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IIA Addendum – Reasonable alternatives

1 Introduction

- 1.1 Paragraph 35 of the NPPF sets out that for plans to be found sound, they should provide “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.”
- 1.2 The council’s broad strategy for growth is set out in policy 1 of the draft City Plan, whilst policies 2-6 set out priorities and growth targets for key areas of change.
- 1.3 In developing this strategy, the reasonable strategic options that have been tested for accommodating future growth in Westminster’s growth, as set out in section 2 of the Integrated Impact Assessment, were:
 - The draft London Plan (2017) housing target;
 - Increased housing delivery for the first ten years of the plan.
- 1.4 This addendum provides further detail of what other growth options were not considered to represent reasonable options, and have therefore not been subject to full IIA testing. It also provides commentary on the council’s approach to the spatial distribution of growth.

2 Quantity of growth

- 2.1 The regional, national, and international importance of the economic activity that happens in Westminster means that the balance between residential and commercial growth, and the impact this has on the city’s townscape and heritage, have been key considerations as the draft City Plan was developed.
- 2.2 In developing its strategy, the council has had regard to projected levels of need for new office jobs set out in the London Office Policy Review (2017), retail space from the GLA’s Consumer Expenditure and Comparison

Floorspace Need in London (2017), and the need for growth in convenience retail and other town centre uses.

- 2.3 Planning for less commercial growth than suggested by the London Office Policy Review and the GLA's retail projections would be contrary to the evidence base supporting the plan and was not therefore considered a reasonable option that merits full consideration through the IIA. Doing so would undermine central London's competitiveness as a global office centre, retail and leisure hub.
- 2.4 Conversely, while ambitious total jobs targets for the Oxford Street District and the West End have been cited in Regulation 19 representations as justification for seeking higher levels of commercial growth across Westminster, the council is also of the view that these do not merit full consideration through the IIA. As set out in paragraph 2.23 of the Economy and Employment Topic Paper (EV_E_002), neither of these targets have been informed by any assessment of likely development capacity, having regard to townscape, heritage and character. They do not therefore take sufficient account of key development constraints to ensure they are deliverable as well as ambitious, as required by the NPPF. Furthermore, all jobs targets in the draft City Plan are expressed as minimums, meaning they could be exceeded if achieved in a manner that is acceptable in all other respects.
- 2.5 Options regarding different levels of housing growth are assessed in section 2.1 of the IIA. Since this time, the examination into the new London Plan has concluded, and the ten year housing target for Westminster within it has been reduced – from 10,010 in the submission version to 9,850 in the intend to publish version.
- 2.6 While the City Plan IIA assessment sought to focus on what were at the time considered reasonable options, correspondence with the Inspectors has since noted that while the council's ambitions around housing growth were to be applauded, more robust justification of their deliverability was required. As such, the council has subsequently re-examined its assumptions regarding housing capacity, and is now proposing to amend its housing target for the plan period to 20,685. Based on an updated analysis of site suitability, availability, capacity, and windfall assumptions, this extrapolates the 10 year housing target in the intend to publish version of the London Plan, to cover the entire plan period of the draft City Plan. Further explanation is set out in the addendum to Housing Topic Paper (EV_H_013).

3 Distribution of growth

Identified key growth areas

- 3.1 The core objectives of Westminster's spatial strategy are outlined in Policy 1 of the draft City Plan. Aligning with key aims of the London Plan they focus on delivering new homes and jobs, protecting and enhancing the city's unique assets, prioritising sustainable travel and driving growth. Each of the areas specifically highlighted for growth have been selected for its particular potential to deliver on one or several of these outcomes, with a particular emphasis on aligning growth with areas likely to benefit from improved connectivity.
- 3.2 Key areas where commercial and housing growth is directed in policy 1 of the draft City Plan are:
- The CAZ, West End (WERLSPA) and town centre hierarchy;
 - Paddington, Victoria and Tottenham Court Road Opportunity Areas;
 - Church Street/ Edgware Road and Ebury Bridge Estate Renewal Areas; and
 - The North West Economic Development Area.
- 3.3 Together these areas cover much of the city, and provide the logical destinations to absorb the majority of Westminster's future growth, for the following reasons:
- The CAZ is recognised in the London Plan as one of the world's most attractive and competitive business locations, with high public transport accessibility and a rich mix of uses. The intensification and provision of additional office space, including through mixed use development, is supported through London Plan policies SD4 and SD5;
 - The WERLSPA, which itself falls within the wider CAZ, provides a key concentration of commercial activity, including some of London's most iconic shopping and leisure districts, alongside its role as a global office centre. Commercial led intensification here can provide agglomeration benefits, while the introduction of Elizabeth line will significantly reduce travel times for visitors and workers from a wider catchment area; increasing the business case for further commercial-led growth;
 - The intensification of town centres is supported in both the NPPF and the London Plan in the interests of securing a sustainable pattern of growth;
 - Paddington, Victoria, and Tottenham Court Road have all been long identified as Opportunity Areas in the London Plan as offering high levels of public transport accessibility and scope for continued large scale change. All benefit from ongoing or planned transport infrastructure investment through the Elizabeth Line or Crossrail 2;
 - Estate Renewal Areas offer major opportunities for residential led growth within the council's control that can secure an uplift in much

needed affordable housing, improve local design and character, and ensure residents benefit from enhanced connectivity into jobs and opportunities in central London; particularly through the Elizabeth Line and Crossrail 2;

- The North West Economic Development Area offers significant opportunities for intensification and regeneration that can help address persistent levels of deprivation, offering improved job prospects for local residents; both within the area, and capitalising on improved access into central London through the Elizabeth Line at Paddington.

3.4 The key diagram to the draft City Plan (figure 7) further demonstrates how identified growth areas are aligned to ongoing or planned investments in transport infrastructure. As can be seen from this, the North West Economic Development Area, the Paddington Opportunity Area and the Church Street/Edgware Road HRA in the north of the city take advantage of the new Elizabeth line, which will offer connection to the WERLSPA and the very heart of the city. Meanwhile, Crossrail 2 running north-south across the city will effectively link the Westminster portion of the Tottenham Court Road Opportunity Area to both the Victoria Opportunity Area and the second of our identified Housing Renewal Areas at Ebury Bridge Estate. This will give access from residential parts in the south of the city to the West End.

3.5 The planned spatial distribution of growth has therefore been driven by the opportunities presented by new and existing transport connections. It has been developed with the movement of people into and around the city in mind, ensuring that the benefits of development are unlocked by delivering ease of movement between the places people live, work and visit. This focus on connectivity has its roots in the council's 'City for All' vision, which looks to deliver a global city with strong neighbourhoods and thriving communities, and tackle inequalities, so that all of Westminster's residents can benefit from the opportunities presented by the city's future growth and prosperity.

Areas not identified as key growth areas

3.6 The only areas not specifically identified in Westminster's spatial strategy as areas to direct growth to are set out in table 1 below, along with reasons for discounting them. For each of these areas, it is the combination of factors, rather than any individual reason, that resulted in them being discounted as potential strategic focus for growth.

Table 1: Areas not identified in Spatial Strategy

Area	Reason
Belgravia	<ul style="list-style-type: none"> • Embassies and residential (with higher levels of owner occupation than the Westminster average) are the dominant land use, and their historic character limits opportunities for strategic intensification; • Areas not identified do not fall within the CAZ, an Opportunity Area (as defined by the London Plan), or have been historically identified by the council as an Economic Development Area; • Not directly served by Elizabeth Line or Crossrail 2; • No identified sites.
Maida Vale	<ul style="list-style-type: none"> • Largely residential areas of uniform character with higher levels of owner occupation than the Westminster average, that do not lend themselves to strategic intensification; • Only town centres are local centres serving a small catchment thereby offering limited opportunities for strategic intensification; • Multiple land ownerships an obstacle to redevelopment opportunities – not part of the Great Estates; • Not within the CAZ or an Opportunity Area (as defined by the London Plan), or historically identified by the council as an Economic Development Area; • Not directly served by Elizabeth Line or Crossrail 2 and lower PTAL ratings for parts of the area compared to the rest of the city; • No identified sites.
St Johns Wood	<ul style="list-style-type: none"> • Largely residential (beyond district centre) of uniform character with higher than Westminster average levels of owner occupation, that do not lend themselves to strategic intensification; • Multiple land ownerships an obstacle to redevelopment opportunities – not part of the Great Estates; • Not within the CAZ or an Opportunity Area (as defined by the London Plan), or historically identified by the council as an Economic Development Area; • Not directly served by Elizabeth Line or Crossrail 2 and lower PTAL ratings for parts of the area compared to the rest of the city; • No identified sites.
Bayswater	<ul style="list-style-type: none"> • Beyond Queensway/ Westbourne Grove Major Centre the area is of largely uniform residential character including higher than Westminster average levels of owner occupation, that do not lend themselves towards strategic intensification; • Multiple land ownerships an obstacle to redevelopment opportunities – not part of the Great Estates; • Not within the CAZ or an Opportunity Area (as defined by the London Plan), or historically identified by the council as an Economic Development Area; • Not directly served by Elizabeth Line or Crossrail 2; • No identified sites.

3.7 As these areas have all been discounted for the reason given in table 1 above, no reasonable alternative growth areas are considered to exist that would merit full testing against IIA objectives.

Growth targets

3.8 Where growth areas have been identified in the draft City Plan, a range of different targets for each area have not been tested through the IIA. This is because the nature of Westminster, as a highly urbanised city with a range of high value existing uses, makes it difficult to accurately predict where landowners will choose to reinvest in sites. As such, development has historically been heavily dependent on windfall development, and the draft City Plan provides a supportive framework to enable such opportunities to continue to come forward. Further detail on where such opportunities are likely to be taken will be set out in the future Site Allocations DPD, which will be informed by further work with key landowners.

3.9 Nevertheless, some targets for key growth areas have been referred to in the draft City Plan, based on where there is a greater degree of certainty of proposals coming forward or being implemented. These have been informed by targets in the London Plan and the council’s proposals in Housing Renewal Areas that have been developed in consultation with local communities.

3.10 Table 2 below provides an overview of the home and job figures set out in the draft City Plan for different areas, and signposts the source of such figures.

Table 2: Overview of homes and jobs figures for different growth areas

Area	Homes	Jobs	Commentary
CAZ	N/A	N/A	Covers a large proportion of Westminster (approximately 67%), where the numerous windfall opportunities for growth supported by the draft City Plan are difficult to accurately predict - due to the reliance on landowner willingness to reinvest in viable existing uses.
WERLSPA	N/A	N/A	No specific targets set out in the draft City Plan for same reasons that apply to the CAZ. Nevertheless, as referred to in paragraph 2.7 of the draft City Plan, some scenario testing (which has not been informed by the capacity of individual sites), identifies a potential of an uplift of 124,000 total jobs across the entire West End to the period 2041. N.B. the geographical area used for this scenario testing goes beyond the WERLSPA designation, and also covers

			land outside of Westminster's administrative boundaries.
Tottenham Court Road OA (Westminster portion)	150	3,000	As identified in the London Plan for the period 2016-2041. N.B. as set out in paragraph 2.5 of the City Plan, higher targets in the London Plan include land in the London Borough of Camden.
Paddington OA	1,000	13,000	As identified in the London Plan for the period 2016-2041.
Victoria OA	1,000	4,000	As identified in the London Plan for the period 2016-2041.
NWEDA	N/A	N/A	Is not identified as an Opportunity Area in the London Plan and has not to date been subject to any Masterplan.
Church Street HRA	2,000	350	In accordance with the Church Street Masterplan (2017).
Ebury Bridge HRA	350	N/A	Informed by the Housing Renewal Strategy preferred scenario (2018) which identifies capacity for approximately 750 new homes (gross). Figures expressed in the draft City Plan reflect the net uplift on these sites.

4 Conclusion

- 4.1 As set out above, given the context of higher-level policy, the nature of development in Westminster, and the policy approach in the draft City Plan, limited 'reasonable alternative' options to the council's strategy for growth exist. Where alternative approaches were considered and discounted without full assessment against the IIA framework, clear justification to rule out such options exists.