

Integrated Impact Assessment Scoping Report

Consultation Draft – Westminster City Plan Full Revision

August 2017



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www.westminster.gov.uk/revision-westminsters-city-plan

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Introduction

What is this document?

This document is an Integrated Impact Assessment (IIA) Scoping Report. It sets out a proposed set of objectives and indicators against which the council will appraise the environmental, social and economic sustainability impacts, and equalities, health, crime and disorder effects of the policies in Westminster's emerging City Plan. The council is seeking views on the appropriateness of these objectives and indicators.

This document is not an Integrated Impact Assessment Report – but forms the first stage in the preparation of an integrated impact assessment.

This revised scoping report takes account of changes in baseline information since its previous IIA Scoping report, as well as a new Joint Health and Wellbeing Strategy for Westminster (2017-2022) and updated Equalities Objectives (2016-2020).

This scoping report has been prepared as part of stage one of the Integrated Impact Assessment (IIA) process for the Westminster City Plan Full Revision. Once adopted, the new Plan will include both strategic and development management policies.

Best practice for assessments of this kind is to use an iterative approach drawing on earlier assessments. In this case, an IIA Scoping Report for Westminster's City Plan: Strategic Policies was published in 2014 with consultation between 17th June and 30th July 2014. This took account of changes in market conditions, new evidence and trends which were set out in a series of policy topic-based consultation booklets (see part 1 of this document for further information). This in turn updated the IIA Scoping Report published for consultation between 4 October 2012 and 9 November 2012 in respect of what were then Core Strategy principles.

This new IIA Scoping Report builds on comments received from these previous stages, and from consultation associated with specific topic based revisions to the City Plan undertaken in 2016 in respect of Basements, Mixed Use, Special Policy Areas and the Policies Map. It is an opportunity to refresh the scoping report drafted in 2014, updating the baseline information and identification of key issues – particularly new policy priorities at Westminster, a new UK government, and the decision to exit the European Union. It is also an opportunity to revisit statistics and data published as part of the Local Economic Assessment which set out the context for the City Plan revision. This new IIA Scoping Report will ensure a robust foundation for the Integrated Impact Assessment for the Westminster City Plan Full Revision.

Scoping

This report presents the proposed methodology and baseline information for carrying out the IIA for Westminster's City Plan. It includes:

- An overview of the **Westminster City Plan**;
- The Integrated Impact Assessment **approach**;
- The key **baseline information** and identification of **key issues**;
- The **plans, programmes and strategies** relevant to the review;
- The proposed **objectives** and **IIA Assessment Framework**;
- Next steps in the process.

The IIA Assessment Framework is the methodology which will enable the environmental, social and economic sustainability impacts and the equalities, health, crime and disorder effects and the policies in Westminster's City Plan to be analysed, compared and critically assessed on a systematic basis. This scoping report aims to provide sufficient information on the proposed approach and seeks feedback to help inform the ongoing preparation of the IIA. Table 1 details the five stage approach for the preparation of the IIA.

The IIA will fulfil the requirement for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) required by the Strategic Environmental Assessment Directive EC/2001/42 (SEA Directive). It will also provide the basis for the council to consider the equalities impacts to enable it to comply with the Public Sector Equalities Duty (section 149 of the Equality Act 2010). The IIA will also consider crime and disorder matters in accordance with The Crime and Disorder Act 1998 (as amended by the Police and Justice Act 2006).

Although not a statutory requirement a Health Impact Assessment will also be included in the IIA, as good practice, to help the council ensure policies, where possible, actively promote health gain for the local population, reduce health inequalities and do not actively damage health. This is particularly important in light of the Health and Social Care Act 2012 which transferred statutory responsibility for local population health improvement to local authorities, and the publication of Westminster's Health and Wellbeing Strategy 2017-2022.

This integrated approach avoids the need to undertake and report on separate assessments, reducing duplication of assessment work and helping those considering and commenting on the council's proposals to understand the proposed policies and their potential effects.

Table 1- Stages of the Integrated Impact Assessment (IIA)

Stage one Assemble the evidence base to inform the IIA and establish a framework for undertaking the appraisal (in the form of sustainability objectives).	Scoping Report – This Stage
Stage two Appraise the plan objectives and policies against the IIA Assessment Framework taking into account the evidence base. Propose mitigation measures for alleviating the plan’s adverse effects as well as indicators for monitoring the plan’s sustainability.	Appraisal Framework Assessment
Stage three Prepare an Integrated Impact Assessment Report documenting the appraisal process and findings.	IIA Report
Stage four Consult stakeholders on IIA Report.	IIA Report
Stage five Monitor the implementation of the plan including its sustainability effects.	Authorities Monitoring Report (AMR)

Consultation arrangements

This scoping report will be sent to the following organisations:

- Natural England;
- Environment Agency;
- Historic England;
- Greater London Authority;
- Central London and West London Clinical Commissioning Groups.

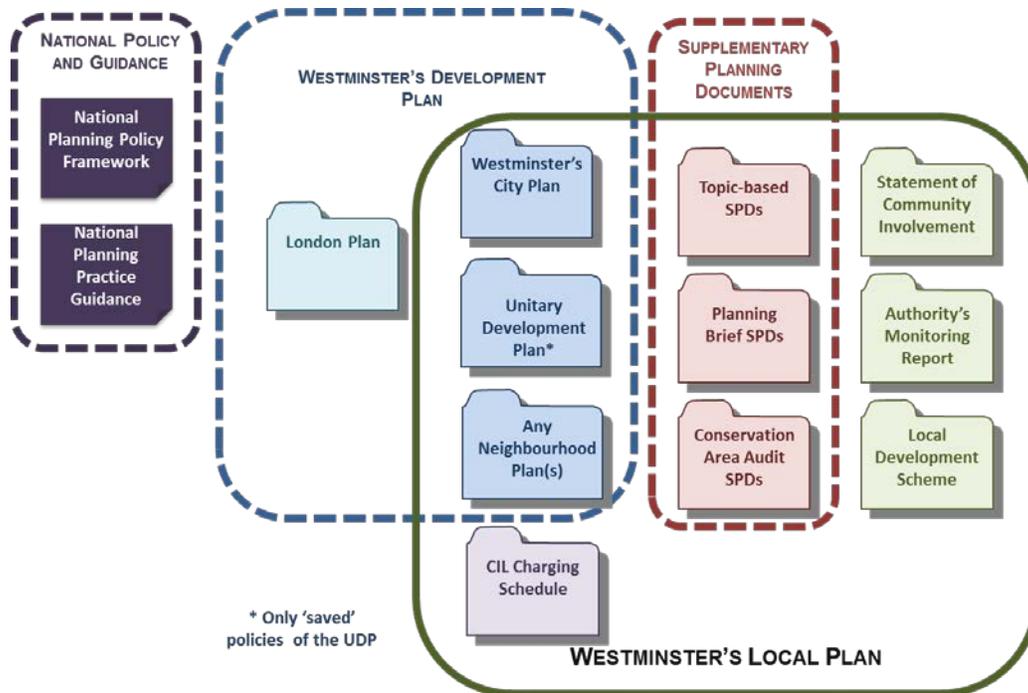
Natural England, the Environment Agency and Historic England are statutory consultees as set out in The Environmental Assessment of Plans and Programmes Regulations 2004.

The council will also send this report to neighbouring boroughs and the other bodies prescribed for the purposes of section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) to ensure it continues to meet its statutory duty to cooperate in the planning of sustainable development.

In addition the Scoping Report will be sent to all the other key contacts on the Westminster's Policy Framework Consultation database. It will also be circulated within the Council.

At draft IIA report stage all contacts including other general consultation bodies, relevant agencies and consultees registered on Westminster's Policy Framework Consultation database will be provided with a further opportunity to comment.

1. The Local Plan – Westminster’s City Plan



Westminster City Plan Full Revision

- 1.1 A single comprehensive local plan has been a long term aim of the council and it has been working towards this. Over the last twelve months, however, priority has been given to revisions in a number of discrete policy areas (basements, mixed use, special policy areas and the policies map) where there was a pressing need for change. It is now intended to move to a full revision that will pick up on the remaining subject-specific revisions previously programmed. [A formal notification, under regulation 18 of the Town and Country Planning \(England\) 2012](#), of the of the council’s intention to undertake a Full Revision to the plan was given on 16th June 2017, with consultation running until 28th July 2017. The Council’s [Local Development Scheme](#), also published in June 2017 sets out the proposed programme for the Full Revision. This replaces the previous version published in March 2015, which programmed a number of subject-specific revisions and which can also be downloaded [here](#).
- 1.2 Once adopted, the Westminster City Plan Full Revision will comprise a comprehensive, up-to-date statement of planning policy, covering both strategic and detailed development management policies. It will also identify “City management policies” where planning and other regulatory regimes will work together to deliver special planning objectives. This new plan will provide a sound basis for decision-making, ending the need for reliance on ‘saved’ UDP policies which currently provide the detailed development management policy framework. The above diagram shows Westminster’s current policy framework, for reference.

- 1.3 The revision builds on the series of topic based booklets published between October 2013 and March 2015. To reflect good practice in carrying out assessments of this kind, this document takes an iterative approach drawing on those prepared during earlier revisions. The next section provides an overview of Westminster’s plan process to date.

Topic Based Revisions 2015-2016

- 1.4 On 9th November 2016, the council formally adopted the latest version of [Westminster’s City Plan \(November 2016\)](#) which included the special policy areas and policies map revision, as well as the previously adopted basements revision and mixed use revision. These revisions made changes to Westminster’s City Plan: Strategic Policies. They were subject to an Integrated Impact Assessment at pre-submission and Submission Stages. The pre-submission and submission stage IIA reports associated with the special policy areas and policies map revision can be found [here](#), and those associated with the basements and mixed use revision, including a post hearing addendum to the IIA can be downloaded from the City Plan previous stages webpage [here](#).

Previous Stages: Strategic Policies

- 1.5 [Westminster’s City Plan: Strategic Policies](#), (adopted on 13 November 2013), set out the vision for Westminster up to 2025 and beyond and put in place a strategic policy framework to deliver that vision. This document was based on a review of the Core Strategy adopted in January 2011 and was fully reviewed and updated to ensure consistency with the National Planning Policy Framework (NPPF), and the London Plan published by the Mayor of London in July 2011.
- 1.6 This plan was the subject of an Integrated Impact Assessment; the report can be viewed [here](#). This built on The Core Strategy Sustainability Appraisal Report which included a Strategic Environmental Assessment (November 2009), which can be found [here](#) with associated appendices [here](#). The 2007 scoping report is available to view [here](#).

Previous Stages: City Management Policies

- 1.7 Work on developing the detailed city and development management policies began in 2008 as part of what was then called a “City Management Policy Review”. This work is now being integrated as part of efforts to produce a single local plan. The Council has undertaken an open approach to involving communities and stakeholders, with additional (informal) consultation stages during the document development process to provide opportunities for early and on-going involvement in policy development. The steps taken to date are as follows:
- [Regulation 18 - Notification of the intent to prepare the plan October/ November 2008 \(Statutory Stage\)](#)
 - [Consultation Workshops in the summer of 2009 \(Informal Stage\)](#)

- [City Management Plan Policy Options: January 2011 \(Informal Stage Consultation from January 2011 to March 2011\)](#)
- [City Management Plan Consultation Draft: November 2011 \(Informal Stage Consultation from November 2011 to March 2012\)](#)
- [Regulation 18-Notification of the intent to revise Westminster's Core Strategy to prepare a single local plan for Westminster May 2012 \(Statutory Stage\)](#)
- [Topic based booklets \(Informal Stage consultation from October 2013 – March 2015\)](#)

Previous IIA Scoping Reports

- 1.8 Each of these policy revisions was the subject of an IIA. An IIA Scoping Report for Westminster's City Plan was published in 2014 with consultation between 17th June and 30th July 2014. This can be viewed [here](#). This built on previous IIA Scoping Reports for Westminster's City Plan from 2012 - which focused on the city management policies - and from 2007, which was used in the Sustainability Report for the strategic policies in the Core Strategy and the IIA Report for the NPPF Revision to the Core Strategy (now known as Westminster's City Plan: Strategic Policies) from 2007 onwards. The 2014 Scoping Report included comments received in response to this previous consultation and was intended to provide a robust foundation for the Integrated Impact Assessment for both the detailed city management policies and any alterations to the strategic policies in Westminster's City Plan.
- 1.9 The IIA Scoping Report for Westminster's City Plan was subject to a five week consultation period between 4 October 2012 and 9 November 2012.

Developing Westminster's Local Plan Topic Based Booklets

- 1.10 Given significant changes to market conditions in Westminster, the results of the 2011 Census and other new information, a further round of informal consultation was started in 2013, with the publication of a series of topic based booklets. The booklets built upon the policy approach published in the City Management Plan Consultation Draft in November 2011, taking into account previous consultation responses and updating the draft policies to include the most recent data, new evidence and trends. Consultation on individual topic based booklets enabled a focused and engaged discussion on key issues. It also allowed issues to be dealt with on a topic basis, making the consultation more meaningful and manageable for consultees. The following topic based booklets were consulted upon over the period October 2013 – March 2015:
- Basements
 - Mayfair and St James's
 - Flood Risk
 - Housing Need, Delivery and Quality

- Westminster's Economy
- Food, Drink, Entertainment, Tourism Arts and Culture
- Social and Community uses
- Affordable Housing
- Mixed Use and Office to Residential Conversion
- Heritage, Views and Tall Buildings
- Design
- Health, Well-being and Personal Safety
- Planning and Pollution Control
- Open Space and Green Infrastructure
- Public Realm and Advertisements
- Transport and Movement
- Spatial Policy and Implementation
- Energy
- The West End

1.11 The booklets along with responses received can be viewed on the Council's [website](#).

The topic based revisions to the City Plan undertaken in 2015-2016 (see section 1.4 above) were based upon the policies consulted on through the corresponding booklets. The remaining booklets form one of the starting points for the Westminster City Plan Full Revision.

The London Plan

1.12 The Mayor is responsible for London wide strategic planning, including the preparation of his spatial development strategy (known as 'the London Plan'). The current London Plan was published in March 2016, consolidating all alterations to the 2011 version. These alterations comprise:

- Revised early minor alterations to the London Plan published in October 2013, to ensure consistency with the NPPF
- Further Alterations to the London Plan published March 2015
- Housing Standards minor alterations to the London Plan published March 2016 and
- Parking Standards minor alterations to the London plan published March 2016.

A new London Plan is expected by the end of 2019. Planning policies in Westminster must be in general conformity with the London Plan.

2. The Integrated Impact Assessment Approach

- 2.1 This section explains the approach the council is taking to the integrated assessment of emerging City Plan policies, how this sits with the various legal duties we have and how it carries forward our wider strategic priorities
- 2.2 The integrated approach avoids the need to undertake and report on separate assessments, seeks to reduce any duplication of assessment work and benefits from a shared, consistent understanding of the policies. The IIA incorporates the statutory requirements of a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). In addition to these requirements it will also explicitly consider equalities, community safety and health. This report also includes reference to the Council's corporate priorities as set out in City for All 2017-18 (March 2017) and how these relate to the IIA objectives (these are shown in Table 3 pp.71-73).
- 2.3 Under Section 19 (5) of the Planning and Compulsory Purchase Act 2004, a Sustainability Appraisal (SA) is required for all development plan documents, which include local plans. An SA should incorporate a Strategic Environmental Assessment for the purposes of the EU Strategic Environmental Assessment Directive EC/2001/42 and the UK Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.4 Annex 1 of the SEA Directive states that the assessment should include information on the *likely significant effects on the environment, including on issues such as;*
- (i) biodiversity;*
 - (ii) population;*
 - (iii) human health;*
 - (iv) fauna;*
 - (v) flora;*
 - (vi) soil;*
 - (vii) water;*
 - (viii) air;*
 - (ix) climatic factors;*
 - (x) material assets;*
 - (xi) cultural heritage, including architectural and archaeological heritage;*
 - (xii) landscape; and*
 - (xiii) the inter-relationship between the issues referred to in subsections (i) to (xii).*
- 2.5 Paragraph 165 of the National Planning Policy Framework states that:

A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

2.6 The Council has a statutory duty to consider the equality impacts of its decisions. The public sector equalities duty (set out in Section 149 of the Equality Act 2010) came into force on 5 April 2011. This extended the previous duties to cover the following protected characteristics:

age, disability, gender reassignment, pregnancy and maternity, race - including ethnic or national origins, colour or nationality, religion or belief - including lack of belief, sex and sexual orientation.

2.7 The equalities duty has three aims. It requires public bodies to have due regard to the need to:

1. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it and;
3. Foster good relations between people who share a protected characteristic and those who do not share it.

2.8 Having 'due regard' for advancing equality involves, in particular having regard to the need to:

1. Remove or minimise disadvantages suffered by people due to their protected groups;
2. Take steps to meet the needs of people from protected groups where these are different from the needs of other people; and
3. Encourage people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

2.9 The Equality Act 2010 also provides rights for people not to be directly discriminated against or harassed because they have associations with someone who has a protected characteristic.

2.10 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. Section 17 was amended by the Police and Justice Act 2006 to state that:

'Without prejudice to other obligations imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all it reasonably can to prevent: a) crime and disorder in its area (including antisocial behavior and adversely affecting the local environment); and b) the misuse of drugs, alcohol and other substances in its area'.

The City Council's strategic priorities in terms of Section 17 of the Crime and Disorder Act 1987 (as amended by the Police and Justice Act 2006) are set out in the Safer Westminster Partnership – Crime and Disorder Reduction Strategy 2011-14. The impact of reduction in crime and disorder in accordance with Section 17 will be considered by an assessment of each policy against Objective 2 (to reduce crime and the fear of crime) in the Integrated Impact Assessment Framework (see section 5).

- 2.11 While there is no statutory requirement to undertake a Health Impact Assessment (HIA), 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. The purpose of an HIA is to ensure that where possible, policies actively promote healthy living for the local population, reduce health inequalities and do not actively damage health. This is particularly important in light of the Health and Social Care Act 2012 which transferred statutory responsibility for local population health improvement to local authorities.
- 2.12 Westminster's Joint Health and Wellbeing Strategy (2017-2022) sets out long term goals to improve the health and wellbeing of Westminster's residents, workers and visitors (2013-28) and short term Strategy Priorities up to 2022 as follows:

Strategic Priorities (short term):

- Improving outcomes for children and young people
- Reducing the risk factors for, and improving the management of, long term conditions such as dementia
- Improving mental health through prevention and self-management
- Creating and leading a sustainable and effective local health and care system.

Long Term Goals:

- Improving the environment in which children and young people live, learn, work and play
- Helping more people to live healthily for longer and fewer die prematurely
- Helping to create a safe, supportive and sustainable city in which all are empowered to play as full a role as possible
- Helping to enable people living with injury, disability, long term conditions, and their carers, to have a good quality of life and remain independent for longer.

- 2.13 These long term goals will be considered in the context of those aspects of the built environment most likely to influence health in Westminster (see paragraph 6.4 for further detail) will be considered as part of the IIA Assessment Framework).

- 2.14 The City Council's corporate ambitions are set out in City for All 2017/18 which introduces three new priorities – civic leadership and responsibility, opportunity and fairness across the city and, setting the

standards for a world class city. In addition, five programmes have been agreed to deliver these priorities in order to make Westminster a sustainable place in which to work, live and visit. These five programmes are linked to IIA Framework objectives as follows:

(i) Civic Leadership:

- *Ensure that everybody believes they have a stake and future in the city and can actively contribute to their community. (IIA Framework Objectives 1, 16)*
- *Increase our support for the city's businesses by working closely with our excellent Business Improvement Districts. (IIA Framework Objectives 16, 17)*
- *Implement the recommendations of our Community Cohesion Commission, including launching the 'My Westminster' campaign to celebrate the diversity and vibrancy of our neighbourhoods. (IIA Framework Objective 1)*

(ii) Building Homes and Celebrating Neighbourhoods:

- *We are proud that a quarter of our housing stock is social housing and we want to continue to build cohesive mixed neighbourhoods for everyone in Westminster. (IIA Framework Objectives 1, 3)*
- *Deliver 1,850 affordable homes by 2023 to give families the chance to lay down their foundations. (IIA Framework Objectives 1, 3)*
- *Champion the 80,000 people who rent privately by making sure homes in Westminster are up to scratch with a city-wide review, using our powers to prevent rogue landlords from exploiting our residents. (IIA Framework Objectives 1, 3)*
- *Deliver our Health and Wellbeing Strategy, including developing accommodation for people with care needs to provide extra nursing home places and specialist services. (IIA Framework Objectives 3, 4)*
- *We will also open the new Moberly Leisure Centre, part of a £26m investment providing the best community sporting facilities for Westminster residents. (IIA Framework Objectives 4, 16)*

(iii) Creating a Greener City:

- *We plan to make Westminster a global example of how to tackle air pollution in a major world city, delivering cleaner air and widely prized open spaces. (IIA Framework Objectives 4, 5, 8, 9, 11, 15)*
- *We will launch our new Clean Air Strategy filled with measures to improve air quality in the city. (IIA Framework Objectives 4, 5, 9, 11)*
- *Take direct action by refurbishing City Hall to make it 45% more energy efficient and bring forward a new Sustainability Manifesto to set the green agenda in Westminster. (IIA Framework Objectives 5, 6)*

- *Build Westminster's reputation as an environmentally friendly city by bringing forward a new Open Spaces and Biodiversity Strategy to make sure the city's green spaces remain world class. (IIA Framework Objectives 6, 7, 8, 15)*
- *Create the first new play streets within the Marylebone Low Emission Neighbourhood, where children can enjoy playing without harmful emissions. (IIA Framework Objectives 1, 4, 9)*
- *Roll out the first green business club across Westminster, making it easier for businesses to make their buildings more energy efficient. (IIA Framework Objectives 5, 6, 16, 17)*

(iv) World Class Westminster:

- *Consult on what good growth for Westminster means, asking residents, businesses and all those with a stake in the city to contribute to how Westminster should look in the future. (IIA Framework Objectives 13, 17)*
- *Set out a clear vision and plan for our night time economy, to promote the interests of residents, businesses and visitors. (IIA Framework Objectives 4, 10, 16, 17)*
- *Introduce a Gig and Sharing Economy Charter that sets out the standards we expect this growing part of the economy to adhere to in the city. This will include scrutinising operators' enforcement of the government's 90-day maximum letting limit with a clear aim to reduce the anti-social behaviour impact it can have on our residents if not properly regulated. (IIA Framework Objectives: 4, 10)*
- *Put the first spade in the ground for Baker Street Two Way and Bond Street public realm improvements ensuring the city is ready and looking its best to greet the extra footfall expected in the West End following the opening of the Elizabeth Line. (IIA Framework Objective 14)*
- *Along with TfL we will be speaking to residents, businesses and visitors to help us shape the future of the Oxford Street district so that it remains the UK's best known shopping and entertainment destination. (IIA Framework Objectives 11, 16)*

(v) Smart Council:

- *Launch a new 'Report It' campaign to predict and proactively deal with developing trends on the day that they are reported to us. We will also use this new technology to enable residents to report on the negative impacts of the gig-economy and flag anti-social behavior to enable us to focus our enforcement more proactively. (IIA Framework Objectives 2, 4, 10)*

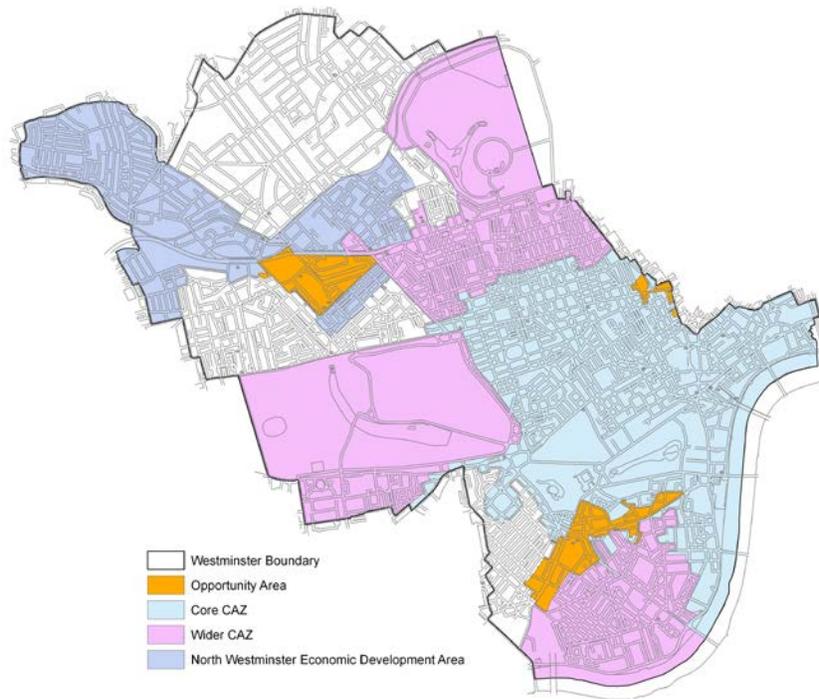
3. Baseline Information

The requirement for Baseline Information

3.1 An important part of the IIA scoping process is to set out the current conditions in Westminster. This information is a starting baseline to help 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 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.

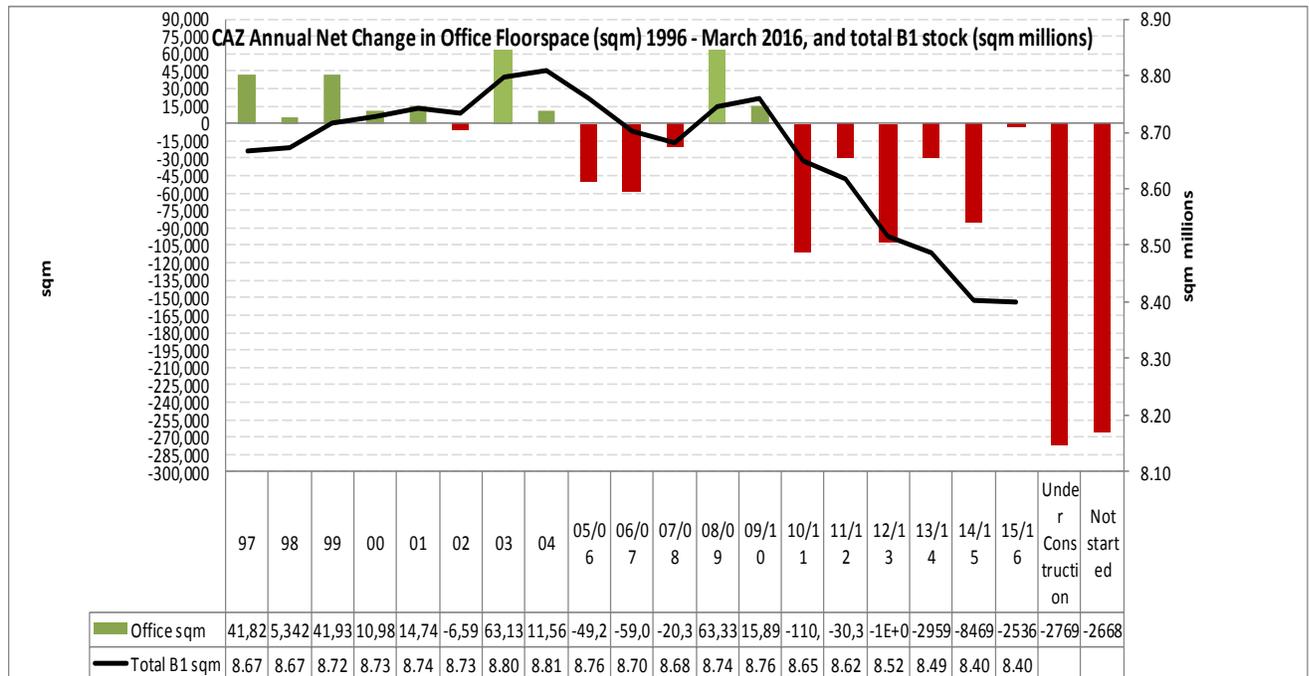
Beyond the services, Westminster is the centre of national government, which is reflected in the number of public sector employees in the city. Tourism and entertainment related industries are also significant employers and drivers of the economy, as is the world renowned retail sector in the West End. 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 and City Plans 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.

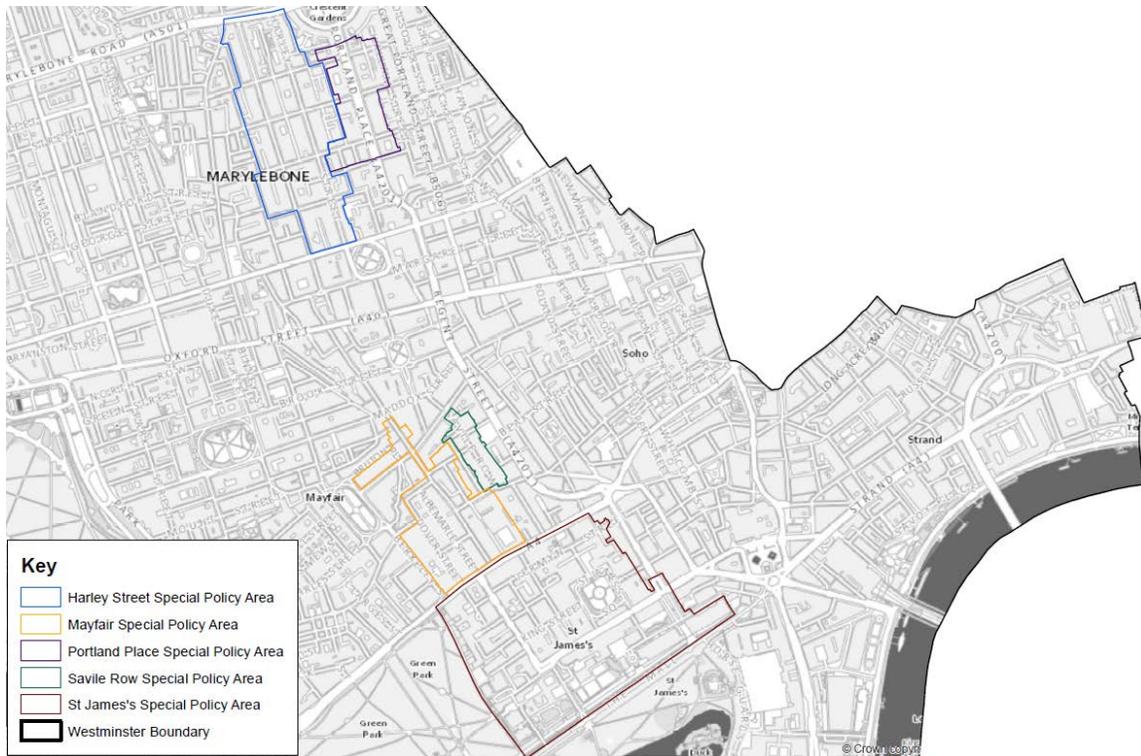
- 3.10 In March 2017 the West End was recognised as the fifth most expensive office market in the world (behind two markets in Hong Kong and two in Beijing) with highest achieved rents of £127 per square foot.^x
- 3.11 The demand for new space has come from occupiers including hedge funds, private equity 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

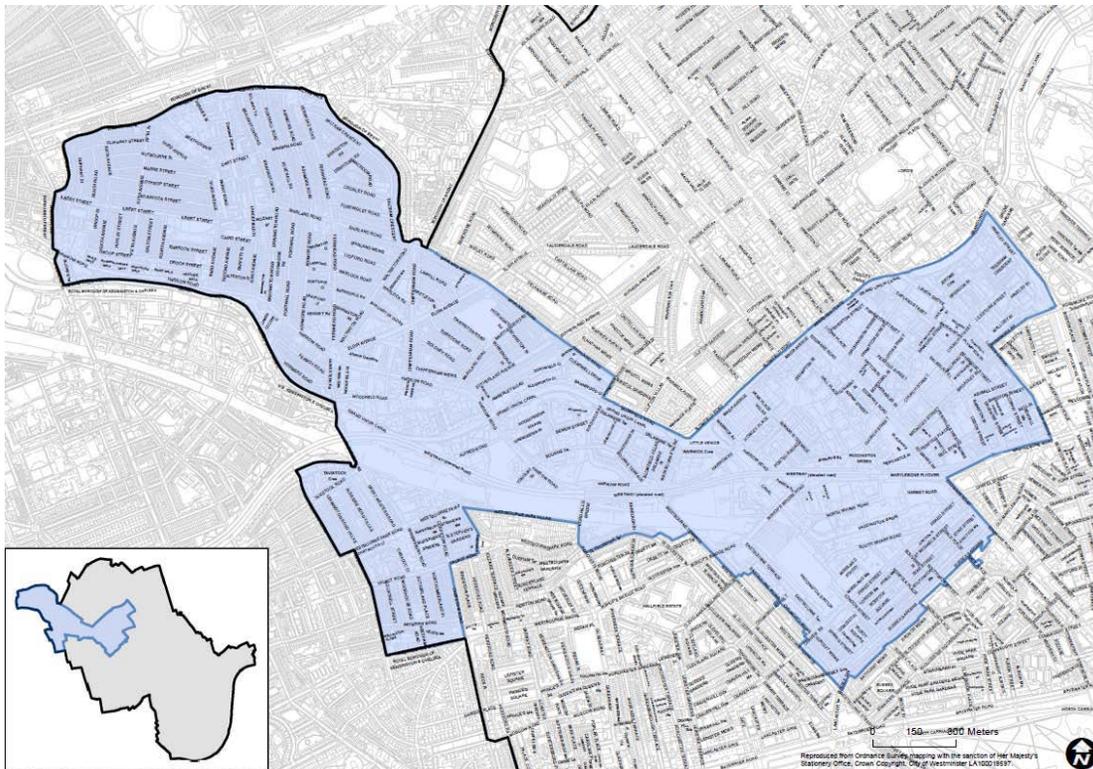


The North West Westminster Economic Development Area (NWEDA)

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 6 million shoppers visited the West End every week. Shop vacancy rates are low in the West End and most of Westminster. Prime zone A retail rents are amongst the highest in the world and continue to rise, currently achieving over £2,000 per sq ft in parts of the West End such as Bond Street.^{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 shopping 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, 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 scheme may be limited, there may be opportunities for mid and small scale developments. Careful adaptations across individual properties and modest property holdings will still be very important for the delivery of future growth in Westminster.

- 3.40 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. The results of the consultations will be used to inform the emerging planning policies and the future approach to growth in the borough.
- 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.

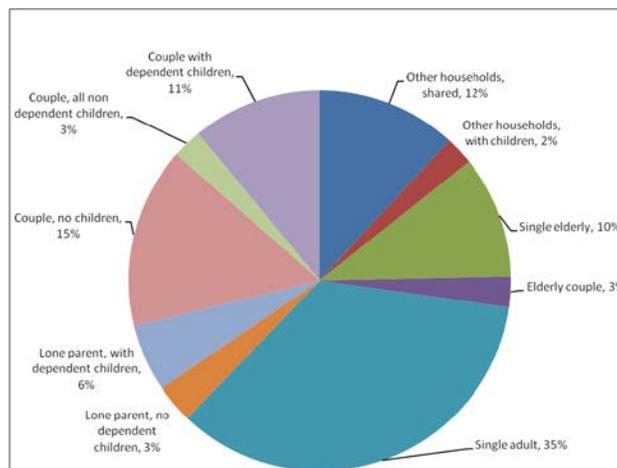
- 3.46 Overcrowding on the existing public transport system may impact on the desire of new businesses to locate in Westminster and may be off-putting for visitors who come to shop and use the entertainment facilities. While overcrowding may be partly addressed by the Elizabeth Line opening in 2018, 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)

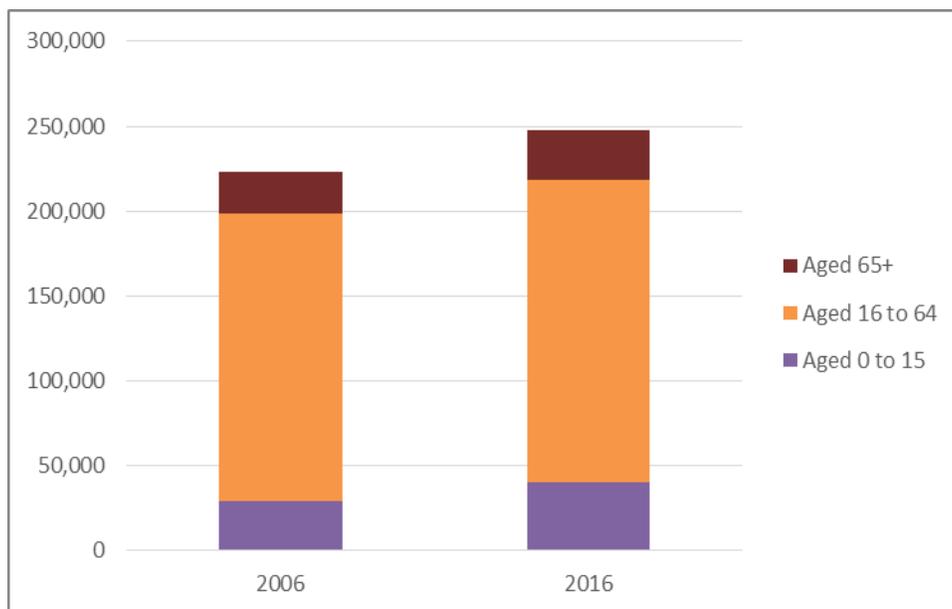


- 3.49 Single adults make up the largest proportion of households in Westminster, although there is a wide variety of household composition, with a cumulative total of 22% families with children^{xi}. Westminster has proportionally more working age people than London or England, a similar percentage 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 5th highest proportion in London^{xliii} (the London average is 37% and England 14%^{xliiv}). 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%).^{xliv} At least 140 different languages are spoken by residents of Westminster.^{xlvi} 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.^{xlvii}

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.^{xlviii}

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.^{li} 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^{liii} than a typical family household^{liiii}). 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

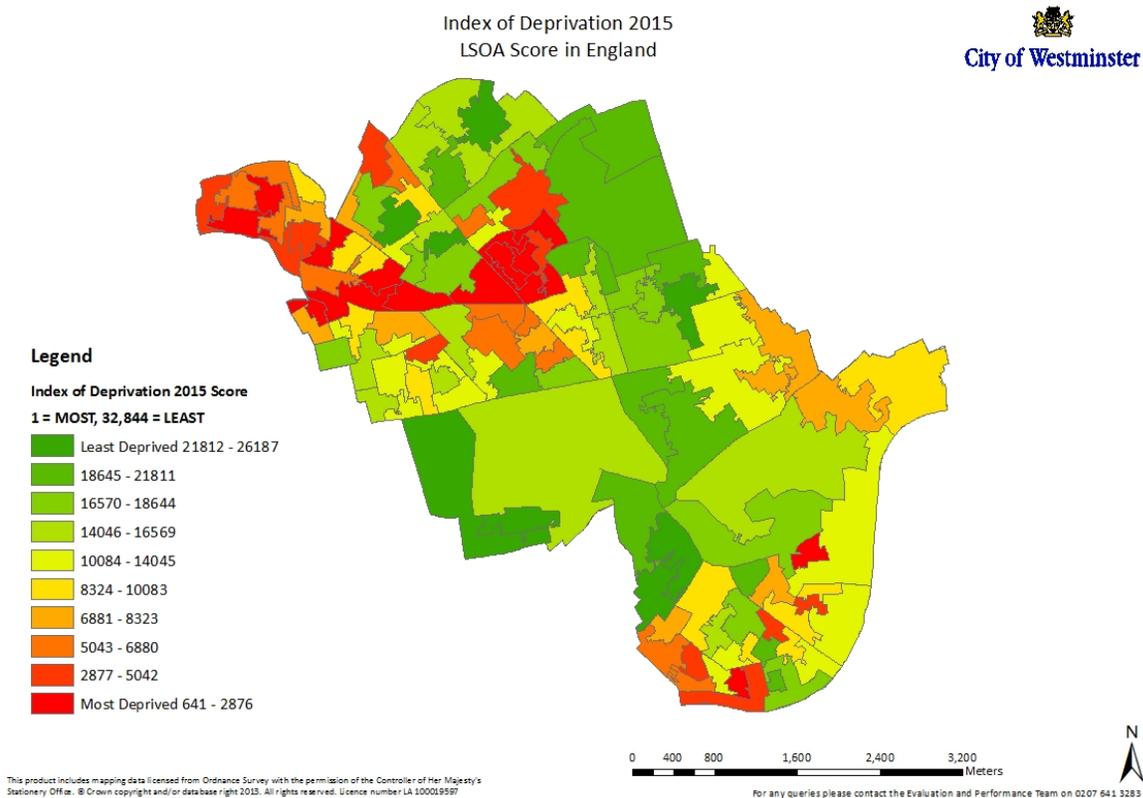
3.60 The Index of Multiple Deprivation (2015) identifies Westminster as the 57th most deprived of the 326 districts in England¹, from being the 87th most deprived Local Authority in 2010.

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.

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.^{lvi}

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}

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

- 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

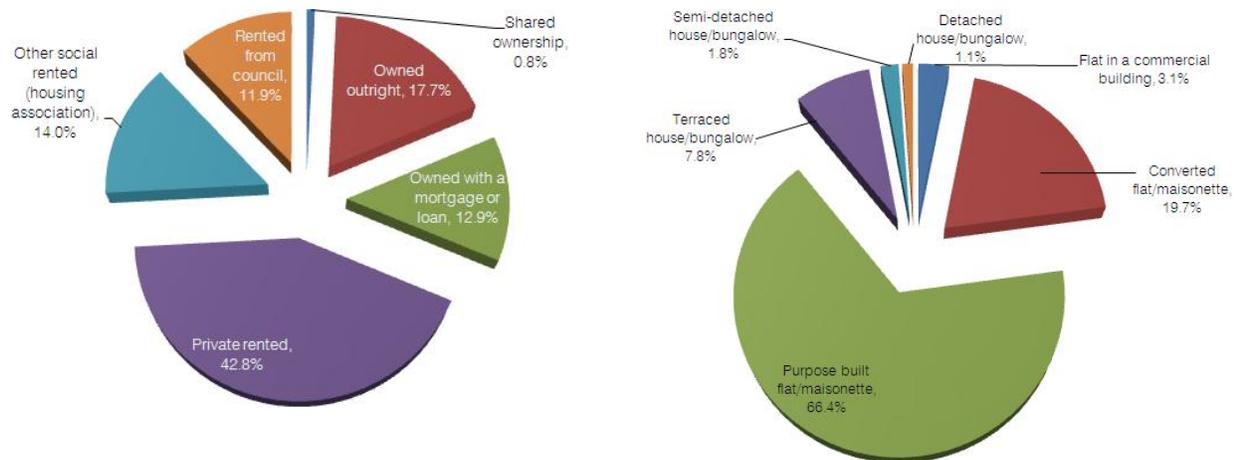
- 3.70 The built environment is a contributing factor affecting the health and well-being of a local population. For example access to play space, open space, education, shopping and transport choices (e.g. healthy food and safe pedestrian environments), safe and healthy working environment and low pollution 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

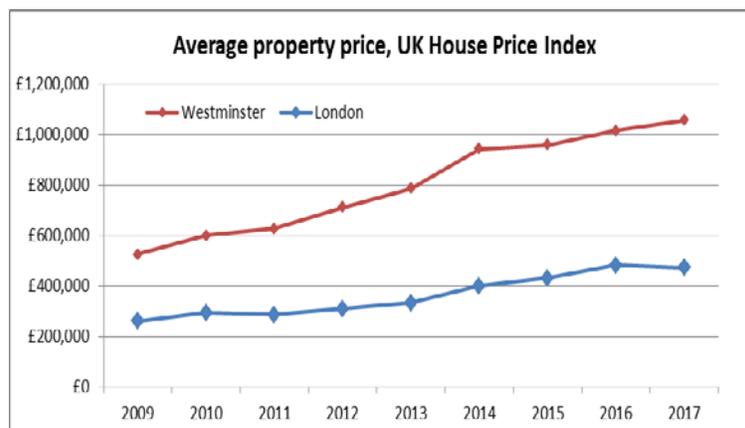
3.71 Westminster has approximately 122,020 residential properties; the majority of these are purpose built privately rented flats/maisonettes.^{lxvi}

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%.^{lxxx} In September 2015 Council Tax records show that 1% of properties in Westminster were long term empty or vacant.^{lxxxi}
- 3.75 In September 2015, older people/physical disability services supplied by the council supported 4,480 people in the community.^{lxxxii} Some 40% of older people aged 65 plus live alone in Westminster.^{lxxxiii}
- 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. Is it, 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.^{lxxxiv}
- 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 3500 people.^{lxxxv} 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.^{lxxxvi}

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^{lxxxvii}, 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.^{lxxxviii} 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”. Westminster’s 85 London Squares enjoy protection under the London Squares Preservation Act 1931. 23 listed buildings in Westminster are currently on the Historic England’s Buildings at Risk Register (BAR). It also has one of London’s four World Heritage Sites designated by UNESCO.
- 3.87 Seventeen of the 27 views identified in the London Plan are either to or from Westminster. It is crossed by five important viewing corridors, including those to Westminster’s World Heritage Site: the Palace of Westminster and Westminster Abbey including St Margaret’s Church. Westminster’s World Heritage Site was inscribed in 1987 for its outstanding universal cultural heritage.
- 3.88 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.
- 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 is 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.
- 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, whilst protecting the intrinsic historic character of Westminster. This could be assisted by specific information campaigns including the showcase of positive examples of how to best tailor retrofit activities for historic buildings of different types of construction. There is also increasing need to incorporate sustainable design measures into new build development to improve environmental performance, create a safe and healthy indoor environment and to minimize and mitigate different negative impacts of climate change, at city-wide and neighbourhood levels.

Likely future conditions

- 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 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 1000 people during that time. This is lower than the London and national average, although this is to be expected given the intensely built up nature of the area and current land use.
- 3.100 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

3.105 Although Westminster has over 200 ‘parcels’ of open space,^{lxxxiii} only 65% of this total space offers free access to the public^{lxxxiv}. 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.

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 publically 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.^{lxxxv}

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^{lxxxvi}

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^{lxxxvii} 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.^{lxxxviii}

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).^{lxxxix}

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 adaption 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^{xc}. However, all three concentrations exceed the World Health Organisation's annual mean guidelines^{xci}.

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%^{xcii} of all PM₁₀ emissions in Westminster, nearly

60% of NO₂ emissions and nearly two-thirds of PM_{2.5} emissions come from road transport.^{xciii}

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^{xciv} 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 move to electric vehicles would reduce pollution by removing particulates from exhausts. However, a significant amount of pollution is also created by the wear of brake pads and tyres on the road. There will be a need to manage traffic levels and encourage more sustainable forms of transport of people and goods, for example reducing the number of commercial movements through use of measures like freight consolidation.
- 3.131 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.^{xcv} 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 (SFRA)^{xcvi} 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.
- 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; the latest modelling identifies sixteen surface water flooding hotspots across Westminster where the potential impacts on people and property are greatest.

Figure 3.12 – Map of Flood Zones

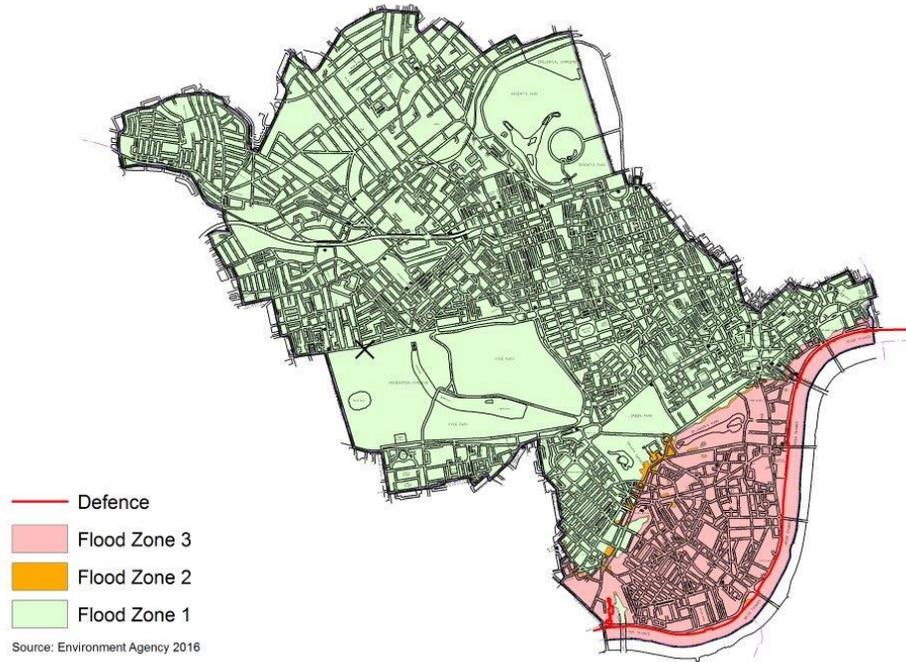
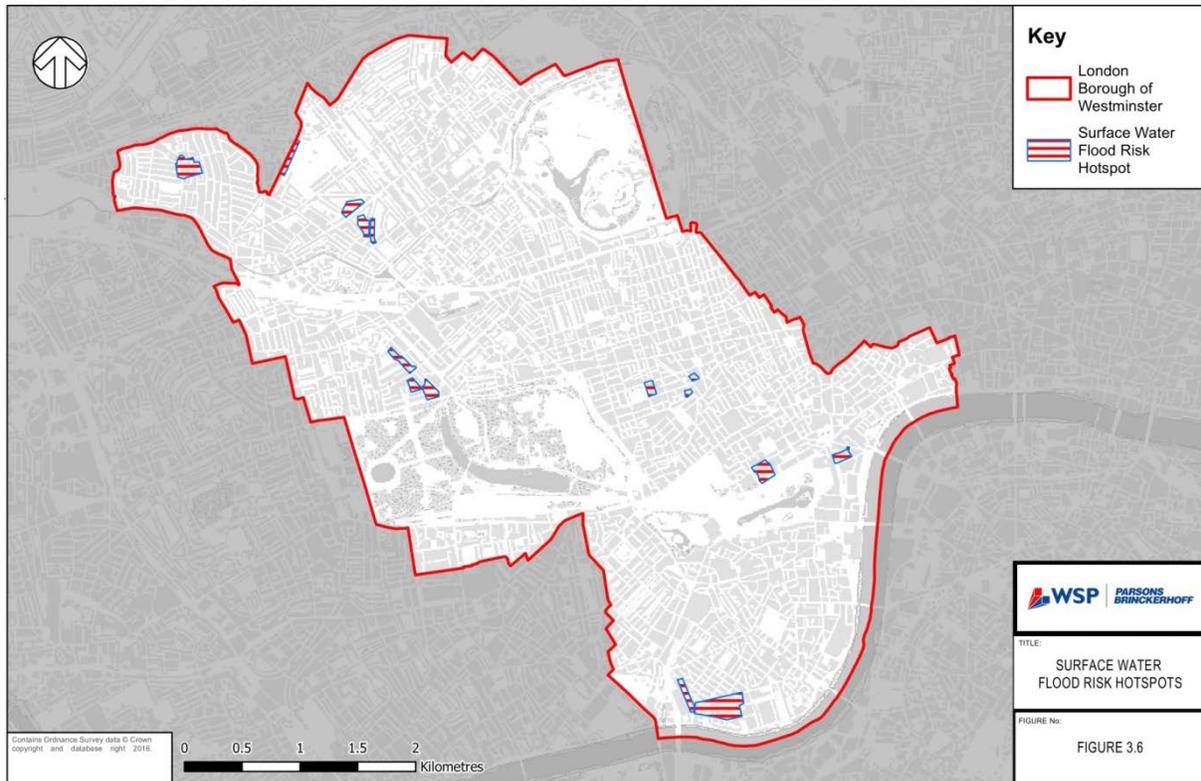


Figure 3.13 – Map of Surface Water Flood Risk Hotspots



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 River Basin District Flood Risk Management Plan 2015-2021^{xcvii} requires the Council to produce a local flood risk assessment and a flood risk management strategy. These are expected to be published in September 2017. 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 upmost 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.
- 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.^{xcviii} Nearly a quarter of Westminster households now have a water meter - an increase from 15% in 2000-01.^{xcix}
- 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.^c However, 38 million tonnes of raw sewage are released into the Thames each year affecting water quality and biodiversity. Thames Water is constructing a Thames Tideway Tunnel – a major sewer running underneath the Thames that will help tackle the problem of overflows from existing historic sewers and will protect the River Thames from increasing pollution.^{ci} As part of the proposals there is a worksite and long term creation of new public realm on the Victoria Embankment Foreshore.

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

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%^{cii}

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^{ciii} 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.^{civ}

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^{cv} 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

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. LAmx. The maximum A-weighted, sound pressure for a discrete event or over a specific time period (LAmx T).

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%).^{cv} The majority of complaints received in 2016/17 originated from the West End (354,000) and St. James's (244,000)^{cvi}.

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 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.

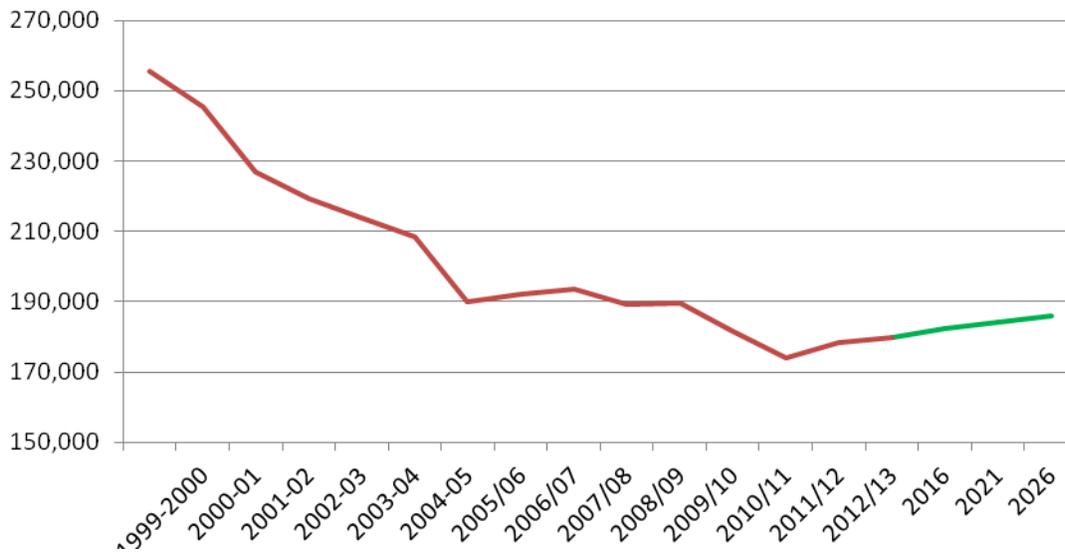
Likely future conditions

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.^{cviii} 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)^{cxix}



- 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^{cx}
- 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.^{cxix} 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 (8000 tonnes) of this was from commingled collections. The City Council aims to achieve a municipal waste recycling rate of 30% by 2020, 35% by 2025 and 40% by 2031.^{cxii}
- 3.161 The construction sector produces the largest amount of waste in London^{cxiii}. 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.^{cxiv}

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.^{cxv} The current London Plan has reduced Westminster's waste apportionment from previous estimates to:

- 86,000 tonnes-in 2016,
- 99,000 tonnes in 2021
- 119,000 tonnes in 2026
- 121,000 tonnes in 2031
- 124,000 tonnes- in 2036.^{cxvi}

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.^{cxvii}

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

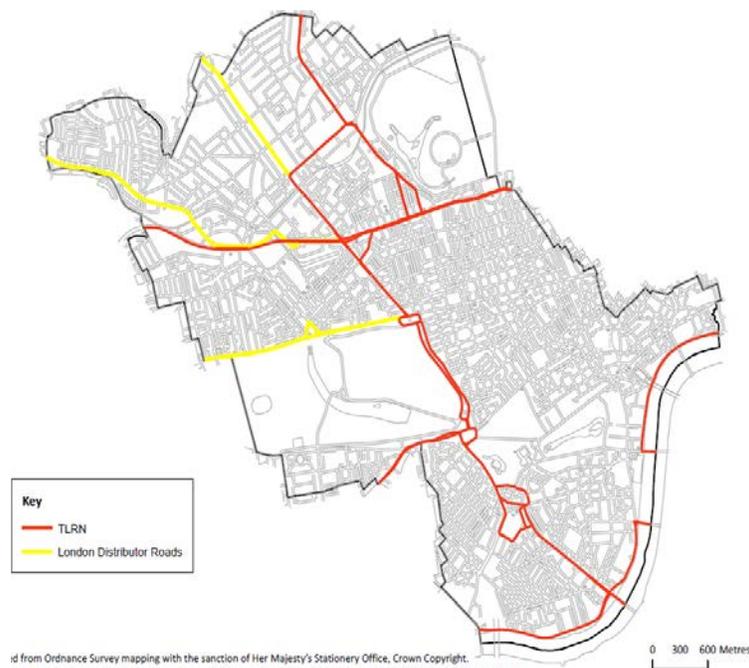
3.166 There remains a strong national and regional drive to increase municipal waste recycling rates but without intervention to compel higher rates of participation and capture recycling and composting rates are likely to remain broadly static. The Mayor of London aims to achieve net self-sufficiency 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^{cxviii}. 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.^{cxix} In addition, the Elizabeth Line is due to open in late 2018 which will add 10% to London's rail capacity and an extra 1.5 million people within 45 minutes of central London. Westminster will be served by 3 Elizabeth Line stations, which will provide step-free accessibility at all stations along this line.

Figure 3.15 – Westminster's Road Hierarchy

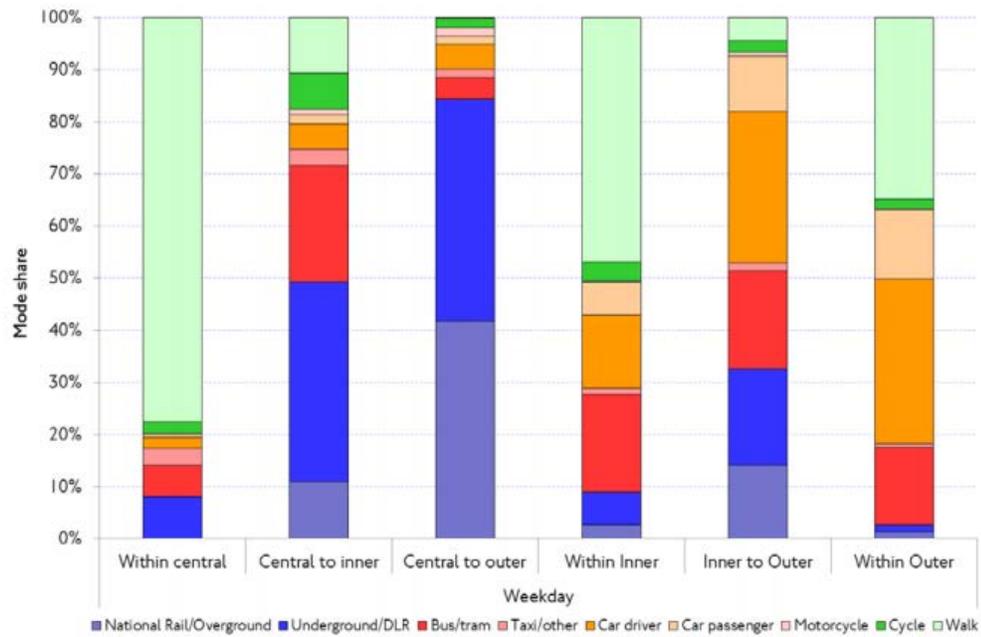


3.169 Westminster's highway network consists of: 350kms of carriageway including 27.5kms of strategic roads managed by Transport for London (TfL), 623 kms of footway including 55km on strategic roads. Westminster's position at London's centre, with its unique mix of residential and commercial neighbourhoods, 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 shopping centres in Westminster and across London^{cxx}, and around 4 million vehicles enter the Congestion Charge Zone per month^{cxxi}.

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

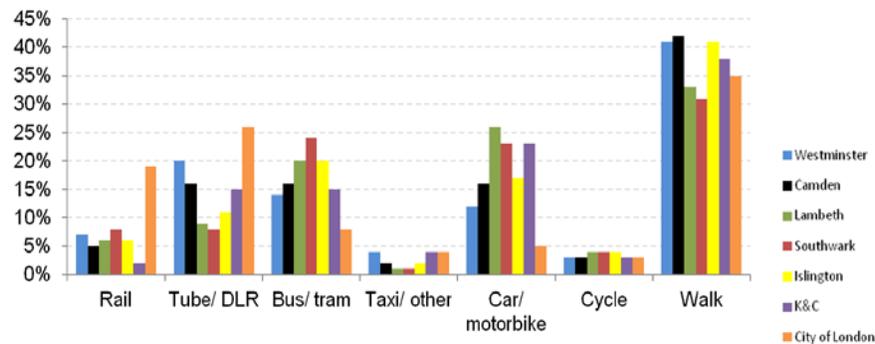
3.170 In Westminster high numbers of people participate in active travel,⁷ with the percentage of people cycling to work higher than the greater London average.^{cxxii} The modal share of journeys originating in Westminster is as follows: 40% walk; 23% use the Underground; 13% bus, 7% rail, 21% use a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

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



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.^{cxxv} These figures reflect an established shift away from private motorised transport

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

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%.^{cxxvi} Other changes since 2012 are likely to be slight increases in people using the Underground and taxi (with private hire vehicles). Rail use will also increase after 2018 once the Elizabeth line opens.

3.172 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.^{cxxvii} 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:

- 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.^{cxxviii}

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

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.^{cxxx}

3.176 Westminster typically has the highest number of road casualties in all London boroughs, which in 2015 involved a total of 1808 casualties, which are categorised as follows: 4 fatal, 131 serious, 1673 slight^{cxxxi}.

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 late 2018 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.^{cxxxii} 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 is consulting on a new CIL charge to part-fund the line's construction.
- 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.

4 Relevant Plans, Programmes and Strategies

- 4.1 As part of the IIA scoping process a comprehensive review of relevant plans, programmes and strategies has been 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 relevant documents are set out below in accordance with their spatial significance and grouped accordingly as International; National; Regional (London wide); Neighbouring Authorities and Local (Westminster).

International

Commitments arising from the Paris Agreement (2016) on climate change

EU Directives 79/409/EEC; 92/43/EEC; 2000/60/EC; 96/62/EC; 75/442/EEC; 99/31/WC

EU Directive 2002/49/EC – Environmental Noise Directive (END)

EU Directive 2008/50/EC

EU Water Directive Framework 2000

Kyoto protocol to the United Nations framework convention on climate change (2005)

The World Summit on Sustainable Development – Commitments arising from Johannesburg Summit United Nations (2002)

National

Air pollution: Action in a Changing Climate (2010) *Department for the Environment, Food and Rural Affairs*

Air Quality Standards Regulations 2010

Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) *Department for the Environment, Food and Rural Affairs*

Clean Air Act 1993

Climate Change Act 2008

Conservation Principles, Policies and Guidance for the sustainable management of the historic environment (2015) *Historic England*

Crowded Places Guidance: The Planning System and Counter-Terrorism (2012) *Home Office*

Design and Construction. SPG on the London Plan policies regarding environmental sustainability (2014)

Energy Efficiency and Historic Buildings (2012) *English Heritage*

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

Housing and Planning Act 2016

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 (2012) *Department for Communities and Local Government*

National Waste 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 Traveler Sites (Updated 2015) *Communities and Local Government*

Planning Policy Statement 10: Planning for Sustainable Waste Management (2005) *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*

Thames Estuary 2100 Plan (2012) *Environment Agency*

Thames river basin district flood risk management plan (FRMP) 2015 to 2021 (2016) *Environment Agency*

Thames river basin district river basin management plan (2015) *Department for the Environment, Food and Rural Affairs*

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

Understanding Place: Historic Area assessments. Historic England Advice Note 1 (2017) *Historic England*

Working Together to Promote Active Travel. A briefing for local authorities (2016) *Public Health England*

2010 Local Authority Carbon Dioxide Figures (2012) *Department of Climate and Energy Change*

2010 to 2015 government policy: environmental quality (Updated May 2015) *Department for the Environment, Food and Rural Affairs*

Regional

Affordable Housing and Viability SPG (Consultation draft) (2016) *Mayor of London*

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

Culture and the night time economy SPG (Consultation draft) (April 2017) *Mayor of London*

Energy Planning: GLA Guidance on preparing energy assessments (2011) *Greater London Authority*

(Draft) Housing Strategy (2014) *Mayor of London*

Health Issues in Planning - Best Practice Guidance, (2007) *Mayor of London*

Housing SPG (2016) *Mayor of London*

Land for Industry and Transport SPG (2012) *Mayor of London*

Local Authorities and Air Quality (2017) *Mayor of London*

London Carbon Scenarios to 2026 Report (2006) *London Energy Partnership*

London Office Policy Review (2017) *Ramidus Consulting Limited and CAG Consulting*

London Plan (2016) *Mayor of London*

London View Management Framework SPG (2012) *Mayor of London*

Air Quality Strategy: Cleaning London's Air (2014) *Mayor of London*

Green infrastructure and open environments: All London Green Grid SPG (2012) *Mayor of London*

Climate Change Mitigation and Energy Strategy (2011) *Mayor of London*

Cultural Metropolis: Mayor's Cultural Strategy (2014) *Mayor of London*

Delivering London's Energy future: the Mayor's climate change mitigation and energy strategy (2011) *Mayor of London*

Economic Development Strategy for London (2010) *Mayor of London*

London's Foundations Supplementary Planning Guidance (2012) *Mayor of London*

London's World Heritage Sites – Guidance on Settings Supplementary Planning Guidance (2012) *Mayor of London*

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

Mayor's Transport Strategy 2017 (Consultation Draft) (2017) *Mayor of London*

Securing London's water future: the Mayor's Water Strategy (2011) *Mayor of London*

Sustainable Design and Construction SPG (April 2014) *Mayor of London*

Transport Strategy (2010) *Mayor of London*

Green infrastructure and open environments: Tree and Woodlands Supplementary Planning Guidance (2013) *Mayor of London*

Waste Management Strategies (2011) *Mayor of London*

Neighbouring Authorities

City of London – Local Plan (adopted January 2015)

London Borough of Brent – Core Strategy (adopted 12 July 2010), Development Management Policy (2016) and Site Specific Allocations (2011)

London Borough of Camden – Local Plan (adopted July 2017)

Royal Borough of Kensington and Chelsea – Consolidated Local Plan (adopted July 2015) and review of the Local Plan (2015 - 2017)

Local

Affordable Housing Viability Study (2010) *DTZ Research. Published by Westminster City Council (jointly commissioned with London Borough of Camden)*

Affordable Housing Viability Study, Payments in Lieu of Affordable Housing (2011) *DTZ Research. Published by Westminster City Council (jointly commissioned with London Borough of Camden)*

Basement Development in Westminster SPD (2014) *Westminster City Council*

Air Quality Action Plan 2013-2018 (2013) *Westminster City Council*

Biodiversity Action Plan (2007) *Westminster City Council*

Church Street Master Plan Health Profile refresh 2013 (2013) *JSNA*

(Draft) Church Street Master Plan (2017) *Westminster City Council, Peter Brett Associates LLP*

City For All (2017) *Westminster City Council*

Core Strategy Sustainability Appraisal Scoping Report (2007) *Westminster City Council*

Core Strategy Sustainability Appraisal - Publication Draft (2009) *Westminster City Council*

Core Strategy NPPF Revision (Draft) IIA (2012) *Westminster City Council*

Creative Industries Report and Statistical Update (2007 and 2011) *GVA Grimley; Burns and Owens*

Cycling Strategy (2014) *Westminster City Council*

Decentralised Energy Masterplan for the City of Westminster (2014) *Parsons Brinckerhoff. Published by Westminster City Council*

Economic Development Strategic Framework (2015) *Westminster City Council*

Economic Development Strategy 2008-2011 (2007) *Westminster City Council*

Equalities Impact Analysis Guidance For assistance with Tri-and Bi-Borough and single Borough decisions

Estates Strategy 2008- 2013 (2008) *Westminster NHS Primary Care Trust*

Every Older Person Matters (2010 – 2013) *Westminster City Council*

Health and Wellbeing Strategy Strategy for Westminster 2017 - 2022 (2016) *Westminster City Council, NHS Central London CCG, West London CCG*

Health profile 2017 - City of Westminster (2017) *Public Health England*

Housing Renewal Strategy (2010) *Westminster City Council*

(Draft) Housing Strategy (2015) *Westminster City Council*

Housing Strategy Direction of Travel Statement (2015) *Westminster City Council*

(The) Importance of the Historic Environment to the Office Market in Westminster (2007) *Drivers Jonas*

Improving Historic Soho's Environmental Performance (February 2013) *Westminster City Council*

Interim Note on the Affordable Housing Policy (2015) *Westminster City Council*

Local Development Scheme (2017) *Westminster City Council*

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

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

Local Flood Risk Management Strategy (emerging) (2017) *Westminster City Council*

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

Noise Attitudes Survey (2008) *GfK NOP Social Research. Published by Westminster City Council*

Noise Survey (2008) *Scott Wilson. Published by Westminster City Council*

Our Strategy for Tackling Health Inequalities in Westminster 2009-2016 (2009) *NHS Westminster*

Overseas Investment: Homes for Londoners Board Sub-Group Report (2017) *Homes for Londoners board*

Preliminary Flood Risk Assessment (2011) *Drain London Westminster City Council*

The Prime Residential Market in Westminster (2014) *Ramidus. Published by Westminster City Council*

Retrofitting Historic Buildings for Sustainability (January 2013) *Westminster City Council*

Retrofitting Soho (2008) *The Max Lock Centre, University of Westminster. Published by MLC Press, University of Westminster in partnership with Westminster City Council*

Safer Westminster Partnership Strategy (2011- 2014) *Westminster City Council*

Strategic Plan 2008-2013 (2008) *Westminster NHS*

Statement of Community Involvement (2014) *Westminster City Council*

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

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

Strategic Flood Risk Assessment 2016 (emerging) *Westminster City Council*

Strategic Service Development Plan 2008-2013 (2008) *Westminster NHS Primary Care Trust*

(A) Study of Small Offices in Westminster 2008 (2009) *DTZ Research. Published by Westminster City Council*

Trees and the Public Realm (2011) *Westminster City Council*

Walking Strategy 2017 – 2027 (2017) *Westminster City Council*

Waste Sites Assessment (2009) *Westminster City Council*

Westminster City Council Equality Objectives 2012-2016

Westminster City Plan 2006 - 2016 Sustainable Community Strategy (2006) *Westminster City Partnership*

Westminster's Housing Market Study (2014) *ECORYS*

Westminster's Housing Market Analysis (2014) *Wessex Economics*

Westminster Infrastructure Plan: Technical Assessment 2006-2026 (2009) *URS Consultants. Published by Westminster City Council*

Westminster (City of) Local Economic Assessment Baseline Study (2011) *Westminster_City Council*

Westminster Noise Strategy (2010) *Westminster City Council*

Westminster Office Study – Impact of the Recession (2009) *Drivers Jonas. Published by Westminster City Council*

Westminster's Open Spaces and Biodiversity Strategy (emerging) (2017) *Westminster City Council*

Westminster Profile (2015) *Westminster City Council*

Westminster's City Plan: Strategic Policies (2016) *Westminster City Council*

Westminster Way (2011) *Westminster City Council*

5 Key Sustainability Issues and Setting Objectives

5.1 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 in Section 3 of this scoping report and the review of plans, programmes and strategies in Section 4. 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 in Table 3 pp 67-70).

- **IIA Objective 1. To create cohesive inclusive and safe communities, supported by the delivery of physical and social infrastructure needed to support the growth of a complex, changing and growing city and provision of civic leadership to deliver objectives shared with partners and ensure best use of land and resources.**

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 (See Section 6) and may be influenced by development, land use, environmental or social policy considerations. The council has a renewed focus on how it acts as a custodian of the city and advocates for resident interests. These are some of the most pressing issues facing the City and are therefore important to give prominence to in this assessment framework.

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

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

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).

Crime, disorder and antisocial behavior 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, safety 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**

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.

- **IIA Objective 7. To reduce flood risk**

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 Urban Drainage Systems (SUDs) is increasingly important in reducing surface water flood risk.

- **IIA Objective 8. To protect and enhance 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**

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 ensure new development respects and enhances our priceless heritage and new developments are designed to an exemplary standard.**

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 achieve excellence in new design and which will respect and build on this inheritance while also being accessible, safe, sustainable and suitable for modern city life.

- **IIA Objective 14. To maintain and enhance Westminster's built environment and townscapes.**

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.

- **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.

- 5.2 Many of the objectives will overlap in terms of sustainability issues and others may be in conflict. The impact of this will be more evident in the next stage of the IIA (Stage 2) when the individual policies in Westminster’s City Plan are assessed against the objectives.

Relationship between the IIA Objectives and SEA issues

- 5.3 The IIA report will incorporate a Strategic Environmental Assessment (SEA). 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 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

6. The IIA Assessment Framework

- 6.1 The IIA Assessment Framework is the methodology which will enable the environmental, social and economic sustainability impacts and equalities, health and crime and disorder effects and of the policies in Westminster's City Plan to be analysed, compared and critically assessed.
- 6.2 Having established the objectives in Section 5, this part of the scoping report sets out the IIA Assessment Framework, including the sub-criteria for the equalities and health considerations.
- 6.3 The IIA Assessment Framework includes key specific priority objectives from the Council's Equality Objectives 2016-2020 which are defined in red text in the Assessment Framework. These specific priorities along with any potential impact of the policy on persons who share one or a number of the equalities characteristics (see Table 4 below) will be assessed as part of the IIA process.
- 6.4 Whilst individual conditions and lifestyle decisions are the principal factors affecting health, the local environment still has a major role to play. Local environmental conditions, such as air quality, noise levels and housing conditions can have a direct impact on health. The built environment can facilitate social interaction and create healthy, inclusive communities, including access to local services, employment opportunities, and safe and accessible environments. The built environment can also affect behavioural choices people make, such as being active by having access to open space and pleasant routes which encourage walking and cycling. Sustainable design policies can reduce waste and emissions which help to address air quality, and can take account of the impacts of a changing climate that can affect health such as overheating and flooding.
- 6.5 The Health and Wellbeing Strategy for Westminster (2017-2022) sets out long term goals to improve the health and wellbeing of Westminster's residents, workers and visitors (2013-28) with short term Strategy Priorities up to 2016.
- 6.6 The long term goals set out in the Health and Wellbeing Strategy and the built environment factors that are most likely to influence health in Westminster (explained in paragraph 6.4) will be considered as part of the IIA Assessment Framework (shown in blue text in Table 3).
- 6.7 Table 3 shows the Integrated Impact Assessment Framework which will be used for the assessment of new policies in Westminster's City Plan. The sub-criteria questions help in analysing the issues to be considered in the objectives.

Table 3 Integrated Impact Assessment Framework

SA (SEA)EQIA/HIA Objective	sub criteria for assessment Including EQIA/HIA considerations:
1) To create cohesive, inclusive and safe communities	Will it improve access to local services? Shopping? Community facilities? * Will it increase ability to influence decision making (neighbourhoods)? * Will it foster an inclusive Westminster community? Will it encourage engagement in the community activity?
2) To reduce crime and fear of crime	Will it reduce crime, disorder and antisocial behaviour? ** Will it reduce fear of crime, disorder and antisocial behaviour? ** Will it reduce other behaviour adversely affecting the local environment? **
3) To ensure provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	Will it reduce homelessness? ** Will it increase range of affordable housing? ** Will it reduce number of unfit homes? ** Will it create high quality homes? ** Will it providing housing than can help people stay independent for longer?
4) To promote and improve health and well being	Will it help improve health inequalities? ** Will it reduce death rates? * Will it improve access/movement? * Will it encourage healthy lifestyles? * Will it improve cultural wellbeing? Will it support communities to lead healthy lifestyles through increased participation in sport and physical activity? * Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? * Will it provide access to a healthy diet and encourage healthy lifestyles? Will it encourage a physically active lifestyle (helping to reduce obesity)? Will it create healthy workplaces?
5) To reduce greenhouse emissions and support climate change adaptation	Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing the need to travel? * Will it reduce ozone depleting emissions? * Will it reduce emissions through retrofitting new

	<p>technology?*</p> <p>Will it reduce heat island effects on people and property?*</p>
6) To reduce use of limited natural resources e.g. water, fossil fuels, quarried materials, wood	<p>Will it reduce water consumption and improve water efficiency?</p> <p>Will it reduce consumption of fossil fuels *</p> <p>Will use of other natural resources (e.g. quarried materials) be minimised?</p> <p>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</p>
7) To reduce flood risk , promote SUDs, protect surface and groundwater quality	<p>Will it minimise flood risk from all sources of flooding? *</p> <p>Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?*</p> <p>Will it reduce combined sewer overflow events?*</p>
8) To protect, enhance and create environments that encourage and support biodiversity	<p>Will it protect, enhance and increase biodiversity and protect habitats?</p> <p>Will it preserve SINCs?</p> <p>Will it improve access to and promote educational value of sites of biodiversity interest?*</p> <p>Will it conserve and enhance species and habitats?</p>
9) To improve air quality	<p>Will it improve air quality? *</p> <p>Will it reduce emissions of key pollutants?*</p>
10) To reduce noise and impact of noise	<p>Will it reduce noise concerns and noise complaints?</p> <p>Will it reduce noise levels? *</p>
11) To reduce need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport	<p>Will it reduce volumes of traffic?*</p> <p>Will it encourage walking and cycling?*</p> <p>Will it increase proportion of journeys using modes other than the car?*</p>
12) To reduce waste production and increase recycling, recovery and re-use of waste	<p>Will it reduce consumption of materials and resources?</p> <p>Will it reduce household waste?</p> <p>Will it increase recycling, recovery and re-use?</p> <p>Will it reduce construction waste?</p>
13) 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>
14) To enhance public realm and street improvements	<p>Will it reduce litter?</p> <p>Will it enhance the quality of public realm?</p> <p>Will it improve access and mobility for all equality group</p>

	strands? **
15) To protect, enhance and seek opportunities to increase open space	Will it improve open space? * Will it improve landscape character? Will it improve access to open space? **
16) To ensure equality of opportunities, improve local opportunities and support sustainable economic growth throughout Westminster.	Will it improve qualifications, skills or training? ** Will it 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) 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, reducing disparity? **

(* asterisks show where the sub-criteria other than that identified in coloured text is likely to impact on equalities and or health)

Table 4 Protected Equalities Characteristics

<p>The protected equalities characteristics set out in the Equality Act 2010 which will be considered when assessing the impacts of the draft policies in the Integrated Impact Assessment Framework are:</p> <ul style="list-style-type: none"> • Age; • Disability; • Sexual orientation and gender reassignment; • Marriage and civil partnership; • Pregnancy and maternity; • Race- this includes ethnic or national origins, colour or nationality; • Religion or belief (including lack of belief); and • Sex (i.e. gender).

6.8 The anticipated effects of each new policy in Westminster’s City Plan will be analysed against each of the 17 Objectives and sub-criteria identified in the Integrated Impact Assessment Framework and will be scored as follows:

Major positive	++
Minor positive	+
Neutral	0
Minor negative	-
Major negative	--

With a commentary to include an overall summary and on long and short term positive and negative effects, mitigation/changes to plan and on uncertainty, risks and cumulative effects, where appropriate dependent on the scope of the policy it is assessing.

Appendix 2 contains the detailed IIA appraisal template that will be used to score the emerging policies based on the 17 objections and associated sub-criteria.

7. Next steps

- 7.1 This scoping report and its consultation fulfils the requirements relevant to Stage 1 of the IIA process as set out in Table 1 (Page 3).
- 7.2 There will be a five week consultation period for this scoping report and amendments will be made to incorporate stakeholder feedback where appropriate.
- 7.3 Stage 2 will run alongside the preparation of Westminster's City Plan by assessing all emerging draft policies against the 17 objectives as set out in the IIA Framework using the appraisal template set out in Appendix 2
- 7.4 Stage 3 will then consist of an Integrated Impact Assessment Report which details the process undertaken and explain the results of the assessment. Key stakeholders will be consulted on the Integrated Impact Assessment report (Stage 4) and changes made. Any comments received will also feed into the Examination in Public of Westminster's City Plan, where appropriate.

Appendices

Appendix 1 – Regulation 18 Notice



Councillor Daniel Astaire
Cabinet Member Planning and Public Realm

Please reply to: Andrew Barry-Pursell

Direct Line / Voicemail: 020 7641 6000

Fax: 020 7641 3050

Email: planningpolicy@westminster.gov.uk

Date: 16th June 2017

Dear Sir/Madam

Revision to Westminster City Plan (November 2016)

In March 2015 the council made known that it would be making a number of separate revisions to its City Plan. We are writing to advise you that following the completion of three of these revisions in 2016 (relating to basements, mixed use, special policy areas/policies map) and a change in Leadership and key Cabinet Member positions at the council, the council now intends to carry out a full review of the entire plan. This will include incorporation and updating of policies currently “saved” from the Unitary Development Plan (2007).

This is an opportunity to reconsider the strategic vision and objectives and the direction the plan should take on a number of important areas. It also provides an opportunity to update figures and projections and progress remaining and previously consulted upon changes as a single comprehensive revision to the plan. This revision will result in a single local plan providing a strategic planning policy framework for the City of Westminster for the period to 2035.

This revision will be known as the ‘Westminster City Plan Full Revision’. The city council intends that it will result in a local plan by the third quarter of 2018. **This notice of intention to revise the adopted plan, Westminster’s City Plan (November 2016), is being made in accordance with Regulation 18 of the Town & Country Planning (Local Planning) (England) Regulations 2012.**

Once this revision has been made, the new document will be the ‘local plan’ for Westminster and will replace all current policies in the adopted Westminster’s City Plan

and saved policies in the Unitary Development Plan. Detailed information about this revision is set out in Westminster's Local Development Scheme which can be viewed at www.westminster.gov.uk/local-development-scheme.

In summary, the scope of the **Westminster City Plan Full Revision** will be to renew the council's planning policy agenda, in line with the council's City for All vision. This will entail a full review of all policies in Westminster's City Plan (November 2016) and the "saved" UDP policies with a particular focus on (but not limited to):

- **A renewed vision and strategic objectives.**
- **Increasing overall housing targets and the delivery of affordable housing** on site, and, where appropriate, off site; in preference to a payment in lieu, through changes to the affordable housing policy cascade; changes to the calculation of payment in lieu; changes to policy relating to 'super-size' residential units; reviewing the use of affordable housing credits, introducing policies on affordable rent, tenure mix, amending the split between intermediate and social housing to 60:40, introducing post-permission reviews of viability where larger schemes are not providing policy-consistent levels of affordable housing, and to enable families to remain in Westminster, with the use of s106 prioritised for meeting housing need.
- **A focus on joint work across the public sector to make the most efficient use of land assets ('One Public Estate')**
- **Reconsideration of existing policy designations;** including 'Core and Wider Central Activities Zone (CAZ)' and the 'West End Special Retail Policy Area', and the way these relate to Westminster's and the Mayor's CAZ; the introduction of a new 'West End' designation; potential changes to the North Westminster Economic Development Area; separate policy treatment of the Church Street/Edgware Road and other housing renewal areas; changes to reflect the wider role of St. John's Wood as a centre for leisure and recreation, and consequent changes to other designations.
- **Changes and simplification of policies adopted as part of the Mixed Use revision.** In particular this will involve:
 - the removal of policy S1 3A which introduces a 30% commercial uplift 'allowance' without providing residential floorspace, in the Core CAZ.
 - Changes to policy S1 3B which allows a 30% commercial uplift 'discount' for proposals involving an increase in floor space of 30-50%
 - A change of approach to Mixed Use credits, and a greater emphasis on delivery of housing on site (see above).
 - Amendment of the cascade at Policy S1 3C
 - Changes and simplifications to the supporting text.
- **Changes to business and employment policies** with increased support or employment through policies which focus on the provision of a range of workspace, support for the digital economy and job opportunities for Westminster residents.
- **Changes to policy S20 Offices and other B1 floorspace** policy to encourage a range of types of floorspace, without detriment to the delivery of affordable housing.
- **A review of retail policies to include the addition of an exception to policy S21 Retail** in respect of development which provides for a better mix of uses, or more unique uses and to clarify policy related to A2 uses following the council's Article 4 direction in respect of A1 to A2 uses.
- **Review of policies on the night-time economy and, in particular, the concept and policy wording of the existing 'Stress Areas'** to reflect a more positive approach to

the evening and night time economy, a possible relaxation of the policy restrictions on entertainment uses, combined with a stricter requirement to contribute to a reduction in cumulative impact in the currently named stress areas.

- **Clarification on the policy position on tall and higher buildings**, guided by the outcomes of the 'Building Height – Getting the Right Kind of Growth for Westminster' consultation and to include a review of local views in policy S26.
- **A review of the uses protected by the St. James's Special Policy Area**, in particular private members' clubs.
- **A review of all 'design' policies, including potential for minor amendments and simplification to the basements policy.**
- **An update of policy S29 Health, Safety and Well-being,**
- **A review of policy S34 Social and Community infrastructure**, in particular the necessity for continued protection of these uses on large development sites.
- **A review of all transport policies including removal of references in policy S41 'Pedestrian Movement and Sustainable Transport'** to reducing the reliance on private motor vehicles and single person motor vehicle trips, and introduction of wording to ensure development does not impede traffic flow and vehicle movement.
- **Specifying which principles and parts of the plan should be taken into account in the preparation of neighbourhood plans.**

This Full Revision will also include those areas previously the subject of a series of informal consultation booklets, published between October 2013 and March 2015 (and not already covered by the three revisions made in 2016). As such the Full Revision will also include policies relating to the following areas:

- Town centres and retail, including street markets
- Commercial and West End.
- Environmental policies (e.g. energy and waste)

The Full Revision will also:

- Provide greater detail to those policies in the City Plan and ensure that development accords with the objectives set out in the City Plan and is consistent with national policies and those emerging from preparation of the London Plan and other Mayoral strategies.
- Revise the adopted Westminster's City Plan (November 2016) and Policies Map as appropriate
- Ensure policies are presented in a way that is clear, concise, and user-friendly.

As the Full Revision will incorporate all remaining "saved" Unitary Development Plan policies, <https://www.westminster.gov.uk/unitary-development-plan-udp> , the Unitary Development Plan (Jan 2007), will no longer form part of the statutory development plan for Westminster from adoption of the revised local plan.

If you have any comments on the Westminster City Plan Full Revision please send them in writing by 28th July 2017 to planningpolicy@westminster.gov.uk or by post to Policy and

Strategy, Westminster City Council, 6th Floor, 5 The Strand, London WC2N 5HR. For more information, please call 020 7641 6000.

Further information is available on the City Council's website at www.westminster.gov.uk/revision-westminsters-city-plan.

A handwritten signature in black ink, appearing to read 'Daniel Astaire', enclosed in a thin black rectangular border.

Councillor Daniel Astaire

Cabinet Member for Planning and Public Realm

7. End Notes

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