage at Risk Register (2017). It also has one of London’s four World Heritage Sites designated by UNESCO: The Palace of Westminster and Westminster Abbey including St Margaret’s Church. Westminster’s World Heritage Site was inscribed in 1987 for its outstanding universal cultural heritage.
- 3.87 Eighteen of the 27 views identified in the London Plan are either to or from Westminster. It is crossed by five important viewing corridors, including those to Westminster’s World Heritage Site.
- 3.88 There are three scheduled ancient monuments in Westminster – The Jewel Tower and The Chapter House and Pyx Chambers in the Abbey Cloisters and Subterranean commercial ice-well, Park Crescent West). Following a recent review completed in 2017 the number of archaeological priority areas (APA) recommended in Westminster, with a known archaeological interest or particular potential for new discoveries, based on the National Heritage List for England (NHLE) register has increased from five to sixteen. The recommended 16 Archaeological Priority Areas will cover 61 % of the land area of Westminster. The APAs are identified in four tiers of significance, with Tier 1 (of national significance) representing 8% of Westminster.
- 3.89 Until very recently, there had been a steady increase in applications for basement extensions; in 2011-12 Westminster determined 182 applications (161 of these were approved). The City Plan was revised in 2016 to address concerns about the impacts of this form of development and there are indications that the numbers of applications have reduced as a result (from a peak of 295 residential basement applications in 2015/15 to 184 in January-November 2016). The basement policy set limits on depth and extent of excavation and introduced a range of additional controls and requirements aimed at mitigating the impact on the heritage, environment and local amenity. Westminster has also issued an Article 4 Direction making applications for planning permission necessary for all residential basements.

- 3.90 Westminster has a legacy of good quality accessible and secure streets. The Council has de-cluttered many streets by removing unnecessary street signs and barriers etc. and continues to de-clutter, especially as it is faced with new types of street furniture, such as new telephone boxes sited primarily for their advertising potential. Westminster's streets require maintenance and upgrading, and many city streets need frequent management to better enforce against badly sited tables and chairs and other clutter on the footway. Westminster also has an impressive collection of historic street furniture, much of it listed.

Issues and problems

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

different negative impacts of climate change, at city-wide and neighbourhood levels.

Likely future conditions

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

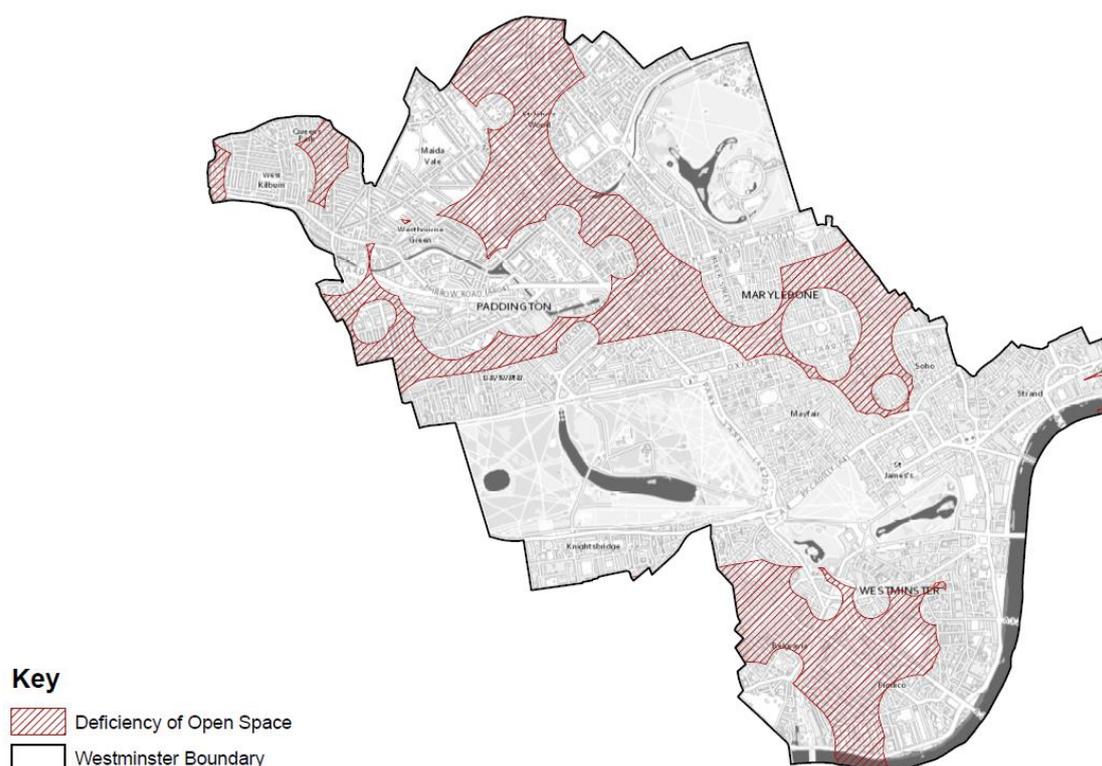
Open Space

- 3.99 The open space network in Central Westminster is different to that elsewhere in London. It includes the River Thames, canals, the Royal Parks and historic London Squares and a range of smaller spaces. Westminster has 436 hectares of open space in total, which amounts to 2.19 hectares per 1000 population. It should be noted, though, that with the considerable inflation in Westminster's population during the daytime (with visitors and workers included), provision effectively falls to around 0.4 hectares per 1,000 people during that time. This is lower than the London and national average, although this is to be expected given the intensely built up nature of the area and current land use.
- 3.100 Westminster contains five Royal Parks: Regent's Park; Kensington Gardens; Hyde Park; Green Park and St. James's Park, which cumulatively provide 250 hectares of centrally located open space. Apart from being protected for their heritage status, these are also designated as Metropolitan Open Land, and as

such have a protected status similar to that of the Green Belt. Together they comprise 89% of Westminster's public open space and it is estimated that 25 million people visits them per year.

- 3.101 Access to open spaces is essential for people's health and wellbeing. Apart from playing an important role for recreational, cultural and social values green, open spaces are important for improving air quality, preventing and mitigating flooding. They are also important as living spaces and stepping stones for wildlife and strongly contribute to the character of the neighbourhood, of Westminster and the capital.
- 3.102 Open spaces are also an integral part of Westminster's heritage and essential to its unique character. The Royal Parks and River Thames form essential elements of the settings of world famous landmarks such as the Palace of Westminster and Buckingham Palace and Westminster's open spaces feature in many of the protected views across the city. Over half of Westminster's open spaces have heritage designation, with 85 London Squares and 21 Historic England's registered parks and gardens of special historic interest, including the Royal Parks.
- 3.103 Also considered part of our 'portfolio' of open spaces is Westminster's waterways and waterbodies, forming part of London's Blue Ribbon Network. The Blue Ribbon is of strategic importance to London and includes the River Thames, Grand Union and Regent's canals, the Serpentine and the Long Water in Hyde Park and Kensington Gardens. These water elements also play an important role for Westminster's character and environmental qualities.

Figure 3.11 – Map of open space deficiency areas



Issues and problems

- 3.104 Despite having an impressive green network, given its location at the heart of a global city, Westminster has both an overall and localised shortage of open space, with some neighbourhoods being deficient in open space and in access to play space for children (see figure 3.11). The council seeks to protect and wherever possible increase its open spaces and green infrastructure, through its City Plan policies and strategic approach.^{lxxxiii} Areas of shortage in green assets will be prioritised.
- 3.104a Provision of large open spaces is inevitably a particular challenge in Westminster, with great pressure on land space. The Royal Parks provide the only metropolitan-scale public spaces in Westminster; they are therefore important in providing open landscapes and tranquillity amidst a busy, densely built up area and have significant heritage, ecological and natural conservation value. Beyond the Royal Parks (and with the exception of Paddington Recreation Ground), Westminster's parks are comparatively small in size.
- 3.105 Although Westminster has over 200 'parcels' of open space,^{lxxxiv} only 65% of this total space offers free access to the public^{lxxxv}. Many spaces offer restricted access to the public or are entirely private, including some of Westminster's most cherished and iconic open spaces which are privately owned.
- 3.105a Alongside public spaces, private open spaces are also vitally important for the well-known streetscene character of Westminster, making a major contribution to the ambience and attractiveness of the city for visitors and those who live, work or invest in Westminster.
- 3.106 Given this shortage of publicly accessible open space, in particular green space, and the difficulty in finding appropriate new sites, the protection of existing sites is especially important.
- 3.107 The health and wellbeing benefits, both mental and physical, of open spaces and having contact with nature are well documented. Accessible safe green space is shown in particular to reduce mental distress and depression in children. Access to a garden or living a short distance from green areas, as well as leading to improvements in the environment are associated with general improvements in mental health and wellbeing.^{lxxxvi}
- 3.108 Westminster's open spaces can often be in high demand to be used for public events. These can deliver a range of benefits to the local area, economy and community. It is important to ensure these are managed in ways that ensure the protection of those spaces as places for public enjoyment.

Likely future conditions

- 3.109 Open space is a finite resource and often its loss is incremental rather than through wholesale development. Policy intervention is important to guard

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

Other green infrastructure and biodiversity^{lxxxvii}

- 3.110 Westminster's total green infrastructure comprises parks and gardens including residential gardens, green corridors, pocket parks and small open spaces, street trees and living roofs and walls, roof terraces and balconies which individually and collectively provide habitat for a diverse range of species. Waterways provide important habitats for aquatic species – for example the Grand Union Canal (which is considered to be in generally healthy condition) supports fish species including bream, roach, perch, tench and carp and has been designated a 'good' status under the Thames Water Directive Framework.
- 3.111 Although it is densely developed Westminster has a diverse ecology. The following wildlife species have all been spotted in Westminster: robin, dunnock, blackbird, song thrush, starling, blackcap, tawny owl, stock dove, great spotted woodpecker, stag beetles, hedgehogs, five different species of bat, reptiles and amphibians, including frogs, toads and smooth newts. Some sites make a particularly significant contribution to supporting biodiversity, such as the wildlife garden in Regent's Park and the St John's Wood Local Nature Reserve (which has been recognised as one of the best small open spaces in inner London for birds).
- 3.112 The built environment itself is recognised as an important habitat for biodiversity. An increase in the number of living roofs and walls is having a positive impact on this.
- 3.113 Westminster has over 30 designated Sites of Importance for Nature Conservation (SINCs) all of which are to be protected and enhanced for their biodiversity and ecological value.

Issues and problems

- 3.114 Supporting the natural environment increases the number and quality of habitats, which in turn supports a greater population and range of animal, bird, insect and aquatic species. With great pressures on available land, providing additional habitats can be challenging, although much can be achieved even in smaller green spaces to support Westminster's wildlife. There are opportunities to support biodiversity as part of the development process

through design, provision of new green space and enhanced public realm and specialist provision for species on a site. Engaging the public can also be important, encouraging people to use their own gardens, balconies and window boxes to help protect biodiversity by choosing specific plant species for example. Residents and private businesses can also install bird boxes, bat boxes and so on.

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

Likely future conditions

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

Climate Change

- 3.117 Climate change is a global problem and the baseline is not local to Westminster. The Government's latest UK Climate Change Projections^{lxxxviii} suggest that by the 2050's London could see a 2.7 degree Celsius increase in mean summer temperature, a 15% increase in mean winter rainfall and an 18% decrease in mean summer rainfall over a 1961-1990 baseline.^{lxxxix}
- 3.118 The impacts of a changing climate in London are shown in the table below (taken from the Mayor of London's Climate Change Adaptation Strategy, 2011).^{xc}

Rising temperatures	Summers will be hotter. By the middle of the century, the average summer day is projected to be 2.7°C warmer and very hot days 6.5°C warmer than the baseline average. By the end of the century the average summer day is likely to be 3.9°C warmer and the hottest day of the year could be 10°C hotter than the hottest day today. Winters will be warmer, with the average, mid-century winter's day being 2.2°C warmer and a very warm winter day 3.5°C above the baseline. Very cold winters will still occur, but will occur less frequently.
Seasonal rainfall	Summers will be drier. By the middle of the century, the average summer is projected to be 19% drier and the driest summer 39% drier than the baseline average. By the end of century average summers could be 23% drier. Winters will be wetter. By the middle of the

	century, the average winter is projected to be 15% wetter and the wettest winter 33% wetter than the baseline average.
Tidal surges	Tidal surges are not projected to increase in frequency or height, except under an extreme scenario, where a 70cm increase has been projected.
Sea level rise	Sea levels are projected to rise by up to 96cms by the end of the century. An extreme projection of a 2 metre increase has been generated using the latest ice-sheet modelling published after the IPCC (Intergovernmental Panel on Climate Change) Fourth Assessment report.

Issues and problems

- 3.119 Climate change will significantly affect the way the city works and is experienced and will have major implications for the health and well-being of its people. These effects are likely to include heat-related health issues, flooding damage to buildings and infrastructure. But the indirect impacts upon cities can be much broader. Climate change will affect air temperature and quality, biodiversity, and the local micro-climate, exacerbating some and lessening others. There is likely to be greater attention to whether infrastructure (including social infrastructure like hospitals and schools) remains fit for purpose and requires adaptation or replacement to meet changing conditions. Creating well managed and used green spaces and building efficient community capacity will increase Westminster's resilience and improve quality of life.
- 3.120 Preparing for extreme weather and further climate change is about managing risks and increasing our resilience to them – it is therefore as much about the economy, quality of life and social equality, as about the environment.
- 3.121 Many of the vulnerabilities to climate impacts stem from London's 'urbanisation' – built up area absorb and retain heat. Because of its central location Westminster suffers disproportionately from the effects of London's 'urban heat island' (which is defined as an area significantly warmer than surrounding areas due to human activity). In central areas, this is exacerbated by the 24 hour nature of this part of the city. To ensure the well-being and health of Westminster's people it will be important that new developments are built in accordance with adopted sustainable design standards. Not only the buildings but the surrounding area should be planned and designed to minimise and mitigate any negative effects of climate change. Noise and poor air quality are also relevant to this issue as they increase reliance on air conditioning, which further contributes to localised heating effects, noise pollution and energy consumption.

Likely future conditions

- 3.122 Central London is already vulnerable to extreme weather, in the form of floods, droughts, heat waves and very cold weather. Westminster has already

experienced some changes to its climate including warmer wetter winters and hotter, drier summers and these trends are likely to continue (with what is currently experienced as a heatwave becoming a summer norm, for example) in the future. Extreme weather, such as heat waves and very heavy rainfall such as that experienced in early 2014 is expected to become more frequent and intense. Very cold winters will still occur, though they will become less frequent. Climate change is recognised as an increasingly significant challenge. Central London including Westminster is likely to suffer more regularly from the adverse effects of the heat island effect and be more susceptible to surface water and storm water flooding. As the climate changes it will be important to find ways of adapting to its effects, some of which may be unanticipated. It will also be important to ensure that steps are taken to mitigate future change, particularly by keeping future carbon emissions to a minimum.

Air Quality

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

pollution tend to be in areas of low density development or open spaces such as Hyde Park.

Issues and problems

- 3.127 Air quality has direct implications for human health. Research shows that poor air quality can reduce the quality of life by causing health problems, especially in those who are more vulnerable such as children, the elderly and those with pre-existing health conditions. There is considerable research showing a link between exposure to air pollution and effects on health and, importantly, for particulate matter – studies have been unable to identify a safe level at which there is no effect on health.
- 3.128 Studies show that poor air quality principally affects respiratory and cardiovascular systems with some initial symptoms being sore eyes and nose, itchy irritated throat, coughing and troubled breathing. There is also evidence that high levels of air pollution can trigger an increase in admissions to hospital and contribute to the premature death of those people that are more vulnerable to daily changes in levels of air pollutants. Pollutants have the following effects on health:
- PM₁₀ particles (10 microns diameter)
Clear evidence of a causal link to lung cancer, asthma, bronchitis symptoms especially in the young.
 - PM_{2.5} particles (2.5 microns diameter)
Clear evidence of a causal link to cardio-vascular disease, stroke, lung cancer, respiratory disease. Public Health England estimates it causes 3,389 premature deaths in London each year with children, women and those affected by deprivation affected more. These are also associated with cognitive impairment, Parkinson's, Alzheimer's, Type II diabetes and adverse birth outcomes.
 - PM_{0.1} particles (0.1 microns diameter)
There is probable evidence that this is the most damaging form of pollution for health, with no safe limit. They can penetrate the lungs, brain and other organs causing inflammation.
 - NO_x & O₃ gas
There is clear evidence that these cause respiratory disease at levels found in London and most UK and EU cities. Those suffering from cardio-vascular disease, chronic obstructive pulmonary disease and diabetes patients are particularly vulnerable.
- 3.129 A report on 'Long-Term Exposure to Air Pollution: Effect on Mortality' published in 2009 by the Committee on the Medical Effects of Air Pollutants (COMEAP) states that population life expectancy is shorter in areas of high pollution when compared to areas with less pollution.
- 3.130 The increasing push to more to electric vehicles would reduce pollution by removing particulates from exhausts. However, a significant amount of

pollution is also created by the wear of brake pads and tyres on the road. There will be a need to manage traffic levels and encourage more sustainable forms of transport of people and goods, for example reducing the number of commercial movements through use of measures like freight consolidation.

- 3.131 There is much less awareness about the significant contribution of emissions from buildings and construction to air pollution. Whilst some good practices have been developed (e.g. the Green Club in the Marylebone Low Emission Neighbourhood), emissions from buildings are not predicted to fall, unlike emissions from transport. It is therefore crucial for the Council to raise awareness of this both with residents and with businesses, and set and enforce high standards for development, construction and refurbishment to accelerate the improvement of the building stock in the city.

Likely future conditions

- 3.132 Improving air quality in London is a national and regional priority and the issue is likely to be given an increasingly high profile over the period covered by the new Plan. Tackling air pollution is one of the City Council's key priorities, highlighted in "City for All". This refers to publication of a Clean Air Strategy setting out a range of action to address the issue, including a campaign to stop vehicle idling. In 2016 the council launched an Air Quality Task Group to focus on collecting evidence to help build on its efforts to tackle harmful air pollution in central London. Westminster's population swells to over one million every weekday. This influx impacts both on energy use and transport services. In addition people are generally using more energy to heat their homes and water than in the past. Actions to improve air quality may have helped mitigate some of the impact that population growth may have caused, but there has been only very little improvement to overall air quality and, given the predicted increases in population, more needs to be done in order to meet the national objectives.
- 3.133 The pressure on the streets of Westminster means that road transport emissions remain a key source of air pollution and CO₂ emissions, although emissions from transport sources have somewhat reduced in the last decade as engines become cleaner and the Low Emissions Zone was introduced across London in 2008. Pollution linked with vehicular traffic is expected to be further reduced with the introduction of the world's first Ultra-Low Emission Zone in 2020, which will comprise a large part of Westminster.
- 3.134 There is a growing need to find ways of managing growth in ways that protect and enhance the environment. Increasing development density can itself contribute to this, enabling use of shared facilities, reducing the need for vehicle movement while increasing the potential for cost-effective public transport. There will be a need to ensure that design and construction of new development goes further, ensuring emissions from domestic, commercial and industrial energy generation and heating are kept to a minimum. This will be particularly important to the health and well-being of all Westminster's people,

particularly as a growing population could lead to higher numbers of people exposed to poor air quality, which may have significant health service implications.

- 3.135 The significant pressure to reduce emissions of greenhouse gases, particularly CO₂, is leading a drive for more renewable energy. Whilst increased use of renewable energy is to be encouraged, certain technologies and fuels such as biomass (e.g. wood pellets and chips) can have harmful consequences for air quality, and other emerging fuels such as liquid biofuels and biogas may have some currently unclear consequences for local air pollution.
- 3.136 The Mayor's Air Quality Fund (MAQF) currently supports a significant number of active projects and has encouraged more partnership working across boroughs. Westminster has engaged with the Mayor's sponsored "Clean Air Better Business" programme, initiated via the Cross River Partnership, involving collaboration between Business Improvement Districts (BIDs) and Central London boroughs. This has delivered projects such as cleaner walking routes away from polluted roads and green infrastructure improvements.^{xvii} In 2016 Westminster worked in partnership with local stakeholders and secured funding from the MAQF to create a Low Emission Neighbourhood (LEN) in Marylebone, an area-based scheme with a set of measures aimed at reducing transport emissions, encouraging sustainable ways of transport and improving air quality.

Flooding

- 3.137 Westminster's Strategic Flood Risk Assessment 2018 (SFRA) indicates the greatest risk of flooding is from surface water flooding. Westminster has an extremely high level of flood protection from fluvial and tidal flooding including the Thames Barrier and the Embankment wall. However, a residual risk exists from a breach of the flood defences.
- 3.138 In highly developed areas like Westminster, surface water flooding occurs when intense rainfall is unable to soak into the ground or enter drainage systems, because of gully or pipe blockages, breakages in water pipes or where drainage capacity has been exceeded. Westminster has experienced localised surface water flooding in the past (e.g. at Victoria Underground station resulting in its temporary closure). While there have been significant regional flooding events which have affected Westminster (e.g. the 1928 and 1947 Thames floods), the city has not suffered any past floods which had significant harmful consequences of a scale registered on a national scale (comparable for instance, to the summer 2007 and winter 2013/ 2014 floods). The SFRA identifies areas at the highest risk of surface water flooding. In these surface water flooding hotspots the potential impacts on people and property are the greatest.

Figure 3.12 – Map of Flood Zones

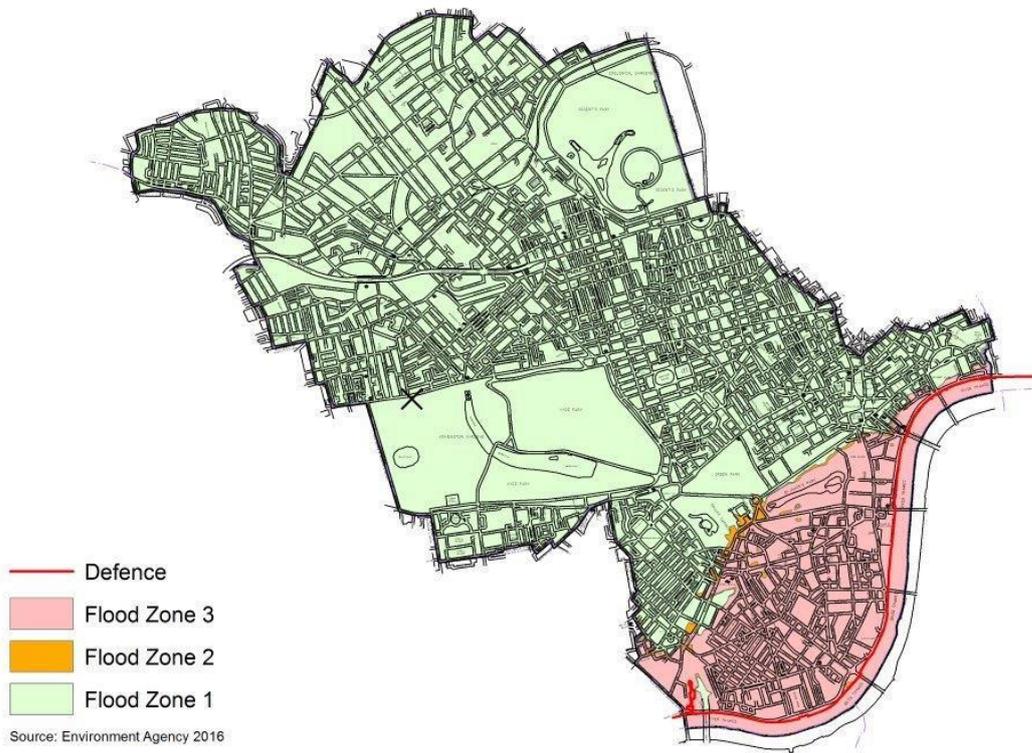
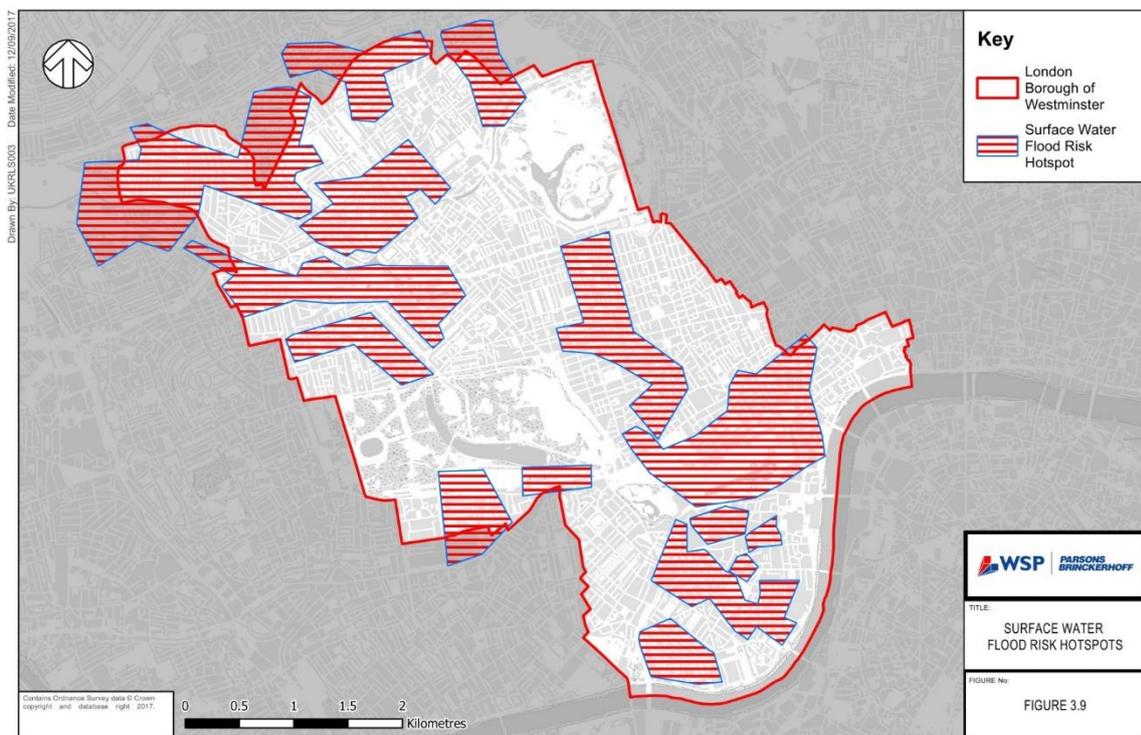


Figure 3.13 – Map of Surface Water Flood Risk Hotspots ^{xcvii}



Likely future conditions

- 3.139 Climate change projections indicate rising sea levels will have an impact on the risks of flooding from the River Thames. However, the Environment Agency is considering new approaches to flood defences that will protect Westminster (and London more widely) into the next century. The Thames Estuary 2100 Plan is the Environment Agency's plan to manage tidal flood risk in the Thames estuary up to 2100. The Thames River Basin District Flood Risk Management Plan 2015-2021^{xcviii} requires the Council to produce a local flood risk assessment and a flood risk management strategy. Westminster will continue to update its flood risk advice based on changes to flood risk management options.
- 3.140 Climate change predictions indicate increased volume and intensity of rainfall, which will result in greater risks of surface water flooding incidents as current drainage capacity is exceeded. The use of Sustainable Urban Drainage Systems² will become increasingly important to minimise surface water flooding and mitigate the impacts. Retaining existing open areas and permeable surface materials in the otherwise dense, urban context of Westminster as well as increase planting is of utmost importance to minimise and mitigate increased summer temperatures as well as the risk for increased flooding.

Water

- 3.141 The River Thames is the primary source of water supply in London. Two thirds of London's supply is taken from the freshwater River Thames, a further 22% comes from the River Lee and the remaining 15% comes from groundwater. Westminster is located in Thames Water's London Water Resource Zone classified as 'seriously water stressed'.
- 3.142 The average consumption of water in Westminster in 2010-2011 was 166.5 litres per person per day, which is slightly lower than the 168 litres per day in 2000-01. The five year average for Westminster between 2006-07 and 2010-11 is 160.8 litres per day. All of these figures are significantly higher than the average water consumption figure for England and Wales of 150 litres per person per day.^{xcix} Nearly a quarter of Westminster households now have a water meter - an increase from 15% in 2000-01.^c
- 3.143 No major (Category 1)³ pollution incidents were recorded in Westminster between 2005 and 2010. One significant (Category 2)⁴ incident connected to sewage pollutants was registered in 2015.^{ci} However, 38 million tonnes of raw sewage are released into the Thames each year affecting water quality and biodiversity. Thames Water is constructing a Thames Tideway Tunnel – a

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

³ Category 1 – major, persistent, extensive or serious impact or damage to air, land, water, people, property, ecosystems, habitats and/or amenity

⁴ Category 2 – significant impact or effect on the environment, people and/or property

major sewer running underneath the Thames that will help tackle the problem of overflows from existing historic sewers and will protect the River Thames from increasing pollution.^{cii} As part of the proposals there is a worksite and long term creation of new public realm on the Victoria Embankment Foreshore. The Thames River Basin Management Plan provides evidence on how all waterbodies in the Thames catchment are currently perform (under the Water Framework Directive) and specifies objectives and measures to improve water quality in rivers, canals, groundwater and surface water bodies.

Issues and problems

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

Likely future conditions

- 3.145 Water is a precious resource (increasingly so as the population continues to grow and the climate change brings about drier summers) and therefore ways need to be found to reduce consumption. Water consumption per person will need to be reduced given pressures on supply from an expanding population and climate change; this will require both increased water use efficiency and increased water recycling. Planning policy will have a part to play by ensuring that new development is designed and built to make the most efficient use of water resources.

Carbon and Green House Gas Emissions

- 3.146 London's total emissions of CO₂ from domestic, industry/commercial and transportation sectors have decreased from 46,930 kilo tonnes in 2005 to 35,817 kilo tonnes in 2014. During the same period, Westminster's carbon emissions fell from 3,382 to 2,502 kilo tonnes. Westminster has some of the highest carbon emissions of any local authority area in the UK because of its built up nature and 24 hour activity. However, over the last few years Westminster has seen an 18% reduction in its emissions – but this is less than below the London average reduction of 37%. Unlike other parts of the country, Westminster's carbon footprint is not linked to large scale industrial activity, which can be more easily reduced. Rather it is the cumulative impact of many small occupiers, with approximately 75% of the emissions from the use of commercial occupiers, particularly electricity. This is much higher than the national average level for emissions from commercial and domestic buildings of about 37%^{ciii}

Issues and problems

- 3.147 With 2,502 kilo-tonnes of carbon emitted in 2014, Westminster has some of the highest carbon emissions in the UK, larger than that of other major cities such as Edinburgh and Manchester which are considerably larger in terms of area and population. Approximately 75% of Westminster's carbon emissions

come from the commercial sector (which includes office, retail and entertainment) and with 15% from domestic users and 10% from transportation.

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

Likely future conditions

- 3.149 Data produced by the Department of Energy and Climate Change for 2005 to 2014^{civ} indicate that the emissions of carbon dioxide from Westminster fell by 18% over this period; however much greater progress will be needed in future years if Westminster is to contribute to meeting regional and national carbon reduction targets and mitigating global climate change.

Heat and Power Networks

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

Issues and problems

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

Likely future conditions

- 3.152 The Pimlico and Whitehall district heating undertakings have the potential to be networked more widely and there are early opportunities in both the Victoria and Paddington Opportunity Areas, where it is possible to plan a network in at the earliest design stage. Whilst the Decentralised Energy Masterplan for Westminster^{cvi} concludes that most of the city is technically

and commercially viable for heat networks, it also recognises that public sector support will be essential to roll out a network over the less dense areas. This will help deliver carbon reduction, reduce fuel poverty and deliver local energy security, but significant decisions are to be made regarding the potential level of intervention by the Council.

Noise

3.153 In 2016/17 the council noise team received 17,598 complaints. The Westminster Noise Strategy (2010) identifies that average noise levels in Westminster are 62 decibels (dB) LAeq⁵ in the day (07:00 – 19:00 hrs) and 55.7dB LAeq in the night (23:00 – 07:00 hrs). This compares to WHO guidelines which say that in order to protect the majority of people from being seriously annoyed, the noise levels on balconies, terraces and outdoor living areas should not exceed 55dB LAeq for steady continuous noise in the day and 45dB LAeq and 60dB LAmax at night. Road traffic is the main source of noise, and it is the biggest cause for concern amongst residents. In 2016/17 most complaints were received in relation to noise originating from residential premises (over 40%), followed by noise incidents on streets (27.6%) and commercial premises (11.5%).^{cvii} The majority of complaints received in 2016/17 originated from the West End (354,000) and St. James's (244,000)^{cviii}.

Westminster's noise levels exceed World Health Organisation (WHO) guidelines. Noise can have a negative impact on sleep, learning and communication and generally lead to annoyance. The recent European WHO Night Time Noise Guidance document strengthens the link between high ambient noise and night time noise events with adverse health effects. The mixture of land uses and volume of vehicle and pedestrian movement combine to create a complex urban environment and the sound environment is intrinsic to this complexity. Activities in many parts of Westminster are 24 hour in nature which contributes significantly to the problem and means that the quiet night-time period is shorter in many parts of the city and comparably noisier than other cities.

Issues and problems

3.154 Addressing noise issues is particularly challenging in a densely-developed and intensively used urban environment like Westminster, and it will be important to ensure that policies manage growth in ways that minimise noise problems, particularly for those with particular sensitivity. In addition to health impacts on residents, noise can be a significant issue for businesses as well whether because it affects activities within a building or because development that brings more people close to uses like theatres that generate noise can make their functioning difficult. There will be a need to ensure appropriate and

⁵ LAeq Ambient noise is normally measured as LAeq. LAeq T is the equivalent A-weighted sound pressure level that gives the energy average of a fluctuating sound level measured over a specified time duration. LAmax. The maximum A-weighted, sound pressure for a discrete event or over a specific time period (LAmax T).

realistic standards to balance all these needs and to ensure protection of those parts of the city that are relatively tranquil. One approach being taken is encouragement of new technologies such as electric and hybrid vehicles which are generally quieter than other vehicles. An expansion in the use of other quieter technologies has significant potential to reduce noise levels.

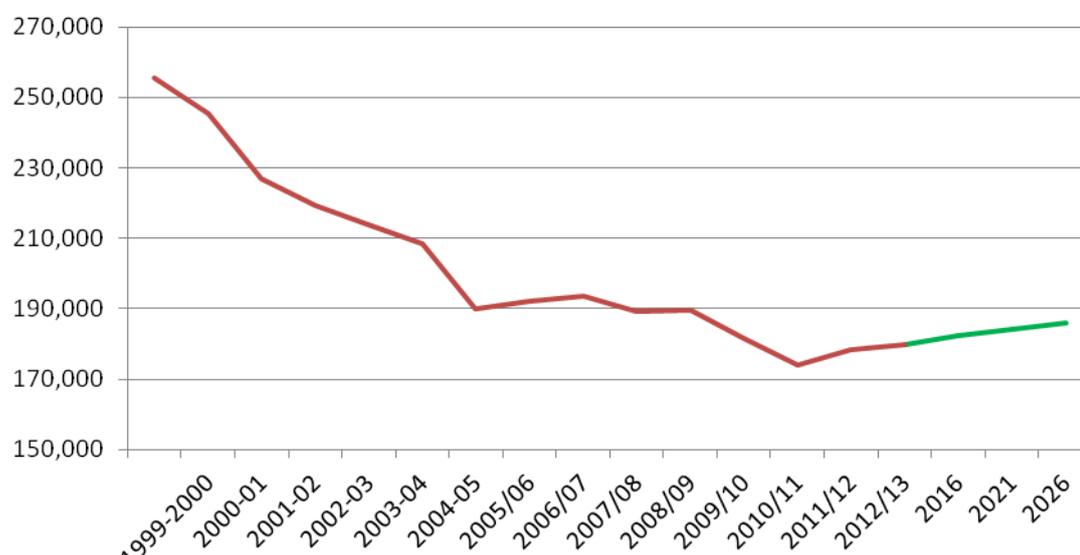
Likely future conditions

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

Waste

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

Figure 3.14 – Municipal Waste Management Tonnages (1999-2013 and projected to 2026)^{cx}



3.157 Most of Westminster's waste (82%) is transferred to Energy from Waste (EfW) facilities outside of Westminster, whilst 18% is recycled. No Westminster waste goes directly to landfill^{cxii}

3.158 Westminster does not itself operate any waste management or re-use facilities. The majority of waste is delivered to the South East London Combined Heat and Power (SELCHP) facility. Recyclables are delivered to a

Material Recycling Facility (MRF) in Southwark or to the Brent Waste Transfer Facility from where they are transferred to processors. The Brent Waste Transfer Station also accepts general waste when SELCHP is closed. Food waste is delivered to the Southwark Transfer station.

- 3.159 At 19% Westminster had one of the lowest household recycling and composting rates in London in 2016 (the London average is 34%). Although the percentage of recycling has increased from 7% in 2000/1, progress has been reversed in recent years, slipping from 25% between 2010 and 2012 to 19% in 2016/7.^{cxii} This reflects the high proportion of households (over 90%) living in flats.
- 3.160 Of the 95,000 tonnes of commercial waste collected in 2016/17, 16,000 was recycled. This represents 16% of all commercial waste collected and the majority (8,000 tonnes) of this was from co-mingled collections. The City Council aims to achieve a municipal waste recycling rate of 30% by 2020, 35% by 2025 and 40% by 2031.^{cxiii}
- 3.161 The construction sector produces the largest amount of waste in London^{cxiv}. On an average day more than 600 building projects are underway in Westminster. In 2016 200,000 tonnes of construction demolition and excavation waste was produced in Westminster, this is predicted to rise to 219,000 in 2036.^{cxv}

Issues and problems

- 3.162 Predicting the amount of waste generated in Westminster is particularly challenging as street cleaning and commercial services make up 60% of the municipal waste stream.
- 3.163 In London it is estimated that there is a need for 22 hectares of additional land in order to effectively manage waste.^{cxvi} The current London Plan has reduced Westminster's waste apportionment from previous estimates to^{cxvii}:
- 86,000 tonnes-in 2016,
 - 99,000 tonnes in 2021
 - 119,000 tonnes in 2026
 - 121,000 tonnes in 2031
 - 124,000 tonnes- in 2036.

The lack of available sites in Westminster means the Council has been unable to identify enough capacity within the borough itself to meet these apportionments.^{cxviii}

- 3.164 The management of waste contributes towards climate change. Throughout the various stages of its production, transportation, handling, treatment and disposal carbon dioxide and methane is released.

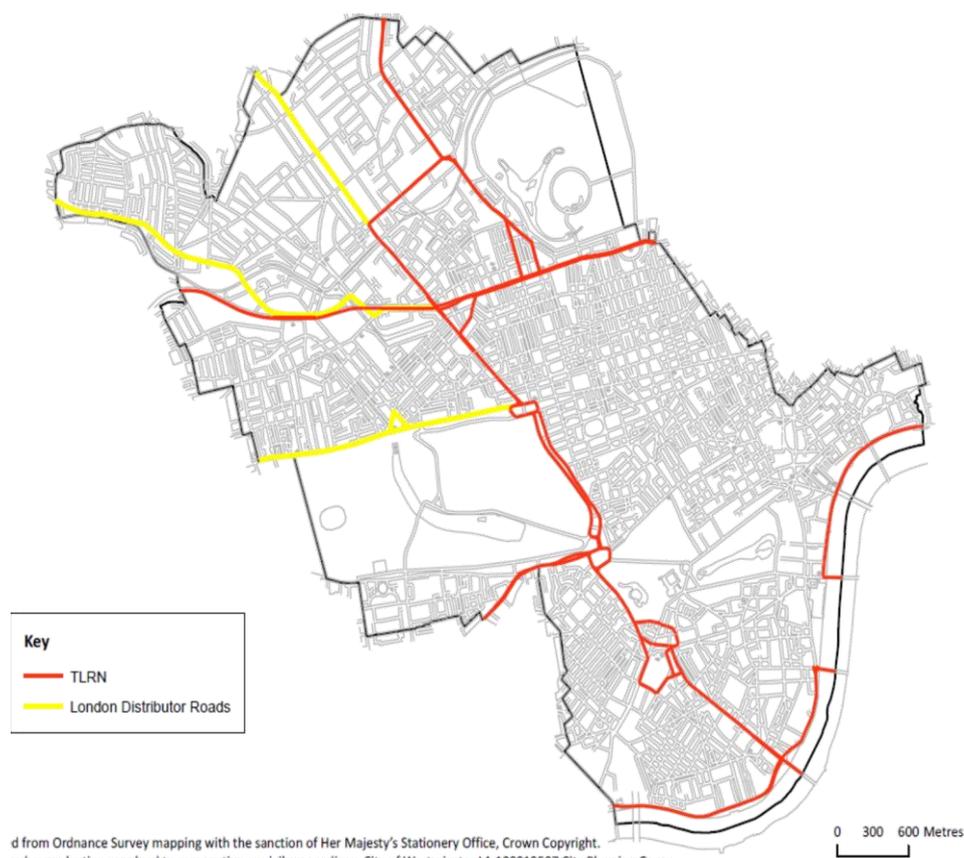
- 3.165 Methane is 23 times more potent than carbon dioxide as a greenhouse gas and is released as waste decomposes in landfill. Diverting waste from landfill to for example recycling and energy generation facilities is a key priority for all UK local authorities, and the Mayor has set a strategic policy for London to manage the equivalent of 100% of its waste within its boundaries by 2026.

Likely future conditions

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

Transportation and Pedestrians

- 3.168 Westminster is among the most comprehensively served locations by public transport in the country and one of the best served in the world. There are four main rail termini; 32 underground stations with 10 of the 12 tube lines running through the city, including all 5 night tube routes; 4 river bus piers with commuter services; 157 daytime, night bus and 24 hour bus routes; and 169 cycle hire docking stations. European, National and local express coach services also serve the city from Victoria Coach Station.^{cxx} In addition, the Elizabeth Line is due to open in 2020 which will add 10% to London's rail capacity and an extra 1.5 million people within 45 minutes of central London. Westminster will be served by three Elizabeth Line stations, which will provide step-free accessibility at all stations along this line.

Figure 3.15 – Westminster’s Road Hierarchy

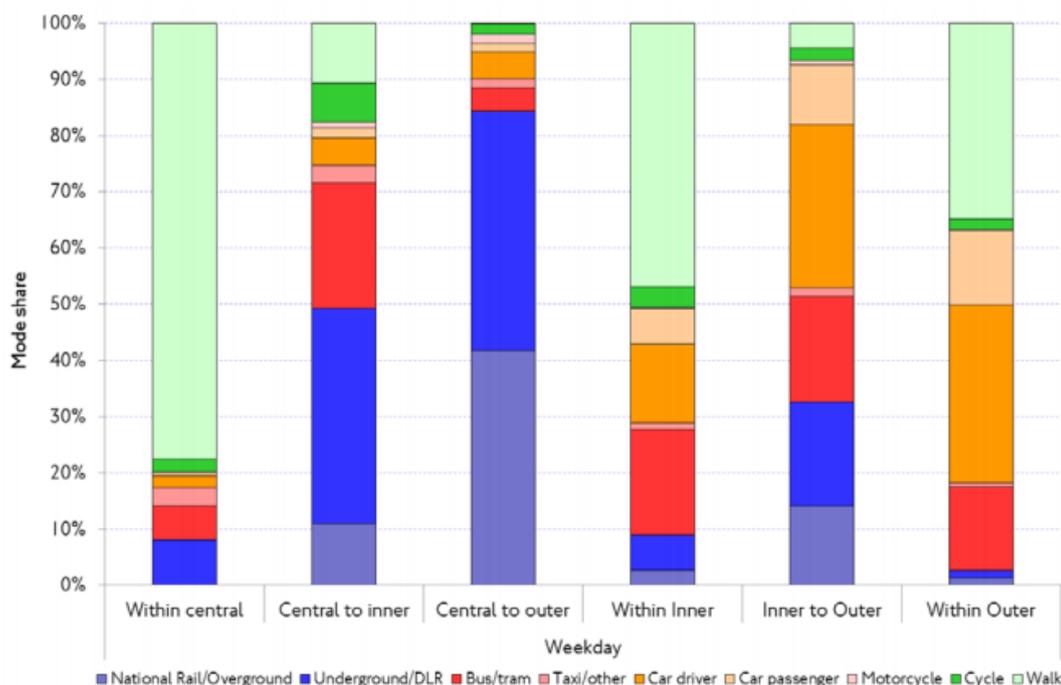
3.169 Westminster’s highway network consists of: 350kms of carriageway including 27.5kms of strategic roads managed by Transport for London (TfL), 623 kms of footway including 55km on strategic roads. Westminster’s position at London’s centre, with its unique mix of residential and commercial neighbourhoods, many of the country’s iconic visitor attractions and its dense pattern of development and economic activity means that there are competing demands for use of its highway space throughout the day and increasingly at night. For example freight and servicing makes up a quarter of central London weekday traffic; 150,000 taxi passengers use Oxford Street each day; 100,000 pedestrians pass through the West End during one hour at peak time⁶, which is far more than all other town centres in Westminster and across London^{cxxi}, and around 4 million vehicles enter the Congestion Charge Zone per month^{cxxii}.

3.170 In Westminster high numbers of people participate in active travel,⁷ with the percentage of people cycling to work higher than the greater London average.^{cxxiii} The modal share of journeys originating in Westminster is as follows: 40% walk; 23% use the Underground; 13% bus, 7% rail, 21% use a car or a motorcycle; 4% taxi and 3% cycle^{cxxiv}.

⁶ The count was undertaken during the course of one hour at peak time (between 3 and 4pm).

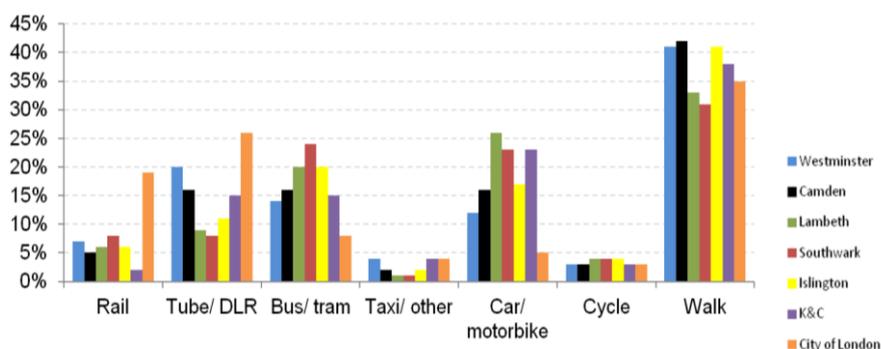
⁷ This is an approach to travel and transport focused on physical activity (walking and cycling) as opposed to motorised and carbon dependent means.

Figure 3.16 – Weekday mode share by trip origin and destination, LTDS 2012/13 to 2014/15 average^{cxxv}



Source: TfL Planning, Strategic Analysis.

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



Source – London Travel Demand Survey

3.171 In 2015, 45% of journey stages in London were made by public transport, compared with 32% by private transport.^{cxxvi} These figures reflect an established shift away from private motorised transport to the public transport modes. Between 2000 and autumn 2012 the average number of cyclists per day passing through central London increased significantly by 150%.^{cxxvii} Other changes since 2012 are likely to be slight increases in people using the Underground and taxi (with private hire vehicles). Rail use will also increase after 2020 once the Elizabeth line opens.

3.172 Car ownership has fallen across central and inner London in recent years. Car ownership in households in Westminster has fallen from 63% to 56% between 2001 and 2011 according to Census data, and in some areas like the West

End only 30% of households own a vehicle. This equates to 0.5 cars per resident, compared with 0.8 in London as a whole and 1.1 nationally. The use of cars in Westminster by its residents is 25% below the average for greater London and is the lowest rate in London.^{cxxviii} The relatively low car usage is particularly influenced by the relatively good public transport network, the densely built-up nature of the area and constraints on parking space at destinations in central area.

The council's on-street car parking stress surveys continue to indicate high demand for residential car-parking across the city. Partly this is due to the historic nature of the building stock here which means that many existing residents do not have access to off-street parking.

3.173 The on-street parking stock across the borough consists of^{cxxix}:

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

3.174 In 2013 264 kilo tonnes of CO₂ emissions emanated from all sources of ground based transport in Westminster.^{cxxx}

3.175 From 2017 all Westminster schools will have a Travel Plan in place which looks at ways in which pupils can be encouraged to walk or cycle to school.^{cxxxi}

3.176 Westminster typically has the highest number of road casualties in all London boroughs, which in 2015 involved a total of 1,808 casualties, which are categorised as follows: 4 fatal, 131 serious, 1673 slight^{cxxxii}.

Issues and problems

3.177 Westminster's function as a centre of business and government and its position at the heart of London's transport infrastructure requires the movement of people and goods on a large scale without delay. The transport system also gives access to shopping, entertainment and attractions for workers, residents, students and visitors. The existing transport networks within Westminster do not always meet these needs, which is not helped by the responsibility for transport in Westminster being shared between the

Council and a number of agencies and transport providers including TfL and the Department for Transport.

- 3.178 The high level of demand for transport together with the movement of people into and out of Westminster can have detrimental impacts on the local environment and the public realm for example congestion at popular interchanges such as Oxford Circus. The level of vehicle movement on Westminster's road network results in increased congestion and emissions leading to poor air quality and noise pollution in these locations. Westminster's location and the fact that highway management is split between the City Council and Transport for London requires joint work between agencies.
- 3.179 Sustainable transport options (encouraging walking and cycling in particular) are consequently very relevant for Westminster. The density of land use and movement means that many journeys are short and can be made by foot. Walking is considered by many as the best way to improve health. It helps to reduce traffic congestion, and hence air and noise pollution and may often result in quicker journey times. Prioritising pedestrian movement encourages improvements to the public realm, for example, by ensuring that proposals to place furniture or other objects do not obstruct safe and efficient movement or cause confusion to people unfamiliar with the layout of the city. There are a number of opportunities and challenges associated with the increase in cycling and this can be supported through a wide range of schemes and initiatives.
- 3.180 The concentration of commercial premises (office, retail and entertainment venues), interspersed with residential, and the dense historic urban fabric characteristics of Westminster create both opportunities and challenges in terms of servicing and deliveries, safety, noise and disturbance. Density of use offers opportunities for innovative transport schemes that do not risk the safety of other users of the highway or the public realm. Promoting safe and fuel efficient driving techniques for vehicles (e.g. no idling), including heavy goods vehicles, can also significantly minimise air and noise disturbance. There is also scope for shared facilities reducing the need for movements, such as freight consolidation centres.
- 3.181 Road safety is a significant issue within Westminster, with the highest number of casualties and fatalities in London. Pedestrians and cyclists are the most vulnerable users of the highway and there has been an increase in accidents resulting in fatal or serious injuries among these groups.
- 3.182 Parking is a complex and sometimes contentious issue in Westminster, requiring a balance to be struck between competing interests, in a location where land is limited.

Likely future conditions

- 3.183 The pressure on Westminster's transport network is going to increase, with a growing population and economy. The opening of the Elizabeth Line by 2020 will help to cater for some of this projected growth. It is estimated that the Elizabeth Line services will transport 200 million passengers each year. This is partly because it will enable an extra **1.5 million people to be within 45 minutes** of central London, **linking London's key employment, leisure and business districts.**^{cxxxiii} The Elizabeth line will stop at three stations in Westminster: Paddington, Bond Street and Tottenham Court Road. In the medium-term it is likely that the additional capacity brought by schemes like the Elizabeth Line and upgrades to London Underground services will be outweighed by additional growth-generated demand which will start increasing issues of congestion and crowding.
- 3.184 Crossrail 2 (a rail service linking south-west to north-east London and running through Westminster) is already subject to a safeguarding direction from the Secretary of State. In the autumn of 2015 TfL consulted on a preferred route, which crosses Westminster and would include stations at Tottenham Court Road and Victoria. In the 2017 election none of the political party manifestos provided support to fund Crossrail 2. It also did not feature in the Queen's Speech in 2017, however the Mayor of London remains committed to the project and has introduced a new CIL charging schedule to part-fund the line's construction. In July 2017 support for Crossrail 2 was expressed by the Secretary of State for Transport and the Mayor of London, announcing the next stage of consultation.
- 3.185 There is increasing concern about the environmental impact of transport. The most effective way to reduce CO₂ emissions from vehicles is to reduce congestion by changing to other modes. This can occur by creating more opportunities to enable Westminster's residents and visitors to walk and cycle, which also has potential health benefits. This could also lead to a reduction in congestion, which in turn may reduce carbon emissions and improve air quality. Other approaches include cleaning up vehicles by switching to electric cars, taxis and buses and by using car club vehicles. However, this is less effective as it maintains and possibly increases vehicles and hence congestion from other polluting vehicles, and about half of the electrical power used in electric vehicles is generated from carbon sources (like gas and coal).
- 3.186 The most significant future transport innovation is likely to be the introduction of autonomous vehicles. Driverless vehicles should result in distinct improvements in road safety and are much cheaper to use, which is likely to create new markets for transporting the young, the elderly, disabled and for convenience. They are also likely to reduce the need for car ownership and on-street parking, but will increase the volume of driving on the roads. As such, autonomous vehicles are likely to challenge and change all other modes of surface transport. In addition, the transition to driverless vehicles is unlikely to be a smooth series of improvements because it may easily result in higher levels of congestion, and possibly pollution, and more and/or different types of

accidents.

Annex IV – Plans and programmes

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

International

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

National

- Air pollution: Action in a Changing Climate (2010) *Department for the Environment, Food and Rural Affairs*
- Air Quality Standards Regulations 2010
- Ancient Monument and Archaeological Area Act 1979
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) *Department for the Environment, Food and Rural Affairs*
- Clean Air Act 1993
- Climate Change Act 2008
- Conservation Principles, Policies and Guidance for the sustainable management of the historic environment (2015) *Historic England*
- Crowded Places Guidance: The Planning System and Counter-Terrorism (2012) *Home Office*
- Design and Construction. SPG on the London Plan policies regarding environmental sustainability (2014)
- Energy Efficiency and Historic Buildings: How to improve energy efficiency (2018) *Historic England*

- Environment Act 1995 (updated 2007)
- Equality Act 2010
- Fixing our broken housing market (2017) *Department of Communities and Local Government*
- Heritage 2020: Strategic Priorities for England's Historic Environment 2015-2020 (2014) *Historic England*
- Historic Environment Good Practice Advice in Planning: 3 (2017) *Historic England*
- Housing and Planning Act 2016
- Integrated Security. A Public Realm Design Guide for Hostile Vehicle Mitigation. Second edition. (2014) *Centre for the Protection of National Infrastructure*
- UK plan for tackling roadside nitrogen dioxide concentrations (2017) *Department for Environment Food and Rural Affairs, Department for Transport, Scottish Government, Department of Agriculture Environment and Rural Affairs, Welsh Government*
- London Borough Environmental Fact Sheet (2011) *Environment Agency*
- National Planning Policy Framework (2018) *Department for Communities and Local Government*
- National Planning Policy for Waste (2014) *Department for Communities and Local Government*
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Planning Act 2008
- Planning and Compulsory Purchase Act (2004)
- Planning Policy for Traveller Sites (Updated 2015) *Communities and Local Government*
- Planning Practice Guidance (2014) (including revisions from 2015 and 2016)
- Secured by Design. Commercial developments (2015) *Official Police Security initiative*
- Secured by Design. Homes (2016) *Official Police Security initiative.*
- Seeing the History in the View: A method for assessing Heritage Significance within Views (2011) *Historic England*
- Tall buildings. Historic Environment Advice Note 4 (2015) *Historic England*
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) *Department for Environment, Food and Rural Affairs, Scottish Executive, Welsh Assembly Government and Department of the Environment Northern Ireland. Published by DEFRA*
- The importance of good design. Planning Practice Guidance (2014) *Department for Communities and Local Government*
- (The) Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning Note 3 (2015) *Historic England*
- Technical Guidance to the National Planning Policy Framework (2012) *Department for Communities and Local Government*
- Town and Country Planning (Local Planning) (England) Regulations 2012
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Annex V – Background to IIA Objectives

The establishment of appropriate objectives and associated more detailed sub-criteria⁸ is central to the assessment process. Together, these provide a framework that can be fairly easily used to test the likely effects of policies in Westminster's City Plan in delivering identified sustainable development objectives on a systematic basis. The sustainability issues set out in this section form the basis of the objectives.

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

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

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

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

Westminster's national status and position in the centre of London, its attractiveness to large numbers of workers and visitors and the intensity with which it is used around the clock means that crime (including terrorism) and anti-social behaviour are particularly important issues here. Section 17 of the Crime and Disorder Act 1998 (as amended by the Police and Justice Act 2006) places a responsibility on local authorities to exercise their various

⁸ The sub-criteria used for assessment is set out in the form of guide questions in the IIA Framework (Table 3 pp 72-74).

functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder. Crime, disorder and antisocial behaviour issues cut across a number of policy matters and can usefully be considered as an objective in the IIA.

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

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

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

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

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

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

standards need to be applied in new developments to mitigate climate change.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Annex VI – City for All and the IIA

The five programmes of City for All 2018/19 are linked to IIA objectives as follows:

City for All priorities	City for All objective	IIA objectives
1. City of opportunity Everyone should have the opportunity to build their lives, careers and families here.	We will deliver the most ambitious house building programme in the city for a generation. We are on track to deliver nearly 2,000 new council and affordable homes by 2023 and have identified sites for a further 2,000 homes.	3, 4
	We will roll out our #MyWestminster City Lions Programme for 13 to 16 year olds, making sure that young people from a variety of backgrounds have access to all of the opportunities the city has to offer.	1, 4, 16
	We will consult on and adopt a new City Plan, putting in place the biggest change in policy for a generation to support the building of more affordable homes and making sure residents are at the heart of all new developments.	1, 3, 4
	We will support 750 people into jobs per year. We also will make sure people have the best chance of finding work by ensuring our housing and children's services work together to enable parents to return to work.	4, 16, 17
	We will launch a new enterprise partnership bringing together businesses from across the city to shape a new economic development strategy.	16, 17
	We recognise that we have some of the best schools in the country. We will do all we can to make sure they continue to receive the support needed to maintain the highest standards.	1, 16
	We will work with businesses, residents, schools, colleges, and policy makers to build a new model of vocational education and, by 2020, launch a new city skills framework. This will support people develop their talents – and learn entirely new ones – from birth to well after retirement.	16
	2. City that offers excellent local services Westminster has a national reputation for providing excellent local, value for money services. We will continue to drive improvements, working with our	We will continue to invest in and maintain the highest standards in our outstanding children's services as rated by Ofsted.
By the end of 2019 we will license buskers and street entertainers to make sure that residents and visitors get the best experience, and that new performers have a chance to shine.		4
We will extend our Licensing Charter across the whole of the city, working in partnership with the industry to set the standards for how venues take care of the welfare of patrons and be good neighbours.		4
We have established the Housing Standards Task Force which has the dedicated job of making sure		3, 4

partners to make sure the city is safe, clean and well run.	private renters are protected from rogue landlords and unlawful nightly letting does not overrun the city.	
	We will ask all power and utility companies to sign up to a new protocol to coordinate works so our streets and traffic are not needlessly disrupted.	11
	We will deliver a step change in the quality of CityWest Homes customer service so that it is the standard that our tenants and lessees deserve.	3, 4
3. Caring and fairer city Caring and supporting the most vulnerable within our community is, and will always remain, our most important priority.	We have earmarked five schemes chosen by residents that will receive a combined investment of nearly £400,000 raised through our voluntary community contribution scheme. This will include helping rough sleepers off the streets at night, tackling loneliness and isolation across all age groups and supporting youth services.	1, 3, 4
	We will continue to support our new £6m state-of-the-art assessment centre, outreach services and accommodation for rough sleepers, helping people to get off the streets at night.	1, 3, 4
	We will be opening a new 84-bed home to provide specialist care for people living with dementia as part of a wider dementia strategy to support those and their families living with this difficult illness.	3, 4
	We will prioritise resources to support our most vulnerable children. We are offering a package of help to the 700 children with special education needs and their families, including a short breaks offer. We will pilot a new approach to tackling the root cause of exclusion from primary school, helping every child thrive in the classroom.	1, 4, 16
	We will consult on a new gambling policy, leading the way nationally on setting the standards for the industry and protecting the most vulnerable in our neighbourhoods by providing better regulation of betting shops across the city.	4
	We will fund a dedicated officer to support the work of our local neighbourhoods and the police to combat hate crime and discrimination as part of a new anti-hate crime strategy.	2
4. Healthier and greener city Children growing up and going to school in Westminster deserve a healthy start in life and to breathe clean air. We will work closely with partners including the NHS	We will deliver a new £1m Schools Clean Air Fund, giving schools the resources they need to tackle poor air quality.	9
	We will launch a new healthier schools programme, bringing together action on air quality, oral health and obesity to make sure the 42,600 children who live, learn and grow up here get the best start in life.	4, 9
	Our new four year ActiveWestminster strategy will ensure all our neighbourhoods have access to open spaces and sports facilities through developments like the new £28m Moberly Sports Centre.	1, 4, 15

<p>to encourage individuals and families to enjoy active and healthy lives, while we focus our resources on the support needed for the most vulnerable in our city.</p>	<p>We will launch a new Green for 18 campaign to raise awareness and make it easy to reduce our reliance on single use plastic. Westminster City Council has already banned single use plastic containers in meetings.</p>	6, 12
	<p>We will launch a new Recycling Information Hub and roll out five neighbourhood pilots including the expansion of our In It To Win It campaign, working with local neighbourhoods to achieve a step change in recycling rates across the city.</p>	12
	<p>We will expand our network of 165 electric charging points by 25%, making it as easy as possible for people to switch to electric vehicles.</p>	5, 6, 9, 11
	<p>We will plant 3,000 trees by 2020.</p>	4, 8, 9
	<p>We will expand #DontBeldle, setting the ambition for 1,000 businesses to sign up and play their part in reducing their own and their customers' emissions.</p>	4, 9
<p>5. City that celebrates its communities We are proud of Westminster's vibrant neighbourhoods and mixed communities. We want to make sure everybody has a stake in the city and can actively contribute to their community. Through our #MyWestminster programme, we celebrate the city's diversity and make sure local people are at the heart of every decision we make.</p>	<p>More than 3,000 people from all over Westminster celebrated the second #MyWestminster Day at Paddington Recreation Ground on 1 July, cementing it as a major annual event to celebrate the city's neighbourhoods.</p>	1, 4
	<p>We will continue the roll out of the #MyWestminster Fund, making up to £10,000 available to grassroots organisations across the city to help make a difference in their neighbourhoods.</p>	1, 4, 17
	<p>We will work with our neighbourhoods and businesses to make sure our valued EU residents remain welcome and the local economy continues to thrive as the UK prepares to leave the European Union.</p>	1, 16
	<p>We will work with residents to develop new proposals for the Oxford Street District, which includes the reduction of pollution levels, control of deliveries, protection of resident parking bays, ensuring traffic will not 'rat run' down residential roads and effective management of pedestrian areas and surrounding streets.</p>	1, 4, 9, 10, 11, 14
	<p>We will remove unwanted and misused phone boxes from our streets.</p>	14
	<p>We are consulting on a new markets strategy, listening to the views of residents, shoppers, visitors and traders on how we can keep the city's eight thriving local markets at the heart of local neighbourhoods. The new strategy will roll out in 2019.</p>	1, 4, 17
	<p>We are reforming the planning system so that, for the first time, members of the public will be able to speak at planning meetings. This is one of a range of measures to make the UK's busiest planning authority more transparent.</p>	1
	<p>We will retain and support Westminster's libraries at the heart of our neighbourhoods.</p>	1, 4

	We will introduce a new licensing policy by 2020 to ensure that Westminster remains a major night time destination, balancing the needs of residents, visitors and businesses.	16, 17
	We will introduce 20mph speed limits where residents tell us they want them.	1, 4, 11

Annex VII – SEA Compliance

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

Table VII.1 Compliance with the SEA Directive

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

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 2, Section 1.5
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Section 4
10. A non-technical summary of the information provided under paragraphs 1 to 9.	Non-technical summary

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

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

Endnotes

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- ^{viii} The Santander UK Town and City Index (2013)
- ^{ix} Non-domestic rating: business floorspace (2016) *Valuation Office Agency*
- ^x Global Prime Office Rents (March 2017) *CBRE*
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- ^{xvi} Fortune Global 500 (2016) *Fortune.com*
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- ^{xix} Index of Multiple Deprivation (2015) *DCLG data modelled by Westminster City Council*
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- ^{xxvi} Westminster's Economy Developing Westminster's Local Plan Consultation booklet (2014) *Westminster City Council*
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