CITY PLAN 2019 - 2040

Integrated Impact Assessment – Appendix

VIII Reasonable Alternative Appraisals

Regulation 19 Consultation

March 2024

FAIRER WESTMINSTER

City of Westminster

Contents

This is Appendix VIII to the City Plan Partial Review (Regulation 19) Integrated Impact Assessment. This document sets out the detailed reasonable alternative appraisal assessments undertaken to inform the preferred option of the policies in scope for this partial review. This document should be read in conjunction with the main Integrated Impact Assessment report.

1.1 Affordable Housing Reasonable Alternative Appraisal

Option A: Retain City Plan policy 9 as adopted (2021)		
Sustainability Appraisal Objective	**Score**	**Analysis**
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	+	i. Existing Policy 9 seeks to provide new affordable homes to foster mixed and sustainable communities where there is better access to local services and community facilities to meet the needs of those living in the area. New affordable homes are vital to the effective functioning of the local economy and delivery of public services to meet the variety of needs of different people and families. **(++)** ii. No likely impact. iii. The existing policy was considered in the City Plan 2020 IIA to have a major positive contribution to this objective as the delivery of affordable housing contributes to achieving inclusive communities. However, the tenure split meant that the majority of new affordable housing would be intermediate. While this seeks to rebalance the mix of tenures within Westminster's housing stock, this could have a negative impact on the quantity of social rent units available to meet existing housing needs and address the council's waiting list for social housing. **(-)** iv. No likely impact.
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	0	No impacts identified.
3. Housing i. Will it create high quality homes?	+	i. The existing policy was considered in the City Plan 2020 IIA to have a major positive contribution to this objective as the delivery of affordable housing contributes to achieving high quality homes. However, more could be done to

ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?		strengthen the policy and deliver affordable housing on-site and requiring small developments to contribute to affordable housing. (-) ii. The existing policy 9 will greatly increase the amount of intermediate housing available in the City but will only slightly increase the number of social rented homes. (+) iii. Existing policy 9 will contribute to reducing homelessness by boosting the supply of affordable housing of different tenures across a range of household incomes. However, an increase in social rented homes would possibly more likely reduce homelessness than intermediate housing, which the existing policy seeks to favour in the tenure split. (+) iv. The provision of social rented and intermediate homes will provide accommodation to support people to remain independent for longer. (++) v. A greater provision of intermediate housing would reduce the reliance upon lower cost and quality open market options, which may reduce the number of unfit homes. Under this existing policy, a lot of regeneration work is taking place to provide affordable homes and reduce the number of unfit homes. (++) vi. The current tenure split means that intermediate housing is currently prioritised over social housing. While the policy supports a range of intermediate home sizes are provided, in line with the council's Annual Affordable Housing Statement informed by local needs, intermediate homes are less likely to be family sized than social homes. (-)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing?	+	i. Existing policy 9 seeks to improve health inequalities by ensuring no net loss of affordable housing and increasing the provision of high-quality affordable housing for those in need and reduce homelessness. However, prioritising intermediate housing has meant less social homes that could otherwise have been provided have been delivered. This may lead to these households becoming homeless or being in temporary accommodation longer and therefore, not reducing health inequalities. (-) ii. No likely impact iii. Existing policy 9 could improve the availability of affordable homes within accessible locations. (++)

vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		iv. No likely impact v. No likely impact vi. The provision of new affordable homes will provide accommodation that fosters an inclusive community with higher density living and increase access to services/facilities. A balance however, will need to be made to manage amenities to ensure the quality of life for both new and existing neighbouring residents. This will as a result, minimise loneliness, maximise independence and improve the mental and physical wellbeing of older people. (+) vii. No likely impact viii. No likely impact ix. Existing policy 9 seeks to increase healthy years life expectancy by ensuring no net loss of affordable housing and increasing the provision of high-quality affordable housing for those in need and reduce homelessness. However, by prioritising intermediate housing has been reduced for those in need of social housing. This may lead to these households becoming homeless or being in temporary accommodation longer and therefore, not increasing healthy years life expectancy for these individuals/families (-). x. The provision of new affordable homes will provide accommodation for individuals/families and as a result, improve mental health and wellbeing. However, by prioritising intermediate homes over social rent homes, this could impact and decrease the mental health and wellbeing for those in need as this may lead to households becoming homeless or being in temporary accommodation for longer (-). xi. No likely impact
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions?	0	No impacts identified.

iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?		
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	0	No impacts identified.
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	0	No impacts identified.
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation?	0	No impacts identified.

iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?		
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	0	No impacts identified.
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	0	No impacts identified.
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	0	No impacts identified.
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	0	No impacts identified.
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views?	0	No impacts identified.

iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?		
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	0	No impacts identified.
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	0	No impacts identified.
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings?	0	No impacts identified.

v. Will it promote equality of opportunity across the city by tackling barriers to employment?		
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	0	No impacts identified.

Option B: Seek affordable housing contributions from small-scale residential developments in a revised Policy 9		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	+	i. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development financial contributions towards affordable housing would increase the funding available to the council to deliver more affordable housing. As the council will be able to decide where to spend the money, this will ensure new homes are located in sustainable locations to improve access for new residents to existing local services and community facilities to meet the needs of those living in the new homes. (+) ii. As part of an increased and direct affordable housing delivery, the council will consult more with communities which will likely have a positive impact on the ability of neighbourhoods influencing decision-making on sites in the area. (+) iii. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development contributions would increase the funding available to increase the quantity of affordable housing where needed, and as a result, will likely deliver more mixed communities as more affordable housing will be delivered. However, this may also deter small-scale residential development from being developed and as a result lead to certain types of affordable homes from not being delivered that meets different needs of the community. (+) iv. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development contributions would increase the funding available to the council to increase affordable housing and as a result, will likely foster an inclusive community. Direct delivery by the council could encourage those from different social/cultural backgrounds to engage with the delivery process, which could also lead to more engagement in community activity. However, small site contributions may also deter small-scale residential development from being built by developers due to an uplift in costs and thus, affect the delivery of certain types of homes that meets different needs of the community. This could then, in turn, reduce engagement from different social/cultural backgrounds in community activity. **(+)**

2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	0	No impacts identified.
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, the increased funding available for affordable housing delivery could improve the quality of affordable housing homes delivered. However, there is a risk that it could affect the quantity of high-quality homes through increased costs for the development of small-scale residential development. (+) ii. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development' financial contributions towards affordable housing would increase the funding available to increase the range of affordable housing. (++) iii. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development' financial contributions would increase the money available for the delivery of affordable housing in the city, which may help reduce homelessness by making more low-cost housing options available. (+) iv. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development financial contributions would increase the funds available for housing for affordable housing for specific groups, including older people and those living with disabilities, increasing the amount of housing that would help people stay independent. (++) v. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, the increase in funding for affordable housing would increase funding available for housing renewal and estate regeneration, reducing the number of unfit homes.

		vi. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, the increase in affordable housing funding available will enable the council to direct deliver a wide range of affordable housing to meet identified needs. However, the financing of small-scale residential development would be affected, which may result in developers opting for particular housing types and sizes rather than providing a range, although other Development Plan policies would continue to manage this. (+)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?	++	i. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development financial contributions would increase the funds available to the council to deliver affordable housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer and therefore, improving health inequalities. (+) ii. No likely impact iii. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development financial contributions would increase the funds available to the council to deliver affordable housing within accessible locations. (++) iv. No likely impact v. No likely impact vi. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development financial contributions would increase the funds available to the council to deliver affordable housing for those most in need. The provision of new affordable homes will provide accommodation that fosters an inclusive community and increase access to services/facilities. This will as a result, minimise loneliness, maximise independence and improve the mental and physical wellbeing of older people. (++) vii. No likely impact viii. No likely impact ix. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development financial

		contributions would increase the funds available to the council to deliver affordable housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer and therefore, increasing healthy years life expectancy. (+) x. Where it is accepted that affordable housing cannot be provided on-site and when a payment-in-lieu is made, small-scale residential development financial contributions would increase the funds available to the council to deliver affordable housing for those most in need. The provision of new affordable homes will reduce homelessness and those in temporary accommodation and as a result, improve mental health and wellbeing. (++) xi. Although this option will not directly deliver improvements to facilities and accessibility for people with disabilities, small-scale residential development financial contributions would increase funds available to the council to deliver affordable housing and contribute towards meeting Westminster's housing needs for different groups. This will assist in improving facilities and accessibility for people with disabilities. **(+)**
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	0	No impacts identified.
6. Natural resources i. Will it reduce water consumption and improve water efficiency?	0	No impacts identified.

ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?		
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	0	No impacts identified.
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	0	No impacts identified.
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	0	No impacts identified.
10. Noise	0	No impacts identified.

i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?		
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	0	No impacts identified.
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	0	No impacts identified.
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	0	No impacts identified.
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards?	0	No impacts identified.

iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?		
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	0	No impacts identified.
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	0	No impacts identified.
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors?	0	No impacts identified.

v. Will it promote regeneration?		

Option C: Amend the tenure split to prioritise social rent in a revised Policy 9		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	++	i. No likely impact. (0) ii. An increase in ability of neighbourhoods influencing decision-making is likely given that those living in social rent and intermediate homes are likely to want to influence their area as they will have in principle, a home for life in the area in comparison to those purchasing privately on the open market. (++) iii. Those on social housing waiting list may likely be at higher risk of social exclusion and amending the tenure split should help to avoid this. Increased number of social rent homes will make Westminster more inclusive, as although it means a decrease in the delivery of intermediate housing properties. (++) iv. An increase in social rent homes could encourage engagement in community activity from those most in need. It could encourage those from different social/cultural backgrounds engage and have an impact on delivering what they would like to see within their community, offering a different view to those within intermediate housing. Additionally, an increase in community engagement is likely given that those living in social rent and intermediate homes are likely to want to influence their area as they will have in principle, a home for life in the area in comparison to those purchasing privately on the open market. (++)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	0	No impacts identified.
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness?	++	i. Prioritising social rented homes will see an increase in this tenure coming forward which will be required to comply with other Development Plan policies and be of high quality. (++) ii. This will greatly increase the amount of social rented housing available in the city but will only slightly increase the number of intermediate homes, which is already

iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?		at a low base. The policy will still ensure a range of affordable housing is delivered. (+) iii. An increase in socially rented homes would increase the availability of housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation. (++) iv. An increase in socially rented homes would increase the availability of housing for specific groups, including older people and those living with disabilities, increasing the amount of housing that would help people stay independent. (++) v. Prioritising socially rented homes would increase the amount of affordable homes available, enabling flexibility for affordable housing providers across their portfolio, to make way for unfit homes to be decanted and refurbished for social housing. (++) vi. Prioritising the delivery of social homes over intermediate homes is likely to increase the range of sizes, as intermediate homes tend to lean towards a market who are less likely to require family sized units (mostly one-bedrooms). (++)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces?	+	i. An increase in socially rented homes would increase the availability of housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer and therefore, improving health inequalities. (+) ii. No likely impact iii. No likely impact iv. No likely impact v. No likely impact vi. An increase in socially rented homes would increase the availability of housing for older people, foster an inclusive community and increase access to services/facilities through higher density living. However, a balance will need to be made to ensure the quality of life for both new and existing neighbouring residents as part of development proposals for higher density living. Overall, this will minimise loneliness, maximise independence and improve the mental and physical wellbeing of older people. (+) vii. No likely impact

ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		viii. No likely impact ix. An increase in socially rented homes would increase the availability of housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer and therefore, increasing healthy years life expectancy. (+) x. An increase in socially rented homes would increase the availability of housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer and therefore, improving mental health and wellbeing. (++) xi. Although this option will not directly deliver improvements to facilities and accessibility for people with disabilities, it will increase the availability of housing for meeting the needs of different groups and as a result, increase access to facilities and accessibility for people with disabilities. (+)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	0	No impacts identified.
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?	0	No impacts identified.

iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?		
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	0	No impacts identified.
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	0	No impacts identified.
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	0	No impacts identified.
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	0	No impacts identified.
11. Transport	0	No impacts identified.

i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?		
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	0	No impacts identified.
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	0	No impacts identified.
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm?	0	No impacts identified.

v. Will it improve access and mobility for all equality group strands?		
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	0	No impacts identified.
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	0	No impacts identified.
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	0	No impacts identified.

Option D: Amend existing policy 9 to seek both affordable housing contributions from small-scale residential development and prioritise social rent.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	++	i. Seeking both affordable housing contributions and re-balancing the tenure split to prioritise social housing over intermediate housing will increase the amount of genuinely affordable housing available for those most in need. This will improve access to local services and community facilities to meet the needs of those living in the area. New affordable homes are vital to the effective functioning of the local economy and delivery of public services to meet the variety of needs of different people and families. (++) ii. As part of affordable housing delivery, the Council will consult more with communities which will likely have a positive impact on the ability of neighbourhoods influencing decision-making on sites in the area. Additionally, an increase in the community influencing decision-making is likely given that those living in social rent and intermediate homes are likely to want to influence their area as they will have in principle, a home for life in the area in comparison to those purchasing privately on the open market. (++) iii. Overall, the delivery of more affordable homes will make Westminster more inclusive, as the housing needs of Westminster's residents will be better met. Small-scale residential development financial contributions will facilitate the delivery of an inclusive community by increasing the deliverability of affordable housing. (++) iv. An increase in social rent homes could encourage engagement in community activity from those most in need. It could encourage those from different social/cultural backgrounds to engage and have an impact on delivering what they would like to see within their community. Small-scale residential development financial contributions may also help increase affordable housing delivery that meets different needs of the community. As the council would then decide how it spends those funds, it could ensure and encourage engagement from different social/cultural backgrounds in community activity. (++)
2. Crime reduction	0	No impacts identified.

i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?		
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	++	i. Prioritising social rent homes will see an increase in these tenures coming forward which will be required to comply with other development plan policies and be of high quality. Similarly, this will be the case where the increased funding from small-scale residential development contributions for affordable housing could improve the quality of homes being delivered. However, depending on the pricing, small-scale residential development contributions could impact on financing of small-scale residential development being delivered, possibly affecting the quality of homes. **(+)** ii. Prioritising socially rented homes, will greatly increase the amount of social rented housing available in the city but will only slightly increase the number of intermediate homes. Small site contributions though, will likely increase the delivery of affordable housing of different ranges, types and tenures. **(++)** iii. Small-scale residential development contributions and an increase in socially rented homes would increase the availability of housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer. **(++)** iv. An increase in socially rented homes and small-scale residential development contributions to be used to deliver affordable housing would increase the availability of housing for specific groups, including older people and those living with disabilities, increasing the amount of housing that would help people stay independent. **(++)** v. Increased number of socially rented homes and small-scale residential development contributions to fund the provision of affordable housing would increase the amount of affordable homes available across Westminster. This would

		enable flexibility for affordable housing providers across their portfolio, allowing unfit homes to be decanted and refurbished. **(++)** vi. Increasing the number of social homes over intermediate homes is likely to increase a range of sizes, as intermediate homes tend to lean towards a market who are less likely to require family sized units. The financing of small-scale residential development would however, be affected and may result in developers opting for less risky housing types and sizes. That being said, other development plan policies would continue to regulate this. **(++)**
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?	++	i. An increase in socially rented homes and small site contributions to be used to deliver affordable housing would increase the availability of housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer and therefore, improving health inequalities. **(++)** ii. No likely impact iii. Prioritising socially rented homes and small-scale residential development contributions to be used to deliver affordable housing would increase the availability where access/movement to and within areas in Westminster are better. **(++)** iv. No likely impact v. No likely impact vi. An increase in socially rented homes and small-scale residential development contributions to be used to deliver affordable housing would increase the availability of housing for older people, foster an inclusive community and increase access to services/facilities. This will as a result, minimise loneliness, maximise independence and improve the mental and physical wellbeing of older people. **(++)** vii. No likely impact viii. No likely impact ix. An increase in socially rented homes and small-scale residential development contributions would increase the availability of housing for those most in need. This may lead to the reduction of households becoming homeless or being in

		temporary accommodation longer and therefore, increasing healthy years life expectancy. **(++)** x. An increase in socially rented homes and small-scale residential development contributions would increase the availability of housing for those most in need. This may lead to the reduction of households becoming homeless or being in temporary accommodation longer and therefore, improving mental health and wellbeing. **(++)** xi. An increase in socially rented homes and small-scale residential development contributions would increase the availability of housing for meeting the needs of different groups and increase access to facilities and accessibility for people with disabilities. **(++)**
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	0	No impacts identified.
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?	0	No impacts identified.

iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?		
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	0	No impacts identified.
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	0	No impacts identified.
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	0	No impacts identified.
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	0	No impacts identified.
11. Transport	0	No impacts identified.

i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?		
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	0	No impacts identified.
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	0	No impacts identified.
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm?	0	No impacts identified.

v. Will it improve access and mobility for all equality group strands?		
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	0	No impacts identified.
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	0	No impacts identified.
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	0	No impacts identified.

1.2 Retrofit-First Reasonable Alternative Appraisal

Option A: No retrofit first policy		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	0	i. Existing policy seeks to bring forward development which facilitates access to local services, shops and community facilities, which can be achieved through both demolition and rebuild options and through retrofitting, which is currently encouraged in existing City Plan policies. (0) ii. The existing policy supports the creation of new community facilities which neighbourhoods can have influence over. (0) iii. The current approach in the City Plan (2019- 2040) supports new, mixed used developments that increase the range and type of housing, fostering an inclusive Westminster. (0) iv. New builds have more flexibility to create new spaces that can encourage engagement in community activity, retrofit may be more limited in the opportunities to deliver new community spaces however, it can help protect and revitalise existing community spaces. (0)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	0	i. Existing policies within the adopted City Plan facilitate the consideration of crime and antisocial behaviour in proposed developments, which would continue. (0) ii. Whilst current policies encourage retrofitting, the acceptance of demolition is more common. In the absence of a retrofit-first policy, the demolition of buildings and providing completely new structures may continue, which may have a greater impact on reconfiguring sites which could reduce fear of crime compared to retrofit, which will prioritise reusing existing buildings. However, it is noted that by encouraging more retrofits, construction periods would be reduced which would mean that periods where a site is inactive or covered in hoarding will be reduced, which could also have positive impact on perceptions of crime. On balance, this has a neutral impact. (0)

		iii. The adopted City Plan policy which encourages all developments to introduce measures to reduce adverse behaviours will continue regardless of whether a retrofit-first policy is introduced or not. (0)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. Existing policies in the adopted City Plan will continue to encourage the development of high-quality homes. (+) ii. Current adopted City Plan policies on the provision of affordable homes will continue. Any retrofit-first policy would have an exemption applied to affordable housing schemes, meaning that the impact would be neutral and therefore existing positives associated with housing delivery would be maintained. (+) iii. Existing policy supports the generation of new residential development, bringing forward affordable housing which contributes to reducing homelessness. (0) iv. Existing policies on providing housing to meet a range of different needs, as identified in the Housing Needs Assessment would continue. (+) v. Existing policies support proposals for developments which seek to redevelop homes which may be deemed to be unfit. (+) vi. Yes, existing policy supports intensification of sites (in strategic areas) meaning large, high density residential-led schemes can come forward offering a range of housing types and tenures (+)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet?	0	i. Existing policies in the adopted City Plan seek to improve health inequalities through restrictions on uses such as hot food takeaways, shisha smoking and in the consideration of social infrastructure needs. Whilst retrofit is currently encouraged, the rate of demolition is higher in the absence of a retrofit-first policy. This means that air quality concerns associated with construction which may have a greater impact on vulnerable members of the community. As a result, impacts on health inequalities would remain neutral. (0) ii. Under existing policy, new development can create more homes fit for purpose, contributing through healthier living standards to a reduction in death rates. However, a new retrofit policy has the potential to protect life by taking a proactive approach at addressing matters related to global warming, flooding, and rising sea levels and can contribute to a reduction in the potential loss of life through the impact of global warming and climate change. (0)

viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		iii. No impact identified. (0) iv. Through current levels of demolition, sites may be better able to reconfigure buildings in order to create more space for areas for sports and leisure. Whilst the introduction of a retrofit-first policy may limit this ability, there may be instances where the provision of publicly accessible open space may be considered a public benefit alongside the delivery of other benefits (for example public infrastructure, affordable housing etc.) which would enable demolition to still occur where appropriate. As such, the current benefits of the built environment prioritising healthy lifestyles could remain. (+) v. Existing policies in the adopted City Plan around heritage would remain. (0) vi. No impact identified. (0) vii. No likely impact. (0) viii. Yes, sustainable developments should provide access to newly built, high-quality homes and workplaces. These new homes will be designed in a way to support health and wellbeing of residents, however long-term environmental benefits are reduced. Retrofit will also be able to create healthier homes and workplaces by improving existing buildings whilst also reducing total greenhouse gas emissions of development (0) ix. Under existing policy, initiatives to improve health outcomes will remain. The absence of a retrofit-first policy will mean development will still bring forward high quality housing which will have a positive impact on healthy years life expectancy, however a retrofit approach will significantly reduce greenhouse emissions which will have a positive impact on life expectancy (0) x. Yes, see i, viii, and ix. (0) xi. Accessibility needs (such as Building Regulations M4(2) and M4(3)) will continue to be required for new homes as part of any proposed development. In some cases, it may be easier for new builds to comply with these requirements. However, this is not to say that creative solutions to retrofitting could not also achieve a similar outcome. (0)
5. Climate change	--	i. Whilst current policies do encourage retrofitting and schemes referrable to the Mayor of London already require whole life carbon assessments, the introduction	

i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?		of a bespoke retrofit-first policy would greatly improve reductions in total greenhouse gas emissions and increase the number of zero carbon energy developments. Without this approach, development will still contribute to this objective through adopting low or zero carbon energy measures (PVs, solar thermal systems or geothermal systems) and through using innovative green construction methods, however this will be less effective as the current City Plan is silent on embodied carbon. Furthermore, it is evident that in order to meet the objective of being net-zero by 2040, a drastic reduction in emissions (which could be achieved through a retrofit-first policy) would be needed. (-) ii. See above (-) iii. No, the option suggests not having a retrofit-first policy, so retrofit will not be as actively encouraged (--) iv. Measures to reduce heat island effect may be easier to implement in new build developments. However, creative retrofitting solutions could also help to reduce negative effects. Furthermore, the introduction of greening measures which can assist in reducing heat effects will be applicable regardless of whether a development is a new-build or a retrofit. (0) v. The absence of a retrofit-first approach will limit resilience to climate change as there will be less of a concentration on reducing total carbon emissions from developments. (--)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	--	i. Development will still strive to reduce water consumption however, without a retrofit-first policy, there is less prioritisation on reusing, recycling of materials, so water consumption is likely to be higher in new builds compared to a retrofit-first policy being in place (--) ii. Existing policy encourages the reduction of fossil fuel consumption by utilising PV and other renewable sources; however, this will not be as effective as using the lowest carbon materials available which are those which can be re-used from existing buildings through retrofitting. (--) iii. To reduce embodied carbon overall, this will require either the use of more sustainable products, less products, or the re-use of existing products. As such, natural resources such as quarried materials in steel and concrete which can be

		the most carbon intensive would need to be reduced. In the absence of a retrofit-first policy which would prioritise this, this would be achieved to a lesser extent. (-) iv. Same as above (--) v. New builds may be able to make more efficient use of land. By demolishing existing buildings and reconfiguring sites, brownfield land can be used more effectively and may also be able to support higher density development. (+)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	0	i. Existing policy for new developments supports the use of SUDs, permeable surfaces and other above ground water management systems to mitigate floods. Furthermore, new developments can utilise new more resistant materials. However, regardless of whether a new build or retrofit approach is adopted (as encouraged by a retrofit-first policy), flood risks would need to be mitigated. (0) ii. Both new build and retrofit developments have the ability to reduce property damage in the event of storm events. (0) iii. Same as above (0) iv. New builds may be able to make greater improvements to water quality on site through the use of new technologies and materials. A retrofit-first policy aims to implement similar improvements reducing the use of new materials and thus reducing waste/emissions, which could further minimise impact on water quality (-).
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	0	i. New builds and a retrofit-first approach can both protect and enhance biodiversity through incorporating green/blue infrastructure into scheme designs. Both existing policy and retrofit-first policy could support the expansion of urban green spaces, providing opportunities for biodiversity to thrive. However, retrofit may offer more protection for habitats due to its long-term positive impacts on reducing greenhouse emissions and mitigating the effects of climate change. Overall however, all developments will be required to deliver biodiversity net gain, which means that this will have a neutral impact on the whole. (0) ii. A retrofit-first approach may be better suited for sites of importance for nature conservation as the retention of existing buildings/materials will be a priority, causing the least damage to the environment (-) iii. No likely impact (0)

		iv. See above i. (0)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	-	i. No, following current policy guidance, schemes can implement several mitigation techniques to reduce the impact of dust and other air pollutants, however the absence of a retrofit-first policy will mean developments will not prioritise the reuse and recycling of existing materials, which could lessen some of these impacts. (--) ii. Current rates of demolition and use of new materials in construction projects means that a number of key pollutants in emissions are released into the air. The current rates of this would continue in the absence of a retrofit-first policy. If a retrofit-first policy were to be introduced, this could reduce the overall release of these emissions, which would be more effective in reducing key pollutants than current policy guidance. (-)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	-	i. Existing rates of demolition and rebuild require extensive construction periods. This can involve extensive noise associated with demolition practices, coupled with noise associated with structural work (for example, piling rigs). A retrofit-first policy will help to encourage a higher number of retrofits which may have a reduced construction period (leading to less noise complaints) and will also likely not involve extensive structural amendments to buildings, reducing the use of piling rigs etc. (-) ii. Same as above.
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	0	No impacts identified.
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste?	--	i. Without a retrofit-first policy there is less focus on reusing materials and thus an increase in the consumption of materials and resources. Retrofitting reuses existing structures, recycles materials and optimizes the energy performance of buildings, consequently reducing the demand for energy resources (--)

iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?		ii. No impact identified. iii. Continuing current construction practices without a retrofit-first policy means there will be less prioritisation of circular economy, recycling, recovery and re-use of materials. (--). iv. See answers to i and iv. (--)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	+	i. Current policies in the adopted City Plan require that heritage assets are conserved and enhanced. Any new developments must be sensitive to surrounding heritage and townscape values, which would continue to occur in the absence of a retrofit-first policy. (+) ii. Developments regardless of whether they are a retrofit or new build solution will have the same ability to impact on strategic views. (0) iii. See answer to (i) above. (+) iv. City Plan policy will continue to be followed which includes archaeological assessments to ensure archaeological features are recorded and protected. (+) v. No impact identified.
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	0	i. The absence of a retrofit-first approach will not negatively impact the enhancement of townscape as new build developments will continue to improve urban areas in line with adopted policy; however, a retrofit policy may encourage more frequent revitalisation of existing old buildings, instead of allowing buildings to deteriorate and wait for demolition. Together, this would have a neutral impact on development. (0) ii. Adopted City Plan policy will continue to require exemplary design standards of new builds and retrofit developments. (0) iii. No impact identified. (0) iv. New builds may have more opportunity to create new space and add new structures to enhance the quality of the public realm, whereas a retrofit-first policy may encounter more constraints across the site. However, a retrofit-first policy would not preclude demolition occurring where significant new public open space is provided. (0) v. Both new builds and retrofitted buildings can improve access and mobility through improved design. (0)

15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	+	i. New builds will have greater options to create new space, therefore have greater impact on enhancing open space. However, a retrofit-first policy would not preclude demolition occurring where significant new public open space is provided. Despite this, current practices will still enable enhancements to quality of open space. (+) ii. Current policy guidance will continue to encourage the improvement of landscape through the introduction new buildings and new public spaces. A retrofit-first approach may not be able to contribute to this significantly due to the need to retain existing structures (+) iii. Development for new builds can more easily demolish underutilised buildings and create new play/green space, improving access to open space. In some instances, site constraints may make it more difficult achieve the same level of public benefit due to limited abilities to improve the quantum or accessibility of open space with existing building footprints. (+) iv. Existing City Plan policy encourages the enhancement of the green infrastructure network while having no retrofit-first policy doesn't impact. (0)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	+	i. The construction industry remains an important employer for Westminster residents across a broad range of skillsets and qualifications. This will continue regardless of if a new retrofit first policy is introduced or not. (+) ii. See response to i above. (+) iii. See response to i above. (+) iv. No likely impact (0) v. See response to i above.(+)
17. Economy i. Will it improve business development and environment?	+	i. A retrofit-first approach may be able to bring a greater range of affordable workspace which will improve business development; however, new builds will continue to provide new services/workspace in strategic locations, contributing to the business environment. (+)

ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?		ii. New builds can improve business resilience by offering a greater range of high-end workspaces to support high-value job creation, however a retrofit-first approach can also create new jobs whilst reducing energy costs, cost of resources and increasing resilience of existing infrastructure, whilst also ensuring that there are a broad range of office options available to the market. (+) iii. New builds may offer less affordable workspace than retrofitted buildings due to the incurring building costs that may be generated from a new build compared to a retrofit. This may therefore decrease opportunities for startups and small businesses. That being said, not all office space needs to be grade A to be lettable and so the impact on startups and small businesses is limited, particularly as these types of businesses may be unlikely to have the capital available to rent Grade A offices in the first place. (0) iv. Both new builds and retrofitted buildings have the potential to promote business in key sectors which can deliver more high-end/specialist workspace. (++) v. Neutral, both retrofit-first approaches and current policy guidelines can promote regeneration outcomes, as is currently the place under extant City Plan policies. (0)

Option B: Setting embodied carbon budgets for all proposals involving total demolition, and all major schemes, with a favourable view of extensions which enable retrofit		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	0	No impact identified.
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	0	No impact identified.
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. Setting embodied carbon budgets for all proposals involving total demolition and all major schemes has the potential to cause a slight increase in costs to keep embodied carbon of new buildings within the benchmark ranges set for residential buildings. However, given the evidence base which will be used to support any new policy, it has been identified that this cost uplift would be minimal. Therefore, it is unlikely that fewer new build homes would be delivered. Furthermore, by reducing demolition due to embodied carbon impacts, many developments will be steered towards retrofitting which could seek to improve the deliverability of high-quality homes compared to what is currently existing on-site, by bringing unfit homes back into use. The favourable view of extensions as part of this policy approach may also assist in achieving a residential floorspace uplift which could further help in the delivery of new, high-quality homes across the city. (+)

		ii. Setting embodied carbon budgets, particularly for major schemes, may see an impact on the range of affordable housing being delivered through increased costs to keep embodied carbon of new buildings within a set budget. Applicants may highlight viability concerns to providing the range of affordable housing required when also applying this policy option as part of their development proposals. (-) iii. Setting embodied carbon budgets for all proposals involving total demolition, and all major schemes should not on the whole impact the delivery of homes (including bringing unfit homes back into use) and therefore will further assist in reducing homelessness. (+) iv. The extant City Plan policies already supports development that produces homes that prolong independence and/or are fit for purpose and offer a range of housing types/sizes. Setting embodied carbon budgets for all proposals involving total demolition and all major schemes will be alongside the need to continue to fulfil these housing objectives outlined in the City Plan. (0) v. See answer to (i) above (+) vi. See answer to (i) and (iv) above. (0)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces?	+	i. Setting embodied carbon budgets for all proposals involving total demolition and all major schemes will encourage the reduced extraction and transportation of raw materials, along with reduced levels of demolition. It is expected that this will result in less particulates being released into the air, which will have a positive impact on respiratory health. This is especially the case for disadvantaged members of Westminster community where particulates contribute to poorer health outcomes and earlier average mortality. Furthermore, some retrofit schemes will have a less intensive construction period which may benefit the health of local people nearby. This will have a positive impact on health inequalities. (+) ii. No likely impact (0) iii. No likely impact (0) iv. No likely impact (0) v. Setting embodied carbon budgets for all proposals involving total demolition and all major schemes promotes a retrofit first approach which supports the reuse and

ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		retention of important structures of cultural significance. This can encourage more culturally important buildings to be kept and reutilised, instead of demolished, improving the cultural wellbeing of areas within Westminster. (+) vi. No likely impact (0) vii. No likely impact (0) viii. Setting embodied carbon budgets for all proposals involving total demolition and all major schemes will continue to support City Plan policy which requires development to be of exemplary design standards, zero carbon and to reduce on-site energy demand. The policy also encourages the reuse of existing structures within development. This is expected to decrease building work and the levels or particulates associated with demolition and more broadly that associated with extraction and transportation of materials. This will help improve air quality and create healthier living and working environments. (+) ix. See answers to (i) and (ii) (+) x. Due to the environmental benefits aforementioned (improved air quality) it is likely there will be a positive impact on health, leading to improved wellbeing. For many buildings undergoing a retrofit, the main structural elements are retained which can mean that construction periods are shortened and can be less of a local disturbance (for example, the use of piling rigs may be minimised). This can help to improve wellbeing in the short term for neighbouring residents. (+) xi. No likely impact (0)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property?	++	i. Up to 50% of a building's emissions over its lifetime can be from embodied emissions (e.g. Construction, demolition, and disposal) . Setting embodied carbon budgets for all proposals involving demolition and major schemes will seek to reduce emissions. (++) ii. No likely impact (0) iii. Setting embodied carbon budgets for proposals involving demolition and major schemes will advocate for a retrofit first approach. Maximising the reuse of existing buildings and their materials through retrofitting is the most impactful strategy for reducing embodied carbon in development. It also creates additional incentives for retrofitting, by allowing the benefits of retrofit to be considered when assessing

v. Will it increase resilience to climate change?		alterations and extensions. Following this approach, proposals that involve demolition will have to meet embodied carbon benchmarks. This may encourage them to use new retrofitting technology to ensure that these benchmarks are achievable (++). iv. No likely impact. (0) v. Retrofitting involves the reuse of existing structures and materials in order to minimise the impact of development on climate change. Retrofit development may also include adaptation upgrades which bolster a building's resilience to climate change. This increases current buildings climate change resilience whilst limiting the negative impacts on the environment that come from construction (such as extraction and transportation and associated embodied carbon). Where new buildings may be able to be developed (within the carbon budgets), new technologies in new builds can also help to support greater resilience to climate change impacts (++)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	++	i. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could seek to improve water efficiency. Where low-carbon new builds are also able to meet the benchmarks, these schemes will also use materials that are associated with less intensive water usage. (+) ii. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could seek to remove fossil fuel energy systems. Embodied carbon budgets will also seek to reduce consumption of fossil fuels within development proposals by requiring applicants to demonstrate they meet the benchmark and will likely include reduced construction timelines which will also reduce the use of fossil fuels used in construction machinery. (++) iii. Introducing embodied carbon budgets will require more developments to reduce their embodied carbon. This will require either the use of more sustainable products, less products, or the re-use of existing products. As such, natural resources such as quarried materials in steel and concrete which can be the most carbon intensive will be reduced. This would have an overall positive effect. (++)

		iv. As part of setting embodied carbon budgets for proposals involving demolition and major schemes, this will ensure that the use of renewable resources over non-renewable resources is favoured in order to meet the benchmarks. (++) v. Although new builds may have less constraints compared to retrofit, in the context of Westminster, retrofitting will likely make efficient use of land. Westminster is a densely populated urban area with limited available space. Retrofitting existing buildings helps maximize the use of space. (+)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	++	i. As part of setting embodied carbon benchmarks for proposals involving demolition and major schemes, retrofitting buildings should be prioritised over demolition. This will mean that more building footprints will remain the same, which will have a neutral impact on flood risks. Adopted City Plan policies on minimising flood risks will remain alongside the new retrofit first policy, meaning that where there may be an increased flood risk through any development work, this will need to be mitigated against. More broadly, this policy approach encourages reducing embodied emissions. Such emissions contribute to climate change which can affect changes in weather events and lead to effects such as increased rainfall. Decreasing contributions from developments to climate change can (in the long-term and cumulatively) can make a positive contribution to minimising flood risk. (++) ii. See response to (i) above (++) iii. No likely impact iv. No likely impact
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest?	0	i. Retrofitted buildings usually offer less opportunity for biodiversity gain, as what can be delivered is governed by the existing building, although careful design can maximise habitat creation. For schemes where planning permission is required (for example larger scale retrofits and/or schemes where demolition is allowed), new legislation requires developments to deliver biodiversity net gain which will mean that in some instances, biodiversity will be enhanced. (0) ii. Setting embodied carbon budgets for all proposals may preserve sites of importance for nature conservation as the retention of existing buildings/materials will be a priority, causing the least damage to the environment (+)

iv. Will it conserve and enhance species and habitats?		iii. No likely impact iv. See above i. (0)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	++	i. Up to 50% of a building's emissions over its lifetime can be from embodied emissions (e.g. construction, demolition, and disposal) . Setting embodied carbon budgets for all proposals involving demolition and major schemes will therefore seek to improve air quality. Furthermore, by indirectly encouraging more retrofits, these will likely have shorter construction periods. This will also have positive effects upon air quality, as machinery will be used for shorter time periods, there will be less construction traffic and there will likely be less demolition. (++) ii. See response to i above. (++)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	++	i. Setting embodied carbon budgets for those involving demolition and major schemes will steer many developments towards retrofitting which could seek to improve noise mitigation within existing buildings. This may result in reducing noise concerns and complaints. Furthermore, by indirectly encouraging more retrofits, these will likely have shorter construction periods. This will also have positive effects upon noise, as machinery will be used for shorter time periods and noise intensive activities such as demolition or the use of piling rigs would either be reduced or non-existent. (++) ii. See response to i above. (++)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	0	i. Setting embodied carbon budgets for schemes involving demolition and major schemes should help to reduce volumes of traffic from fewer construction waste materials during the construction period. However, this would be significantly improved if applied to all proposals. Furthermore, this impact will be temporary as it only applies during the construction phase of a development. (+) ii. No likely impact. (0) iii. No likely impact. (0) iv. No likely impact. (0)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste?	++	i. As part of setting embodied carbon budgets for proposals involving demolition and major schemes, this will ensure that the use of non-renewable resources and non-sustainable materials are reduced. (++) ii. No likely impact

iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?		iii. As part of setting embodied carbon budgets for proposals involving demolition and major schemes, this will ensure that construction waste is reduced and re-used, increasing rates of material recovery. (++) iv. See response to i and iii above. (++)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	+	i. Setting embodied carbon budgets for all major schemes and those involving demolition will encourage a retrofit first approach. This means there is more opportunity for development to conserve or enhance heritage sites and their cultural value, complementing adopted policy and statutory requirements. This includes the reuse of significant materials or retention of important structures that reflect local historical character. However, this policy approach does encourage extensions on buildings to provide an uplift of floorspace. Whilst existing policies on heritage will still need to be adhered to (for example, in the context of listed buildings), there may be some changes to heritage sites as a result of the policy approach when the benefits of retrofitting are balanced alongside the conservation of heritage. Equally, retrofitting of existing buildings which have negative townscape values (particularly those identified in Conservation Areas) may be enhanced through the policy approach. Therefore, overall, it is assumed that this would have a positive effect on heritage. (+) ii. The reuse of existing buildings instead of redevelopments which alter the building envelope may mean less risk of new development which could potentially harm strategic views.(+) See response to i above. (+) iii. Reducing the number of schemes that require demolition, should help preserve archaeological features because as much of the existing structures will be reused as possible. Furthermore, retrofitting can include improvements that seek to better the preservation and enhancement of archaeological features. (++) iv. No likely impact. (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter?	0	i. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could encourage existing buildings to be re-purposed in such a way that responds to and enhances the townscape through innovative design. (+) ii. See response to i above. (+)

iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?		iii. No likely impact iv. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could encourage existing buildings to be designed for users in mind and enhance the quality of the public realm. However, it is recognised that the building footprint of some existing buildings (which would be encouraged to be retained) may not maximise opportunities for reconfiguration which could enhance the public realm. Overall, this will have a neutral effect. (0) v. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could see better accessibility to existing buildings and designed in a way that benefits all equality group strands. That being said, new-builds can make this a lot easier to meet the M4(2) and M4(3) regulations, along with fire accessibility requirements. However, as it is not impossible to meet these accessibility regulations in retrofitted buildings, this will have an overall neutral impact. (0)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	0	i. New builds may have greater options to create new space, therefore they may have a greater impact on enhancing open space. However, setting embodied carbon targets would not preclude demolition occurring, as long as new builds were able to be built with a low embodied carbon, which means that new open space may still be able to occur. Furthermore, retrofitting existing buildings could also still enhance existing open space areas that already exist, and/or could improve access to them where possible through retrofitting options. (0) ii. Encouraging more buildings to be retrofitted by virtue of needing to meet embodied carbon benchmarks may enhance landscape character as existing buildings with a negative impact on streetscape may be renewed. It is noted however that where new builds may be allowed, these may also have a positive impact on landscape character. This effect is therefore neutral overall. (0) iii. Development for new builds without carbon budgets can more easily demolish underutilised buildings and create new play/green space, improving access to open space. In some instances, site constraints may make it more difficult achieve the same level of public benefit due to limited abilities to improve the quantum or

		accessibility of open space with existing building footprints (which would be encouraged by virtue of the embodied carbon targets). However, retrofitting existing buildings could also still enhance existing open space areas that already exist, and/or could improve access to them where possible through retrofitting options. (0) iv. Development for new builds without carbon budgets can more easily demolish underutilised buildings and create new or enhanced green infrastructure. In some instances, site constraints may make it more difficult achieve the same level of public benefit due to limited abilities to improve the quantum or accessibility of open space with existing building footprints (which would be encouraged by virtue of the embodied carbon targets). However, given the need to adhere to biodiversity net gain requirements, all development, regardless of whether it is in line with embodied carbon targets or not will still need to enhance green infrastructure, with innovative design solutions able to do this to a significant degree on both new build and retrofit schemes, subject to planning permission (0)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	++	i. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting. The type of green economy jobs created from this are likely to be managerial and/or require specialist skills and technical expertise. Growing this upcoming industry will therefore likely improve qualifications, skills and training. Furthermore, if demolition is required as part of a proposal, the increased emphasis on circular economy will support new skilled jobs in this area. (++) ii. Development will continue to provide local jobs, including jobs through construction firms and developers who will continue to work with the Westminster Employment Service (secured through Section 106 for major developments) to support those furthest from the labour market in job opportunities within development schemes, including major retrofits schemes. This will provide more opportunities for those furthest away from the labour market to enter into new jobs, including those in sustainable green industries (such as low carbon building). For other minor planning applications which either involve demolition (and are therefore not subject to any future draft policy) and or are retrofits, activity in this

			industry will still continue to create new jobs for local people, even in absence of Section 106 agreements on employment initiatives, as is currently required for major applications. In addition, the policy approach supports the retrofitting of office space which can increase job density, maximising use of existing office space and creating new jobs. The reuse and enhancement of existing buildings can help ensure there is a variety of sizes and types of office spaces on offer (instead of all new development being high-end, Grade A or of similar styles and sizes). This can provide more affordable workspace which is more attractive to SMEs and new business startups, effectively catering to a broader audience across a range of industries. For the reasons listed above, the policy approach will help reduce unemployment and provide job opportunities for those most in need. (++)
		iii.	By requiring development involving demolition to deliver public benefits, more schemes may provide affordable workplaces, which will enable greater small business and start ups, improving employment opportunities. (+)
		iv.	This approach would support the growth of the Green Economy in London, which will help create a positive relationship between economic growth and environmental needs. Furthermore, 28% of green jobs are located within London which suggests many (higher skilled) jobs created through retrofitting are likely to be sourced from the local economy. In addition, existing City Plan requirements for major planning applications to prepare and adhere to an Employment and Skills Plan (ESP) means that as the policy is still encouraging development, local residents who are out of work, new to the workforce and/or are currently in education will be able to continue to benefit from ESP initiatives, where major development through retrofit and/or low carbon demolition and re-build schemes are brought forward. As was noted in the response to (ii) above, where schemes are considered to be minor applications (and therefore not subject to the preparation of an ESP), this will still provide job opportunities in the construction sector which could be taken up by local people. In the long term, this will continue to assist in improving earnings, including for lower skilled jobs which will remain vital in retrofit projects in a resilient business environment. These factors suggest

		the policy should help improve earnings, whilst ensuring reduced negative impacts on the environment. (+) v. See response to (i) and (ii) above. (++)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	++	i. Under this policy approach, improving/reusing existing buildings or in some cases bringing them back into active use, can prolong the use of buildings for some businesses. This avoids buildings becoming unlettable due to failing energy/environmental standards, improving business development and environment. Furthermore, the approach supports the development of businesses in a growing industry (retrofitting) and within the wider green economy which can help to promote sustainable growth across the city. ii. However, some types of businesses across the city that require high-end office floorspace may need to adjust their approaches to development. This is because the need to reduce demolition and/or stay within embodied carbon targets may conflict with structural and layout requirements in existing buildings, such as floor to ceiling heights, which may be perceived to be needed to attract specific high-end tenants which offer high-value jobs. However, it has been evidenced that many global companies with high-end jobs have taken on retrofitted office premises across the city and that considerations of a 'desirable place to work' are not just based on structural elements of a building, but rather on the wider cultural and social ecosystem in the area surrounding the office. This has therefore proven that the ability to attract businesses which will continue to contribute to the city's economy will not be deterred by this policy approach. Furthermore, high-quality retrofitted buildings are able to still generate high rental yields which will ultimately help to continue to keep investment (and re-investment) in Westminster. The policy will ensure that where demolition does occur, this results in the delivery of the best outcomes, and most optimal building, bringing the biggest business development improvements. iii. Furthermore, the policy approach may still enable low-carbon new build development which could continue to support high value jobs in the city. Therefore overall, it is expected that the policy approach will still have a beneficial effect on the business environment across the city. The policy approach will help to ensure a

		balance between best in class, and more affordable office space, by causing a reduction in the number of brand new buildings. This will create a more varied and balanced eco-system of office /retail space available, which will have a more balanced impact on the economy. (++) iv. Setting embodied carbon benchmarks may have an initial impact on the businesses in the city as they adapt to new requirements. However, this could help business resilience in the long term and would ensure a greener economy, focussed on sustainable growth. Allowing upwards extensions on buildings where appropriate, may also allow for existing businesses in the city to expand and stay within Westminster, rather than relocating. (++) v. Setting embodied carbon budgets may result in a greater variety of size and type of office space which may appeal to new business start-ups, small businesses and opportunities for local people. Also, as an increase in retrofitting occurs and a need for specialist skills to be developed, this could be embedded into local skills training to ensure local people have opportunities for jobs in this sector. (++) vi. See response to iii above. (++) vii. Setting embodied carbon budgets for schemes involving demolition and major schemes may promote regeneration of existing buildings wanting to be more energy efficient however, this is also likely to take place as part of full-scale redevelopment with demolition and new buildings incorporated. The incorporation of an approach which is more favourable to extensions on existing buildings however may further enhance regeneration outcomes in the delivery of increased floorspace, improving the viability of retrofit schemes and continuing to keep investment in Westminster. (+)

Option C: Setting embodied carbon budgets for all proposals involving total demolition, and all major schemes, but without a favourable view of extensions which enable retrofit		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	0	No impact identified.
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	0	No impact identified.
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. Setting embodied carbon targets for all proposals involving total demolition and all major schemes has the potential to cause a slight increase in costs to keep embodied carbon of new buildings within the benchmark ranges set for residential buildings. However, given the evidence base which will be used to support any new policy, it has been identified that this cost uplift would be minimal. Therefore, it is unlikely that fewer new build homes would be delivered. Furthermore, by reducing demolition due to embodied carbon impacts, many developments will be steered towards retrofitting which could seek to improve the deliverability of high-quality homes compared to what is currently existing on-site, by bringing unfit homes back into use. (+) ii. Setting embodied carbon targets, particularly for major schemes, may see an impact on the range of affordable housing being delivered through increased costs

		to keep embodied carbon of new buildings within a set budget. Applicants may highlight viability concerns to providing the range of affordable housing required when also applying this policy option as part of their development proposals. (-) iii. Setting embodied carbon budgets for all proposals involving total demolition, and all major schemes should not on the whole impact the delivery of homes (including bringing unfit homes back into use) and therefore will further assist in reducing homelessness. (+) iv. The adopted City Plan policies already support development that produces homes that prolong independence and/or are fit for purpose and offer a range of housing types/sizes. Setting embodied carbon budgets for all proposals involving total demolition and all major schemes will be alongside the need to continue to fulfil these housing objectives outlined in the City Plan. (0) v. See answer to (i) above (+) vi. See answer to (i) and (iv) above. (0)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy?	+	i. Setting embodied carbon budgets for all proposals involving total demolition and all major schemes will encourage the reduced extraction and transportation of raw materials, along with reduced levels of demolition. It is expected that this will result in less particulates being released into the air, which will have a positive impact on respiratory health. This is especially the case for disadvantaged members of Westminster community where particulates contribute to poorer health outcomes and earlier average mortality. Furthermore, some retrofit schemes will have a less intensive construction period which may benefit the health of local people nearby. This will have a positive impact on health inequalities. (+) ii. No likely impact (0) iii. No likely impact (0) iv. No likely impact (0) v. Setting embodied carbon budgets for all proposals involving total demolition and all major schemes promotes a retrofit first approach which supports the reuse and retention of important structures of cultural significance. This can encourage more

x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		culturally important buildings to be kept and reutilised, instead of demolished, improving the cultural wellbeing of areas within Westminster. (+) vi. No likely impact (0) vii. No likely impact (0) viii. Setting embodied carbon budgets for all proposals involving total demolition and all major schemes will continue to support City Plan policy which requires development to be of exemplary design standards, zero carbon and to reduce on-site energy demand. The policy also encourages the reuse of existing structures within development. This is expected to decrease building work and the levels or particulates associated with demolition and more broadly that associated with extraction and transportation of materials. This will help improve air quality and create healthier living and working environments. (+) ix. See answers to (i) and (ii) (+) x. Due to the environmental benefits aforementioned (improved air quality) it is likely there will be a positive impact on health, leading to improved wellbeing. For many buildings undergoing a retrofit, the main structural elements are retained which can mean that construction periods are shortened and can be less of a local disturbance (for example, the use of piling rigs may be minimised). This can help to improve wellbeing in the short term for neighbouring residents. (+) xi. No likely impact (0)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property?	++	i. Up to 50% of a building's emissions over its lifetime can be from embodied emissions (e.g. Construction, demolition, and disposal) . Setting embodied carbon budgets for all proposals involving demolition and major schemes will seek to reduce emissions. (++) ii. No likely impact. (0) iii. Setting embodied carbon targets for proposals involving demolition and major schemes will advocate for a retrofit first approach. Maximising the reuse of existing buildings and their materials through retrofitting is the most impactful strategy for reducing embodied carbon in development. It also creates additional incentives for retrofitting, by allowing the benefits of retrofit to be considered when assessing alterations and extensions. Following this approach, proposals that involve

v. Will it increase resilience to climate change?		demolition will have to meet embodied carbon benchmarks. This may encourage them to use new retrofitting technology to ensure that these benchmarks are achievable (++). iv. No likely impact v. Retrofitting involves the reuse of existing structures and materials in order to minimise the impact of development on climate change. Retrofit development may also include adaptation upgrades which bolster a building's resilience to climate change. This increases current buildings climate change resilience whilst limiting the negative impacts on the environment that come from construction (such as extraction and transportation and associated embodied carbon). Where new buildings may be able to be developed (within the carbon budgets), new technologies in new builds can also help to support greater resilience to climate change impacts (++)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	++	i. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could seek to improve water efficiency. Where low-carbon new builds are also able to meet the benchmarks, these schemes will also use materials that are associated with less intensive water usage. (+) ii. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could seek to remove fossil fuel energy systems. Embodied carbon budgets will also seek to reduce consumption of fossil fuels within development proposals by requiring applicants to demonstrate they meet the benchmark and will likely include reduced construction timelines which will also reduce the use of fossil fuels used in construction machinery. (++) iii. Introducing embodied carbon budgets will require more developments to reduce their embodied carbon. This will require either the use of more sustainable products, less products, or the re-use of existing products. As such, natural resources such as quarried materials in steel and concrete which can be the most carbon intensive will be reduced. This would have an overall positive effect. (++)

		iv. As part of setting embodied carbon budgets for proposals involving demolition and major schemes, this will ensure that the use of renewable resources over non-renewable resources is favoured in order to meet the benchmarks. (++) v. Although new builds may have less constraints compared to retrofit, in the context of Westminster, retrofitting will likely make efficient use of land. Westminster is a densely populated urban area with limited available space. Retrofitting existing buildings helps maximize the use of space. (+)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	++	i. As part of setting embodied carbon targets for proposals involving demolition and major schemes, retrofitting buildings should be prioritised over demolition. This will mean that more building footprints will remain the same, which will have a neutral impact on flood risks. Adopted City Plan policies on minimising flood risks will remain alongside any new retrofit first policy, meaning that where there may be an increased flood risk through any development work, this will need to be mitigated against. More broadly, this policy approach encourages reducing embodied emissions. Such emissions contribute to climate change which can affect changes in weather events and lead to effects such as increased rainfall. Decreasing contributions from developments to climate change can (in the long-term and cumulatively) can make a positive contribution to minimising flood risk. (++) ii. See response to (i) above (++) iii. No likely impact iv. No likely impact
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest?	0	i. Retrofitted buildings usually offer less opportunity for biodiversity gain, as what can be delivered is governed by the existing building, although careful design can maximise habitat creation. For schemes where planning permission is required (for example larger scale retrofits and/or schemes where demolition is allowed), new legislation requires developments to deliver biodiversity net gain which will mean that in some instances, biodiversity will be enhanced. (0) ii. Setting embodied carbon budgets for all proposals may preserve sites of importance for nature conservation as the retention of existing buildings/materials will be a priority, causing the least damage to the environment (+)

iv. Will it conserve and enhance species and habitats?		iii. No likely impact. (0) iv. See above i. (0)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	++	i. Up to 50% of a building's emissions over its lifetime can be from embodied emissions (e.g. construction, demolition, and disposal) . Setting embodied carbon budgets for all proposals involving demolition and major schemes will therefore seek to improve air quality. Furthermore, by indirectly encouraging more retrofits, these will likely have shorter construction periods. This will also have positive effects upon air quality, as machinery will be used for shorter time periods, there will be less construction traffic and there will likely be less demolition. (++) ii. See response to i above.
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	++	i. Setting embodied carbon budgets for those involving demolition and major schemes will steer many developments towards retrofitting which could seek to improve noise mitigation within existing buildings. This may result in reducing noise concerns and complaints. Furthermore, by indirectly encouraging more retrofits, these will likely have shorter construction periods. This will also have positive effects upon noise, as machinery will be used for shorter time periods and noise intensive activities such as demolition or the use of piling rigs would either be reduced or non-existent. (++) ii. See response to i above.
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	0	i. Setting embodied carbon budgets for schemes involving demolition and major schemes should help to reduce volumes of traffic from fewer construction waste materials during the construction period. However, this would be significantly improved if applied to all proposals. Furthermore, this impact will be temporary as it only applies during the construction phase of a development. (+) ii. No likely impact iii. No likely impact iv. No likely impact
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste?	++	i. As part of setting embodied carbon budgets for proposals involving demolition and major schemes, this will ensure that the use of non-renewable resources and non-sustainable materials are reduced. (++) ii. No likely impact

iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?		iii. As part of setting embodied carbon budgets for proposals involving demolition and major schemes, this will ensure that construction waste is reduced and re-used, increasing rates of material recovery. (++) iv. See response to i and iii above. (++)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	+	i. Setting embodied carbon budgets for all major schemes and those involving demolition will encourage a retrofit first approach. This means there is more opportunity for development to conserve or enhance heritage sites and their cultural value, complementing adopted policy and statutory requirements. This includes the reuse of significant materials or retention of important structures that reflect local historical character. Furthermore, retrofitting of existing buildings which have negative townscape values (particularly those identified in Conservation Areas) may be enhanced through the policy approach. Therefore, overall, it is assumed that this would have a positive effect on heritage. (+) ii. The reuse of existing buildings instead of redevelopments which alter the building envelope may mean less risk of new development which could potentially harm strategic views.(+) iii. See response to i above. (+) iv. Reducing the number of schemes that require demolition, should help preserve archaeological features because as much of the existing structures will be reused as possible. Furthermore, retrofitting can include improvements that seek to better the preservation and enhancement of archaeological features. (+) v. No likely impact
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	0	i. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could encourage existing buildings to be re-purposed in such a way that responds to and enhances the townscape through innovative design. (0) ii. See response to i above. iii. No likely impact iv. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could encourage existing buildings to be designed for users in mind and enhance the quality of the

		public realm. However, it is recognised that the building footprint of some existing buildings (which would be encouraged to be retained) may not maximise opportunities for reconfiguration which could enhance the public realm. Overall, this will have a neutral effect. (0) v. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting which could see better accessibility to existing buildings and designed in a way that benefits all equality group strands. That being said, new-builds can make this a lot easier to meet the M4(2) and M4(3) regulations, along with fire accessibility requirements. However, as it is not impossible to meet these accessibility regulations in retrofitted buildings, this will have an overall neutral impact. (0)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	0	i. New builds may have greater options to create new space, therefore they may have a greater impact on enhancing open space. However, setting embodied carbon targets would not preclude demolition occurring, as long as new builds were able to be built with a low embodied carbon, which means that new open space may still be able to occur. Furthermore, retrofitting existing buildings could also still enhance existing open space areas that already exist, and/or could improve access to them where possible through retrofitting options. (0) ii. Encouraging more buildings to be retrofitted by virtue of needing to meet embodied carbon benchmarks may enhance landscape character as existing buildings with a negative impact on streetscape may be renewed. It is noted however that where new builds may be allowed, these may also have a positive impact on landscape character. This effect is therefore neutral overall. (0) iii. Development for new builds without carbon budgets can more easily demolish underutilised buildings and create new play/green space, improving access to open space. In some instances, site constraints may make it more difficult achieve the same level of public benefit due to limited abilities to improve the quantum or accessibility of open space with existing building footprints (which would be encouraged by virtue of the embodied carbon targets). However, retrofitting existing buildings could also still enhance existing open space areas that already

		exist, and/or could improve access to them where possible through retrofitting options. (0) iv. Development for new builds without carbon budgets can more easily demolish underutilised buildings and create new green infrastructure. In some instances, site constraints may make it more difficult achieve the same level of public benefit due to limited abilities to improve the quantum or accessibility of open space with existing building footprints (which would be encouraged by virtue of the embodied carbon targets). However, given the need to adhere to biodiversity net gain requirements, all development, regardless of whether it is in line with embodied carbon targets or not will still need to enhance green infrastructure, with innovative design solutions able to do this to a significant degree on both new build and retrofit schemes, subject to planning permission (0)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	++	i. Setting embodied carbon budgets for schemes involving demolition and major schemes may steer developments towards retrofitting. The type of green economy jobs created from this are likely to be managerial and/or require specialist skills and technical expertise. Growing this upcoming industry will therefore likely improve qualifications, skills and training. Furthermore, if demolition is required as part of a proposal, the increased emphasis on circular economy will support new skilled jobs in this area. (++) ii. Retrofit developments will provide a certain number of jobs through construction and developers will also work with Westminster Employment Service (secured through S106) to support those furthest from the labour market in job opportunities within retrofit schemes, as is required by planning permissions for major schemes. This will provide more opportunity for those furthest away from the labour market to enter into green jobs. In addition, the policy approach supports the retrofitting of office space which can increase job density, maximising use of existing office space and creating new jobs. The reuse and enhancement of existing buildings can help ensure there is a variety of sizes and types of office spaces on offer (instead of all new development being high-end, Grade A or of similar styles and sizes). This can provide more affordable workspace which is more

		attractive to SMEs and new business startups, effectively catering to a broader audience across a range of industries. (++) iii. By requiring development involving demolition to deliver public benefits, more schemes may provide affordable workplaces, which will enable greater small business and start ups, improving employment opportunities. (+) iv. This approach would support the growth of the Green Economy in London, which will help create a positive relationship between economic growth and environmental needs. Furthermore, 28% of green jobs are located within London which suggests many (higher skilled) jobs created through retrofitting are likely to be sourced from the local economy. In addition, existing City Plan requirements for major developments to prepare and adhere to an Employment and Skills Plan (ESP) means that as this approach is still encouraging development, local residents who are out of work, new to the workforce and/or are currently in education will be able to continue to benefit from ESP initiatives. In the long term, this will continue to assist in improving earnings, including for lower skilled jobs which will remain vital in retrofit projects, extension projects and low carbon new-build schemes. These factors suggest the policy should help improve earnings, whilst ensuring little negative impact on the environment. (+) v. See response to i above.
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	+	i. Under this policy approach, improving/reusing existing buildings or in some cases bringing them back into active use, can prolong the use of buildings for some businesses. This avoids buildings becoming unlettable due to failing energy/environmental standards, improving business development and environment. Furthermore, the approach supports the development of businesses in a growing industry (retrofitting) and within the wider green economy which can help to promote sustainable growth across the city. However, some types of businesses across the city that require high-end office floorspace may need to adjust their approaches to development. This is because the need to reduce demolition and/or stay within embodied carbon targets may conflict with structural and layout requirements in existing buildings, such as floor to ceiling heights, which may be perceived to be needed to attract specific high-end tenants

		which offer high-value jobs. However, it has been evidenced that many global companies with high-end jobs have taken on retrofitted office premises across the city and that considerations of a 'desirable place to work' are not just based on structural elements of a building, but rather on the wider cultural and social ecosystem in the area surrounding the office. This has therefore proven that the ability to attract businesses which will continue to contribute to the city's economy will not be deterred by this policy approach. Furthermore, high-quality retrofitted buildings are able to still generate high rental yields which will ultimately help to continue to keep investment (and re-investment) in Westminster. The policy approach will therefore ensure that where demolition does occur, this results in the delivery of the best outcomes, and most optimal building, bringing the biggest business development improvements. Furthermore, the policy approach may still enable low-carbon new build development which could continue to support high value jobs in the city. Therefore overall, it is expected that the policy approach will still have a beneficial effect on the business environment across the city. The policy approach will also ensure a balance between best in class, and more affordable office space, by causing a reduction in the number of brand new buildings. This will create a more varied and balanced eco-system of office /retail space available, which will have a more balanced impact on the economy. (++) ii. Setting embodied carbon benchmarks may have an initial impact on the businesses in the city as they adapt to new requirements. However, this could help business resilience in the long term and would ensure a greener economy, focussed on sustainable growth. (+) iii. Setting embodied carbon budgets may result in a greater variety of size and type of office space which may appeal to new business start-ups, small businesses and opportunities for local people. Also, as an increase in retrofitting occurs and a need for specialist skills to be developed, this could be embedded into local skills training to ensure local people have opportunities for jobs in this sector. (++) iv. See response to iii above. (++) v. Setting embodied carbon budgets for schemes involving demolition and major schemes may promote regeneration of existing buildings wanting to be more

		energy efficient however, this is also likely to take place as part of full-scale redevelopment with demolition and new buildings incorporated. (0)

Option D: Setting embodied carbon budgets for all development		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	0	No likely impact identified.
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	0	No likely impact identified.
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. Setting embodied carbon budgets for all proposals has the potential to cause a slight increase in costs to keep embodied carbon of new buildings within the benchmark ranges set for residential buildings. However, given the evidence base which will be used to support any new policy, it has been identified that this cost uplift would be minimal. Therefore, it is unlikely that fewer new build homes would be delivered. Furthermore, by reducing demolition due to embodied carbon impacts, many developments will be steered towards retrofitting which could seek to improve the deliverability of high-quality homes compared to what is currently existing on-site, by bringing unfit homes back into use. (+) ii. Setting embodied carbon targets may see an impact on the range of affordable housing being delivered through increased costs to keep embodied carbon of new buildings within a set budget. Applicants may highlight viability concerns to

		providing the range of affordable housing required when also applying this policy option as part of their development proposals. (-) iii. Setting embodied carbon budgets for all proposals should not on the whole impact the delivery of homes (including bringing unfit homes back into use) and therefore will further assist in reducing homelessness. (+) iv. The adopted City Plan policies already support development that produces homes that prolong independence and/or are fit for purpose and offer a range of housing types/sizes. Setting embodied carbon budgets for all proposals will be alongside the need to continue to fulfil these housing objectives outlined in the City Plan. (0) v. See answer to (i) above (+) vi. See answer to (i) and (iv) above. (0)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing?	+	i. Setting embodied carbon budgets for all proposals will encourage the reduced extraction and transportation of raw materials, along with reduced levels of demolition. It is expected that this will result in less particulates being released into the air, which will have a positive impact on respiratory health. This is especially the case for disadvantaged members of Westminster community where particulates contribute to poorer health outcomes and earlier average mortality. Furthermore, some retrofit schemes will have a less intensive construction period which may benefit the health of local people nearby. This will have a positive impact on health inequalities. (+) ii. No likely impact (0) iii. No likely impact (0) iv. No likely impact (0) v. Setting embodied carbon budgets for all proposals promotes a retrofit first approach which supports the reuse and retention of important structures of cultural significance. This can encourage more culturally important buildings to be kept and reutilised, instead of demolished, improving the cultural wellbeing of areas within Westminster. (+) vi. No likely impact (0) vii. No likely impact (0)

xi. Will it improve facilities and accessibility for people with disabilities?		viii. Setting embodied carbon budgets for all proposals will continue to support City Plan policy which requires development to be of exemplary design standards, zero carbon and to reduce on-site energy demand. The policy also encourages the reuse of existing structures within development. This is expected to decrease building work and the levels or particulates associated with demolition and more broadly that associated with extraction and transportation of materials. This will help improve air quality and create healthier living and working environments. (+) ix. See answers to (i) and (ii) (+) x. Due to the environmental benefits aforementioned (improved air quality) it is likely there will be a positive impact on health, leading to improved wellbeing. For many buildings undergoing a retrofit, the main structural elements are retained which can mean that construction periods are shortened and can be less of a local disturbance (for example, the use of piling rigs may be minimised). This can help to improve wellbeing in the short term for neighbouring residents. (+) xi. No likely impact (0)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	++	i. Up to 50% of a building's emissions over its lifetime can be from embodied emissions (e.g. Construction, demolition, and disposal) . Setting embodied carbon budgets for all proposals will seek to reduce emissions. (++) ii. No likely impact iii. Setting embodied carbon budgets for all proposals will advocate for a retrofit first approach. Maximising the reuse of existing buildings and their materials through retrofitting is the most impactful strategy for reducing embodied carbon in development. It also creates additional incentives for retrofitting, by allowing the benefits of retrofit to be considered when assessing alterations and extensions. Following this approach, all proposals will have to meet embodied carbon benchmarks. This may encourage them to use new retrofitting technology to ensure that these benchmarks are achievable (++). iv. No likely impact v. Retrofitting involves the reuse of existing structures and materials in order to minimise the impact of development on climate change. Retrofit development may also include adaptation upgrades which bolster a building's resilience to

		climate change. This increases current buildings climate change resilience whilst limiting the negative impacts on the environment that come from construction (such as extraction and transportation and associated embodied carbon). Where new buildings may be able to be developed (within the carbon budgets), new technologies in new builds can also help to support greater resilience to climate change impacts (++)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	++	i. Setting embodied carbon budgets for all schemes will steer developments towards retrofitting which could seek to improve water efficiency. Where low-carbon new builds are also able to meet the benchmarks, these schemes will also use materials that are associated with less intensive water usage. (+) ii. Setting embodied carbon budgets for all schemes will steer developments towards retrofitting which could seek to remove fossil fuel energy systems. Embodied carbon budgets will also seek to reduce consumption of fossil fuels within development proposals by requiring applicants to demonstrate they meet the benchmark and will likely include reduced construction timelines which will also reduce the use of fossil fuels used in construction machinery. (++) iii. Introducing embodied carbon budgets will require all developments to reduce their embodied carbon. This will require either the use of more sustainable products, less products, or the re-use of existing products. As such, natural resources such as quarried materials in steel and concrete which can be the most carbon intensive will be reduced. This would have an overall positive effect. (++) iv. As part of setting embodied carbon budgets for all proposals, this will ensure that the use of renewable resources over non-renewable resources is favoured in order to meet the benchmarks. (++) v. Although new builds may have less constraints compared to retrofit, in the context of Westminster, retrofitting will likely make efficient use of land. Westminster is a densely populated urban area with limited available space. Retrofitting existing buildings helps maximize the use of space. (+)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding?	++	i. As part of setting embodied carbon budgets for all proposals, retrofitting buildings will likely be prioritised over demolition. This will mean that more building footprints will remain the same, which will have a neutral impact on flood risks.

ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?		Other existing City Plan policies on minimising flood risks will remain alongside the new retrofit first policy, meaning that where there may be an increased flood risk through any development work, this will need to be mitigated against. More broadly, this approach will encourage reduced embodied emissions which negatively impact climate change which can affect changes in weather events and lead to effects such as increased rainfall. Decreasing developments impact on climate change can (in the long-term) can make a positive contribution to minimising flood risk. (++) ii. See response to (i) above (++) iii. No likely impact iv. No likely impact
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	0	i. Retrofitted buildings usually offer less opportunity for biodiversity gain, as what can be delivered is governed by the existing building, although careful design can maximise habitat creation. For schemes where planning permission is required (for example larger scale retrofits and/or schemes where demolition is allowed), new legislation requires developments to deliver biodiversity net gain which will mean that in some instances, biodiversity will be enhanced. (0) ii. Setting embodied carbon budgets for all proposals may preserve sites of importance for nature conservation as the retention of existing buildings/materials will be a priority, causing the least damage to the environment (+) iii. No likely impact iv. See above i. (0)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	++	i. Up to 50% of a building's emissions over its lifetime can be from embodied emissions (e.g. construction, demolition, and disposal) . Setting embodied carbon budgets for all proposals will therefore seek to improve air quality. Furthermore, by indirectly encouraging more retrofits, these will likely have shorter construction periods. This will also have positive effects upon air quality, as machinery will be used for shorter time periods, there will be less construction traffic and there will likely be less demolition. (++) ii. See response to i above. (++)

10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	++	i. Setting embodied carbon budgets for all schemes will steer many developments towards retrofitting which could seek to improve noise mitigation within existing buildings. This may result in reducing noise concerns and complaints. Furthermore, by indirectly encouraging more retrofits, these will likely have shorter construction periods. This will also have positive effects upon noise, as machinery will be used for shorter time periods and noise intensive activities such as demolition or the use of piling rigs would either be reduced or non-existent. (++) ii. See response to i above. (++)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	0	i. Setting embodied carbon budgets for all schemes should help to reduce volumes of traffic from fewer construction waste materials during the construction period. This impact will be temporary as it only applies during the construction phase of a development. (+) ii. No likely impact iii. No likely impact iv. No likely impact
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	++	i. As part of setting embodied carbon budgets for all proposals, this will ensure that the use of non-renewable resources and non-sustainable materials are reduced. (++) ii. No likely impact iii. As part of setting embodied carbon budgets for all proposals, this will ensure that construction waste is reduced and re-used, increasing rates of material recovery. (++) iv. See response to i and iii above. (++)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings?	+	i. Setting embodied carbon budgets for all schemes will encourage a retrofit first approach. This means there is more opportunity for development to conserve or enhance heritage sites and their cultural value, complementing adopted policy and statutory requirements. This includes the reuse of significant materials or retention of important structures that reflect local historical character. Furthermore, retrofitting of existing buildings which have negative townscape values (particularly those identified in Conservation Areas) may be enhanced through the policy

v. Will it protect and enhance the setting of the Westminster World Heritage Site?		approach. Therefore, overall, it is assumed that this would have a positive effect on heritage. (+) ii. The reuse of existing buildings instead of redevelopments which alter the building envelope may mean less risk of new development which could potentially harm strategic views.(+) iii. See response to i above. (+) iv. Reducing the number of schemes that require demolition, should help preserve archaeological features because as much of the existing structures will be reused as possible. Furthermore, retrofitting can include improvements that seek to better the preservation and enhancement of archaeological features. (+) v. No likely impact
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	0	i. Setting embodied carbon budgets for all schemes will steer developments towards retrofitting which could encourage existing buildings to be re-purposed in such a way that responds to and enhances the townscape through innovative design. (0) ii. See response to i above. iii. No likely impact iv. Setting embodied carbon budgets for all schemes may steer developments towards retrofitting which could encourage existing buildings to be designed for users in mind and enhance the quality of the public realm. However, it is recognised that the building footprint of some existing buildings (which would be encouraged to be retained) may not maximise opportunities for reconfiguration which could enhance the public realm. Overall, this will have a neutral effect. (0) v. Setting embodied carbon budgets for all schemes will steer developments towards retrofitting which could see better accessibility to existing buildings and designed in a way that benefits all equality group strands. That being said, new-builds can make this a lot easier to meet the M4(2) and M4(3) regulations, along with fire accessibility requirements. However, as it is not impossible to meet these accessibility regulations in retrofitted buildings, this will have an overall neutral impact. (0)
15. Open Space i. Will it enhance the quality of open space?	0	i. New builds may have greater options to create new space, therefore they may have a greater impact on enhancing open space. However, setting embodied

ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?		carbon targets would not preclude demolition occurring, as long as new builds were able to be built with a low embodied carbon, which means that new open space may still be able to occur. Furthermore, retrofitting existing buildings could also still enhance existing open space areas that already exist, and/or could improve access to them where possible through retrofitting options. (0) ii. Encouraging more buildings to be retrofitted by virtue of needing to meet embodied carbon benchmarks may enhance landscape character as existing buildings with a negative impact on streetscape may be renewed. It is noted however that where new builds may be allowed, these may also have a positive impact on landscape character. This effect is therefore neutral overall. (0) iii. Development for new builds without carbon budgets can more easily demolish underutilised buildings and create new play/green space, improving access to open space. In some instances, site constraints may make it more difficult achieve the same level of public benefit due to limited abilities to improve the quantum or accessibility of open space with existing building footprints (which would be encouraged by virtue of the embodied carbon targets). However, retrofitting existing buildings could also still enhance existing open space areas that already exist, and/or could improve access to them where possible through retrofitting options. (0) iv. Development for new builds without carbon budgets can more easily demolish underutilised buildings and create new green infrastructure. In some instances, site constraints may make it more difficult achieve the same level of public benefit due to limited abilities to improve the quantum or accessibility of open space with existing building footprints (which would be encouraged by virtue of the embodied carbon targets). However, given the need to adhere to biodiversity net gain requirements, all development, regardless of whether it is in line with embodied carbon targets or not will still need to enhance green infrastructure, with innovative design solutions able to do this to a significant degree on both new build and retrofit schemes, subject to planning permission (0)
16. Employment Opportunities	++	i. Setting embodied carbon budgets for all schemes will steer developments towards retrofitting. The type of green economy jobs created from this are likely to be

i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?		managerial and/or require specialist skills and technical expertise. Growing this upcoming industry will therefore likely improve qualifications, skills and training. Furthermore, if demolition is required as part of a proposal, the increased emphasis on circular economy will support new skilled jobs in this area. (++) ii. Retrofit developments will provide a certain number of jobs through construction and developers will also work with Westminster Employment Service (secured through S106) to support those furthest from the labour market in job opportunities within retrofit schemes, as is required by planning permissions for major schemes. This will provide more opportunity for those furthest away from the labour market to enter into green jobs. In addition, retrofitting office space can increase job density, maximising use of existing office space and creating new jobs. Retrofitted office space also helps diversify the offer of workspaces within Westminster, ensuring provision for affordable workspaces, which can attract startups and small businesses. For the reasons listed above, this policy option could help reduce unemployment and provide job opportunities for those most in need. (++) iii. By requiring development involving demolition to deliver public benefits, more schemes may provide affordable workplaces, which will enable greater small business and start ups, improving employment opportunities. (+) iv. This approach would support the growth of the Green Economy in London, which will help create a positive relationship between economic growth and environmental needs. Furthermore, 28% of green jobs are located within London which suggests many (higher skilled) jobs created through retrofitting are likely to be sourced from the local economy. In addition, existing City Plan requirements for major developments to prepare and adhere to an Employment and Skills Plan (ESP) means that as this approach is still encouraging development, local residents who are out of work, new to the workforce and/or are currently in education will be able to continue to benefit from ESP initiatives. In the long term, this will continue to assist in improving earnings, including for lower skilled jobs which will remain vital in retrofit projects, extension projects and low carbon new-build

		schemes. These factors suggest the policy should help improve earnings, whilst ensuring little negative impact on the environment. (+) v. See response to i above. (++)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	+	i. Under this policy approach, improving/reusing existing buildings or in some cases bringing them back into active use, can prolong the use of buildings for some businesses. This avoids buildings becoming unlettable due to failing energy/environmental standards, improving business development and environment. Furthermore, the approach supports the development of businesses in a growing industry (retrofitting) and within the wider green economy which can help to promote sustainable growth across the city. However, some types of businesses across the city that require high-end office floorspace may need to adjust their approaches to development. This is because the need to reduce demolition and/or stay within embodied carbon targets may conflict with structural and layout requirements in existing buildings, such as floor to ceiling heights, which may be perceived to be needed to attract specific high-end tenants which offer high-value jobs. However, it has been evidenced that many global companies with high-end jobs have taken on retrofitted office premises across the city and that considerations of a 'desirable place to work' are not just based on structural elements of a building, but rather on the wider cultural and social ecosystem in the area surrounding the office. This has therefore proven that the ability to attract businesses which will continue to contribute to the city's economy will not be deterred by this policy approach. Furthermore, high-quality retrofitted buildings are able to still generate high rental yields which will ultimately help to continue to keep investment (and re-investment) in Westminster. The policy approach will ensure that where demolition does occur, this results in the delivery of the best outcomes, and most optimal building, bringing the biggest business development improvements. Furthermore, the policy approach may still enable low-carbon new build development which could continue to support high value jobs in the city. Therefore overall, it is expected that the policy approach will still have a beneficial effect on the business environment across the city. The policy approach will also ensure a balance between best in class, and more affordable

		office space, by causing a reduction in the number of brand new buildings. This will create a more varied and balanced eco-system of office /retail space available, which will have a more balanced impact on the economy. (++) ii. Setting embodied carbon benchmarks may have an initial impact on the businesses in the city as they adapt to new requirements. However, this could help business resilience in the long term and would ensure a greener economy, focussed on sustainable growth. (+) iii. Setting embodied carbon budgets may result in a greater variety of size and type of office space which may appeal to new business start-ups, small businesses and opportunities for local people. Also, as an increase in retrofitting occurs and a need for specialist skills to be developed, this could be embedded into local skills training to ensure local people have opportunities for jobs in this sector. (++) iv. See response to iii above. (++) v. Setting embodied carbon budgets for schemes involving demolition and major schemes may promote regeneration of existing buildings wanting to be more energy efficient however, this is also likely to take place as part of full-scale redevelopment with demolition and new buildings incorporated. (0)

Option E: Require all applications to submit Whole Life Carbon assessment comparing retrofit to redevelopment and assess whether retrofitting is a viable option		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	0	No impacts identified.
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	0	No impacts identified.
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. Requiring all applications to submit Whole Life Carbon (WLC) assessments will not necessarily decrease the number of high-quality homes. The assessment will ensure whether a high-quality housing scheme can be feasibly achieved through retrofit, and if not, then redevelopment is acceptable. This means that current rates of housing delivery to provide high quality homes across the city will be maintained. (+) ii. Using WLC assessments to assess the viability of retrofit, may see an impact on the range of affordable housing being delivered. Increased costs may be incurred through retrofitting which could reduce the amount and range of affordable housing being delivered. However, applicants will have to provide proof that providing the range of affordable housing required cannot be met through a retrofit scheme, and if their proof is sound in these instances redevelopment may

		be acceptable. This will mean that the ability to provide an increased range of affordable housing will continue. (+) iii. Requiring all applications to submit WLC assessments may impact the amount of housing being delivered due to the costs incurred to achieve retrofitting over redevelopment, which could be evidenced within the WLC assessment. As a result, this could impact on the amount of housing being delivered to reduce homelessness. However, WLC assessments will ensure that retrofitting is a viable option and if not then redevelopment will be acceptable. Therefore, this should ensure housing and the reduction of homelessness is not impacted. (+) iv. No likely impact. v. Requiring applications to submit WLC assessments to demonstrate retrofit development is a viable option could seek to reduce the number of unfit homes and improve quality of homes through retrofitting rather than redevelopment as a result. (+) vi. See response to i above. (+)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces?	0	i. Requiring a WLC assessment may encourage schemes to adopt proposals which are low-carbon and therefore reduce extraction and transportation of raw materials, along with reduced levels of demolition. It is expected that this will result in less particulates being released into the air, which will have a positive impact on respiratory health. This is especially the case for disadvantaged members of Westminster community where particulates contribute to poorer health outcomes and earlier average mortality. Furthermore, some retrofit schemes will have a less intensive construction period which may benefit the health of local people nearby. This will have a positive impact on health inequalities. However, it is noted that by submitting a WLC assessment, it may be found that retrofitting is not financially viable. This would mean that these benefits would not be achieved. (0) ii. No likely impact iii. No likely impact iv. No likely impact v. No likely impact

ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		vi. No likely impact vii. No likely impact viii. See response to i above. Requiring all applications to submit a WLC assessment should seek to promote development coming forward via retrofitting and/or low carbon alternatives. This can help to ensure that development supports the continued creation of healthy homes and workplaces. However, it is noted that if financial viability shows that retrofitting is not feasible, these benefits would not be realised. (0) ix. See response to viii above. (0) x. No likely impact xi. No likely impact
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	+	i. Up to 50% of a building's emissions over its lifetime can be from embodied emissions (e.g. Construction, demolition, and disposal) . Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option will seek to identify opportunities to reduce emissions which improve energy consumption. However, without the setting of defined carbon benchmarks, this may not significantly reduce emissions. (+) ii. No likely impact (0) iii. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option, may steer developments towards retrofitting which could seek to reducing emissions through retrofitting new technology. However, as this will not be mandated, retrofits overall may be reduced. (0) iv. No likely impact v. See response to (iii) above. (0)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?	+	i. It is unlikely that a WLC assessment will highlight areas to reduce water consumption and will therefore have negligible impact on water efficiency (0) ii. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option, may steer developments towards retrofitting which could seek to remove fossil fuel energy systems and could improve building efficiencies. Fossil fuels can also be reduced through shorter construction periods which use less machinery (such as piling rigs) and for a shorter amount of time. It

iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?		is noted however, that in the absence of needing to provide a WLC assessment, new buildings would also be required to use minimal fossil fuels in operation, as per EPC requirements and existing City Plan policies. (+) iii. Introducing WLC assessments may promote more developments to consider how they can reduce their embodied carbon. This could then require either the use of more sustainable products, less products, or the re-use of existing products. As such, natural resources such as quarried materials in steel and concrete which can be the most carbon intensive will be reduced. (+) iv. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option will better demonstrate that the use of renewable resources over non-renewable resources are favoured. (+) v. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option will make efficient use of land as applicants will be able to consider existing buildings that would benefit from retention and retrofit. This will ensure existing land is used more efficiently as buildings can be brought back into active use, if not already, alongside new builds through an options appraisal. (++)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	+	i. No likely impact. ii. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option will seek to increase resilience to climate change through reducing embodied emissions that contribute to climate change effects. This includes adapting to making buildings climate adaptive to climate emergency such as storm events/heavy rainfall and improving flood resistance and flood resilience. However, as WLC assessments will just demonstrate potential options rather than adopting that which is lowest in embodied carbon, the overall impact of this may be reduced. (+) iii. No likely impact iv. No likely impact
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats?	0	i. Both new builds and retrofits can both protect and enhance biodiversity through incorporating green/blue infrastructure into scheme designs. Furthermore, all developments subject to planning permission will be required to deliver

ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?		biodiversity net gain, which means that this will have a neutral impact on the whole. (0) ii. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option may preserve sites of importance for nature conservation as the retention of existing buildings/materials will be a priority, causing the least damage to the environment (+) iii. No likely impact iv. See above i.
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	+	i. Up to 50% of a building's emissions over its lifetime can be from embodied emissions (e.g. Construction, demolition, and disposal) . Requiring all applications to submit WLC assessments demonstrating retrofitting is a viable option will therefore seek to consider retrofitting options which may improve air quality by reducing emissions. (+) ii. See response to ii above.
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	+	i. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option will steer some developments towards retrofitting which could seek to improve noise mitigation within existing buildings. In addition, as part of retrofitting it is likely that less construction noise would be generated in comparison to demolition taking place. This may result in a reduction in noise concerns and complaints. (+) ii. See response to i above.
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	0	i. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option should help to promote retrofitting which will assist in reducing volumes of traffic during construction periods from less construction waste materials. However, where it is demonstrated that this is not financially viable, current levels of construction traffic for sites subject to demolition and re-build may continue. This would reduce the positive effect on reducing volumes of traffic across the city. (+) ii. No likely impact iii. No likely impact iv. No likely impact

12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	+	i. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option will help to encourage the use of renewable resources and that the use of non-sustainable materials are reduced. (+) ii. No likely impact iii. As part of requiring WLC assessments, this will help to identify areas where embodied carbon can be saved. This will likely highlight the ability to re-use existing materials, which can ultimately reduce construction waste, improving rates of recycling, resource recovery and re-use. (+) iv. See answer to (i) and (iii) above.
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	+	i. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option may provide more opportunities for development to conserve or enhance heritage sites and their cultural value. This includes the reuse of significant materials or retention of important structures that reflect local historical character. This approach could help conserve or enhance heritage sites and assets of cultural value. Furthermore, retrofitting of existing buildings which have negative townscape values (particularly in Conservation Areas) may be enhanced. (+) ii. The reuse of existing buildings may mean less risk of new development which could potentially harm strategic views. (+) iii. See response to i above. (+) iv. Reducing the number of schemes that require demolition, should help preserve archaeological features because as much of the existing structures will be reused as possible. Furthermore, retrofitting can include improvements that seek to better the preservation and enhancement of archaeological features. (+) v. No likely impact
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter?	0	i. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option may steer developments towards retrofitting which could encourage existing buildings to be re-purposed in such a way that responds to and enhances the townscape through innovative design. The preparation of a WLC assessment may not preclude the option of a demolition and re-build

iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?		scheme, which may also enhance the local townscape. The effect overall is therefore neutral. (0) ii. See response to (i) above. (+) iii. No likely impact iv. Requiring WLC assessments may steer many developments towards retrofitting which could encourage existing buildings to be designed for users in mind and enhance the quality of the public realm. However, it is recognised that the building footprint of some existing buildings (which would be encouraged to be retained) may not maximise opportunities for reconfiguration which could further enhance the public realm. (0) v. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option may steer developments towards retrofitting which could see better accessibility to existing buildings and ensuring that they are designed in a way that benefits all equality group strands. That being said, new-builds can be easier to meet the M4(2) and M4(3) regulations, along with fire accessibility requirements. However, this is not impossible in retrofit options. As this policy approach would possibly make it easier to continue to demolish and re-build on the grounds of financial concerns (including costs to adhere to these regulations), this would likely have a positive impact. (+)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	+	i. By providing a WLC assessment, it may be demonstrated that new builds may have greater options to create new space, therefore these buildings with larger embodied carbon may have a greater impact on enhancing open space. However, retrofitting existing buildings could also still enhance existing open space areas that already exist, and/or improving access to them where possible through retrofitting options. (+) ii. Requiring WLC assessments may encourage retrofitting which may enhance landscape character as existing buildings with a negative impact on streetscape could be renewed. It is noted however that where new builds may be allowed, these may also have a positive impact on landscape character. (+) iii. Requiring WLC assessments will help to identify different options for retrofitting and new-build in the context of embodied carbon and financial viability.

		Development of new builds can more easily demolish underutilised buildings and create new play/green space, improving access to open space. In some instances, site constraints may make it more difficult achieve the same level of public benefit due to limited abilities to improve the quantum or accessibility of open space with existing building footprints (which would be encouraged by virtue of the WLC assessment). However, retrofitting existing buildings could also still enhance existing open space areas that already exist, and/or could improve access to them where possible through retrofitting options. (+) iv. Given the need to adhere to biodiversity net gain requirements, all development, regardless of the results of a WLC assessment will still need to enhance green infrastructure, with innovative design solutions able to do this to a significant degree on both new build and retrofit schemes subject to planning permission. (0)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	+	i. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option may steer developments towards retrofitting which will require specialist skills and thus improve qualifications, skills or training in the planning/construction industry as a result. However, as schemes will also continue to adopt traditional methods of construction (including demolition and re-build) if it is found that it is financially unviable to undertake a retrofit, this would likely not improve new skills across this industry. However, sustained development activity (particularly in the construction sector) will continue to offer entry-level jobs to people across the city which will improve individual qualifications, skills and training prospects. (+) ii. See response to i above. iii. See response to i above. iv. No likely impact v. See response to i above.
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy?	+	i. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option should improve the business development and environment by providing less environmentally harmful ways to construct pleasant environments to work in. However, as the WLC assessments will be reviewed in the context of financial viability, where it is demonstrated that retrofits cannot achieve

iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?		the same financial return for a desired business objective, there may be greater scope to instead opt for a demolition and re-build option which could overcome perceived barriers within existing buildings such as structural constraints to attract high-end clients to generate significant financial return for the development. However, this type of development will unlikely assist in providing a broader range of commercial spaces which could attract different types of businesses which are also important to the maintenance of the Westminster economy. (+) ii. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option may have an initial impact on the businesses in the city as they adapt to new requirements. However, as the WLC assessment will be reviewed in the context of financial viability, this will have a positive effect on maintaining business resilience in the short term. In the long-term however, sustainable business decisions which recognise carbon emissions from all sources will ultimately create a more sustainable economy. (+) iii. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option may result in more wholescale demolition and re-build options which seek to attract high-end tenants for commercial spaces. This can reduce the variety of size and type of office space which may appeal to new business start-ups, small businesses and opportunities for local people as the development remains contingent on financial viability, which could therefore seek the greatest financial returns possible. (-) iv. By requiring all applications to submit a WLC assessment, this will ensure that development options are considered between environmental and commercial constraints, which will therefore continue to promote business activity in key sectors. (++) v. Requiring all applications to submit WLC assessments demonstrating whether retrofitting is a viable option will continue to promote regeneration outcomes across the city, whilst ensuring that these remain feasible via either newbuild or retrofitting options. (++)

1.3 Site Allocations Reasonable Alternatives

Grosvenor Sidings

Option A: Existing land use		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	--	i. Currently the main use of the site does not improve access to local services, shops and community facilities. The principal use of the site is as a train depot and a British Transport Police building, the site does not offer services of community uses. (--) ii. There is little opportunity for neighbourhood decision making on this site. The current uses of the site do not support neighbourhood intervention or encourage local decision making as most of the site is not open for public use. (--) iii. The site does not offer facilities or space to promote an inclusive Westminster, this is because most of the site is inaccessible to the public. (--) iv. There is a lack of community infrastructure on site, and the site is an Area of Play Space Deficiency and Area of Open Space Deficiency. This means the current use of the site is not conducive to community activity. (--)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	+	i. The presence of the British Transport Police building on site may reduce crime, disorder and antisocial behaviour on site and in the neighbouring areas (+) ii. The sidings are regularly used, meaning there is little inactivity on the site. Furthermore, the presence of the police building may contribute to reducing the fear of crime and disorder (real and perceived). (+) iii. The site does little to actively reduce disorder, antisocial behaviour or reduce other behaviours such as fly-tipping and vandalism. (0)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing?	0	No impacts identified.

iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?		
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?	-	i. The site does not offer any services or facilities to ameliorate health inequalities in the area. The main use of the site (train depot) means there is an increase in air pollutants (as the Chatham line is primarily operated by diesel trains), which may be exacerbated if trains are idle or in the depot. There is a very small amount of urban greenery, which has a small positive increase on air pollution/beauty of the area but there is no opportunity to improve access to healthy activities (outdoor play, cycling etc.). However, the sites current use as a train depot helps to support the wider public transport network of London and greater access to public transport can assist in improving health inequalities. (0) ii. No impact identified (0) iii. The train lines (Chatham and Brighton main line) help improve movement to a certain extent as they support lines running up into Victoria and south across the river Thames, however the site does not improve pedestrian access or movement for active transport. It does not support East to West movement across the site, decreasing permeability. (0) iv. The site does not provide open space, play space or sports facilities. For this reason, it does not encourage participation in sports or physical activity. (--) v. The ancillary structures on site include a Grade II listed building (123A Grosvenor Road, SW1). This heritage asset (along with a cluster of listed buildings that sit just outside the South West of the site) helps celebrates the site's special history and this contributes to the local culture. (+) vi. The site does not contribute to minimising loneliness, maximising independence or improving mental wellbeing of older people. (-) vii. No impact identified (0) viii. The site does not currently support any health homes or workspaces. (-)

		ix. The current uses of the site as a trainline and depot may impact on nearby resident amenity through noise and vibration impacts, particularly for residents of the Peabody Estate adjacent to the site. This may have an impact on healthy life expectancy. (-) x. The existing use of the site could negatively impact mental health and wellbeing due to the proximity to the train tracks and subsequent noise pollution and vibrations from the trains. (-) xi. The site does not facilitate any access and is therefore lacking in facilities for people with disabilities. Apart from supporting the train line, which does aid accessibility into Victoria and out of the city, there is no onsite infrastructure to aid mobility for less able-bodied people. (-)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	-	i. The railway produces some greenhouse gas emissions, and it does not produce or use zero carbon energy; however, the sidings are quite an important part of infrastructure for supporting public transport in London and beyond. This helps reduce energy consumption by reducing the need to use private forms of vehicle travel (cars). (+) ii. Same impact as (i). (+) iii. Currently, there are no opportunities to retrofit the site to adopt new technologies without redevelopment. (--) iv. The current site has a limited amount of greenery. As a result, it does little to reduce urban heat island effects. (-) v. Rail infrastructure is quite vulnerable to extreme weather events and climate change and there is very little permeable land or vegetation on site to contribute to flood protection. This means the current uses of the site do not increase resilience to climate change. (-)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised?	-	i. At present, the use of the British Transport Police building and the sidings does not promote opportunities for water recycling or reusing. (-) ii. The sidings are currently used by trains which operate on both renewable and non-renewable sources. Maintaining the use of the sidings supports the use of greener modes of transport which can help reduce the consumption of car/vehicle fossil fuels. (+)

iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?		iii. In its current use, no other natural resources are used. (0) iv. The Brighton Main Line, which runs from London Victoria to Brighton, is electrified which means renewable energy can be used, promoting the use of renewable resources. The Chatham mainline is still primarily operated by diesel trains. Therefore, the sidings are currently used by trains which operate on both renewable and non-renewable sources. (0) v. At present the site is not making efficient use of land. It is currently underutilised and does not contribute to uses needed in the CAZ where commercial and residential growth is supported. (--)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	--	i. Most of the area is covered in impermeable surfaces and very low levels of urban greening. This exacerbates risks from all sources of flooding as the site is in Flood Zone 3 and Surface Water Hotspot. (--) ii. No impact identified (0) iii. No impact identified (0) iv. The site offers very little natural filtration of water due to its low levels of green infrastructure. Furthermore, although railway lines themselves do not typically have a direct impact on water quality, construction, maintenance, and operation of railways can decrease water quality due to runoff and erosion, chemical contaminants and accidental spills. (--)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	--	i. The current function as a sidings and British Transport Police buildings does not contribute to the protection, improvement, or expansion of biodiversity and protected habitats. (--) ii. No impact identified (0) iii. The use of the site at present is not conducive to promoting the educational value of biodiversity. (--) iv. There is little to no urban greening on this site, therefore there is very little opportunity to conserve and enhance species and habitats. (--)

9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	--	i. The use of the site as a depot means there are negative air quality effects, especially if diesel trains are left idle. Furthermore, there is hardly any greenery on site to help naturally ameliorate air quality. (--) ii. The Brighton Main Line, which runs from London Victoria to Brighton, is electrified, which helps contribute to reducing emissions of key pollutants, however the site has no key infrastructure to improving air quality or reducing key emissions. (--)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	--	i. As the site is actively used as a train depot, there is potential risk of noise complaints. This is especially because the surrounding areas are predominantly residential and there are little noise mitigation measures (sound buffers/trees etc.) on site. (--) ii. The current use of the site will not reduce noise levels. (--)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	-	i. The site supports quite an important public transport link into Victoria which contributes to the public transport network in Westminster and beyond, thus having a positive impact on the volume of traffic. However, the site does not support east to west movement (vehicular/active transport) decreasing permeability in the area, which may increase traffic and congestion on nearby major roads such as along the A3212 (Grosvenor Road). (0) ii. The site does not support pedestrian routes or cycle paths. It creates a disconnect between cycle routes that surround the site, discouraging walking and cycling. (--) iii. The site has some positive influence on modal shift, encouraging people to travel via train instead of personal motor vehicles. However, it lacks pedestrianised routes/cycle paths so does not support active modes of transport. (0) iv. The site's current use actively promotes accessibility to public transportation and plays a role in enhancing London's overall transport network. (+)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	-	i. Currently, the consumption of materials and resources is low due to the site being underutilised. However, the use of diesel trains on the lines does not reduce the consumption of materials and resources. (-) ii. No impact identified. (0) iii. No impact identified. (0) iv. No impact identified. (0)

13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	+	i. The site is home to one listed building (123A Grosvenor Road, SW1 House). The retention of this heritage assets would remain if the site continued its current use. (+) ii. Local views across the site (from east (Peabody estate) to west) and are currently protected. Local views North looking south to the Battersea Power Station are not currently protected but has the potential to be recognised in a site allocation policy. (0) iii. The current use does not harm the listed building on site, or the cluster in the south west just outside the boundary. Furthermore, Peabody Conservation Area comprises avenue buildings lined by blocks which architecturally align with that of 123A Grosvenor Road. This enhances the special historical character of the area (+) iv. The area sits in a tier 3 archaeological priority area (Pimlico Archaeological Priority Area 'APA'). The APA is considered to have a high potential for the preservation of organic remains and moderate potential for prehistoric material. Its current use is not working towards enhancing or recording this potential. (-) v. No impact identified. (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	-	i. The listed building towards the south of the site is in keeping with buildings in the adjacent Conservation Area and surrounding listed buildings which positively contributes to the townscape character of in Pimlico. However, overall, the railways sidings and the British Transport Police building do little to enhance townscape. (-) ii. The current uses (the sidings and British Transport Police building) do not encourage exemplary design standards (e.g. they do not use renewable energies or increase biodiversity) (-) iii. No impact identified. (0) iv. The land is not publicly accessible. There is no support for permeability or encouragement of outdoor facilities for leisure, exercise or recreation. Furthermore, there is a lack of design elements which enhance urban greening or celebrate the rich local historical character (--)

		v. The site does not support access and mobility across all groups. It increases mobility for those using the railway but does not encourage other modes of mobility. (-)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	--	i. The site provides no open space (--) ii. The site does very little to improve landscape character. The Grade II listed building (123A Grosvenor Road, SW1 House) does contribute to the special historical environment but other than this there are no design/infrastructure elements that ameliorate the landscape character. (-) iii. The site does not provide open space nor create green links between open spaces to improve access. (--) iv. The site creates a severance between local parks and areas of green infrastructure. It provides some greenery, but this is very limited. (-)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	-	i. The sites current function as a train siding and the British Transport Police building creates some opportunities for skills and training for those working in these locations. However, the rest of the site does not contribute to improving skills or training and it is anticipated that very few jobs are supported across the site overall. (-) ii. The two uses aforementioned are sources of employment, which may reduce rates of unemployment. However, it is anticipated the extent of this is low. (0) iii. The two uses mentioned in (i) support some employment which could provide jobs for those most in need. However, it is anticipated the extent of this is low. (0) iv. The jobs available across the site can help to secure earnings for some people and improve the incomes of local people, however the number of job opportunities on site is limited. (0) v. The train lines increase accessibility in and out of the city, this increases opportunity for people to access employment within the CAZ. However, at present the site is underperforming in its ability to provide more employment opportunities. (-)
17. Economy i. Will it improve business development and environment?	-	i. The use of the sidings and the British Transport Police building does not directly improve the business environment locally. Whilst the railway transport supports

ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?		access into the CAZ, it also contributes to negative externalities which would likely deter local businesses being located nearby. (-) ii. The current use of the site will not improve business resilience and economy as it is not providing a wide range of employment opportunities, other than the few employment opportunities on site. (-) iii. There are no opportunities for small businesses and start-ups, which is particularly relevant for the CAZ. (--) iv. The site provides employment for railway which is a key worker job (transportation). This current use does promote use for jobs within railway services, however these are limited. (+) v. Presently, the site does not promote regeneration. (-)

Conclusion

To conclude, at present the site is underutilised and does not constitute sustainable development, as outlined in the NPPF. Although the current use of the site as a siding for trains and site for British Transport Police plays a role in generating some employment opportunities and income within the transport service industry, there is potential for the site to contribute more to other needs such as housing, public realm and heritage conservation. Furthermore, the site has very low ecological value and does not contribute at all to the lack of open space and green space in the area. Redevelopment of this site could release land for alternative purposes, addressing housing demand and fostering economic growth in the vicinity. Enhancements to the site might involve expanding open and green spaces, improving climate change resilience and improving permeability and connectivity across the site.

Option B: Proposed allocation Residential-led development with provision of commercial floor space, community floor space, retention of Grade II listed building, public realm improvements, open and play spaces and increased permeability.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	++	i. The policy supports proposals that provide commercial, and community uses. This can contribute to the creation of sustainable communities, offering residents convenient access to services and businesses. Although commercial uses within this option will be limited. (+) ii. The policy supports schemes that create the opportunity for members of the community to comment on the application and contribute to the decision-making process. Furthermore, providing community floor-space will give residents and stakeholders more areas for neighbourhood-level decision-making. (++) iii. As a publicly-owned site, residential uses will make provision for 50% of housing to be affordable homes – contributing to fostering an inclusive Westminster community. Enhanced permeability through the site and beyond should also mean surrounding streets are more accessible to a range of abilities. (++) iv. New commercial floorspace and community facilities can encourage community activity. Especially if these facilities are introduced with new, pedestrianised transport links, making them easily accessible. (++)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	++	i. The increase in residential and community activity provides extra natural surveillance which can reduce crime and antisocial behaviour. This will be complemented by the likely retention of the British Transport Police building on site. Furthermore, better street lighting and providing well-designed public realm will also help decrease disorder and anti-social behaviour (++) ii. Same reasons above (++) iii. Following the policy, proposals should use high quality design which can help manage antisocial behaviour and loitering. (++)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing?	++	i. The policy supports schemes that will bring forward new high-quality housing. (++) ii. At least 50% of new homes shall be affordable, this will greatly increase the range of affordable housing in Westminster. (++)

iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?		iii. Following the policy, this option is likely to contribute to reducing homelessness as it will bring a range of affordable housing options to help provide for those most in need. (++) iv. The implementation of thoughtful design should be able to provide homes that help people stay independent for longer. (++) v. Increasing residential uses on site will deliver a high number of new homes, providing more residential units that are fit for the purposes of residents. (++) vi. Following the policy, this option is likely to offer a range of housing types and sizes that can accommodate a variety of family sizes and meet the various needs of the community. (++)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?	++	i. The policy supports schemes that will integrate residential, commercial and community spaces giving residents easier access to essential services and recreational areas. Furthermore, new public realm and open space will provide areas for play and physical exercise. Improving the environmental quality on site and providing affordable good quality homes will also help ameliorate health inequalities. (++) ii. Providing new residential units and job opportunities for those most vulnerable should increase support for people that need it most and thus contribute to reducing death rates. (++) iii. New pedestrian/cycle links through the site will create safe, pedestrian access from Ebury Bridge to the River Thames on Grosvenor Road, this will greatly improve movement in area. (++) iv. Increased support of active travel and accessible open space will help improved physical activity of residents. The provision of new open spaces, play areas, and enhanced connectivity through cycling paths and walking routes encourages physical activity and outdoor recreation. This is particularly important in this area where green spaces are limited. (++) v. Local and accessible recreational opportunities can help increase community cohesion and improve cultural wellbeing, as it encourages shared activities. Moreover, the policy supports new community floor space and well-designed public areas that can facilitate social interaction and cultural well-being (++)

		vi. Increasing the greening factor of the site will help create a more natural, relaxing and aesthetically pleasing environment. The development will also bring forward advanced public realm improvements which means it should be equitably accessible to all, regardless of ability. These factors should help maximise independence and improve mental and physical wellbeing of the elderly. (++) vii. No impacts identified (0) viii. The site is adjacent to an active railway, mitigation measures will need to be integrated within the design of potential schemes to reduce amenity impacts for future workers and residents. Despite this, new residential, commercial and community uses with access to on-site open space and green infrastructure will help to create healthy homes and workspaces. This will be further supported by increasing connectivity through and around the site and supporting good access to transport networks. (+) ix. The site has active train lines, this use will have to be mitigated for due to its impact on residential amenity. However, the policy supports schemes that will bring great improvements to environmental quality, encourage more physical activity and providing better quality homes. These changes should contribute towards increasing life expectancy. (+) x. Answered in points above. xi. Better designed public realm includes infrastructure that supports the mobility and movement for people with disabilities. Community facilities offered should also be designed to support the needs of the local community, including those with disabilities. (++)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology?	+	i. Following the policy, new development will contribute to reducing greenhouse emissions by considering a low-carbon approach in the construction/design of the building and using renewable energy options. Furthermore, by providing community facilities and commercial units on site, this reduces the need for residents to travel. However, increasing the density on site will result in higher carbon emissions and continued use of railway/sidings will contribute to the retention of the greenhouse gas emissions on-site. (0) ii. As per answer to (i). (0)

iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?		iii. The policy supports schemes that sensitively repurpose the on-site listed 123A Grosvenor Road building and workshop building, which may reduce emissions associated with their usage through retrofit. (+) iv. Materials used in the fabric of the buildings can be carefully considered to ensure they have minimal heat retention. In addition, onsite urban greening / blue water features can help providing a cooling effect. (++) v. Flood risk should be a priority through potential developments. The use of SuDS, water retention techniques and permeable paving will increase resilience to climate change. (++)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	+	i. The implementation of new residential, commercial and community uses is expected to lead to a significant rise in water usage. Nevertheless, the policy supports proposals that incorporate water harvesting and recycling strategies to minimize water consumption. (0) ii. Fossil fuel consumption will greatly increase on site, as much of the site is currently underutilised. During construction, the development should aim to prioritise green or eco-friendly construction practices where viable. Increased accessibility for walking and cycling can also contribute to the reduction in fossil fuels. (0) iii. Sustainability should be throughout the heart of the proposal, which includes reducing consumption of natural resources and choosing sustainable alternatives instead of conventional methods. (+) iv. A sustainable proposal will prioritise the renewable resources wherever possible and feasible (+) v. The site is currently underutilised, non-accessible to the public and does not provide ecological or community benefits. New commercial, residential and community uses with open space will make efficient use of the land. (++)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?	+	i. Currently the site is mostly impermeable. Policy supports schemes that use SuDS, green infrastructure and permeable paving materials which can minimise flood risk. (++) ii. The site is in flood zone 3 and is a surface water hotspot, placing new residential homes in a flood prone area may increase the risk of property damage due to

iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?		storm events. However, property damage due to storm events can be reduced through high quality design. (+) iii. Opportunities can be explored to mitigate combined sewer overflow events through redevelopment of the site. (+) iv. The site is contaminated due to its historical and current use; however, following the City Plan (Policy 33) developments can look to employ a remediation scheme and maximise the use of natural filtration techniques (like SuDS) to ameliorate water quality. (+)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	++	i. Following the policy, this option will increase the provision of blue and green infrastructure which enhances biodiversity and provides new habitats (green roofs, walls, trees, shrubs etc.). (++) ii. No impact identified. (0) iii. Under the policy, access to local sites of biodiversity will be improved by supporting better permeability and connectivity through and around the site. (++) iv. The site's redevelopment includes the provision of new open and green spaces. This presents opportunities for optimizing strategies aimed at the conservation and enhancement of species and habitats. New community space on site also presents the opportunity to conserve and enhance species and habitats. (++)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	0	i. Construction of a mixed-use scheme will greatly increase air pollutants. In addition, the adjacent active railway and busy Grosvenor Road will also continue to contribute to air pollution. These factors will decrease air quality. However, the policy supports development that increases connectivity through and around the site and supports good access to public transport networks, encouraging fewer polluting forms of transportation. Furthermore, steps to ameliorate air quality will need to be integrated within the design for the scheme to reduce amenity impacts for future workers and residents. This includes increased urban greening which contributes to improving air quality. These measures should help improve air quality in and around the site. (0) ii. Construction of new development will increase emissions of key pollutants however, the policy supports increased connectivity and permeability through and around the site, encouraging greener forms of transport. Furthermore, the

		sensitive repurposing of existing buildings will also contribute to the reduction of key emissions. (0)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	-	i. Placing new homes and community facilities so near to active train tracks may increase noise concerns and noise complaints. This can be mitigated through the use of noise dampening materials in the fabric of buildings, using vegetation as noise barriers and the orientation of buildings. (-) ii. Same as above. (-)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	++	i. Policy supports an increase in commercial and community facilities, making services more easily accessible. This should also reduce occupants needs to travel which will have a positive impact on nearby traffic. (+) ii. The policy aims to provide more accessible and well-lit pedestrian pathways. The policy also requires proposals to also consider how to include wayfinding through and to the site. This will enhance walkability and the attractiveness of active modes of transport like cycling. (++) iii. The approach to transport arrangements on site should have sustainability at its core. This means the attractiveness of other modes of transport should increase, decreasing the need for car usage. (++) iv. The northern part of the site has a high PTAL rating of 6 whilst the south has a low PTAL rating of 3, creating better permeability and connectivity throughout the site should increase the PTAL rating of the south section. (++)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	0	i. The policy supports intensification of the site which will increase consumption of materials during construction, however, it supports aims to reduce material and resource usage by employing innovative waste reduction techniques like water harvesting/recycling and the sensitive reuse of existing structures where possible (0) ii. Increasing the number of homes will produce more household waste, however this will be mitigated as much as possible through sustainable design which includes providing proper recycling facilities. (0) iii. Intensifying uses on site will increase recycling and reuse through taking a sustainable approach which includes accessible recycling facilities for residential,

		community and commercial spaces and using onsite water harvesting to reuse wastewater. (+) iv. Answered in i. (0)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	+	i. There are various heritage assets around the site, a Grade II Listed Building on site and the Peabody Avenue and Churchill Gardens Conservation Areas sit near to the site. Following the policy, new development will conserve and enhance these heritage assets through careful design techniques that reflect local historical architecture. There is also an opportunity to enhance the existing heritage asset on-site through retrofit, ensuring its future preservation. (++) ii. The policy supports development that is designed to reflect and respond to the local townscape and protects and enhances strategic of views and local views intersecting Peabody Avenue and adjacent Conservation Areas. (+) iii. The proposed uses will be sympathetic to local (residential) character and cultural history and will not include the removal of any assets or have any particularly risky uses that may harm the local historical setting. (+) iv. The site sits in the Pimlico Archaeological Priority Area, which is tier 3 zone, so has potential for heritage assets of archaeological interest. Following adopted City Plan policy, archaeological assessments will be undertaken before commencement of development to ensure archaeological features are recorded and protected. (+) v. No impact identified. (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	++	i. New retail, commercial and community uses with new open spaces will enhance the local setting by reflecting the unique architectural character of the Peabody Conservation Area, complementing the heritage assets onsite/near the site boundary and improving on public realm (++) ii. Under the policy, new development will adhere to BREEAM design standards, which means it will follow a sustainable building design and has the opportunity to be of exemplary design standards. (+) iii. No impacts identified (0) iv. The public realm should be vastly improved through new development. New lighting, safer pedestrianised routes and cycle pathways will create a more inviting public realm that offers a pleasant experience. Furthermore, increased urban

		greening and new open space and play space on site will create more opportunities for leisure and recreation. (++) v. The site currently does not have pedestrian access. Integration of new public realm will provide new paths to maximise accessibility, promote permeability and to ensure cohesion across the site. Inclusive design features will ensure the buildings and layout of the development are accessible for all groups. (++)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	++	i. The policy supports the provision of new open space and play space. These spaces should be of high quality and accessible to all in line with adopted policy. (++) ii. The policy support schemes that aim to ameliorate the landscape's character through the introduction of high-quality buildings, new travel routes, public spaces and additional open space. This will optimize land utilization and offers an opportunity to commemorate the distinctive historical townscape. Furthermore, development should include the sensitive retrofit of existing structures of significance (on-site Listed 123A Grosvenor Road building and workshop building). (++) iii. New accessible, open space and play space will be created under this policy, that is within walking distance for occupants of the new buildings and residents of nearby developments. (++) iv. The provision of new green open spaces, new play space and natural climate change mitigation measures (e.g. SuDs) will enhance the green infrastructure network. (++)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings?	+	i. New commercial space has the potential to bring forward apprenticeships and work experience opportunities, although these will be limited compared to if the site were proposing a commercial-led scheme. Moreover, the sidings, rail tracks and the British Transport Police building will continue to be used, meaning they will continue to provide skills and training opportunities. (+) ii. New commercial and community uses will provide new jobs (not only through construction). This may be limited though, compared to if the site were proposing a commercial-led scheme but should help to reduce unemployment. (+) iii. Intensifying commercial uses on the site means there will be opportunities for Westminster Employment Service to work with developers and offer placements

v. Will it promote equality of opportunity across the city by tackling barriers to employment?		during construction. These shall prioritise residents who are furthest away from the employment. (+) iv. The policy supports schemes that provide commercial space. This has the potential to improve earnings. The provision may potentially be small if there are mainly residential uses on site. Furthermore, it is likely the sidings are relocated elsewhere (not necessarily in Westminster) to create opportunities to develop on site whilst also ensuring they continue to support the public transport network. However, the continued use of the British Transport Police building will contribute to improving earnings. (0) v. New travel routes will be created, following the policy, making commuting across the site and wider Pimlico/Victoria area a lot easier. This will open employment opportunities for residents, mitigating some barriers to employment. Intensifying commercial and community uses on site will also create more local jobs. This can help provide easily accessible employment opportunities for those in need. (+)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	+	i. Intensifying mainly residential uses on site may not bring significant new businesses to the area, however, it will increase footfall with new occupants and improved connectivity and permeability. This should help improve business development for existing businesses and any new businesses that will be created. (+) ii. The policy supports schemes that deliver commercial uses. This will help enhance business resilience and stimulate the local economy. Intensifying mainly residential uses on site may not achieve this as well as maximising commercial uses would, however increasing pedestrian traffic to and around the area will improve business resilience in the vicinity. (+) iii. The increase in commercial uses will have a positive effect on new business start-ups. The policy supports development which assists in meeting the strategic needs of the CAZ, which includes encouraging new startups and SMEs. (+) iv. The site will contribute a limited amount of commercial floor space which will help promote business in key sectors outlined in the policy for this area. (+)

		v. Redevelopment of the site has the potential to help to support wider regeneration in the area. The policy supports uses that complement nearby schemes such as residential and community uses as seen in Ebury Estate. (++)

Conclusion

To conclude, a residential led, mixed used development, with commercial and community spaces, new open space, new play space is considered to be the most sustainable option for this site. The scheme will make efficient use of the land, contributing significantly to affordable housing need. The provision of commercial space within the development will be limited, but will provide local employment opportunities, supporting economic growth in the area. Economic growth will also be supported by the improvements to transport, connectivity and permeability made by the development. The comprehensive redevelopment of the site will also bring environmental benefits through the net gain in urban greening. Currently, the local area is deficient in green space. This proposal will vastly increase the amount of vegetation on site, creating more permeable surfaces, maximising green infrastructure, whilst securing other flood mitigation measures to address the high flood risk. Notably, the design of this scheme means it will likely have a limited impact on the local historical townscape and heritage assets, which is a considerable constraint on this site. Cumulatively, this is considered to be the preferred, most sustainable option that contributes the most positive effects against the majority of sustainable objectives.

Option C: Reasonable Alternative 1 Completely residential development, retention of Grade II listed building, public realm improvements, open and play spaces and increased permeability.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	+	i. Improvements to public realm will increase connectivity across the site, which will help improve access to nearby services (+) ii. Under the policy, new development will bring opportunities for the neighbourhood to influence decision-making through public consultation during the planning process. (+) iii. New residential uses will provide a considerable number of affordable homes and ensure a variety of housing needs are met, helping to foster an inclusive community in Westminster. (++) iv. New open / play space will create more opportunity for community activity and shared leisure/recreational activity. This will have less impact than schemes providing dedicated community space. (+)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	++	i. Intensifying residential uses on site will increase the level of human activity in and around the site. This means more natural surveillance reducing the risk of crime and increasing the sense of safety. Schemes should also be designed and managed to discourage crime, for example through a focus on the layout and orientation of dwellings/retail units. This will be complemented by the likely retention of the British Transport Police building on site. (++) ii. See i (+). iii. Under the policy, schemes should bring forward better waste disposal provision and security measures to minimise negative behaviours that would harm the local environment. (++)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer?	++	i. Intensifying residential uses means there is a great opportunity to create high-quality new residential units that will cater to those most in need. (++) ii. The site is on public land, therefore if viable, the scheme will provide 50% affordable homes. This will be a significant contribution to Westminster's affordable housing need. (++)

v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?		iii. The considerable provision of affordable housing and the diversification of housing options will help reduce homelessness by providing options for those who might otherwise be priced out of the housing market. (++) iv. The policy supports schemes that deliver housing and help meet housing need. This includes schemes that encompass a variety of housing options, aimed at supporting prolonged independence for individuals. (++) v. It is likely that under the policy, schemes will contribute to the number of unfit homes in the borough as they will provide more options to local residents. (++) vi. Under the policy, 50% of new residential units will be affordable. This will provide a greater range of housing types and sizes to address the needs of the local community (++).
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing?	++	i. Residential uses with public realm improvements will improve health inequalities by increasing access to open space and green space and providing healthy new homes. Increasing the urban green factor will ameliorate environmental quality and there should be considerable affordable housing provision, providing safe and healthy homes for those who need it most. However, a lack of commercial uses means limited local services which can negatively impact health (+) ii. By providing better quality affordable homes and safer/greener public realm the scheme should support the reduction in death rates. (++) iii. The policy supports schemes that increase connectivity through and around the site and support good access to transport networks. (++) iv. The new open space and new play space provided will encourage more residents and other users to participate in physical activity. Furthermore, the creation of more attractive, well connected and greener pedestrianised routes can encourage modal shift to active forms of transport. (++) v. Intensifying residential uses and improving public realm has the potential to improve cultural wellbeing as they can contribute to creating a fair and inclusive community through affordable housing provision and increased accessibility/mobility. (++)

xi. Will it improve facilities and accessibility for people with disabilities?		vi. Residential uses and public realm enhancements can support the formation of socially integrated communities. New green space and new open space will support improved mental and physical wellbeing of older people. (++) vii. No impacts identified. (0) viii. The policy supports schemes that provide high quality homes and increased access to on-site open space and green infrastructure which can come through improvements to the public realm. However, as the site is adjacent to active railway lines, mitigation measures will need to be integrated within the design for the scheme to reduce amenity impacts for future residents. If these are properly implemented, this will help to create healthy homes. A lack of commercial uses will not contribute to healthy workspaces. Residential uses will provide a large number of homes but will not contribute to healthy workplaces. Furthermore, as the development will be adjacent to the active railway, mitigation measures will need to be integrated within the design for the scheme to reduce amenity impacts for future workers and residents. If these are properly implemented, this will help to create healthy homes and workspaces. (0) ix. The site will have active train lines running through it, this use will have to be mitigated for due to its impact on residential amenity. However, following the policy, new development should bring great improvements to environmental quality, encourage more physical activity and providing better quality homes. These changes should contribute towards increasing life expectancy. The proposed uses of this option will provide new, safe affordable homes and more attractive, greener public realm which will contribute to better life expectancy, however the continued use of the active railway and its impact on residential amenity will need to be mitigated. (0) x. Improving public realm, providing opportunities for physical activity and community cohesion and offering better quality affordable homes will improve mental health and wellbeing. (++) xi. The proposed uses of this option will not include new community facilities; however, the development will increasing the overall PTAL rating of the site which will ultimately make accessing nearby services for those with disabilities easier.

		Public realm enhancements will be designed to accommodate the diverse needs of all users. (+)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	+	i. Public realm improvements should encourage more people to use active modes of transport, reducing greenhouse gas emissions. Construction of the buildings should consider low carbon approach and using low/zero carbon energy options. However, retaining the existing use of railway/sidings will contribute to the retention of the greenhouse gas emissions from lines that are yet to be electrified. Furthermore, optimising the site with completely residential uses would require greater density which may result in higher greenhouse emissions (0) ii. As per response to (i) above. (0) iii. Under the policy, potential schemes can look to retrofit the old, listed building onsite which may reduce emissions associated with its usage. (+) iv. Increased urban greening will create a cooling effect that can reduce heat island effects. Furthermore, new buildings can prioritise the installation of energy-efficient equipment and orientation (increasing shaded areas) to maximise mitigating urban heat island effect. (+) v. Emphasizing flood risk management will be paramount under the policy. The incorporation of SuDS, water retention methodologies, and permeable paving will bolster resilience to climate change. (++)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	+	i. Optimizing the site for residential uses is expected to bring a significant rise in water usage during the construction phase. Furthermore, although average water consumption in residential homes in the UK is generally lower than retail/commercial units, due to the size of the scheme it may be difficult to reduce water consumption over the lifetime of the development. Nevertheless, the policy supports the incorporation of water harvesting and recycling strategies to minimize water consumption. (0) ii. Intensifying residential uses will greatly increase the consumption of fossil fuels. Construction should strive to prioritise green or alternative construction practices where viable and renewable energy sources can also be installed to reduce operational energy consumption. (0)

		iii. The policy states sustainability is key to the development. This includes the use of natural resources being minimised as much as possible; materials can be sourced from environmentally responsible suppliers and reused wherever possible. (+) iv. Renewable resources will be prioritised wherever possible (+) v. Residential uses will make efficient use of the land, especially since this will compliment uses of nearby regeneration schemes and better connect this part of the CAZ to the rest of the borough. However, it will not deliver any contribution towards the policy requirements of the CAZ (i.e., commercial uses) (+).
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	+	i. The policy supports schemes that will provide more green infrastructure (e.g., SuDS) to reduce stormwater runoff. (+) ii. The policy states that proposals should seek provide flood resilience measures such as SuDs which should help reduce property damage due to storm events. Property damage will also be reduced by incorporating design features such as raising finished floor levels. (++) iii. Opportunities can be explored to mitigate combined sewer overflow events. (+) iv. Despite existing constraints due to previous land use, following City Plan policy 33, appropriate remediations schemes can be deployed to enhance water quality. Moreover, the incorporation of green infrastructure can mitigate water quality issues. (+)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	++	i. The policy supports schemes that incorporate a variety of green and blue infrastructure (green roofs, green walls, trees) to increase the biodiversity value of the site. (++) ii. No impact. (0) iii. Following the policy, potential schemes will increase access/mobility between sites of biodiversity interest as connectivity with local green and blue spaces will be improved (such as Grosvenor Canal, The River Thames (to the south of the site) and Royal Hospital South Grounds). The provision of new green and open spaces within the site can also promote educational value of sites of biodiversity interest. (++)

		iv. The site's redevelopment presents opportunities for optimizing conservation measures for the enhancement of species and habitats associated with the canal. (+)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	0	i. Construction of residential uses will greatly increase air pollutants. Moreover, the site will continue to be near to active train tracks/sidings and busy Grosvenor Road. This means the development will require several mitigation techniques to reduce the impact of dust and other air pollutants. However, increased urban greening and other public realm improvements will increase the attractiveness of non-polluting modes of transport and increase permeability through the site. This will expand upon the larger potential network of pedestrian routes from Victoria Station to the River. This should help improve air quality. (0) ii. Construction of new development will increase emissions of key pollutants however, new buildings within Westminster should aim to meet Westminster's zero carbon targets on site or provide off-site measures that are close enough to the site to still reduce local emissions. The policy also supports the enhancement of pedestrian and cycle networks, helping to decrease emissions of key pollutants. (0)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	0	i. Placing new homes near to active train tracks may increase noise concerns and complaints during operation. Due to the proximity to conservation areas and the mainly residential surrounding uses, it is likely that construction will cause high noise and vibration levels. Diligent mitigation efforts (sound barriers and machinery with low acoustic emissions) should be used. (-) ii. Over the lifetime of the development, residential uses may create less noise pollution compared to commercial uses. (+)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	++	i. Under the policy, proposals should seek to improve movement and permeability with new pedestrian and cycle routes, which may have a positive impact on nearby traffic. However, this option provides fewer commercial uses. This may increase occupants' travel requirements. (0) ii. The policy supports schemes which endeavour to establish accessible and safe pedestrian pathways, promoting active modes of transportation. New public realm improvements can expand on the trails and dedicated cycle lanes around

		Grosvenor Canal, along Grosvenor Road and on Ebury Bridge Road leading to Victoria. (++) iii. For reasons explained in i and ii, the attractiveness of other modes of transport should increase, decreasing the need for car usage. (++) iv. The northern section of the site has a high PTAL rating, improving connectivity from Ebury Bridge to the River Thames on Grosvenor Road will expand on the potential network of pedestrian routes from Victoria Station to the River. (++)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	0	i. The policy supports intensification of the site, which will increase consumption of materials during construction, however, schemes should aim to reduce material and resource usage by implementing incorporating the reuse of existing structures and employing innovative waste reduction techniques like water harvesting/recycling. (0) ii. There are currently no homes on site, increasing the number of homes will produce more household waste, however this will be mitigated as much as possible through providing proper recycling facilities. (0) iii. Increasing residential uses will increase recycling and reuse on site through providing recycling facilities and using onsite water harvesting to reuse wastewater. (+) iv. Answered in (i) (0)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	+	i. There are various heritage assets around the site, a Grade II Listed Building on site and presence of Peabody Avenue and Churchill Gardens Conservation Areas. The policy requires development to conserve and enhance these heritage assets through careful design techniques that reflect local historical architecture (e.g. using yellow stock bricks, embellishments and fine detailing where possible). There is also an opportunity to enhance the existing heritage asset on-site through retrofit, ensuring its future preservation. (++) ii. The policy supports development that is designed to reflect and respond to the local townscape and protects and enhances strategic of views and local views intersecting Peabody Avenue and adjacent Conservation Areas. (+)

		iii. The proposed use (residential) will be sympathetic to local character and cultural history and will not include any risky uses (e.g. commercial uses) that may harm the local historical setting and local residential amenity. (++) iv. The site sits in the Pimlico Archaeological Priority Area. To preserve, enhance and record archaeological features, development will include archaeological surveys (per City Plan Policy 39) before commencement and follow archaeological monitoring during construction. (+) v. No impact. (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	++	i. New residential uses can enrich the local setting by mirroring the architectural style and design of neighbouring conservation areas and heritage assets. Buildings will also be of a size and massing that complements local townscape. (++) ii. Following the policy, development should be of BREEAM design standards, which means it will follow a sustainable building design and has the opportunity to be of exemplary design standards. (++) iii. No impacts identified. (0) iv. The policy requires development to significantly enhance the public realm. This involves the implementation of improved lighting, safer pedestrian routes, and dedicated cycling pathways to cultivate a more inviting and enjoyable public space. Additionally, proposals should increase urban greening and blue infrastructure, providing new open spaces. (++) v. New public realm will be accessible to everyone, regardless of ability or demographic and will include inclusive design features which will improve navigation for all. (++)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	++	i. The policy supports schemes which include landscaping and design that provides high-quality open space. The spaces will include elements such as green infrastructure and street furniture to make them attractive and inviting. (++) ii. Redevelopment of the site will improve landscape character, providing new wayfinding and landmarks opportunities. Furthermore, policy states proposals will be designed in a way that respects and responds to the local context. (++)

		iii. The scheme will bring forward much needed new open space, it will also increase connectivity between local green spaces and the site, improving access to open space for local residents and visitors. (++) iv. Providing urban greening (green roofs, green walls, SuDs etc.) will extend the green infrastructure network in the area. (++)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	0	i. Construction will create some apprenticeship and work experience opportunities. Furthermore, the continued use of the rail tracks and British Transport Police building means continued provision of skills and training opportunities. However, this option resents a lack of commercial floorspace provision so the improvement to qualifications/skills and training is limited. (+) ii. The policy supports schemes that provide temporary new jobs through construction; however, this option does not provide workspace, there for the positive impact on unemployment will be minimal and not throughout the duration of the development. (0) iii. There will be opportunities for Westminster Employment Service to work with developers and offer placements during construction, however these will be limited. (+) iv. No impacts identified (0) v. Improved travel routes will increase permeability and mobility across this part of the CAZ, mitigating some barriers to employment. However, residential uses will not improve the availability of jobs for those facing barriers to employment (apart from during construction) (0)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors?	-	i. Residential uses will increase footfall in the local area, which may bolster local business development. (+) ii. A lack of commercial uses means a lack of office workspace and retail opportunities. This does not support the key principles of the policy or the CAZ as it will not contribute towards business resilience and enhancing the local economy. (-) iii. As the site will not include any commercial uses, it will not encourage any new business start-ups, small businesses or opportunities for local people. (-)

v. Will it promote regeneration?		iv. The site will continue to provide employment for railway and the British Transport Police which is a key worker job (transportation). However, this employment is not necessarily tied specifically to this site and may continue anyhow. (0) v. Residential uses will make efficient use of underutilized assets and bring forward much needed housing and public realm. However, it will make little positive economic impact, due to the lack of commercial space. (0)

Conclusion

To conclude, a totally residential development with new open space and new play space would make more efficient use of the land than its existing use. The scheme would greatly contribute to Westminster's housing need and deliver significant environmental benefits. Currently, the local area is deficient in green space and an increase in onsite vegetation will create more aesthetically pleasant townscape, increase the biodiversity quality of the site and address the high flood risk. The proposed uses also do not impinge on the local historical townscape and heritage assets, which is a considerable constraint on this site. These factors indicate this would be a sustainable development proposal for the site. The site will provide vast improvements to transport, connectivity and permeability which will increase mobility. However, the site is in CAZ which is an area looking to intensify office clusters and increase retail activity. The site will not provide as much support for employment opportunities and economy due to the lack of commercial and retail space. Cumulatively, this is considered to be a sustainable option that supports many of the sustainability objectives, however, this is not the most suitable for this location due to the lack of employment opportunities.

Option D: Reasonable Alternative 2 Commercial-led scheme with some provision of community floorspace and residential units. Retention of Grade II listed building, public realm improvements, open and play spaces and increased permeability.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	+	i. The proposed uses will bring forward a significant number of new shops, services and community space that will be within walking distance from the local residential community. This will greatly improve access to local services and facilities. (++) ii. New community floorspace will provide more areas for community-led activities that can support neighbourhood-level decision-making. Furthermore, residents and stakeholders can partake in consultation stage of the development and vocalise the types of uses they would like to see developed. (++) iii. Improvements to public realm will mean streets and services are accessible to a range of abilities, creating an inclusive Westminster. The provision of community space also means there are more opportunities for shared community activity, fostering community cohesion. However, as this option proposes a reduced number of new homes, the fostering of an inclusive community would be reduced. (0) iv. New commercial floorspace, new community facilities and improvements to public realm can make the local living environment more inviting and engaging, encouraging community activity. This is especially the case if new facilities are introduced with pedestrianised transport links, making these community hubs easily accessible. (++)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	++	i. The policy supports development that aims to retain the British Transport Police building which helps provide security for the site, reducing crime, disorder, and anti-social behaviour. The rise in commercial activities will also result in increased pedestrian traffic, fostering natural surveillance that aids in crime prevention. Additionally, development should incorporate high quality design elements that discourage criminal activities and anti-social behaviour. (++) ii. For similar reasons above, the fear of crime should be reduced. (+) iii. See answers to i and ii. (++)

3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. This option provides a limited number of new homes, however there is the opportunity to provide high-quality homes. (+) ii. A small number of new homes will be delivered. Following the policy, 50% of the limited number of new residential units will be affordable, this will increase the offer of affordable housing in Westminster, although this will be limited. (+) iii. The policy requires 50% of housing to be affordable, this will contribute to reducing homelessness, however the contribution will be limited. (+) iv. The policy supports schemes that deliver high quality housing which provides opportunity to deliver housing that supports prolonged independence for individuals, however the contribution will be limited. (+) v. It is likely that under the policy, residential uses on site will contribute to the number of unfit homes in the borough as they will provide more options to local residents, however the contribution will be limited. (+) vi. New homes will be provided, however the range of housing types and sizes within this development will be limited due to the small amount of housing provision on site. (+)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces?	++	i. Intensifying commercial uses will deliver a considerable number of new shops and services within walking distance to local residents. Furthermore, public realm improvements will improve the walkability of the site and connectivity with other active transport routes and will provide new accessible open space for exercise and recreation. This will help improve health inequalities. However, the railway lines will still be in use, which means there is a potential negative impact on residential amenity, this can be minimised by locating new homes in quieter areas of the development. (+) ii. New, affordable healthy residential units and workspaces can help decrease death rates by supporting the people that need it most. (+) iii. The policy supports schemes that include increased permeability and connectivity with new routes from Ebury Bridge to the River Thames on Grosvenor Road, this will greatly improve access and movement on site and across the local area. (++)

ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		iv. The provision of better cycling infrastructure, pedestrian routes, new play space and accessible open space will help increase participation in physical activity. This is particularly important on this site where green spaces are limited. (++) v. The proposed uses will include opportunities for accessible areas of recreation and leisure and spaces to celebrate local culture, this can help foster community activity which improves cultural wellbeing. However, as there will be less residential units provided as part of this scheme, the potential for fostering cultural wellbeing will be limited. (0) vi. Providing more urban greening can have a positive impact on mental health. Furthermore, community space and public realm improvements will be accessible to all abilities (including the elderly). However, due to the limited number of homes brought forward, providing homes that maximise independence for the elderly may be unlikely. (0) vii. No impacts identified. (0) viii. Intensifying commercial uses means development should provide high-quality workspaces that meet the needs of a variety of occupants and are conducive to a healthy working environment. The number of healthy homes provided by this scheme will be limited, also see (i). (+) ix. The provision of new homes, improved public realm, increased job opportunities and placing new services in accessible/connected locations should contribute to increase healthy years life expectancy. (++) x. See v, vi and ix. (++) xi. Improvements to the public space will be crafted to cater to the varied requirements of all users, with special attention given to enhancing facilities and infrastructure to ensure accessibility for those with disabilities. (++)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions?	+	i. Increasing commercial uses on site is expected to bring intense energy consumption, high carbon emissions and the continued use of the railway tracks will also contribute to greenhouse emissions. However, this harm can be counterbalanced by considering low or zero-carbon energy sources, promoting renewable energy use on-site and encouraging the reuse of existing structures

iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?		(retrofit) where possible. Furthermore, increasing the number of local services near to residential development should limit the need to travel. (0) ii. As per response to (i) above. (0) iii. The policy requires development to sensitively repurpose the on-site listed 123A Grosvenor Road building and workshop building. This may help reduce emissions. (+) iv. Enhanced blue and green infrastructure will create a cooling effect that can help reduce heat island effects. (+) v. The policy explains emphasizing flood risk management will be paramount in forthcoming schemes. Proposals should be designed with the recommendations of the Strategic Flood Risk Assessment in mind. This includes the incorporation of SuDS, water retention methodologies, and permeable paving will bolster resilience to climate change. (++)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	+	i. Optimising the site with commercial uses will intensify the use of water on-site as water consumption in commercial schemes are generally higher than residential-led schemes, however, there are opportunities to improve water efficiency through implementing effective drainage systems and enhancing on-site water management (recycling/harvesting). (0) ii. New commercial uses are likely to substantially increase the consumption of fossil fuels. However, policy 36 of the City Plan explains schemes should aim to reduce on-site energy demand and maximise the use of low carbon energy sources. Moreover, public realm enhancements should encourage the use of public/active transport, instead of private motor vehicles. These factors can contribute to reducing fossil fuel consumption. (0) iii. Utilising natural resources will be minimised to a feasible extent by sensitively repurposing existing structures, recycling materials and choosing sustainable construction methods. (+) iv. Following the policy, renewable resources will be prioritised wherever possible. (+) v. This option will deliver uses that are most suited to the policy requirements for this area. The CAZ expects to intensify office clusters and encourage growth and diversification in retail and leisure activity whilst respects residential amenity. This

		means this option will make more efficient use of land compared to current uses. (++)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	+	i. The policy explains minimising risk from flooding is essential to future schemes. Proposals should include incorporating green infrastructure, specifically SuDS and focus deployment of water interception and drainage systems to minimize the risk of flooding. (++) ii. Increasing the number of residential and commercial properties in an area of high flood risk will likely increase risk of property damage, however this can be mitigated against by having a detailed design and layout of the scheme which include features such as raised finished floor levels and the sue of water-resistant building materials. (0) iii. Opportunities can be explored to mitigate combined sewer overflow events. (+) iv. The land of the site is contaminated land from previous uses, however, following City Plan policy 33, appropriate remediations schemes can be deployed to enhance water quality. Furthermore, natural mitigation measures (such as the use of specific types of vegetation) can create natural barriers to safeguard water quality. (+)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	++	i. The site is currently in an area of green space deficiency, redevelopment of the site should provide urban greening opportunities and new blue infrastructure which will protect, enhance and increase biodiversity. (++) ii. No impacts identified. (0) iii. Increasing permeability across the site will link nearby sites of biodiversity interest together and make local green and blue spaces (such as Grosvenor Canal, The River Thames (to the south of the site) and Royal Hospital South Grounds) more accessible. Provision of new green and open spaces within the site can also promote educational value of sites of biodiversity interest. (++) iv. Redevelopment of the site is likely to conserve and enhance species and habitats as more green space will be brought forward. Furthermore, new community uses can provide opportunity for to support nature conservation. (++)
9. Air quality i. Will it improve air quality?	0	i. Construction of large new development will greatly increase air pollutants. However, the policy requires schemes to increase permeability through the site to

ii. Will it reduce emissions of key pollutants?		enable improved pedestrian access and expand upon the larger potential network of pedestrian routes from Victoria Station to the River. Increased blue and green infrastructure will also contribute to improving air quality. The continued use of the active railway tracks and subsequent air pollutants (dust and some diesel trains) will continue however and would therefore need to be mitigated. Air quality concerns arising from the Grosvenor Road will also need to be accounted for. (0) ii. The intensification of commercial uses is likely to increase emission of key pollutants. In spite of this, all new buildings should prioritise meeting Westminster's zero carbon targets on site or provide off-site measures that are close enough to the site to still reduce local emissions. New buildings should also be of high-quality and have sustainability at the heart of their operation. (0)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	-	i. The proposed uses are likely to increase noise pollution during construction and throughout the life of the development. This will be exacerbated by the active train tracks and sidings on site and continued use of nearby major roads like the A3212. This may have a negative impact on the surrounding Conservation Areas and residential areas and increase noise concerns. However, the policy can ensure that careful consideration must be taken concerning where uses are located onsite and must be designed with high levels of sound insulation to ensure noise pollution is appropriately managed. (-) ii. Intensifying commercial and community uses will greatly increase noise levels compared to residential uses. Due to the close proximity of heritage assets, residential areas and the Conservation Areas, noise pollution will need to be mitigated as much as possible (-)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	++	i. Optimising the site with commercial uses may increase the number of visitors to the site, which may increase nearby volumes of traffic. However, the policy emphasises development should bring new easily accessible travel routes and enhance permeability across the site. This will make active transport options more attractive and help mitigate the risk of increased traffic. (0) ii. The policy stipulates schemes should provide additional access routes and increased permeability between the Peabody Avenue and Ebury Regeneration

		estates site, including new cycle ways and pedestrianised paths for all abilities. This should encourage modal shift to walking and cycling. (++) iii. The site will continue to function as a part of the London public transport network (train network) and also see answer to ii. These elements should offer a variety of travel options instead of the car. (++) iv. The continued use of the active train tracks will support public transport accessibility in Westminster and across London more broadly. Furthermore, enhancing connectivity will link the site to the wider network of pedestrian walkways and public transport routes, also increasing public transport accessibility. (++)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	0	i. The proposed uses are likely to greatly increase the consumption of materials and resources through construction and the lifetime of the development. This can be mitigated by development adhering to waste management programmes per City Plan policy 37, employing innovative waste reduction techniques like water harvesting/recycling and the sensitive reuse of existing structures where possible. (-) ii. Due to the limited number of homes brought forward, a small amount of household waste will be created however, this will still be an increase compared to current use on site. This can be mitigated by providing homes with appropriate waste receptacles and educational tools. (0) iii. Answered in (i) and (ii) above, recycling, recovery and re-use will be prioritised throughout construction and lifetime of the development to mitigate waste as much as possible. (+) iv. See (i) and (iii). (0)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings?	+	i. On site exists a Grade II Listed Building and nearby sit the Peabody Avenue and Churchill Gardens Conservation Areas. Intensifying commercial uses may cause harm to the setting of these assets. However, the policy requires schemes to be designed in a way that will conserve and enhance heritage assets through careful design techniques that reflect local historical architecture. There is also an opportunity to sensitively repurpose the on-site listed 123A Grosvenor Road building and workshop building, ensuring their future preservation. (0)

iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?		ii. The policy supports development that is designed to reflect and respond to the local townscape and protects and enhances strategic of views and local views intersecting Peabody Avenue and adjacent Conservation Areas. (+) iii. Intensifying commercial uses will not be sympathetic to local (residential) character and may pose a risk to the setting of local conservation areas and heritage assets. Mitigation measures will be required to ensure there is no harm to local residential amenity, the onsite heritage assets, or nearby conservation areas. (-) iv. The site sits in the Pimlico Archaeological Priority Area. To preserve, enhance and record archaeological features, development will include archaeological surveys before commencement and follow archaeological monitoring during construction. (+) v. No impacts identified. (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	+	i. Intensifying commercial uses may not reflect the distinct and recognisable patterns and overall residential character of the surrounding area. However, following the policy, the proposed uses can enhance townscape by ensuring design and landscaping are of high quality. Furthermore, new and improved green/blue infrastructure and accessibly open space will enhance local townscape (0) ii. Following the policy, redevelopment of the site will provide the opportunity to deliver a scheme of exemplary design standards (+) iii. Increasing commercial, community and residential uses may increase litter, however this should be mitigated (per City Plan policy 37) through the provision of suitable, accessible waste disposal opportunities. (0) iv. The policy stipulates new proposals should enhance transport routes (improving permeability), new play space, new open space and increase biodiversity factor. This will create a vibrant, attractive and safer area for residents and visitors to enjoy. (++) v. Inclusive design features should be at the heart of a high-quality, sustainable scheme. This ensures the layout and design of potential development is accessible for all groups. (++)

15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	++	i. The provision of new open space and play space is supported by policy. These spaces will be accessible to all and include good quality green infrastructure. (++) ii. The proposed uses in this option can improve landscape character by using design elements that celebrate the local historical character, incorporating the sensitive retrofit of existing buildings of heritage value and creating safer, easily navigable and attractive green/open spaces. (++) iii. The site is currently deficient of open space and is not publicly accessible. The provision of new open space accompanied by the increased connectivity due to new through roads across the site, will improve access to open space for visitors and residents in and beyond the development site. (++) iv. The provision of new urban green/blue infrastructure will enhance the green infrastructure network. The site will create a better network of green spaces, connecting new green areas to existing green spaces such as Ranleigh Gardens and Ebury Square Gardens (++)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	++	i. Intensifying commercial space will provide a significant number of opportunities to improve qualifications and provide work experience. Moreover, following the policy, skills and employment plans will be used to make sure opportunities for training, apprenticeships, work experience, local recruitment are made available during construction. (++) ii. Commercial uses will create many new jobs and will make a significant contribution to decreasing unemployment. Furthermore, the site will continue to be used by network rail, which is a source of employment. (++) iii. Intensifying commercial uses on site means there is scope for affordable workspace to come forward. There will also be opportunities for residents to work with Westminster Employment Service which will provide placements during construction to those most in need. (++) iv. New commercial and retail spaces will include new shops, businesses (especially SMEs) and new services which will improve earnings in the area. The continued use of the railway tracks and the British Transport Police building will also contribute to improving earnings. (++)

		v. Increasing connectivity across the site and supporting alternative forms of transport that do not depend on the car, will promote equality of opportunity across the city. Furthermore, the types of uses being delivered provides the opportunity to include affordable workspace which can further mitigate barriers to employment (++)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	++	i. Commercial uses will improve business development and the local business environment by increasing pedestrian traffic, which will help support local business. It will also deliver a significant amount of new business opportunities into the area, boosting the local economy. In addition, the site will improve navigation and permeability, aiding the future growth and intensification of the CAZ. (++) ii. See (i). (++) iii. Commercial uses and community uses should provide many opportunities for new business start-ups and small businesses for local people. There is the potential to include affordable working space, which is supported in the CAZ. (++) iv. Following the policy, proposed development will be in keeping with businesses in Victoria and the rest of the CAZ, this will aid the promotion of key sectors. v. The site will continue to provide employment for railway and the British Transport Police which is a key worker job (transportation). However, it is noted that these employment opportunities are not linked to the site and may continue anyhow (+) vi. The proposed uses will make efficient use of underutilized land by bringing forward much needed commercial space, some community space, some housing and significant public realm improvements. This will have a positive economic impact and promote regeneration in the area (++).
Conclusion In conclusion, the proposed redevelopment of the site to a commercial led, mixed use scheme would greatly contribute to driving economic growth and supporting a healthy, vibrant community. The proposed uses will deliver much needed public realm improvements. These improvements look to enhance permeability and connectivity in and around the site, making the site more accessible and walkable. Further public realm benefits include better blue and green infrastructure and improving access to open/green space. These improvements will help beautify the area, mitigate air pollution, increase resilience to climate change risks (such as flooding) and overall increase quality of life for residents and workers in the local area. However, the scheme will contribute a limited amount of residential units, which means it will not provide many healthy new homes for those who are most in need and will not		

contribute as much towards fostering an inclusive community. Furthermore, there are risks involved with having intensified commercial uses in close proximity to several Conservation Areas, heritage assets and near to surrounding residential areas (e.g. increased noise pollution/vibrations). The risk to residential amenity will be exacerbated by the continued use of the active railway. Cumulatively, it is considered that this option meets many of the sustainable objectives, however it is not the most sustainable proposal for the site.

Land adjacent to Royal Oak

Option A: Existing land use		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	--	i. The current site has very limited access to local services or community facilities as it is predominantly vacant land and is not accessible to the pedestrians. To the western aspect of the site is Royal Oak Station which serves the Hammersmith and City line and Circle line and supports the GWML. This transport link provides travel to nearby services in Paddington and Westbourne Park. (+) ii. The site is not useable by residents, other than for travelling (car) over the bridges or travelling by trains to/from Royal Oak station, so there is no ability for neighbourhood decision making (--) iii. The site does not support inclusivity at present. It is mainly for car users to travel across Ranelagh Bridge and Westbourne Bridge or for rail works access lines (access portal to the Elizabeth Line). It creates disconnect between Royal Oak Underground station and surrounding areas such as Paddington and the green space is inaccessible to the public. (--) iv. No, due to the state of the site and its highly restricted access, it may deter community activity (--)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	--	i. The site is currently vacant and disused. It is difficult for the public to access thus providing a secluded, sometimes dark, area that could be used for crime or antisocial behaviour. Site visits reveal vandalism (graffiti) and extensive littering around the site. (--) ii. The site is quite unkept with rough sleepers, graffiti, poor lighting. This is likely to exacerbate any fears or crime and antisocial behaviour (--) iii. It has the potential to increase adverse behaviours if the area stays disused (-)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness?	0	No impact identified.

iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?		
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?	-	i. The current use of the site does extremely little to improve health inequalities in the area. There is a small amount of urban greenery which has a small positive increase on air pollution/beauty of the area, but this is not accessible to the public and there a lack of encouragement of healthy activities (outdoor play, cycling etc.) (-) ii. No impact iii. The site decreases access and movement as it is inaccessible and creates a disconnect between the north and south of the Westway. It fails to support active modes of travel (walking and cycling) between the Royal Oak Underground station and Paddington. (-) iv. There is no encouragement of a healthy lifestyle due to the limited access to green space, lack of safe pedestrianised routes and the lack of cycle paths across the area. (--) v. At present there is no enhancement of cultural wellbeing as the site does not support community uses. Neither does the site provide access to green space or provide any public realm, therefore it does not encourage safe outdoor activities (--) vi. No impact vii. No impact viii. No impact ix. No impact x. May have a slight positive impact on mental health and wellbeing, due to small area of urban greenery/trees. (+) xi. It decreases accessibility for people with disabilities due to lack of safe transport routes and predominantly car uses. (-)

5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	-	i. The current use supports public transport (Royal Oak Underground Station) but does not encourage active modes of transport which have a greater contribution to greenhouse gas reduction. Furthermore, there is no renewable energy use on site and the site does not provide any local services, so does not reduce the need to travel. (--) ii. No impact iii. No impact iv. The low level of vegetation on site may contribute to improving the outdoor thermal environment, as well as mitigate the urban heat island effect. (+) v. The green space is permeable land which can contribute towards flood protection, especially since the site sits in the Westbourne Grove Surface Water Hotspot. However, this is limited due to the train lines running below ground (+)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	-	i. The site is disused resulting in reduced water consumption, reduced consumption of fossil fuels and natural resources. (+) ii. Consumption of fossil fuels is low on site (due to be it being underutilised) but there is no use of renewable technologies, and it is predominantly used by vehicular traffic (across Ranelagh Bridge and Westbourne Bridge which sit inside the red line boundary). This does not reduce fossil fuel use on site. (-) iii. No impact iv. No impact v. The existing use of the site makes inefficient use of the land. The vacant space is not available for public use, provides no community benefits and does nothing to enhance connectivity or enhance the local conservation area. (--)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events?	+	i. The area has unused green space which is permeable land and could mitigate against surface flooding (not all sources of flooding). However, this is limited due to Elizabeth lines running underneath. (+) ii. The green area on site is too small to make considerable impact against heavy rainfall/storm events. (0) iii. No impact iv. Land is contaminated due to previous use so may worsen water quality (--)

iv. Will it protect water quality?		
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	+	i. Existing vegetation and trees may provide some biodiversity value and habitats, but these are not well maintained at present (+) ii. No impact iii. The limited amount of urban greening onsite provides some biodiversity interest, however this is inaccessible and therefore does not promote educational value (-) iv. There may be existing local species and habitats on site that are being conserved (due to the lack of activity), however these are not enhanced due to poor quality of green space (+)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	-	i. Existing vegetation and trees may have a slight positive impact on air quality, especially as it located near busy roads and train tracks (+) ii. The existing vegetation may have a slight positive impact however, the site does not actively reduce emissions. It does not use renewable energy, support active transport (walking/cycling) or provide local services to reduce the need to travel. Furthermore, the site is still predominantly used by polluting vehicles (trucks/cars etc.) that uses Ranelagh Bridge and Westbourne Bridge that run inside the boundary of the red area. (--)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	0	i. No impact ii. The current use of Ranelagh Bridge, which cuts through the centre of the site, and Westbourne Bridge, which sits inside the boundary of the red area, does produce some noise pollution. However, there is a small positive impact as the green area adds to distance between roads/train tracks and residential areas, especially for residents to the south of the site. (0)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car?	-	i. The site includes Ranelagh Bridge and Westbourne Bridge which provides vehicular access to the West Way. Furthermore, the site does not provide any local services/facilities so does not reduce the need to travel. These factors mean the site does contribute to reducing traffic volumes. However, it does support public transport (Royal Oak Underground station on the Hammersmith & City and Circle lines / GWML) which helps alleviate some traffic pressures. (-)

iv. Will it improve public transport accessibility?		ii. It negatively impacts walking and cycling as it provides no safe opportunities for these modes of transport, it also fails to connect surrounding cycle paths together. The design of the area is not pedestrian friendly as it is dark and shadowy, so walking is discouraged. (--) iii. Royal Oak Underground station forms part of the site, which means the site supports train use (GWML/Hammersmith & City and Circle lines), however it still supports car mode of transport (Ranelagh Bridge and Westbourne Bridge) over active transport options (such as walking/cycling). (-) iv. The site does little to enhance access to public transport as it does not support pedestrianised connections between Royal Oak and surrounding transport networks. Walkability and permeability are very poor with no wayfinding opportunities. (-)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	0	i. Consumption of materials and resources is very low due to the site being underutilised (+). ii. No impact iii. No impact iv. No impact
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	-	i. One heritage asset sits inside the boundary of the red area at the far Eastern edge. This is a Westbourne Bridge, a Grade II listed structure. The lack of development on site does protect it to a certain extent however, its lacking active conservation/refurbishment and active enhancement. On either side of the site is the Westbourne, Bayswater and Maida Vale Conservation Areas. Due to site being underutilised, these areas are protected to a certain extent, however the existing uses on site do not contribute to the active conservation or enhancement of these areas (-) ii. Currently there are no tall buildings on site blocking view corridors. (+) iii. See answer to i iv. Due to the site being underutilised, any archaeological features are protected to a certain extent, however they are not being enhanced or recorded (-)

		v. No impact (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	--	i. Other than the grade II listed building on the Eastern edge of the site, the site does not contribute to creating a distinct, recognisable or unique urban landscape in the North of the borough (--) ii. The design of the site is quite poor, not inclusive or conducive to an ableist society. It does not champion renewable technologies or sustainable design. (--) iii. Could potentially increase litter (and fly tipping) as area is unused (-) iv. The quality of public realm is decreased as the land is not accessible to the public and is an eye sore. There is a small amount of existing vegetation which beautifies the site to a certain extent. (0) v. The site does not improve access and mobility, other than its use as an underground train station and vehicular routes across the two bridges, there is no support for encouraging pedestrianised access and active mobility for all equality groups in an around the site. (--)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	--	i. The site currently provides a limited amount of open space, but this is not enhanced and is closed off to the public (0) ii. The use as a car park, underutilised green space and Elizabeth line access, does not improve landscape character. Much of the site is an eye sore and doesn't help form a distinct place identity/character (--) iii. It does not provide pedestrianised access to the green space on site, or improve access to nearby open space (Westbourne Open Green Space) (--) iv. Currently the site provides a small amount of vegetation, but this is disconnected from surrounding urban greening, so this does not contribute to the green infrastructure network in the area. (-)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need?	0	No impact identified.

iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?		
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	0	No impact identified.
Conclusion At present the site is underused and does not constitute sustainable development (in line with NPPF). There is a small biodiversity value on site and the permeable ground may offer some protection from surface flooding, however this is very limited and not accessible to the public due to restricted access and lack of suitable lighting/public realm. There are no health or community benefits to the current use, as it does not improve on quality of life nor create a place identity or support community cohesion. Neither does the site provide services to reduce the need to travel or provide other ways of reducing greenhouse emissions (e.g. promote renewable energy). There is a significant heritage asset (Westbourne Bridge, a grade II listed building) which sits inside the boundary of the red area at the far Eastern edge. This is not being enhanced or celebrated at present. As well as the nearby conservation areas (Westbourne, Bayswater and Maida Vale) which at present the site does not complement. The current vacant use also has the potential to exacerbate the fear of crime and worsen littering/vandalism as the site stays disused and poorly lit. It would be an inefficient use of a city site to continue with the existing use.		

Option B: Proposed Allocation Mixed- use scheme, Commercial led scheme with some provision of residential units, limited public realm improvements and green space etc.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	++	i. The draft policy proposes to provide Class E commercial uses which could include offices, workspaces, local services and shops. These could also include businesses that support community functions. This will improve access to services on site and in the surrounding local area. (++) ii. Under the draft policy, development will offer more opportunity for local residents and stakeholders to influence decision-making on the types of uses, facilities and, homes they think are needed (consultation during the planning process). (++) iii. Following the policy, the site will deliver some housing (potentially non-conventional housing such as student accommodation or live work schemes) which would contribute to achieving inclusive communities and provide choice of housing to Westminster residents. (+) iv. There is a potential for new Class E commercial uses to encourage engagement in community activity. Furthermore, public realm enhancements (such as a potential new square, street furniture, new greenery etc.) would provide better quality open space to support community activities. (+)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	++	i. Under the draft policy, development shall increase the number of residential units and commercial uses on site, increasing footfall and providing more natural surveillance which can help mitigate crime, disorder and antisocial behaviour. Following the policy, delivering a high-quality scheme should include innovative design and management features to reduce crime. (++) ii. Under the draft policy, new development should better the appearance of the site and have a positive impact on the perception of the area. This should help reduce fear of antisocial behaviour. New pedestrianised routes will also increase safety through overlooked walkways. Creating new highway frontage adjacent to Royal Oak Underground station at the West of the site, and adjacent to the underside of the Westway at the East end of the site will also improve negative perceptions of the site. (++)

		iii. More bins and waste disposal opportunities provided with new development should reduce littering. Better, safer public realm and increased natural surveillance should reduce behaviours that would damage the environment. (+)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. Following strategic policy, development of high-quality residential dwelling is encouraged. This means schemes should deliver high quality homes (+) ii. Any scheme compliant with the policy will likely bring forward some affordable housing (potentially non-conventional housing such as student accommodation or live work schemes). The affordable housing contribution should be at least 50% affordable given it is public land. (++) iii. By diversifying the housing type offer in Westminster the policy can contribute to providing homes to those most in need and reduce the risk of those individuals becoming homeless. (+) iv. Strategic policy supports development that provides housing of exemplary design standards. This includes meeting the needs of less abled bodies/aging population. However, providing mainly non-conventional housing (such as student accommodation or live work schemes) is unlikely to provide homes that help people stay independent for longer. (0) v. The policy is likely to contribute to the number of new high-quality homes that are fit for purpose (for example, live work schemes). (+) vi. There is a focus on non-conventional housing such as student accommodation or live work schemes in the policy so this site will provide, a range of housing types. (+)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing?	++	i. Any scheme compliant with the policy has the potential to provide good quality, affordable homes. In addition, the development will likely completely replace existing greenery with new, better features which will improve the environmental quality. This will help people stay healthy and improve their wellbeing. (++) ii. Providing more suitable (affordable) homes and improving mobility in the area will contribute to the reduction in death rates. This is because more suitable accommodation will be provided for those on waiting lists and there will be improved access across the Westway to local services/facilities (such as Grand Union Health Centre). (+)

vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		iii. The policy stipulates that development is to greatly improve public realm. This includes introducing new, safer pedestrianised paths to/through the site which will improve access and movement in the area. (++) iv. Improved public realm, active travel routes and accessible open space will help encourage healthy lifestyles through encouraging participation in physical activity. (+) v. The policy promotes provision of new commercial uses and enhanced public realm. This presents an opportunity to enrich the cultural wellbeing of the area by having local businesses and public realm enhancements which can reflect and celebrate the different cultures in the local area. (+) vi. There is potential for provision of more adaptable homes through design. Furthermore, improved public realm/green space will support improved mental and physical wellbeing of older people. (+) vii. No impact viii. Following the policy, a sustainable mixed used scheme should provide access to newly built, high-quality homes and commercial uses. These new homes will be designed to support health and wellbeing of residents and offer an improved quality of life. The location of the site also means it has good access to public transportation (trains, cycling routes along the canal), so the development can support and further encourage active commuting. (++) ix. It is likely that through offering better quality housing it will have a positive impact on healthy years life expectancy. (+) x. Improving living conditions (especially offering more affordable homes) and improving local facilities and workplace opportunities has a positive impact on mental health and wellbeing of local residents. It will also beautify an otherwise unkept piece of land, improving the physical surroundings of the area which in turn improves mental health. (+) xi. Following strategic policy, new buildings, pedestrianised routes and other public realm enhancements should be designed to increase accessibility and mobility for those with disabilities. (++)

5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	+	i. The policy supports schemes that adopt low or zero carbon energy measures, which will help reduce greenhouse gas emissions. This scheme will probably include intense structural works to make the development sound, which will produce greenhouse emissions, however, this can be offset through the design and operation of new buildings, the approach to the re-use of any materials from the site and maintaining and enhancing biodiversity on the site. (+) ii. No impact iii. No impact iv. The draft policy states schemes should expand the biodiversity currently located on the site. This can help mitigate the urban heat island effect. Having higher quality homes means the role of architecture will also be considered e.g. using high quality materials that have minimal heat absorption and retention (+) v. The policy supports development that increases resilience to climate change by using innovative design solutions to develop hazard-resistant buildings and mitigate surface flood risk in the area. (+)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	+	i. Increasing commercial uses (Class E and light industrial) on site will greatly increase water consumption however, the policy advocates for schemes to apply methods to improve water efficiency and reduce water consumption. This can help achieve reduced water consumption and improve use of water throughout the lifetime of the development (0) ii. The draft policy contributes to reducing fossil fuel consumption by advocating the approach to the reuse of any materials from the site. Furthermore, providing commercial uses will provide more local services which should reduce the need to travel, further reducing the consumption of fossil fuels (+) iii. Following the policy, the use of natural resources can be minimised as much as possible through prioritizing recycling of construction materials and using more sustainable alternatives instead of conventional construction practices. (+) iv. The policy states that sustainability should be at the heart of proposals, including in the operation of new buildings. This means the opportunity to use renewable

		energy resources and renewable construction materials should be explored to achieve this objective. (+) v. The site has the capacity for homes and new commercial spaces (as supported by the adopted NWEDA policy) and public realm opportunities. Its development will make better use of land than current use (++).
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	+	i. Following the policy, existing vegetation is likely to be completely replaced by new, better green features. The improved greenery can contribute to minimising flood risk. Construction of the building will likely be on plinths, due to access routes running underneath, which will also decrease flood risk to the new development (+) ii. There will be an increase of risk of property damage by intensifying a site with high flood risk, however, use of flood resistant materials, green infrastructure and can help improve flood resistance and mitigate property damage. (0) iii. No impact iv. Land is contaminated from previous use however, the policy states that development should provide high-quality living and enhanced biodiversity. Both these measures will contribute to improving water quality. Furthermore, the City Plan (Policy 33) states development that is on contaminated land should include remediation measures in their proposals, also improving water quality. (+)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	++	i. Following the policy, biodiversity on site is likely to be completely replaced by new, better features which add more quality and diversity (e.g. green roofs/green walls/replanting trees). (++) ii. No impact iii. Following the policy, the new and improved urban greenery on site will be publicly accessible, enhancing access to sites of biodiversity interest. (+) iv. Under the policy, development is likely to completely replace existing urban greenery with new, better features which add more quality and diversity. This means species and habitats should be re-provided and enhanced. (++)
9. Air quality i. Will it improve air quality?	-	i. Construction will increase air pollutants and under the policy, the site will continue to have three bridges (vehicle use) run across and along the site which will

ii. Will it reduce emissions of key pollutants?		negatively impact air quality; however, the policy states development should implement mitigation techniques to reduce the impact of dust and other air pollutants. (-) ii. Under the policy, the intensification of new commercial uses and new homes will increase emissions of key pollutants. However, buildings should be of high-quality design and incorporate innovative design/technologies which reduce emissions of key pollutants. Moreover, a key policy principle is enhancing pedestrian permeability through the site and activating public spaces at ground floor level. This should encourage sustainable transportation (walking) and help reduce emissions of key pollutants. Also see answer to i. (0)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	-	i. The policy calls for optimisation of development densities across the site. Commercial uses could increase noise pollution from commercial businesses and active frontages. Furthermore, the site will include the continued and potentially intensified use of Ranelagh Bridge, Westbourne Bridge and Royal Oak Underground train station which will also contribute to noise pollution and possible concerns/complaints. However, a core policy principle is development should include the provision of sound insulation which should mitigate negative impact on residential amenity. (0) ii. Construction of development will likely increase noise levels (and vibration). Furthermore, new commercial uses, the introduction of a station square and the continued use of nearby train lines might also exacerbate noise levels. Following policy, to mitigate the impact of noise levels, development will be required to follow a high-quality design which includes noise reduction. (-)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	++	i. Under the policy, new residential uses and commercial uses are supported. This is likely to increase the volume of traffic in the area. However, the site has a high PTAL rating and policy stipulates development should increase walkability in and around the site. This should mean this increase is minimal. (-) ii. New commercial uses will provide safe and overlooked new walkways, improving pedestrian safety and thus encouraging active modes of transport. Also, the policy calls for enhanced permeability through the site which includes bettering

		cycle/walking paths and supporting infrastructure to make cycling/walking more attractive. (++) iii. The policy is likely to increase walking, cycling and use of public transport by addressing issues of severance caused by the railway, canal, Harrow Road and the Westway and increasing connectivity to Paddington. There is a potential for the site to accommodate the relocation of transport infrastructure, further supporting public transport network in the area. (++) iv. Under the policy, new development should increase permeability in and around the site, especially towards Paddington Basin. Furthermore, development will also increase north to south connectivity across the Westway and there is a potential for the site to accommodate the relocation of public transport infrastructure. These factors will improve public transport accessibility. (++)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	-	i. Following the draft policy, commercial uses will increase consumption of materials and resources during construction and the life of the development. This will be minimised by construction prioritising the use of recycled materials and implementing a sustainable design. (-) ii. Increasing the number homes onsite from 0 will increase household waste however, this can be minimised through providing high-quality homes which would include provisions for recycling, food and garden waste. (-) iii. The draft policy emphasises that a scheme should carefully re-use any materials throughout construction and must have a sustainable design. This should increase recycling and reuse on site. Furthermore, high quality homes and commercial space should provide recycling and reuse opportunities for occupants. (+) iv. Answered in i and iii
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings?	++	i. The site is adjacent to Maida Vale, Westbourne and Bayswater Conservation Areas. There is also a grade II listed structure on the eastern edge of the site (Westbourne Bridge). Following the policy, development should be designed to respect the cultural value of these conservation areas and respond to their heritage value. (++) ii. Following the policy, any new development would need to respect the heritage value of neighbouring conservation areas. This includes protecting strategic views.

iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?		The policy states buildings should be placed carefully so as not to obstruct strategic views ensuring that buildings heights are graded down significantly from the buildings at Kingdom Street (++) iii. The policy states that development will be sympathetic to local character and history. The optimisation of development on site should respond to local heritage value, this will ensure heritage assets and their settings are conserved. (+) iv. The area is not an Area of Special Archaeological Priority however, following City Plan policy (Policy 39) archaeological assessments must be undertaken before commencement of development to ensure archaeological features are identified, recorded and protected. (+) v. No impact (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	++	i. The policy supports development that enhances townscape by using design and landscaping to reflect the distinct and recognisable patterns and overall character of the Westbourne Area. The development can provide high quality buildings that respect the architectural form of nearby residential developments (terrace and villa developments). (++) ii. Following strategic policy, developments will follow BREEAM design standards and be BREEAM certified which means a holistic approach to sustainable building design will be taken. (++) iii. Under the policy, new development should be of high quality. This includes provision of waste disposal opportunities which should contribute to reducing litter on site. (+) iv. The policy advocates for schemes to provide new safe pedestrian routes and will convert the space (which is currently closed to public access) into publicly accessible, external, urban space. It is likely that existing urban greenery will be completely replaced by new, better features which add more quality and diversity. These factors will enhance the quality of the public realm. (++) v. Following the policy, development should enhance permeability through the site. This includes using inclusive design features to ensure the buildings and layout of the development are accessible for all groups, ensuring the development improves mobility for all. (++)

15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	+	i. The policy supports developments that deliver new publicly accessible open space. Furthermore, biodiversity value of the site should be increased, and walkability improved meaning these open spaces should be of high quality. (+) ii. The policy supports the delivery of commercial land (Class E, or light industrial), enhanced permeability through the site and activation of public spaces at ground floor level. This will improve the character of the landscape by providing high quality buildings, new travel routes and new public realm. (++) iii. The policy advocates for better connectivity across the site. This will improve access to local green spaces for residents and workers, such as Westbourne Green Open Space and Porchester Square. (+) iv. Core principles of the draft policy include biodiversity enhancements and improved public realm. This means there will be opportunities to extend the green infrastructure network in the area. (+)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	++	i. Strategic policy states that skills and employment plans will be used to make sure opportunities for training, apprenticeships, work experience, local recruitment are made available through the construction of development. The policy supports the delivery of commercial land (Class E, or light industrial) uses which will also improve qualifications, skills and training opportunities. (++) ii. The policy states that a key policy requirement is adhering to the strategic needs of the North West Economic Development Area and provide job opportunities. Commercial uses will provide additional employment, through new Class E or light industrial workspace and will provide a certain number of jobs through construction. This should reduce unemployment (++) iii. Newly provided workspaces will create a new destination for affordable/flexible workspace, especially for start-ups and small businesses. These spaces can also provide a range of workspace typologies under Class E, including workshops and studios, which there is a need for in nearby NWEDA and Church Street / Edgware Road Housing Renewal Area. Following strategic policy, developers will also work with Westminster Employment Service (secured through S106) to support those furthest from the labour market (++)

		iv. The policy supports Class E commercial uses which can offer new employment opportunities. This can contribute to improving earnings for people in Westminster. (+) v. The range of employment opportunities under Class E commercial space (SME, workshop space and other work (restaurants/cafes) made available will contribute to the job offer in the area. This will help tackle the barrier to unemployment. (also, i and iii) (+)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	++	i. The draft policy supports schemes that create workspace for SMEs, workshops and studios which are needed in the NWEDA, this will help improve business development. Enhanced permeability through the site is also a core principle of development, this will help increase in footfall and make commuting to/around these businesses easier. This will also improve business development. (++) ii. A core principle of the policy is for proposals to respond to the spatial strategy of the NWEDA and the CAZ, in particular by providing new Class E commercial floorspace. This will improve business resilience and local economy. (+) iii. Answered in i iv. Commercial uses on site will contribute to key sectors outlined in the strategic policy for this area. Furthermore, the delivery of live work residential schemes (supported by the policy) can also support business in key sectors (+) v. Commercial uses on the site will bring new businesses and services to the area, promoting regeneration and complementing uses in nearby regeneration schemes in the NWEDA (++)
Conclusion In conclusion, this option provides the most benefits on balance and demonstrates the delivery of commercial uses (Class E or light industrial) potentially as part of a mixed-use scheme with some residential space would by an effective and sustainable use of the land. The increase in homes will offer some options to residents in Westminster and address housing need, and the new commercial uses can provide workspace (some affordable) that can support employment needs in the northwest of the borough. Due to the heritage constraints (local conservation areas and heritage assets) policy requires potential schemes to respect surrounding architecture and massing and to ensure there is little impact on the grade II listed building (Westbourne Bridge) on the eastern edge of the site. This includes ensuring that buildings heights grade down significantly from the buildings at Kingdom Street. This option ensures that development will respect surrounding local heritage assets and their setting. The development will open the site up to pedestrian use and improve walkability/permeability, providing better connections to Paddington and routes across the West Way. It will also provide better urban greenery, enhancing		

the green infrastructure network in the area and providing more flood resistance. This scheme is a vast improvement on existing land use, without causing unnecessary harm to existing heritage assets and local character.

Option C: Reasonable Alternative 1 Residential led scheme with some commercial floorspace, more extensive public realm improvements, green space etc.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	++	i. The policy advocates for proposals to include Class E commercial uses. These could include new shops and community facilities, improving access to local services in the area (+) ii. The policy supports optimisation of land through new development which will offers more opportunity for local residents and stakeholders to influence decision-making on the types of uses, facilities and, homes they think are needed (consultation during the planning process). (++) iii. The policy calls for development to offer more public realm improvements. These should be of good design, meeting a variety of needs and increasing mobility for all abilities, this will generate public realm that can support inclusive communities. Delivering mainly residential uses on site, would also offer a considerable number of affordable homes (50% affordable). Assuming they are delivered on-site and not outside of Westminster as part of a portfolio approach, this means more homes will be available to support an inclusive community in Westminster. (++) iv. The policy calls for an increase in commercial class E uses (including active frontage to activate the highway). Furthermore, it is likely that the existing urban green space will be replaced by new, better features. These improvements can help encourage community activity, as the surrounding urban fabric becomes more inviting and engaging. (+)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	++	i. The policy states development should be of exemplar design, meaning it should help reduce crime and ASB. An increase in residential uses would also mean an increase level of human activity in and around the site, increasing the natural surveillance reducing the risk of crime and increasing the sense of safety. (++) ii. The policy encourages public realm improvements (making the site safer). It also encourages the optimisation of site densities through residential and potential commercial uses (increasing natural surveillance from active frontages and residential units). This should reduce the fear of crime, disorder and ASB. (++)

		iii. Following the policy, more residential (and potentially commercial) uses on site is likely to deter fly tipping, vandalism and loitering due to reasons mentioned above. (+)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	+	i. The policy supports new residential development that secures high quality living. This should ensure high-quality homes are delivered. However, due to the site constraints its likely proposals will have limited residential amenity (e.g. it is likely buildings will be single aspect due to size and shape of the site and one side of buildings will be north facing, reducing the amount of natural light). (-) ii. Following policy, building residential uses on public land means a viable scheme will provide 50% affordable homes. Assuming they are delivered on-site and not outside of Westminster as part of a portfolio approach, this will be a significant contribution to Westminster's affordable housing need. (++) iii. Following adopted City Plan policy, residential uses will provide a considerable amount of affordable housing, providing more options for the most vulnerable. This is likely to help mitigate the issue of homelessness in the area. (+) iv. No impact (0) v. Under the policy, optimising site densities with residential uses will bring forward a high number of affordable homes, so it is likely to contribute to the number of homes in the city however, due to site constraints it is likely these homes will be single aspect and have one side permanently north facing (decreasing the amount of ambient light received from all directions). This may negatively impact residential amenity. (0) vi. The policy supports optimising site densities. Increasing residential uses onsite means the scheme will be able to offer a wider range of housing types (including potentially live work and student accommodation). This will provide a range of housing types for different groups. (+)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement?	+	i. The policy supports proposals that offer significant public realm improvements. This will encourage more active transport and provide opportunities for outdoor physical activity. Furthermore, the affordable housing provision generated by this option (following strategic policy) will assist those who need it most, providing them with safe and healthy homes. These factors should improve health

iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		inequalities. However, due to the site constraints its likely proposals will have limited residential amenity (e.g. it is likely buildings will be single aspect due to size and shape of the site and one side of buildings will be north facing, reducing the amount of natural light). This may have a negative impact on health inequalities. (+) ii. The policy supports the provision of better affordable housing for those most in need and increasing connectivity to and across the site. This provides residents with safe/healthy living environments and increases connectivity to important local services such as health centres. These factors should contribute to reducing death rates. (+) iii. The policy calls for improved pedestrian access in and through the site, with better connectivity between Royal Oak and Paddington. These new and improved paths will enhance access and movement across the site. (+) iv. The policy calls for improved public realm and permeability across the site. This includes enhanced cycle/walking paths which should encourage more physical activity. Furthermore, City Plan policy (Policy 34) requires major development to provide new or improved public open space and space for children's active play, contributing further to this encouraging physical activity. (++) v. Following the policy, schemes should be designed to reflect and enhance the local historical character and provide public open space. This is an opportunity to enhance the cultural well-being of the Westbourne Park area. Public realm enhancements may encompass features that reflect the local culture. (+) vi. There is potential for provision of more adaptable homes through design. Furthermore, improved public realm/green space will support improved mental and physical wellbeing of older people. (+) vii. No impact viii. Following the policy, development delivering residential uses (and potential commercial uses) should provide access to high-quality new homes and workspaces, meaning they are healthy workspaces/homes.

		ix. It is likely that, following the policy, development will offer more affordable housing, make contributions to urban greening and improve air quality. These measures will have a positive impact on life expectancy. (+) x. Yes, for positive reasons covered above. However, due to the site constraints its likely proposals will have limited residential amenity (e.g. it is likely buildings will be single aspect due to size and shape of the site and one side of buildings will be north facing, reducing the amount of natural light). This may limit improvements to mental health and wellbeing. (+) xi. Public realm enhancements are a core principle of the policy and will be designed to accommodate the diverse needs of all users, with scope for a particular focus on enhancing facilities and accessibility for individuals with disabilities. (+)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	-	i. The policy supports optimising the site. New residential uses may require greater density to make a viable scheme, and this could create a substantial increase in carbon emissions. The construction process would generate a lot of greenhouse emissions as extensive works would be needed to make it structurally sound for high-density residential development. However, following the policy, this harm can be counterbalanced by focusing on an approach that reuses materials as much as possible. (-) ii. No impact iii. The policy supports development which prioritises the approach to the re-use of any materials from the site. There is scope to include this approach in a scheme delivering residential uses. (+) iv. The policy calls for development to reprovide urban vegetation which can be incorporated into the design to mitigate the urban heat island effect. However, due to site constraints the shape and positioning of the buildings (likely slim buildings with one side south facing) may increase heat island effect on people and property. (0) v. The policy supports developments with sustainability at the heart of the proposal. This includes an emphasis on resilience to climate change. The increase in biodiversity may help mitigate flood risk. However, optimising the site through residential development may result in higher carbon emissions through

		construction due to the extensive structural works required. Moreover, due to the shape of the site one side of buildings may be south facing, making it difficult to keep cool, thus decreasing some resilience to climate change. (-)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	-	i. Increasing residential uses on site will greatly increase water consumption during construction. Although, the average water consumption in residential units in the UK is generally lower than commercial units, a major housing scheme may find it difficult to mitigate water consumption over the lifetime of the development. Following policy, development should look to apply methods to improve water efficiency and reduce water consumption. (-) ii. The policy supports optimisation of site densities, however optimising site density with residential uses means there will be a significant increase in the consumption of fossil fuels (especially throughout construction due to intensive structural works required). This may be difficult to mitigate over the lifetime of the development. Furthermore, having limited commercial uses on site means less local services being delivered, which encourages the need for people to travel. That being said, construction should strive to prioritise green or alternative construction practices and the reuse of materials where viable. (-) iii. The policy supports the decrease in the utilization of natural resources by prioritizing the recycling of construction materials, however this may be difficult to achieve due to the intensive construction works required for major residential development on site. (0) iv. Sustainability being at the centre of development is one of the core policy principles. This means the use of renewable resources could be prioritised over traditional resources to meet this objective. (+) v. Following policy, this option proposes maximum optimisation of site density, bringing forward a considerable amount of housing(especially affordable housing), public realm improvements (including active transport enhancements) and increased biodiversity. This would make efficient use of the space. (++)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding?	+	i. Following the policy, existing vegetation is likely to be completely replaced by new, better green features. The improved greenery can contribute to minimising flood risk. Construction of the building will likely be on plinths, due to access routes

ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?		running underneath, which will also decrease flood risk to the new development (+) ii. Increasing residential uses in a surface flooding hotspot will increase the risk of property damage however, the policy supports schemes which focus on sustainably through design and enhancing green infrastructure to help mitigate this risk. (0) iii. No impact iv. The site is already constrained by contaminated land from previous usage; however, following policy, the introduction of green infrastructure can help ameliorate water quality. Moreover, further opportunities can be taken to remediate land contamination (City Plan Policy 33). (+)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	++	i. The proposed policy supports the establishment of green infrastructure (green roofs, green walls, and the replanting of trees) to restore and enhance the overall biodiversity value of the site. (++) ii. No impact iii. Following the policy, the new and improved urban greenery on site will be publicly accessible, enhancing access to sites of biodiversity interest. (+) iv. The policy states that sustainability should be at the heart of any proposal, and it is likely that new development will provide new and improved biodiversity features. This will include bettering the conservation and enhancement of species and habitats. (++)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	-	i. The policy aims to optimise density on site and achieving this through residential development is likely to involve intensive structural works, greatly increasing air pollutants. Furthermore, the site will continue to have three bridges (vehicle use) run across and along the site which will negatively impact air quality. However, policy states that residential development within the site must ensure environmental impacts are minimised, in particular air pollution. (-) ii. The policy supports a scheme which enhances active transport routes and prioritises the reuse of resource materials during construction in order to reduce the emission of key pollutants. However, intensifying residential use with little

		increase in commercial uses (i.e. local services) may increase the need to travel. This may increase key pollutants. Also see (i) (0)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	-	i. It is likely that intensifying residential uses will cause high noise levels, including vibrations (especially during construction due to intensive structural works required). This is likely to increase noise concerns and complaints. Policy states that diligent mitigation efforts, such as the use of dampening features will need to be used. (-) ii. An increase in residential uses may increase noise levels (especially throughout construction). Furthermore, a new station square and the continued use of nearby train lines might also exacerbate noise levels. Following policy, to mitigate the impact of noise levels, development will be required to follow a high-quality design which includes noise reduction. Moreover, residential uses may create less noise pollution during the lifetime of the development, compared to having more commercial uses. (+)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	+	i. The policy calls for increased walkability and permeability in and around the site which should help reduce volumes of traffic. However, increased optimisation of site density may also increase traffic due to the number of new residential units and active frontage provided. (0) ii. The proposed policy aims to enhance pedestrian safety by introducing secure and well-monitored walkways, thereby promoting walking. Additionally, as sustainability is central to the policy, development is likely to explore enhancing cycle path connections to existing routes along Porchester Road, Westbourne Bridge, Westbourne Open Green Space, and Porchester Gardens and providing cycle infrastructure. (++) iii. The policy is likely to increase walking, cycling and use of public transport by addressing issues of severance caused by the railway, canal, Harrow Road and the Westway and increasing connectivity to Paddington. (+) iv. The policy advocates the enhancement of public realm and permeability across the site. This can potentially increase connectivity to Paddington and North of the site, helping improve access to public transport. (+)

12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	-	i. The policy calls for the proposed scheme to optimise site density. Achieving this through residential uses will likely greatly increase material and resource consumption both throughout the construction phase and the lifespan of the development. To mitigate this impact, the policy emphasizes the utilization of recycled materials, and other sustainable methods. (-) ii. Optimising the site through residential uses will greatly increase the number of homes and thus the amount of household waste produced onsite. However, this can be minimised through providing high-quality homes which should include provisions for recycling, food and garden waste. (-) iii. Increased recycling will be achieved by measures covered above in i and ii. iv. Answered in i.
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	-	i. The policy states that development must optimise the site whilst avoiding negative impacts on the extant urban character and heritage sites. However, intense works will be needed for optimising the site through residential uses. This is because residential uses would require a greater density and so schemes may potentially struggle to conserve neighbouring heritage sites and reflect the character of local conservation areas. (-) ii. Due to the size/shape of the site, providing the necessary amount of residential space needed to make a viable scheme may conflict with protecting strategic views. However, the policy does call for development to be mindful of the adjacent tall buildings cluster and buildings heights are graded down significantly from the buildings at Kingdom Street, so to a certain extent strategic views will be protected. (0) iii. The policy requires development to respond to local heritage value and include public realm improvements. However, due to the size and shape of land, development may struggle to optimise use of land whilst enhancing the setting of local heritage assets. (-) iv. The area is not an Area of Special Archaeological Priority however, following City Plan policy (Policy 39) archaeological assessments can be undertaken before commencement of development to ensure archaeological features are identified, recorded and protected. (+).

		v. No impact (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	+	i. The proposed policy supports development that enhances townscape by using design and landscaping to reflect the distinct and recognisable patterns and overall character of the Westbourne Area. However, optimising the site through residential uses may deliver development that struggles to reflect the extant local townscape of the neighbouring residential areas. (0) ii. The policy requires development to be of a high design standard however, the design quality of residential units on site may be limited due to site constraints (e.g. less likely to have balconies, be single aspect and north facing). However, following strategic policy, new developments will follow BREEAM design standards and be BREEAM certified which means a holistic approach to sustainable building design will be taken (0) iii. Under the policy, new development should be of high quality. This includes provision of waste disposal opportunities which should contribute to reducing litter on site. (+) iv. The policy supports schemes that provide significant public realm improvements. New pedestrianised routes running through the site will enhance permeability in an around the area, creating a safe pedestrian/cycle path that links the north and south areas of the West Way. A new station square will also enhance the quality of public realm, with improved lighting and street furniture. Re-provided green space can also increase the attractiveness of the site create a location for physical activity, relaxation, and social interaction. (++) v. Following the policy, development should deliver buildings and public realm that is accessible and useable to all groups through the use of inclusive design features. (++)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	+	i. The proposed policy will support development that enhances biodiversity value of the site and improves walkability, meaning new open spaces should be of high quality. However, intensifying residential uses on site may result in limited opportunities for enhanced open space to be delivered on site. (+) ii. The policy supports development that delivers improvements to landscape character through enhanced permeability and activation of public spaces at

		ground floor level. New public realm improvements and green infrastructure additions can be designed thoughtfully in a way that conserves some of Westbourne Parks local character. (+) iii. The site is near to Westbourne Green Open Space and Porchester Square, so improving connectivity/permeability in and around the site will improve access to open space for local residents and workers. However, intensifying residential uses onsite may result in limited opportunities for open space to be delivered on site. (+) iv. The policy supports enhanced biodiversity which includes the use of green roofs, green walls, gardens and SUDs etc. This will add to the network of existing urban greenery in Westbourne Park. (+)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	+	i. City Plan policy calls for major developments to enter into S106 obligations for Employment and Skills Plans and training and work experience opportunities will be made available through the construction of the development. However, delivering limited commercial uses will limit the opportunities for skills and training throughout the lifetime of the development. (+) ii. The proposed policy supports development that creates new jobs through construction. Furthermore, the policy supports commercial (Class E) uses that can offer new employment opportunities (although these will be limited). These factors will contribute to reducing unemployment. (+) iii. Providing limited commercial uses on site will limit the amount of workspace provided, so it is likely no affordable workspace will be brought forward however, following City Plan policy, Westminster Employment Service will offer placements to those furthest away from the employment through construction. (+) iv. Earnings will improve as the current use does not provide any employment opportunities, other than the Royal Oak Underground station (which is to be maintained). The policy supports new commercial (Class E), which will create some earning opportunities. However, optimisation of the site through residential uses will limit these opportunities and subsequent earnings might not be as high as a scheme that intensifies commercial uses. (0)

		v. The policy supports development that will deliver transport improvements and increase permeability of the site. This means the site will be well connected, helping to promote equality of opportunity in Westminster by making employment more easily accessible. Moreover, City Plan policy requires major development to provide apprenticeships and learning programmes to help break down potential barriers to employment (but only during construction). (+)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	+	i. The policy states that any development sitting within the NWEDA and the CAZ should respond to the strategic needs of those areas. Residential uses will have limited contribution to promoting growth and diversification in economic activity, however increased footfall should help to support local businesses and services. (+) ii. The policy calls for increased site density which should help improve resilience and economy by increasing the number of residents and visitors to the area. This will help support local businesses in the long run contributing to economic growth. (+) iii. Residential uses with limited commercial uses will have limited contribution to the strategic needs of the CAZ/NWEDA and the encouragement of start-up businesses and small businesses. (-) iv. For similar reasons in (iii) intensification of residential uses is unlikely to effectively support the key sectors. (-) v. The policy supports optimisation of site densities which can promote regeneration, and residential uses will increase footfall and make the area a more accessible and enjoyable place. However, intensification of mainly residential uses will not complement uses in nearby regeneration schemes in the NWEDA and may not effectively promote wider regeneration in the area. (+)
Conclusion In conclusion, mainly residential uses may not be the most sustainable option for the site. Under the policy, intensifying residential uses would greatly contribute to providing affordable housing and delivering much needed public realm improvements. This would enhance permeability and connectivity, and better urban greening which will help beautify the area, ameliorate environmental quality and increase quality of life. However, due to physical constraints, such as the shape of the site and space available, the quality of housing may be limited (e.g. single aspect and less likely to have balconies) as well as opportunities for new open space. This risks harming residential amenity. Furthermore, the intensification of residential uses has the potential to negatively impact the nearby conservation areas and will produce considerable noise and air pollution throughout construction, which may further harm		

residential amenity. Furthermore, the scheme does not contribute effectively to employment provision, with no offer of affordable/flexible workspace which is needed in this policy area. Many of the benefits (public realm, greening and enhanced connectivity) can be met through the preferred option which may be better able to respect local heritage assets/local character, provide higher-quality homes and support the strategic needs for the NWEDA. Cumulatively, it is considered that this option is not the most sustainable for the site.

St Mary's Hospital

Option A: Existing land use		
Sustainability Appraisal Objective	**Score**	**Analysis**
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	+	i. St Mary's hospital has a major positive effect on the community as it is located in central London, providing a key community facility to a wide population. The hospital is also walking distance to Paddington train station and a number of bus stops. The area is a mixed use with community facilities such as the canal, shops and restaurants nearby. (+) ii. St Mary's have influence over community health initiatives or run programmes aimed at improving local health outcomes, which influence community attitudes and decisions related to health. The Imperial College Healthcare NHS Trust who operate the hospital are also already well versed in providing views to inform local decision making, for example on nearby planning issues. This ability to influence decision making would likely remain the same regardless of whether a new hospital was provided on-site or not. (+) iii. St Mary's hospital is a public hospital, meaning it does help to foster an inclusive Westminster community. (+) iv. St Mary's hospital plays a vital role in community engagement because they have a mandate to engage in health education and community outreach programmes relating to wellness to encourage community members to be proactive about their health. Volunteer's programmes offered by the hospital can also enhance community activity. (+)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	+	i. St Mary's contributes to reducing crime and antisocial behaviour by engaging in public health campaigns against crime and violence. The hospital is also activated at all hours of the day, meaning there is a constant public presence. (++) ii. The hospital can reduce crime by the use of CCTV around the hospital, which can assist the law enforcement and help to reduce fear of crime in the local area. (+) iii. The presence of the hospital as it currently is will likely not significantly reduce specific behaviours that affect the local environment. (-)
3. Housing i. Will it create high quality homes?	0	i. The hospital site does not currently provide for any residential accommodation. (0) ii. The hospital does not currently contribute to any affordable housing provision. (0)

ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?		iii. A sustainable hospital should contribute to reducing homelessness in its vicinity. St Mary's Hospital can partner with local shelters and social services to support individuals experiencing homelessness, addressing their medical and mental health needs. The hospital can also create programmes that help homeless individuals transition to stable housing through collaborations with local housing agencies and non-profit organizations. However, the hospital does not currently provide any housing which helps to house people who are homeless. (0) iv. The hospital does not currently provide any housing which can support independent living (0) v. The hospital does not currently include any residential accommodation, therefore, there are no unfit homes currently on-site (0) vi. The hospital does not currently include any residential accommodation (0)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing?	+	i. The current hospital provides a wide range of health services which help to improve health inequalities (++) ii. The hospital currently provides exemplar care to members of the community, helping to reduce death rates (++) iii. The hospital is currently difficult to access and has poor wayfinding and connections to different hospital uses are difficult to navigate for both patients and staff. Older buildings also have poor access arrangements for people with disabilities or the elderly with reduced mobility. That being said, the hospital is within an accessible location making it easy to access for a wide range of the population (0) iv. The hospital can encourage health and wellbeing practices through its current site. (+) v. The current hospital site caters to a range of different cultures and people from different backgrounds. (+) vi. The hospital currently supports patients (including older patients) to promote greater independence and wellbeing. (+) vii. The hospital does not currently include many food options which means that for staff and visitors, the catering options are very limited – especially for healthy food to support a balanced diet (-)

xi. Will it improve facilities and accessibility for people with disabilities?		viii. The deterioration of the St Mary's estate means that the buildings do not support healthy workplaces where healthcare workers can productively work to their full potential. This experience is also true for patients where overcrowding is experienced in old facilities that do not maximise health benefits such as access to daylight, ventilation etc. (--) ix. The hospital currently supports patients to improve health years life expectancy. (+) x. The hospital currently supports patients to improve their mental health and wellbeing although current aged systems and facilities may also have a negative impact on patient and visitor experience, impacting negatively on mental health and wellbeing. (0) xi. As a hospital, the site must cater for people with disabilities however, more could be done to consolidate and enhance the permeability of the site to improve facilities and accessibilities for people with disabilities. (0)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	--	i. St Mary's Hospital is currently an older hospital with aged energy systems which mean it has a high energy consumption and therefore emits significant greenhouse gas emissions. (--) ii. St Mary's Hospital is currently an older hospital with aged energy systems which mean it has a high energy consumption and therefore it is assumed that it could be emitting ozone depleting emissions. (--) iii. St Mary's Hospital is currently an older hospital with aged buildings which have been in the estate for many decades. Retrofitting has been minimal and therefore the switch to new technologies has not been readily adopted. (--) iv. St Mary's Hospital currently contributes to the urban heat island effect through minimal urban greening measures across the estate. (--) v. As the hospital is significantly aged, the current buildings were designed and built in a time where climate change adaptation was not readily considered. (--)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels?	--	i. St Mary's Hospital is currently an older hospital with aged water systems which mean it has a high water consumption and therefore is not very water efficient. (--)

iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?		ii. St Mary's Hospital is currently an older hospital with aged energy systems which do not rely on any renewable sources of energy. This contributes to the reliance on fossil fuels to continue the operations of the hospital. (--) iii. St Mary's Hospital is currently an older hospital with aged energy systems which do not rely on any renewable sources of energy. This contributes to the reliance on fossil fuels to continue the operations of the hospital. (--) iv. St Mary's Hospital is currently an older hospital with aged energy systems which do not rely on any renewable sources of energy. This contributes to the reliance on fossil fuels to continue the operations of the hospital. (--) v. The current St Mary's estate is sprawling and disconnected. This can make it difficult for different clinical staff to operate across different sections of the hospital and it can be difficult for patients and visitors to navigate their way around the hospital. The current use of land is therefore not efficiently laid out or serviced. (--)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	--	i. There are no known measures to reduce flood risks across the hospital estate. (--) ii. Workers can be given flood awareness information and flood emergency plans, so they are better prepared for heavy rainfall events. (+) iii. There are no known measures in place to mitigate against combined sewer overflow events. (--) iv. There are no known measures in place across the hospital estate to protect water quality (--)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest?	--	i. There are no known measures in place to protect, enhance and increase biodiversity from the existing hospital estate (--) ii. There are no known measures in place by the hospital to demonstrate the preservation of Sites of Importance for Nature Conservation (SINCs) in its vicinity. (--) iii. There are no known initiatives in place which seek to promote the educational value of sites of biodiversity interest (such as the nearby Grand Union Canal). However, the hospital can organize educational programmes, guided tours, or

iv. Will it conserve and enhance species and habitats?		workshops to raise awareness about local biodiversity and its importance for ecosystem health. (-) iv. There are no known measures in place to protect, enhance and increase species and habitats from the existing hospital estate (--)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	--	i. A portion of the site is currently within an Air Quality Focus Area, highlighting that there are current air quality concerns which require mitigation (--) ii. Any existing emissions from the St Mary's hospital which may be contributing to the need for an Air Quality Focus Area would remain. (--)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	-	i. The current use of the hospital means that ambulances arrive to the site at all hours of the day with patients requiring emergency treatment. The continued use of the site as a hospital will mean that concerns around noise will remain. (-) ii. The existing use of the hospital will mean that there will not be any opportunities to reduce noise levels. (-)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	0	i. The current levels of traffic associated with the hospital will remain. There are current issues with traffic movements and ambulance servicing. (-) ii. Given the hospital's current location in close proximity to the Grand Union Canal, walking and cycling are encouraged. This is heightened by the central location of the hospital, which can be accessed through a wide network of footpaths and designated cycle routes. (+) iii. the proximity of the hospital to public transport routes, it is presumed that the majority of journeys currently made to the hospital are through modes other than cars already. This would be likely to remain in the event of the hospital remaining as is. (+) iv. Whilst the site currently has exemplar public transport accessibility, some of the access points are not easily accessible by people with a range of physical abilities. (-)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste?	-	i. The current hospital estate is significantly aged and is unlikely to be efficient in the use of materials and resources. (-) ii. There are no current residential units across the estate where this criterion applies. (0)

iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?		iii. It is not known whether the current facility is making best use of the potential to increase recycling, recovery and reuse. It is likely that the aged facility does not have the capacity to efficiently house different bins to accommodate different waste streams on-site to encourage and facilitate uptake or recycling. However, opportunities exist for the existing hospital to reduce litter by implementing waste management strategies, such as providing sufficient bins and encouraging proper waste disposal among staff, patients, and visitors. Regularly cleaning and maintaining public spaces will help keep the surroundings clean and attractive. (-) iv. If the current hospital were to stay as is, there would not be any construction waste. Therefore, there would be minimal opportunities to minimise construction waste. (0)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	+	i. The site currently contains a number of heritage assets throughout the site. The retention of these sites of heritage and cultural value would remain if the site were to continue in its current use. (++) ii. The current hospital does not impact on any strategic views. (+) iii. Retaining the existing site as is conserves heritage assets, although due to the piecemeal development over the lifetime of the hospital, it is evident that more could be done to enhance the heritage assets and their settings. The Bayswater Conservation Area Extension document (published by the council in 2010) also highlights that some hospital buildings currently have a negative effect on townscape. (-) iv. As this option assumes that there will not be any development on site, there will be limited opportunities to continue to enhance and record archaeological features and settings. (0) v. The hospital in its current does not impact on the Westminster World Heritage Site. (+)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter?	--	i. The current hospital buildings have a mixed impact on townscape which will continue if the hospital remain as is. (0) ii. The hospital includes some buildings of merit which demonstrate exemplar design standards. There are however, additional buildings which may be deemed to not

iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?		uphold exemplar design standards. These will remain if the current hospital use is maintained. (0) iii. The continued use of the site will unlikely have any impacts upon the reduction of litter. (0) iv. The current public realm throughout the site is low in quality. Connections between buildings do not prioritise pedestrians and there is limited space for gathering in the public domain. Furthermore, wayfinding throughout the estate is difficult. (--) v. The accessibility of the public realm is currently not sufficient across all equality group strands, namely due to old buildings and different surface types reducing the accessibility of the site. (--)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	--	i. There is currently very little open space available across the site, that which exists is of poor quality. (--) ii. The site currently has a poor landscape character, which would not be improved with a do nothing approach. (--) iii. The site currently does not include any open space. Access is made to space surrounding the canal basin, however this could be greatly improved through permeability enhancements. (-) iv. The current hospital estate does not contribute to the green infrastructure network. (-)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	+	i. The hospital currently supports around 7,000 jobs, along with the Imperial Medical School also employing a number of staff. The university plays a critical role in improving qualifications of students, whilst on the job training opportunities offered to NHS staff at the hospital is also exemplar. ii. The workforce required for the hospital and the Imperial Medical School provide numerous jobs, helping to reduce unemployment. Reconsolidation of the hospital however, has the potential to increase opportunities to provide further jobs (+) iii. The jobs on offer at the hospital provide employment opportunities across a broad range of sectors and skill levels. This means that people with varying skills and experiences may be able to take up employment at the site. Reconsolidation of the

		hospital however, has the potential to increase opportunities to provide further jobs (+) iv. The jobs available across the site can help to ensure secure earnings, improving the incomes of local people. (+) v. The hospital through the NHS have a wide range of initiatives in place to promote diversity in their workforce and to promote equality of opportunity to persons who may traditionally face barriers to employment. (++)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	-	i. The current hospital has links with local businesses, many of which help to service staff, visitors and patients to the hospital. (+) ii. As a significant institution, St Mary's Hospital plays a role in contributing to the resilience of the local economy. By maintaining stable employment opportunities and investing in long-term economic strategies, the hospital can anchor the community, providing stability and contributing to economic growth. Reconsolidation of the hospital however, provides the opportunity to use surplus land to promote additional floorspace for alternative uses to support and improve the economy. (+) iii. The current hospital site does not presently support new start-up businesses across the estate. (-) iv. The hospital currently promotes business in key sectors including healthcare, whilst the Imperial Medical School promotes the education sector. (+) v. The current hospital estate includes a number of buildings which have significantly aged. Furthermore, the hospital estate does not readily align with the regeneration which has occurred elsewhere throughout the local area in recent years. (--)
Conclusion Whilst the existing use of the site as a hospital is a key piece of infrastructure for the local community, catering to a vast population catchment area and providing a source of employment, skills and training, there are many disbenefits to the identified sustainability objectives of not redeveloping the site.		

Option B: Proposed Allocation Consolidation of existing hospital to modernise the healthcare offering and to release surplus land for a commercial-led scheme with some provision of residential and community floorspace, open and green space etc.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	++	i. St Mary's hospital has a major positive effect on the community as it is located in central London, providing a key community facility to a wide population. The hospital is also walking distance to Paddington train station and a number of bus stops. The area is a mixed use with community facilities such as the canal, shops and restaurants nearby. Providing additional alternative land uses will help to promote and improve user access to local services, shops and community facilities. (++) ii. St Mary's hospital have influence over community health initiatives or run programmes aimed at improving local health outcomes, which influence community attitudes and decisions relating to health. The Imperial College Healthcare NHS Trust who operate the hospital are also well versed in providing views to inform local decision making, for example on nearby planning issues. This ability to influence decision making would likely remain the same regardless of whether a new hospital was provided on-site or not. Current and future commercial uses across the site will also likely be able to influence decision making through organisations such as the Paddington Partnership, which would also remain regardless of whether the site is redeveloped or not. The provision of new residential units however, could enable the creation of a residents society or community organisation which may enable future residents, along with existing neighbouring residents to enhance their ability to influence decision making in the local area. (++) iii. St Mary's hospital is a public hospital, meaning it does help to foster an inclusive Westminster community by providing healthcare services to people from all walks of life. This scheme will also provide opportunities for residential and affordable residential units which will help to foster an inclusive Westminster community. (++) iv. St Mary's hospital plays a vital role in community engagement because they have a mandate to engage in health education and community outreach programs on

		wellness to encourage community members to be proactive about their health. Volunteers' programmes offered by the hospitals to community members also helps to support community activity. This scheme will also provide opportunities for residential and affordable residential units which will help to encourage engagement in community activity. (++)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	++	i. St Mary's contributes to reducing crime and antisocial behaviours by engaging in public health campaigns against crime and violence. The hospital is also activated at all hours of the day, meaning there is a constant public presence. This will be enhanced by the new hospital which will have reduced vacant areas across the Estate and greater activation all hours of the day. This will be further enhanced by the presence of residential units which will also increase passive surveillance and the activation of the site after working hours (++) ii. The hospital can reduce crime by the use of CCTV around the hospital, which can assist law enforcement with investigations and help to reduce fear of crime in the local area. Opportunities through this scheme could provide housing for key workers on shift at the hospital which will reduce the fear of crime by limiting travel at unsociable hours. Other commercial uses will also assist in activating the area at all times of the day, reducing fear of crime and helping to deter antisocial behaviour. This will be further enhanced through the provision of residential units which will again ensure a presence on site after business hours (++) iii. Enhancing the public realm and activating frontages should seek to reduce other behaviour adversely affecting the local environment. (++)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes?	++	i. The provision of residential units as part of the scheme will increase the provision of high-quality new homes that will help to meet those most in need. (++) ii. The site is currently used by public bodies and is partly publicly owned. This means that 50% of new homes built on site will be expected to be affordable, increasing the range of affordable housing tenures available across the borough. (++) iii. A sustainable hospital should contribute to reducing homelessness in its vicinity. St Mary's Hospital can partner with local shelters and social services to support individuals experiencing homelessness, addressing their medical and mental health needs. The hospital can also create programmes that help homeless

vi. Will it provide a range of housing types and sizes?		individuals transition to stable housing through collaborations with local housing agencies and non-profit organizations. The provision of affordable residential units on-site will also seek to reduce homelessness through availability of more social housing to address waiting lists. (++) iv. As the ageing population increases, healthcare facilities like St Mary's Hospital must consider how their presence can support independent living for longer. The provision of residential units on-site would provide a range of homes that can help people stay independent for longer by providing homes for those most in need. (++) v. As the site does not currently support any housing, the scheme will not reduce the number of unfit homes across the Borough. (0) vi. The site is currently used by public bodies and is partly publicly owned. This means that 50% of new homes built on site will be expected to be affordable, increasing the range of housing tenures, types and sizes to meet the needs of the community. (++)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces?	++	i. A modern hospital can help to promote a wide range of health services which help to improve health inequalities. By providing equitable access to quality healthcare services, regardless of socioeconomic status, the hospital can contribute significantly to reducing health disparities in the community. The provision of a new, modern and efficient hospital will help to enhance the level of care provided. (++) ii. A modern hospital can help to provide exemplar care to members of the community, helping to reduce death rates. (++) iii. A new, modern consolidated hospital can improve access/movement across the site by strategically locating its facilities near public transportation hubs, improving wayfinding and connections to different hospital uses, improving access arrangements for people with disabilities or the elderly with reduced mobility and enhancing the public realm of the site. (++) iv. A new hospital and other uses can encourage health and wellbeing practices through increased participation in sport and physical activity. Additional

ix.	Will it increase healthy years life expectancy?		community facilities can assist to link the hospital with wellbeing practices to promote sport and physical activity. (++)
x.	Will it improve mental health and wellbeing?	v.	A modern hospital can help to cater to a range of different cultures and people from different backgrounds. Residential units will also help to foster an inclusive community and promote cultural wellbeing. (++)
xi.	Will it improve facilities and accessibility for people with disabilities?	vi.	A modern hospital can help to support patients (including older patients) to promote greater independence and wellbeing through improved capacity. In addition, residential units on site can help to promote a range of housing types to for older people, maximising their independence and improving their mental and physical wellbeing by being housed in appropriate accommodation, close to key community services. (++)
		vii.	Improved catering facilities within a new modern hospital can help to promote and provide access to a healthy diet for employees, patients and visitors. Additionally, the hospital can promote nutritional education and healthy eating habits to combat diet-related health issues. (++)
		viii.	A new, modern hospital can help to ensure the building supports healthy workplaces for healthcare workers to enable them to productively work to their full potential. New, high-quality homes for residents and employees, as part of a key worker scheme, will also help to create healthy homes. In addition, provision of enhanced public realm and new open spaces can contribute to creating healthy homes and workplaces for users of the site. (++)
		ix.	A new, modern hospital can help to ensure the building supports an increase in healthy years life expectancy amongst patients. (++)
		x.	A new, modern hospital can help to ensure facilities and services are in place to help improve mental health and wellbeing. New, high-quality homes for residents and employees, as part of a key worker scheme, will also help to improve mental health and wellbeing. In addition, provision of enhanced public realm and new open spaces can contribute to an improved mental health and wellbeing for users of the site. (++)
		xi.	A new, modern hospital can help to ensure facilities and services are in place to help improve facilities and accessibility for people with disabilities. (++)

5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	++	i. A new modern hospital can help to modernise aged energy systems which mean it will have a decreased energy consumption and therefore emits less greenhouse gas emissions. This can be achieved by implementing energy efficiency measures to reduce energy consumption, adopting low or zero-carbon energy sources like solar panels or geothermal systems, and promoting renewable energy use on-site. A modern hospital would also have more scope to implement new technological solutions to consultations such as telemedicine options and remote consultations to reduce the need for patient and staff travel, thereby mitigating transportation-related emissions. (++) ii. A new modern hospital can help to modernise aged energy systems which mean it will have a decreased energy consumption and therefore emits less ozone depleting emissions. (++) iii. Opportunities can be explored to retrofit the hospital infrastructure with new technology that promotes energy efficiency and emission reduction. This may involve upgrading lighting systems to LEDs, optimising HVAC systems, and investing in innovative building technologies that monitor and control energy consumption more effectively. By integrating eco-friendly technologies, the hospital can reduce its carbon footprint and become more climate resilient. (++) iv. A new modern hospital can help to minimise heat island effects on people and property. Implementing green roofs, green spaces, and permeable surfaces can help absorb heat and reduce the urban heat island effect. Additionally, the hospital can participate in local tree-planting initiatives to increase shade and cooling in the surrounding area, improving the overall microclimate. (++) v. As part of a new scheme, opportunities can be explored to enhance resilience to climate change by developing climate adaptation plans, investing in backup power systems, and ensuring robust emergency response procedures. The hospital can also collaborate with the council and community organisations to coordinate disaster preparedness efforts and strengthen the community's resilience to climate-related challenges. (++)
6. Natural resources	++	i. A new modern hospital with other alternative land uses will help to reinstate new water systems that will reduce water consumption and improve water efficiency.

i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?		Additionally, the hospital can raise awareness among staff and patients about water conservation practices to promote responsible water usage. (++) ii. A new scheme can help to reduce fossil fuel consumption by utilising renewable energy that includes wind, solar and geothermal electricity. (++) iii. The use of natural resources can be minimised as much as possible, through prioritizing recycling of construction materials and using more sustainable alternatives instead of conventional construction practices, such as using materials from environmentally responsible suppliers. (++) iv. Encouragement of the use of renewable resources to be prioritised over non-renewable resources can be made as part of any new scheme. (+) v. Consolidation of the site to improve the layout for employees, patients and visitors as well as releasing surplus land for a mixed-use, scheme will make efficient use of land in an urban location well serviced by public transport and active transport routes. (++)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	+	i. As part of the redevelopment of the site, opportunities can be taken to introduce flood risk prevention initiatives to minimise flood risk, particularly from surface water flooding. Open and green spaces can also assist in natural flood risk prevention. (++) ii. Through the application of flood resistant measures, the risk of property damage in heavy rainfall events can be reduced. Residents and workers can also be given flood awareness information and flood emergency plans, so they are better prepared for heavy rainfall events. (+) iii. As part of the redevelopment of the site, opportunities can be taken to reduce combined sewer overflow events. (+) iv. The development should positively contribute to improving water quality on site and in the surrounding area, using eco-friendly solutions such as green infrastructure sustainable drainage systems (SuDS) can also naturally help increase local water quality. (+)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats?	++	i. Redevelopment of the site could provide opportunities to maximise solutions to protect, enhance and increase biodiversity and protect habitats within the Canal and as part of the open and green spaces. (++)

ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?		ii. As part of a new scheme, provision can be made to preserve Sites of Importance for Nature Conservation (SINCs) in its vicinity, including the canal. (+) iii. Provision of new green and open spaces can help to improve access and promote educational value of sites of biodiversity interest. Additionally, the hospital can organize educational programmes, guided tours, or workshops to raise awareness about local biodiversity and its importance for ecosystem health. (++) iv. Redevelopment of the site could provide opportunities to maximise solutions to conserve and enhance species and habitats from the Canal and as part of the open and green spaces. (++)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	+	i. A new scheme will need to demonstrate how it will be air quality positive given the need to provide a hospital within a healthy local environment, the sites location within an Opportunity Area, and that the north-eastern tip of the site is within Marylebone Road Air Quality Focus Area. Some degree of air quality will still be impacted due to the traffic movements to and from the hospital, including ambulance servicing. (+) ii. Same as answer above. (+)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	+	i. Alternative uses of the site could seek to reduce noise levels and potential complaints associated with the hospital and users of the site. However, as a mixed-use scheme that includes residential uses, there is the potential for more noise concerns and complaints to be raised due to the impact on residential amenity from future occupiers with the site being so close to the hospital, along with other additional commercial floorspace. There are measures the hospital could take to help reduce noise concerns and complaints associated with use of the site such as, sound insultation, low-noise medical equipment, open engagement with the community regarding noise concerns and minimising noise as part of the construction process. In addition, noise mitigation measures can be designed into the residential unit so noise concerns and complaints are reduced for future occupiers. (+) ii. See answer above. (+)
11. Transport i. Will it reduce volumes of traffic?	++	i. Consolidation of the hospital to release surplus land could help to reduce volumes of traffic. The site is well connected by public transport which users of the site will

ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?		benefit from and enable car-free development. That being said, the ambulance servicing of the hospital will still be retained on site which means emergency vehicles will still contribute to volume of traffic within the area, albeit the access routes can be better designed as part of redevelopment to help mitigate volumes of traffic. (+) ii. Given the hospitals current location in close proximity to the Grand Union Canal, walking and cycling are encouraged. This is heightened by the central location of the hospital, which can be accessed through a wide network or footpaths and designated cycle routes. Enhanced public realm improvements and provision of new and green spaces can assist to encourage walking and cycling to and from the site. (++) iii. Given the proximity of the hospital to public transport routes, it is presumed that the majority of journeys currently made to the hospital are through modes other than cars already. Enhanced public realm improvements and provision of new and green spaces can assist to encourage other more sustainable modes of travelling to the site. (++) iv. The site currently has exemplar public transport accessibility and improvement of access points will ensure accessibility by people with a range of physical abilities. (++)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	+	i. A new scheme will likely improve existing aged systems and ensure reduction of consumption of materials and resources. (+) ii. Increasing the number of homes/workspace units onsite will increase household waste however, this can be minimised through providing recycling waste bins onsite. Also, new workspaces can use green procurement practices and implement low waste practices such as being paperless. The hospital can also implement waste segregation programmes to decrease household waste generated within the hospital premises as part of its commitment to waste reduction. By providing recycling bins and promoting awareness among staff and visitors about waste separation, the hospital can divert significant waste from landfills and promote responsible waste management. (+)

		iii. As part of the new scheme, provision will be made to increase recycling bins onsite. Initiatives to recover and reuse specific waste streams, such as medical equipment refurbishment or donation programmes for used furniture, can significantly reduce the hospital's waste output. (+) iv. The new scheme will increase consumption of materials and resources during construction and the life of the development. This will be minimised during the construction phase by having site waste management plans, prioritising the use of recycled materials and using innovative waste reduction techniques such as water harvesting/recycling. The development will also be subject to emerging City Plan policies on retrofit and whole-life carbon which will likely further reduce construction waste. (0)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	0	i. The site currently contains a number of heritage assets. The heritage and cultural value may be impacted should a new scheme come forward. However, the draft policy makes a reference to optimising densities across the site in the context of responding to heritage value. As part of the justification for this, the policy states that intensification of the site will need to respect and respond to the existing heritage and townscape value, as far as possible within the context of the need to deliver a new hospital on site. (0) ii. There are no strategic views in proximity to the site, as identified within the adopted City Plan. Further, as part of proposals for a new hospital, the draft policy makes clear that building heights should grade down from the height of any new hospital building which should seek to minimise impact on strategic views. (0) iii. In line with existing policy 39 of the adopted City Plan, existing heritage assets throughout the site will need to be conserved or enhanced. Whilst there may be some impacts due to a change in character across the site, it is expected that this would primarily be outside of the Bayswater Conservation Area. Furthermore, whilst there may be the potential to impact some heritage asset, overall the redevelopment of the site includes opportunities to further enhance the setting of these assets, and to redevelop buildings which currently have a negative townscape value. (0)

		iv. Before construction or renovation projects, archaeological assessments may be conducted to identify and protect significant archaeological sites or artefacts. Recording and documenting these findings can contribute to broader archaeological research and historical understanding. (0) v. The redevelopment of the site is not expected to have any impacts upon the Westminster World Heritage Site. (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	++	i. Redevelopment of the site can contribute to the enhancement of the townscape by adopting design and landscaping practices that harmonise with the local architectural context and character. (+) ii. Configuration and redevelopment of the site will provide opportunities to encourage any new scheme to be of exemplary design standards beyond what is currently in place. The hospital can prioritise sustainable building practices, energy-efficient designs, and environmentally friendly materials. Emphasising aesthetics, accessibility, and user comfort will create a welcoming and modern facility that serves as a model for other developments in the healthcare sector. (++) iii. A new scheme will provide opportunities to reduce litter by implementing waste management strategies, such as providing sufficient bins and encouraging proper waste disposal among staff, patients, and visitors. Regularly cleaning and maintaining public spaces will help keep the surroundings clean and attractive. (+) iv. The quality of the public realm will be significantly improved by creating well-designed outdoor spaces, such as gardens, seating areas, and pedestrian-friendly pathways. These spaces can serve as places for relaxation, exercise, and social interaction, contributing to the community's wellbeing. Improved wayfinding and access points will also ensure the site will be accessible for all. (++) v. Consolidation of the hospital and public realm improvements will be designed in such a way to ensure mobility for all users are taken into account. (++)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space?	++	i. Redevelopment of the site will ensure good quality new green and open spaces is incorporated into the scheme. (++) ii. Redevelopment of the site will contribute to an improvement of the landscape character. (+)

iv. Will it enhance the green infrastructure network?		iii. Provision of new green and open spaces can help to improve access to open spaces for future occupiers of the site. Access to open spaces can be improved by providing well-designed pathways, ramps, and access points, ensuring that everyone, including those with mobility challenges, can enjoy these areas. Moreover, promoting active transportation and pedestrian-friendly routes can further increase access to open spaces. (++) iv. Activation of the canal basin and provision of new green and open spaces can help to enhance the green infrastructure network. (++)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	+	i. Reconsolidation of the hospital and additional commercial floorspace will help to increase opportunities to provide further jobs and schemes to improve qualifications, skills or training. (+) ii. Reconsolidation of the hospital and additional commercial floorspace will increase opportunities to provide further jobs and reduce unemployment. The hospital can partner with local organisations and businesses to foster a supportive ecosystem for job opportunities. (+) iii. The jobs on offer at the hospital provide employment opportunities across a broad range of sectors and skill levels. This means that people with varying skills and experiences may be able to take up employment at the site. Reconsolidation of the hospital has the potential to increase opportunities to provide further jobs for those most in need. (++) iv. The jobs available across the site can help to ensure secure earnings, improving the incomes of local people. (+) v. The hospital through the NHS has a wide range of initiatives in place to promote diversity in their workforce and to promote equality of opportunity to persons who may traditionally face barriers to employment. Additional commercial floorspace can also help to promote equal opportunity by providing employment for residents living nearby or new residents on the site. In addition, the site is well connected which makes it a suitable location to promote equality of opportunity across the city and providing employment for those most in need who would benefit from jobs in easily accessible locations. (++)

17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	++	i. A mixed use scheme can help to improve business development and environment by increasing footfall and providing links to nearby businesses in the area. By fostering partnerships with local enterprises, the hospital can strengthen the overall business community in the area. (++) ii. A mixed use scheme could help to improve business resilience and economy by increasing footfall within the area and providing some element of additional commercial floorspace to help boost business resilience in the area. As a significant institution, St Mary's Hospital plays a role in contributing to the resilience of the local economy. By maintaining stable employment opportunities and investing in long-term economic strategies, the hospital can anchor the community, providing stability and contributing to economic growth. (+) iii. A mixed use scheme could help to encourage start-up businesses and small businesses within the area. The hospital may seek to provide opportunities for future residents on-site and prioritise hiring locally, creating job opportunities for the community and supporting economic empowerment. (++) iv. The site is well served by public transport, shops and services as it is within the CAZ and partially within the Praed Street District Centre, which supports commercial growth in this area and promotes business in key sectors. The hospital can promote critical sectors in the local economy, such as healthcare, research, and technology. The hospital can create a dynamic ecosystem that attracts investment and supports growth in these vital sectors by fostering partnerships with other healthcare institutions, research centres, and technology companies and beneficially using the new commercial floorspace to support a life-sciences cluster. (++) v. A mixed use scheme could help to promote wider regeneration in the area by complementing nearby uses. In addition, the site is within the Paddington Opportunity Area which seeks to support regeneration within the wider Paddington area. (++)
Conclusion The consolidation of the hospital will release surplus land for a mixed-use scheme that could contribute to meeting housing need, economic growth and delivering improved critical hospital infrastructure for the wider area. Comprehensive redevelopment of the site could also have benefits in terms of		

increased delivery of open and green space, permeability, and connectivity along with increasing provision of permeable surfaces to address the risk of surface water flooding. Cumulatively, this is considered to be the preferred, most sustainable option that contributes the most positive effects against the majority of sustainable objectives.

Option C: Reasonable Alternative 1 Consolidation of existing hospital to modernise the healthcare offering and to release surplus land for a commercial-led scheme with some provision of community floorspace, open and green space etc.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	+	i. St Mary's hospital has a major positive effect on the community as it is located in central London, providing a key community facility to a wide population. The hospital is also walking distance to Paddington train station and a number of bus stops. The area is a mixed use with community facilities such as the canal, shops and restaurants nearby. Providing additional alternative land uses will help to promote and improve user access to local services, shops and community facilities. (++) ii. St Mary's hospital have influence over community health initiatives or run programmes aimed at improving local health outcomes, which influence community attitudes and decisions related to health. The Imperial College Healthcare NHS Trust who operate the hospital are also well versed in providing views to inform local decision making, for example on nearby planning issues. This ability to influence decision making would likely remain the same regardless of whether a new hospital was provided on-site or not. Current and future commercial uses across the site will also likely remain able to influence decision making through organisations such as the Paddington Partnership, which would also remain regardless of whether the site is redeveloped or not. (0) iii. St Mary's hospital is a public hospital, meaning it does help to foster an inclusive Westminster community by providing healthcare services to people from all walks of life. Non-hospital floorspace across the site (for example, community floorspace) could also help to foster an inclusive Westminster. (+) iv. St Mary's hospital plays a vital role in community engagement because they have a mandate to engage in health education and community outreach programs on wellness to encourage community members to be proactive about their health. Volunteers' programmes offered by the hospitals to community members also helps to support community activity. This scheme will also provide opportunities for further community activity through the provision of community floorspace.

		Furthermore, new businesses on site as part of the redevelopment may also encourage greater community activity through relevant outreach programmes. (++)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	+	i. St Mary's contributes to reducing crime and antisocial behaviours by engaging in public health campaigns against crime and violence. The hospital is also activated at all hours of the day, meaning there is a constant public presence. This will be enhanced by the new hospital which will have reduced vacant areas across the Estate and greater activation all hours of the day. (+) ii. The hospital can reduce crime by the use of CCTV around the hospital, which can assist law enforcement with investigations and help to reduce fear of crime in the local area. The provision of other new commercial uses on site will also assist in activating the area at all times of the day, reducing fear of crime and helping to deter antisocial behaviour. (+) iii. Enhancing the public realm and activating frontages should seek to reduce other behaviour adversely affecting the local environment. (++)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	0	i. This scheme would not provide for any residential accommodation. (0) ii. This scheme would not contribute to any affordable housing provision. (0) iii. The hospital can assist in reducing the likelihood of homelessness by assisting people with chronic health problems which may impact their ability to find stable employment and subsequent housing. However, this scheme would not currently provide any housing which helps to house people who are homeless. (0) iv. This scheme would not provide any housing which can support independent living (0) v. This scheme would not include any residential accommodation, however, as the site does not currently include any residential accommodation, this would have a neutral impact upon the overall reduction of unfit homes across Westminster (0) vi. This scheme would not include any residential accommodation (0)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates?	++	i. A modern hospital can help to promote a wide range of health services which help to improve health inequalities. By providing equitable access to quality healthcare services, regardless of socioeconomic status, the hospital can contribute significantly to reducing health disparities in the community. The provision of a

iii.	Will it improve access/movement?		new, modern and efficient hospital will help to enhance the level of care provided. (++)
iv.	Will it encourage healthy lifestyles through increased participation in sport and physical activity?		ii. A modern hospital can help to provide exemplar care to members of the community, helping to reduce death rates. (++)
v.	Will it improve cultural wellbeing?		iii. A new, modern consolidated hospital can improve access/movement across the site by strategically locating its facilities near public transportation hubs, improving wayfinding and connections to different hospital uses, improving access arrangements for people with disabilities or the elderly with reduced mobility and enhancing the public realm of the site. (++)
vi.	Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people?		iv. A new hospital and other uses can encourage health and wellbeing practices through increased participation in sport and physical activity. Additional community facilities can assist to link the hospital with wellbeing practices to promote sport and physical activity. (++)
vii.	Will it provide access to a healthy diet?		v. A modern hospital can help to cater to a range of different cultures and people from different backgrounds by having new and updated facilities that can cater to all people from all equality groups. (++)
viii.	Will it create healthy homes and workplaces?		vi. A modern hospital can help to support patients (including older patients) to promote greater independence and wellbeing. Provision of on-site community facilities can enhance this objective by implementing programmes that support older people's independence and mental/physical well-being. This may include geriatric care services, fall prevention programmes, home healthcare, and social support initiatives to reduce loneliness and isolation amongst adults especially the elderly. (++)
ix.	Will it increase healthy years life expectancy?		vii. Improved catering facilities within a new modern hospital can help to promote and provide access to a healthy diet for employees, patients and visitors. Additionally, the hospital can promote nutritional education and healthy eating habits to combat diet-related health issues. Other commercial space across the estate may also be used for healthy food outlets, improving the provision of good food options in the local area. (++)
x.	Will it improve mental health and wellbeing?		viii. A new, modern hospital can help to ensure the building supports healthy workplaces for healthcare workers to enable them to productively work to their
xi.	Will it improve facilities and accessibility for people with disabilities?		

		full potential. In addition, provision of enhanced public realm and new open spaces can contribute to creating healthy workplaces for users of the site. However, as the scheme does not include any new homes, here will be a reduced ability to provide any new healthy homes. (+) ix. A new, modern hospital can help to ensure the building supports an increase in healthy years life expectancy amongst patients. (++) x. A new, modern hospital can help to ensure facilities and services are in place to help improve mental health and wellbeing. New, high-quality homes for residents and employees, as part of a key worker scheme, will also help to improve mental health and wellbeing. In addition, provision of enhanced public realm and new open spaces can contribute to an improved mental health and wellbeing for users of the site. (++) xi. A new, modern hospital can help to ensure facilities and services are in place to help improve facilities and accessibility for people with disabilities. (++)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	++	i. A new modern hospital can help to modernise aged energy systems which mean it will have a decreased energy consumption and therefore emits less greenhouse gas emissions. This can be achieved by implementing energy efficiency measures to reduce energy consumption, adopting low or zero-carbon energy sources like solar panels or geothermal systems, and promoting renewable energy use on-site. The hospital can also explore telemedicine options and remote consultations to reduce the need for patient and staff travel, thereby mitigating transportation-related emissions. (++) ii. A new modern hospital can help to modernise aged energy systems which mean it will have a decreased energy consumption and therefore emits less ozone depleting emissions. (++) iii. Opportunities can be explored to retrofit the hospital infrastructure with new technology that promotes energy efficiency and emission reduction. This may involve upgrading lighting systems to LEDs, optimising Heating, Ventilation and Air Conditioning (HVAC) systems, and investing in innovative building technologies that monitor and control energy consumption more effectively. By integrating eco-

		friendly technologies, the hospital can reduce its carbon footprint and become more climate resilient. (++) iv. A new modern hospital can help to minimise heat island effects on people and property. Implementing green roofs, green spaces, and permeable surfaces can help absorb heat and reduce the urban heat island effect. Additionally, the hospital and other development across the estate can participate in local tree-planting initiatives to increase shade and cooling in the surrounding area, improving the overall microclimate. (++) v. As part of a new scheme, opportunities can be explored to enhance resilience to climate change by developing climate adaptation plans, investing in backup power systems, and ensuring robust emergency response procedures. The hospital can also collaborate with the council and community organisations to coordinate disaster preparedness efforts and strengthen the community's resilience to climate-related challenges. (++)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	++	i. A new modern hospital with other alternative land uses will help to reinstate new water systems that will reduce water consumption and improve water efficiency. Additionally, the hospital can raise awareness among staff and patients about water conservation practices to promote responsible water usage. (++) ii. A new scheme can help to reduce fossil fuel consumption by utilising renewable energy that includes wind, solar and geothermal electricity. (++) iii. The use of natural resources can be minimised as much as possible, through prioritizing recycling of construction materials and using more sustainable alternatives instead of conventional construction practices, such as using materials from environmentally responsible suppliers. (++) iv. Encouragement of the use of renewable resources to be prioritised over non-renewable resources can be made as part of any new scheme. (+) v. Consolidation of the site to improve the layout for employees, patients and visitors as well as releasing surplus land for a commercial-led scheme will make efficient use of land in an urban location well serviced by public transport and active transport routes. (++)

7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	+	i. As part of the redevelopment of the site, opportunities can be taken to introduce flood risk prevention initiatives to minimise flooding, particularly surface water flooding. Open and green spaces can also assist in natural flood risk prevention. (++) ii. Through the application of flood resistant measures in newly designed development, the risk of property damage in heavy rainfall events can be reduced. Workers can also be given flood awareness information and flood emergency plans, so they are better prepared for heavy rainfall events. (+) iii. As part of the redevelopment of the site, opportunities can be taken to reduce combined sewer overflow events. (+) iv. The development should positively contribute to improving water quality on site and in the surrounding area, using eco-friendly solutions such as green infrastructure sustainable drainage systems (SuDS) can naturally help increase local water quality. (+)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	++	i. Redevelopment of the site could provide opportunities to maximise solutions to protect, enhance and increase biodiversity and protect habitats within the Canal and as part of the open and green spaces. (++) ii. As part of a new scheme, provision can be made to preserve Sites of Importance for Nature Conservation (SINCs) in its vicinity. (+) iii. Provision of new green and open spaces can help to improve access and promote educational value of sites of biodiversity interest. Additionally, the hospital can organize educational programmes, guided tours, or workshops to raise awareness about local biodiversity and its importance for ecosystem health. (++) iv. Redevelopment of the site could provide opportunities to maximise solutions to conserve and enhance species and habitats from the Canal and as part of improvements to open and green spaces. (++)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	+	i. A new scheme will need to demonstrate how it will be air quality positive given the need to provide a hospital within a healthy local environment, the sites location within an Opportunity Area, and that the north-eastern tip of the site is within Marylebone Road Air Quality Focus Area. Some degree of air quality will still be

		impacted due to the traffic movements to and from the hospital, including ambulance servicing. (+) ii. Same as answer above. (+)
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	+	i. Alternative uses of the site could seek to reduce noise levels and potential complaints associated with the hospital and users of the site. However, having alternative commercial units within close proximity to an active hospital, there is the potential for more noise concerns and complaints to be raised due to the impact on amenity from future occupiers with the site being so close to the hospital. There are measures the hospital could take to help reduce noise concerns and complaints associated with use of the site such as, sound insultation, low-noise medical equipment, open engagement with the community regarding noise concerns and minimising noise as part of construction process. (+) ii. See answer above. (+)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?	++	i. Consolidation of the hospital to release surplus land could help to reduce volumes of traffic. The site is well connected by public transport which users of the site will benefit from and enable car-free development. That being said, the ambulance servicing of the hospital will still be retained on site which means emergency vehicles will still contribute to volume of traffic within the area. (+) ii. Given the hospitals current location in close proximity to the Grand Union Canal, walking and cycling are encouraged. This is heightened by the central location of the hospital, which can be accessed through a wide network or footpaths and designated cycle routes. Enhanced public realm improvements and provision of new open and green spaces can assist to encourage walking and cycling to and from the site. (++) iii. Given the proximity of the hospital to public transport routes, it is presumed that the majority of journeys currently made to the hospital are through modes other than cars already. Enhanced public realm improvements and provision of new open and green spaces can assist to encourage other more sustainable modes of travelling to the site. (++)

		iv. The site currently has exemplar public transport accessibility and improvement of access points will ensure accessibility by people with a range of physical abilities. (++)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	+	i. A new scheme will likely improve existing aged systems and ensure reduction of consumption of materials and resources. (+) ii. There will be no residential units as part of this scheme that will apply to this. (0) iii. As part of the new scheme, provision will be made to increase recycling, food and garden waste bins onsite. Initiatives to recover and reuse specific waste streams, such as medical equipment refurbishment or donation programmes for used furniture, can significantly reduce the hospital's waste output. (+) iv. The new scheme will increase consumption of materials and resources during construction and the life of the development. This will be minimised during the construction phase by having site waste management plans, prioritising the use of recycled materials and using innovative waste reduction techniques such as water harvesting/recycling. The development will also be subject to emerging City Plan policies on retrofit and whole-life carbon which will likely further reduce construction waste. (0)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	0	i. The site currently contains a number of heritage assets. The heritage and cultural value may be impacted should a new scheme come forward. However, the draft policy makes a reference to optimising densities across the site in the context of responding to heritage value. As part of the justification for this, the policy states that intensification of the site will need to respect and respond to the existing heritage and townscape value, as far as possible within the context of the need to deliver a new hospital on site. (0) ii. There are no strategic views in proximity to the site, as identified within the adopted City Plan. Further, as part of proposals for a new hospital, the draft policy makes clear that building heights should grade down from the height of any new hospital building which should seek to minimise impact on strategic views. (0) iii. In line with existing policy 39 of the adopted City Plan, existing heritage assets throughout the site will need to be conserved or enhanced. Whilst there may be some impacts due to a change in character across the site, it is expected that this

		would primarily be outside of the Bayswater Conservation Area. Furthermore, whilst there may be the potential to impact some heritage asset, overall the redevelopment of the site includes opportunities to further enhance the setting of these assets, and to redevelop buildings which currently have a negative townscape value. (0) iv. Before construction or renovation projects, archaeological assessments may be conducted to identify and protect significant archaeological sites or artefacts. Recording and documenting these findings can contribute to broader archaeological research and historical understanding. (0) v. The redevelopment of the site is not expected to have any impacts upon the Westminster World Heritage Site. (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	++	i. Redevelopment of the site can contribute to the enhancement of the townscape by adopting design and landscaping practices that harmonise with the local architectural context and character. (+) ii. Configuration and redevelopment of the site will provide opportunities to encourage any new scheme to be of exemplary design standards beyond what is currently in place. The hospital can prioritise sustainable building practices, energy-efficient designs, and environmentally friendly materials. Emphasising aesthetics, accessibility, and user comfort will create a welcoming and modern facility that serves as a model for others in the healthcare sector. (++) iii. A new scheme will provide opportunities to reduce litter by implementing waste management strategies, such as providing sufficient bins and encouraging proper waste disposal among staff, patients, and visitors. Regularly cleaning and maintaining public spaces will help keep the surroundings clean and attractive. (+) iv. The quality of the public realm will be significantly improved by creating well-designed outdoor spaces, such as gardens, seating areas, and pedestrian-friendly pathways. These spaces can serve as places for relaxation, exercise, and social interaction, contributing to the community's well-being. Improved wayfinding and access points will also ensure the site will be accessible for all. (++) v. Consolidation of the hospital and public realm improvements will be designed in such a way to ensure mobility for all users are taken into account. (++)

15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	++	i. Redevelopment of the site will ensure good quality new green and open spaces is incorporated into the scheme. (++) ii. Redevelopment of the site will contribute to an improvement of the landscape character. (+) iii. Provision of new green and open spaces can help to improve access to open spaces for future occupiers of the site. St Mary's Hospital can improve access to open spaces by providing well-designed pathways, ramps, and access points, ensuring that everyone, including those with mobility challenges, can enjoy these areas. Moreover, promoting active transportation and pedestrian-friendly routes can further increase access to open spaces. (++) iv. Activation of the canal basin and provision of new green and open spaces can help to enhance the green infrastructure network. (++)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	++	i. Reconsolidation of the hospital and additional commercial floorspace will help to increase opportunities to provide further jobs and schemes to improve qualifications, skills or training. As this scheme will prioritise commercial and community floorspace coming forward alongside the hospital redevelopment, opportunities for new jobs and upskilling opportunities will be maximised. (++) ii. Reconsolidation of the hospital and additional commercial floorspace will increase opportunities to provide further jobs and reduce unemployment. The hospital can partner with local organisations and businesses to foster a supportive ecosystem for job opportunities, with new businesses across the remainder of the site also able to target local Westminster residents for new jobs, helping to reduce local unemployment. (++) iii. The jobs on offer at the hospital provide employment opportunities across a broad range of sectors and skill levels. This means that people with varying skills and experiences may be able to take up employment at the site. Reconsolidation of the hospital also has the potential to increase opportunities to provide further jobs for those most in need. This will be bolstered by further commercial opportunities across the life sciences sector and other supporting businesses which will again provide a wide range of jobs to people with different backgrounds (++)

		iv. The jobs available across the site can help to ensure secure earnings, improving the incomes of local people. (+) v. The hospital through the NHS have a wide range of initiatives in place to promote diversity in their workforce and to promote equality of opportunity to persons who may traditionally face barriers to employment. Additional commercial floorspace can also help to promote equal opportunity by providing further employment opportunities. In addition, the site is well connected which makes it a suitable location to promote equality of opportunity across the city and providing employment for those most in need who would benefit from jobs in easily accessible locations. (++)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	++	i. A new hospital and additional commercial floorspace can help to improve business development and environment by increasing footfall and providing links to nearby businesses in the area. By fostering partnerships with local enterprises, the hospital can strengthen the overall business community in the area. Further improvements can also be made through a prioritisation of the life sciences sector in the new commercial floorspace. This can help to create a cluster of specialised economic activity in the local area, promoting it to national and international companies. (++) ii. A new hospital and additional commercial floorspace can help to improve business resilience and the local economy by increasing footfall within the area and providing additional commercial floorspace to help boost business resilience in the area. As a significant institution, St Mary's Hospital plays a role in contributing to the resilience of the local economy. By maintaining stable employment opportunities and investing in long-term economic strategies, the hospital can anchor the community, providing stability and contributing to economic growth. (++) iii. A new hospital and additional commercial floorspace can help to encourage start-up businesses and small businesses within the area. The hospital may seek to provide opportunities for hiring locally, creating job opportunities for the community and supporting economic empowerment. (++)

		iv. The site is well served by public transport, shops and services as it is within the CAZ and partially within the Praed Street District Centre, which supports commercial growth in this area and promotes business in key sectors. The hospital can promote critical sectors in the local economy, such as healthcare, research, and technology. The hospital can create a dynamic ecosystem that attracts investment and supports growth in these vital sectors by fostering partnerships with other healthcare institutions, research centres, and technology companies and beneficially using the new commercial floorspace to support a life-sciences cluster. (++) v. A new hospital and additional commercial floorspace can help to promote wider regeneration in the area by complimenting nearby uses. In addition, the site is within the Paddington Opportunity Area which seeks to support regeneration within the wider Paddington area. (++)
Conclusion The consolidation of the hospital will release surplus land for a new hospital and commercial scheme along with community floorspace which will contribute to meeting economic growth and delivering critical hospital infrastructure in the wider area. Comprehensive redevelopment of the site could also have benefits in terms of increased delivery of open and green space, permeability, and connectivity along with increasing provision of permeable surfaces to address the risk of surface water flooding. The scoring above illustrates that whilst there are sustainable benefits for this scheme coming forward, having elements of residential on-site will contribute greater positive effects.		

Westbourne Park Bus Garage

Option A: Existing land use		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	-	i. Existing use as a bus garage and current proximity to local services, shops and community facilities means it currently has a good level of access. Currently, the buses serve nine TfL bus routes (both regular and night services) (+) ii. Existing use as a bus garage provides little ability for communities to influence decision-making (-) iii. Existing use as a bus garage provides little ability to foster an inclusive Westminster community (-) iv. The site does not currently encourage engagement in community activity (-)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	--	i. The site in its existing use does little to reduce crime, disorder and antisocial behaviour. Elements of the site include some neglected open spaces and disused land near to the canal towpath and underneath the Westway (--). ii. Existing use could increase a fear of crime, disorder and antisocial behaviour with dark, disused spaces near to the canal towpath and underneath the Westway (--). iii. See response to i above.
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?	0	Existing use does not facilitate housing development so impacts on this objective are negligible.

4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?	0	i. The site as a bus garage may continue to support the improvement of health inequalities by providing a public transport service. It is also a source of employment providing jobs and a source of income within the transport service industry. However, it is recognised that the site in its current use can contribute to negative amenity impacts upon nearby existing residents, which may exacerbate health inequalities (+). ii. The existing use of the site as a bus garage will have a neutral effect on death rates (0). iii. Existing use contributes to improved access/movement to local services in and around Westminster and beyond (++). iv. The site does not encourage healthy lifestyles through increased participation in sport and physical activity as although the canal towpath exists as a possible walking/running/cycling route its full potential for this has not been maximised (-). v. The site does little to improve cultural wellbeing (-). vi. The existing use of the bus garage contributes to the wider public transport network of Westminster and London which allows users of public transport to freely access/move in and around the city. This contributes to minimising loneliness, maximising independence and improving mental and physical wellbeing of older people. However, the canal towpath in its current form does little to encourage use by older people and does not contribute to improving their mental and physical wellbeing as a result. (+) vii. No likely impact. (0) viii. The existing site does not create healthy homes and although it is a source of employment, the transport infrastructure within and adjacent to the site provides a negative impact on amenity. Given the condition of the existing buildings and the fact that they have aged, it is likely that the bus garage facilities are not an exemplar healthy workplace (-). ix. As a bus garage the site can help to support the transport network, facilitating members of the community to travel and improve their mental health and wellbeing, which can also help to increase healthy years life expectancy. However, the low quality of the open space does not encourage healthy habits (+).

		x. See answer to vi. xi. The canal towpath and public realm in its current form does little to encourage use and foster inclusivity and accessibility for people with disabilities. (-)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	-	i. Emissions from some older buses on service may contribute to climate change. That being said, the site itself supports the public transport network for Westminster and London which helps to support the reduced use of private motor vehicles and promoting people to use sustainable modes of transportation. The site, however, could benefit from maximising its potential on-site to reduce emissions. (-) ii. See answer to i above. (-) iii. The current site is with aged systems which does not exemplify new technologies. (-) iv. The site does not currently reduce the heat island effect as it severely lacks any green infrastructure which could help with urban cooling measures (-). v. The current use is aged and is not resilient to climate change impacts (-).
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	--	i. The site is currently aged and has low levels of water efficiency. (--) ii. The current use as a bus garage serves buses which are now hybrid, using both electricity and fossil fuels. If the site were to remain in its current use, the consumption of these resources would remain the same. Furthermore, for any buildings on the site, their aged nature will mean that fossil fuel consumptions will remain, therefore not making any reductions. (-) iii. The use of other natural resources will remain the same in the event that the current bus garage remained as is. (0) iv. The current age of the bus garage means that it has a limited use of renewable resources in use. If it were to remain as is, there would not be any ability to prioritise renewable resources over non-renewable. (--) v. The existing layout of the site does not make the most efficient use of land. The bus garage is currently spread over two parcels of land underneath the Westway and is not used at full capacity. (--)

7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	--	i. The majority of the site contains hard surfacing and non-permeable surfaces. The canal also poses a risk of flooding. The site could benefit from flood risk management measures (--) ii. See answer to i above. iii. See answer to i above. iv. The site may be in full or in part contaminated land due to previous uses. This has the potential to impact on the quality of water. (--)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats? ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?	--	i. The existing use as a bus garage does not protect, enhance and increase biodiversity and protected habitats. (--) ii. The site does little in its existing use to preserve the nearby Sites of Importance for Nature Conservation (SINC). The site encourages antisocial behaviour which can pose a risk to preserving the SINCs. (--) iii. The site does little to improve access to and promote educational value of sites of biodiversity interest. (--) iv. There are potential opportunities to increase biodiversity however, the site in its current form does not facilitate this. (--)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	--	i. As a bus garage, the site contributes to negative impacts on air quality from transport related uses. As a result, there would be no improvements to air quality. (-) ii. Same as answer to i above.
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	-	i. The site is in active use as a bus garage which means noise levels associated with buses and users of the site may remain relatively high. (--) ii. In its current format, there would be an opportunity to reduce noise levels, if all buses were to become electric (which TfL have expressed an intention to achieve as stock is upgraded over time), which may reduce noise impacts. (0)
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling?	-	i. The use of the existing site as an active bus garage, means that traffic volumes are high from buses. Moreover, the on-site car parking from staff means there's added traffic from vehicles of some staff members. That being said, the site itself helps to

iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?		support public transport accessibility and contributes to London's transport network, therefore improving accessibility across the city by modes other than cars. (-) ii. The canal towpath is not used to its full potential and therefore does little to encourage further use. (-) iii. See answer to i above. iv. See answer to i above.
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	0	i. The existing use does not generate a significant amount of waste. No likely impact. (0) ii. No likely impact (0) iii. No likely impact (0) iv. No likely impact (0)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?	0	The site is not listed and does not contribute positively to the wider townscape or to the setting of nearby Conservation Areas (0).
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm?	--	i. The existing site does not contribute positively to the wider townscape. Presently, the existing building and the low quality of the public realm creates a hostile environment and does little to contribute to sustainable transport connectivity both to and through the site (--) ii. See answer to i above. (--) iii. Neglected open space and lack of activation of the canal towpath encourages litter. (--)

v. Will it improve access and mobility for all equality group strands?		iv. The site does not currently support a high-quality public realm. (--) v. The site creates a space that may be seen as unsafe and inaccessible for some equality group strands. The canal towpath and public realm in its current form does little to encourage use and foster inclusivity and accessibility for all equality group strands. (--)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	--	i. Neglected open space and lack of activation of the Canal towpath encourages antisocial behaviour and has a negative impact on the landscape character. (--) ii. See answer to i above. iii. See answer to i above. iv. Existing site does little to maximise green infrastructure on-site by not activating the canal towpath and connecting further towards the nearby Meanwhile Gardens. (--)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?	+	i. The bus garage is a source of employment providing jobs and a source of income within the transport service industry. (+) ii. The bus garage provides jobs. If it were to continue in its current state, there will not be a high increase in jobs, meaning that there will be no further contribution to the reduction of unemployment. (0) iii. The site is well connected which makes it a suitable location to promote equality of opportunity across the city and provides jobs for those most in need that would benefit from jobs in easily accessible locations. (+) iv. See answer to i above. (+) v. See answer to iii above. (+)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people?	-	i. The site is a source of employment providing jobs and a source of income within the transport service industry. However, the site does not contribute to wider business development of other enterprises, nor does it create an environment for other local businesses and people to thrive. (-) ii. See answer to i above. (-) iii. See answer to i above. (-) iv. See answer to i above. (-) v. See answer to i above. (-)

iv. Will it promote business in key sectors? v. Will it promote regeneration?		

Conclusion

Whilst the existing use of the site as a bus garage contributes positively to London's public transport network and is a source of employment providing jobs and a source of income within the transport service industry, opportunities exist to redevelop the bus garage to release surplus land for alternative uses that could contribute to meeting housing need and economic growth in the area. The site could benefit from increasing the delivery of open and green space, permeability and connectivity along the canal towpath and immediate area.

Option B: Proposed Allocation Redevelopment of the bus garage (south of the site) to release surplus land north of the site to provide a residential-led scheme with some provision of commercial/leisure/community floorspace, open and green space etc.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	++	i. Retaining use as a bus garage contributes to a good level of access to local services, shops and community facilities across the city. Currently, its buses serve nine TfL bus routes. The site is well-connected by public transport networks and within the vicinity of the Harrow Road District Centre, making it an ideal location for residents to access local services, shops and community facilities. (++) ii. A new residential development on site will increase ability for residents to influence decision-making. (++) iii. New homes (including affordable housing) and a more welcoming public realm will contribute to achieving inclusive communities. (++) iv. Provision of homes on site, particularly affordable homes, may encourage engagement in community activity. (++)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	++	i. Development of the site for a residential-led scheme with provision of commercial/community floorspace and more welcoming public realm and pedestrian routes, should reduce fear and existing crime, disorder and antisocial behaviour. (++) ii. See answer to i above. (++) iii. Increased permeability through the site should enable safe and attractive pedestrian access between Westbourne Park station, the Harrow Road District Centre and buildings around the Grand Union Canal. This should reduce other behaviour adversely affecting the local environment. (++)
3. Housing i. Will it create high quality homes? ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer?	++	i. As a residential-led scheme, the site would benefit from the provision of high-quality new homes that will help those most in need. (++) ii. A new residential scheme should deliver affordable housing, both 'social' and 'intermediate' therefore increasing the range of affordable housing available. (++) iii. A residential-led scheme will reduce homelessness. (++) iv. A residential-led scheme would provide a range of homes that can help people stay independent for longer by providing homes for those most in need. (++)

v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?		v. As there are currently no homes on site, there is unlikely to be any impact on this indicator. However, the provision of affordable housing could reduce the number of households living in overcrowded or unfit homes (+) vi. A residential-led development will provide a range of housing types (market and affordable) and sizes, in line with council's policy. (++)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet? viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?	+	i. Redevelopment of the site could improve health inequalities by providing homes for those most in need in a highly accessible location connected to shops, services and community facilities. It will also retain the existing bus garage use which will retain employment opportunities that the site currently offers and create new jobs as part of a mixed-use development. The site's continued use as a bus garage may help to improve health inequalities by providing a public transport service for all members of the community. However, the site is located amongst a range of transport infrastructure which will have some degree of negative impact on residential amenity which will need to be mitigated for a residential-led scheme to come forward. (+) ii. Providing sustainable transport options, homes and employment for those most in need contribute to a reduction in death rates. (++) iii. Proposed retained and new uses and an improved public realm will contribute to improved access/movement to local services in and around Westminster for future residents and users of the site (++) iv. Activation of the canal frontage and creation of new open and green spaces will encourage healthy lifestyles through increased participation in physical activity through a more attractive, safer environment (++). v. A residential-led scheme and more inclusive public realm will encourage inclusive communities, this in turn should improve cultural wellbeing, maximise independence and improve mental and physical wellbeing of residents and users, including older people. However, the site is located amongst a range of transport infrastructure uses which will have some degree of negative impact on residential amenity which will need to be mitigated for. (+) vi. See answer to v above (+).

		vii. A new mixed-use scheme has the potential to provide access to a healthy diet through provision of local shops or cafes/restaurants which may sell healthy food, along with amenity spaces in new homes which residents could use to grow their own food. (+) viii. A new mixed-use scheme will contribute to providing healthy homes and workspaces with access to on-site new green and open spaces. However, as the site is located amongst a range of transport infrastructure which will have some degree of negative impact on residential amenity, this will need to be mitigated for. (+) ix. See answer to v above (+) x. See answer to v above (+) xi. New buildings and public realm improvements will be designed with all users in mind and will improve facilities and accessibility for people with disabilities. (++)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	++	i. An upgraded bus garage will help reduce some green gas emissions on-site. Supporting uses as part of a mixed-use development site will help reduce the need to travel as the new homes will be well-connected to shops, services and community facilities. (++) ii. An improved bus garage will help reduce some ozone depleting emissions. (++) iii. New major development should at least be Carbon Neutral in line with adopted policy, and reduce emissions through retrofitting new technology. (++) iv. A new residential-led development which provides new open space will help to reduce the heat island effect through installation of energy-efficient equipment, green roofs, increasing shaded areas and other biodiversity improvements. (++) v. Opportunities exist to deliver a greener bus garage and a sustainable mixed-use scheme that reduces carbon emissions, provides new open and green spaces and permeable surfaces to prevent surface water flooding. As a retained bus garage, however, it is inevitable that emissions from the buses will contribute to climate change. That being said, the site itself supports the public transport network for London, reducing private vehicle use and the buses could be electrified in the future. (+)

6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels? iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?	++	i. As part of redevelopment proposals, there is potential to update systems to contribute to the reduction of water consumption and improve water efficiency. (++) ii. As part of redevelopment proposals, there is potential to reduce fossil fuel consumption by utilising renewable sources. However, it is likely that the current use of resources by the buses will continue even when it is redeveloped. (0) iii. The use of natural resources can be minimised, through prioritising recycling of construction materials and using more sustainable alternatives instead of conventional construction practices, such as using natural resources. (++) iv. Encouragement of the use of renewable resources to be prioritised over non-renewable resources can be made as part of any new scheme. (++) v. Redevelopment of the site to release surplus land north of the site for a mixed-use, residential-led scheme will make efficient use of land in an urban location well serviced by public transport. (++)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	++	i. As part of the redevelopment of the site, opportunities can be taken to introduce flood risk management measures. New open and green spaces and new Sustainable Urban Drainage Systems (SuDS) can also assist. (++) ii. Through the application of flood resistant measures, the risk of property damage in heavy rainfall events can be reduced. Residents and workers can also be given flood awareness information and flood emergency plans, so they are better prepared for heavy rainfall events. (++) iii. As part of the redevelopment of the site, opportunities can be taken to reduce combined sewer overflow events. (++) iv. The development should positively contribute to improving water quality on site and in the surrounding area, using eco-friendly solutions such as SuDS that can naturally help increase local water quality. The site may be constrained by contaminated land from a previous usage; however, development should consider appropriate remediation proposals which should enhance water quality. (+)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats?	++	i. Redevelopment of the site will provide opportunities to maximise solutions to protect, enhance and increase biodiversity. (++)

ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?		ii. Redevelopment of the site and activation of the canal towpath will help to reduce antisocial behaviour within this part of the site and can help to preserve the functions of both the Grand Union Canal and Meanwhile Gardens (in Royal Borough of Kensington and Chelsea). (++) iii. Activation of the canal towpath and provision of new green and open spaces can help to improve access and promote educational value of sites of biodiversity interest. Access will also be improved to the canal to facilitate better connections into Meanwhile Gardens. (++) iv. Redevelopment of the site could provide opportunities to maximise solutions to conserve and enhance species and habitats from existing and new open and green spaces. (++)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	0	i. As the bus garage would remain on-site, the negative impact on air quality associated with buses will remain. However, although buses create emissions, they also contribute to the reduction of the use of private motor vehicles in London. The site is located immediately adjacent to the Westway which could impact air quality for future residents of any new buildings, and this will need to be mitigated through design interventions. Any new buildings will need to be designed with the improvement of air quality in mind. (0). ii. See answer to i above (0).
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	-	i. An improved bus garage could lead to reduced noise levels and potential complaints associated with buses. However, as a residential-led scheme, there is the potential for more noise concerns and complaints to be raised from residents of new homes due to the impact on residential amenity from future occupiers with the site being so close to the bus garage, the Westway and train line. (-) ii. Noise levels could also be increased as part of the construction process for those within the vicinity of the site. It is expected that as part of redevelopment of the scheme, mitigation measures will be taken to reduce harm on residential amenity, including noise levels (0).
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling?	++	i. The site is in a highly accessible location, therefore users and new residents of the redeveloped site will benefit from car-free development. That being said, the bus garage will still be retained on site which means buses will still contribute to

iii. Will it increase proportion of journeys using modes other than the car? iv. Will it improve public transport accessibility?		volume of traffic within the area. However, the site itself helps to support London's public transport network, overall reducing volumes of traffic in the city. (+) ii. Activation and expansion of the canal's frontage will help to encourage and promote walking and cycling in the area. (++) iii. Part of the site is currently used as a car park for staff which increases the proportion of journeys using private vehicles. If the car park is removed given that the site is well-connected by public transport, redevelopment could lead to an increase proportion of journeys using modes other than the car. The bus garage itself contributes to London's transport network and contributes to an increase in the number of journeys using modes other than the car. (++) iv. The site itself helps to support public transport accessibility and contributes to London's transport network (++)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	-	i. The new scheme will increase consumption of materials and resources during both the construction phase and the life of the development. Proposals will ensure consumption is minimised by having site waste management plans, prioritising the use of recycled materials and using innovative waste reduction techniques such as water harvesting/recycling in line with adopted policy. (-) ii. Increasing the number homes/workspace units onsite will increase household waste however, this can be minimised through providing recycling, food and garden waste bins and storage onsite. (0) iii. The scheme will increase recycling and reuse on site through providing recycling bins for households and workspaces and using onsite water harvesting to reuse wastewater. (+) iv. See answer to (i). (-)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views? iii. Will it conserve or enhance heritage assets and their settings?	+	i. The low quality of the existing buildings and open spaces, and potential improved activation of the Canal's frontage and enhanced accessibility of the site will enhance the Grand Union Canal as a non-designated heritage asset. New buildings will need to respect the setting of nearby Conservation Area and heritage assets. (+)

iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?		ii. The redevelopment will continue to protect strategic views, as set out in the core policy objectives where new development shall respond to relevant heritage assets and associated views. See answer to (i). (+) iii. No likely impact. (0) iv. No likely impact. (0) v. No likely impact. (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	++	i. Redevelopment of the site has potential to enhance the setting of the Canal and to improve the immediate townscape. (++) ii. Proposals will need to be of exemplary design standards. (++) iii. Redevelopment should seek to reduce litter by ensuring bins are incorporated within accessible locations. (+) iv. The quality of the public realm will be significantly improved by activating and improving the Canal's frontage, providing new green and open spaces and ensuring the site is permeable and accessible to all. (++) v. Public realm improvements will be designed in such a way to ensure mobility for all users are taken into account. (++)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	++	i. Redevelopment of the site will ensure high quality new green and open spaces are incorporated into the scheme. (++) ii. Redevelopment of the site will contribute to an improvement of the landscape character. (++) iii. Activation of the canal's frontage and provision of new green and open spaces can help to improve access to open spaces. Access to Meanwhile Gardens could also improve. (++) iv. Activation of the Canal's frontage and provision of new green and open spaces can help to enhance the green infrastructure network. (++)
16. Employment Opportunities i. Will it improve qualifications, skills or training? ii. Will it create new jobs and reduce unemployment?	++	i. Retaining use of the bus garage and incorporating new commercial uses will contribute to improving qualifications, skills or training opportunities. (++) ii. The site as a bus garage is a source of employment providing jobs and income within the transport service industry. Whilst redevelopment will seek to retain the bus garage employment opportunities on site, this will be enhanced through the provision of some additional commercial floorspace. This will assist in providing

iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?		new employment opportunities whilst reducing levels of local unemployment. However, as a residential-led scheme, employment opportunities may not be as significantly enhanced. (+) iii. The site is well connected which makes it a suitable location to promote equality of opportunity across the city and providing employment for those most in need who would benefit from jobs in easily accessible locations. This could also be achieved through the provision of some affordable workspace floorspace. (++) iv. Earnings could be improved as employment opportunities from the existing bus garage will be retained and some additional commercial floorspace will be provided. However, as a residential-led scheme, employment opportunities and associated earnings may not be as high as a scheme that may be commercial-led. (+) v. See answer to iii above (++)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	++	i. A new residential-led mixed use scheme north of the site could help to improve business development and environment by delivering new employment space and increasing footfall and providing links to nearby businesses in the area, such as the Great Western Studios. (++) ii. A residential-led mixed-use scheme north of the site could help to improve business resilience and economy by increasing footfall within the area and providing some element of additional commercial floorspace to help boost business resilience in the area. However, as the scheme would be residential-led, there will be less opportunities to maximise commercial floorspace and its contribution to the wider economy than if a commercial-led scheme was delivered. (+) iii. A residential-led mixed-use scheme north of the site will help to encourage start-up businesses and small businesses within the area. The site will complement existing businesses adjacent to the site, such as the Great Western Studios. However, given that the scheme will be residential-led, this would reduce the overall quantum of commercial floorspace available which could have a reduced effect on the encouragement of other new businesses in the area. (+)

		iv. The site is well served by public transport, shops and services and within the North West Economic Development Area (NWEDA) policy area and North Paddington Creative Enterprise Zone – both designations support commercial and residential growth in this area and promote businesses in key sectors. (++) v. A residential-led mixed use scheme north of the site could help to promote wider regeneration in the area. (++)
Conclusion A redeveloped bus garage located in the southern portion of the site could help to release surplus land to the northern portion for a residential-led mixed use scheme with some provision of commercial, community/leisure floorspace that could contribute to meeting housing needs and deliver economic growth in the area. Redevelopment of the site could also have benefits in terms of increased delivery of open and green spaces, increased permeability, and connectivity along with provision of permeable surfaces to address the risk of flooding. Cumulatively, given the bus garage is currently still needed, this is considered to be the preferred, most sustainable option that contributes the most positive effects against the majority of sustainable objectives.		

Option C: Reasonable Alternative 1 Redevelopment of the bus garage (south of the site) to release surplus land north of the site to provide a commercial-led scheme with some provision of homes, open and green space etc.		
Sustainability Appraisal Objective	Score	Analysis
1. Communities i. Will it improve access to local services, shops and community facilities? ii. Will it increase ability to influence decision-making (neighbourhoods)? iii. Will it foster an inclusive Westminster community? iv. Will it encourage engagement in community activity?	+	i. Retaining use as a bus garage means there is a good level of access to local services, shops and community facilities. Currently, its buses serve nine TfL bus routes (both regular and night services). The site is well-connected by public transport networks and within the vicinity of the Harrow Road District Centre, making it an ideal location for residents to access local services, shops and community facilities. (++) ii. A new development will increase ability for residents to influence decision-making on the types of uses, facilities and homes they would like to see developed. (++) iii. New homes (including affordable housing) will contribute to achieving inclusive communities by connecting both new and existing residents in the local area together. However, as this is a commercial-led scheme, there will be a reduced potential for fostering an inclusive community. (+) iv. Provision of homes on site, particularly affordable homes that will be for occupiers most in need, may encourage engagement in community activity. However, as a commercial-led scheme would be proposed to the northern portion of the site, this will result in fewer affordable homes being delivered. This could impact on encouraging engagement in community activity. (+)
2. Crime reduction i. Will it reduce crime, disorder and antisocial behaviour? ii. Will it reduce fear of crime, disorder and antisocial behaviour? iii. Will it reduce other behaviour adversely affecting the local environment?	++	i. Redevelopment of the site for a commercial-led scheme, should seek to alleviate and reduce existing crime, disorder and antisocial behaviour. (++) ii. Activation and expansion of the canal frontage and delivery of new open spaces should reduce crime and fear of crime by reactivating neglected, dark spaces. (++) iii. Increased permeability through the site should enable safe and attractive pedestrian access between Westbourne Park station, the Harrow Road District Centre and the Grand Union Canal. This should reduce other behaviour adversely affecting the local environment. (++)
3. Housing i. Will it create high quality homes?	+	i. As a commercial-led scheme with some residential, the site would benefit from the provision of high-quality new homes that will help those most in need. (++)

ii. Will it increase range of affordable housing? iii. Will it reduce homelessness? iv. Will it provide housing than can help people stay independent for longer? v. Will it reduce number of unfit homes? vi. Will it provide a range of housing types and sizes?		ii. New homes will increase the range of affordable housing available across the city. However, as a commercial-led scheme would be proposed on the northern portion of the site, the site would only deliver a small number of homes and therefore affordable homes. This could impact on the range of affordable housing. (+) iii. A residential-led scheme will seek to reduce homelessness. However, as a commercial-led scheme this will result in fewer affordable homes being delivered. This could impact on the reduction of homelessness. (+) iv. A commercial-led scheme with some housing would provide a range of homes that can help people stay independent for longer by providing homes for those most in need. (+) v. As there are currently no homes on site, there is unlikely to be any impact on this indicator. However, the provision of affordable housing could reduce the number of households living in overcrowded or unfit homes (+) vi. New housing development will increase the range of housing tenures, types and sizes to meet the needs of the community. However, as a commercial-led scheme would be proposed on the northern portion of the site, this will result in fewer affordable homes being delivered. This could impact on the range of housing types and sizes. (+)
4. Health and wellbeing i. Will it help improve health inequalities? ii. Will it contribute to a reduction in death rates? iii. Will it improve access/movement? iv. Will it encourage healthy lifestyles through increased participation in sport and physical activity? v. Will it improve cultural wellbeing? vi. Will it minimise loneliness, maximise independence and improve mental and physical wellbeing of older people? vii. Will it provide access to a healthy diet?	+	i. Redeveloping the site will help to improve health inequalities by providing homes for those most in need in a location that is easily accessible and connected to shops, services and community facilities. It will also retain the existing bus garage use which will retain employment opportunities that the site currently offers. The site's continued use as a bus garage may help to improve health inequalities by providing a public transport service for all members of the community. It is also a source of employment, providing jobs and a source of income within the transport service industry. However, the site is located amongst a range of transport infrastructure which will have some degree of negative impact on residential amenity which will need to be mitigated for to ensure new residents have a high quality of life. (+) ii. Providing employment and homes for those most in need should help to support members of the community that need the most assistance and contribute to a

viii. Will it create healthy homes and workplaces? ix. Will it increase healthy years life expectancy? x. Will it improve mental health and wellbeing? xi. Will it improve facilities and accessibility for people with disabilities?		reduction in death rates. However, as a commercial-led scheme, this would result in fewer homes, including affordable homes, that would provide housing for those most in need and impact on the contribution to a reduction in death rates. (+) iii. Proposed uses will contribute to improved access/movement to local services in and around Westminster for future residents and users of the site (++) iv. Activation of the canal frontage and delivery of new open spaces will encourage healthy lifestyles through increased participation in physical activity through a more attractive, greener and safer environment (++). v. As a commercial-led scheme, it is less likely that the redevelopment would improve cultural wellbeing. (+) vi. A commercial-led scheme with some housing will encourage inclusive communities, this in turn should help to minimise loneliness and improve mental and physical wellbeing of older people. However, given that not as many homes would be provided in this scenario, the potential to minimise loneliness would be reduced compared to a residential-led scheme. (+). vii. Creation of a mixed-use community has the potential to provide access to a healthy diet through provision of local shops which may sell healthy food, along with amenity spaces in new homes which residents could use to grow their own food. (++) viii. A mixed-use scheme will contribute to providing healthy homes and workspaces with access to on-site new green and open spaces, increased permeability through the site and good access to transport networks. However, as the site is located amongst a range of transport infrastructure which will have some degree of negative impact on residential amenity, this will need to be mitigated for. (+) ix. Provision of new homes, commercial/community floorspace and new green and open spaces will contribute to increasing healthy years life expectancy. However, the site is located amongst a range of transport infrastructure uses which will have some degree of negative impact on residential amenity which will need to be mitigated for. (+) x. Provision of new homes, commercial/community floorspace and new green and open spaces will contribute to improved mental health and wellbeing. That being

		said, the site is located amongst a range of transport infrastructure uses which will have some degree of negative impact on residential amenity which will need to be mitigated for. (+) xi. The site is well located close to public transport networks, shops, services and facilities, and this will contribute to the improvement of facilities and accessibility for people with disabilities. Provision for public realm improvements will also be designed with all users in mind and will improve facilities and accessibility for people with disabilities. (++)
5. Climate change i. Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and/or reducing the need to travel? ii. Will it reduce ozone depleting emissions? iii. Will it reduce emissions through retrofitting new technology? iv. Will it reduce heat island effects on people and property? v. Will it increase resilience to climate change?	++	i. An upgraded bus garage will help reduce some green gas emissions on-site. Supporting uses as part of a mixed-use development site will help reduce the need to travel as the new homes will be well-connected to shops, services and community facilities. (++) ii. An improved bus garage will help reduce some ozone depleting emissions. (++) iii. New major development should at least be Carbon Neutral in line with adopted policy, and reduce emissions through retrofitting new technology. (++) iv. Redevelopment of the northern parcel of the site to an alternative, commercial-led use will help to reduce the heat island effect through installation of energy-efficient equipment, green roofs, increasing shaded areas and other biodiversity improvements. (++) v. Opportunities exist to deliver a greener bus garage and a sustainable mixed-use scheme that reduces carbon emissions, provides new open and green spaces and permeable surfaces to prevent surface water flooding. As a retained bus garage, however, it is inevitable that emissions from the buses will contribute to climate change. That being said, the site itself supports the public transport network for London, reducing private vehicle use and the buses could be electrified in the future. (+)
6. Natural resources i. Will it reduce water consumption and improve water efficiency? ii. Will it reduce consumption of fossil fuels?	++	i. As part of redevelopment of the northern parcel of the site, there is potential to update systems to contribute to the reduction of water consumption and improve water efficiency. (++)

iii. Will use of other natural resources (e.g. quarried materials, wood) be minimised? iv. Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? v. Will it make efficient use of land?		ii. The new development can contribute to reducing fossil fuel consumption by utilising renewable sources. However, it is likely that the current use of resources by the buses will continue even when it is redeveloped. (0) iii. The use of natural resources can be minimised as much as possible, through prioritising recycling of construction materials and using more sustainable alternatives instead of conventional construction practices, such as using materials from environmentally responsible suppliers. (++) iv. Encouragement of the use of renewable resources to be prioritised over non-renewable resources can be made as part of any new scheme. (++) v. Redevelopment to release surplus land for a mixed-use, commercial-led scheme will make efficient use of land in an urban location well serviced by public transport and active transport routes. (++)
7. Flood risk and water quality i. Will it minimise flood risk from all sources of flooding? ii. Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? iii. Will it reduce combined sewer overflow events? iv. Will it protect water quality?	++	i. As part of the redevelopment of the site, opportunities can be taken to introduce flood risk prevention initiatives to minimise flood risk, particularly from surface water flooding. Open and green spaces can also assist in natural flood risk prevention. (++) ii. Through the application of flood resistant measures, the risk of property damage in heavy rainfall events can be reduced. Residents and workers can also be given flood awareness information and flood emergency plans, so they are better prepared for heavy rainfall events. (+) iii. As part of the redevelopment of the site, opportunities can be taken to reduce combined sewer overflow events. (++) iv. The development should positively contribute to improving water quality on site and in the surrounding area, using eco-friendly solutions such as green infrastructure sustainable drainage systems (SuDS) can naturally help increase local water quality. The site may be already constrained by contaminated land from a previous usage; however, the scheme should apply an appropriate remediation scheme which should enhance water quality. (++)
8. Biodiversity i. Will it protect, enhance and increase biodiversity and protect habitats?	++	i. Redevelopment of the site could provide opportunities to maximise solutions to protect, enhance and increase biodiversity and protect habitats. (++)

ii. Will it preserve Sites of Importance for Nature Conservation? iii. Will it improve access to and promote educational value of sites of biodiversity interest? iv. Will it conserve and enhance species and habitats?		ii. Activation of the canal towpath will help to reduce antisocial behaviour within this part of the site and can help to preserve the Site of Importance for Nature Conservation (SINC), the Grand Union Canal. (++) iii. Activation of the canal towpath and provision of new green and open spaces can help to improve access and promote educational value of sites of biodiversity interest. Access will also be improved to the canal to facilitate better connections into the Meanwhile Gardens. (++) iv. Redevelopment of the site could provide opportunities to maximise solutions to conserve and enhance species and habitats. (++)
9. Air quality i. Will it improve air quality? ii. Will it reduce emissions of key pollutants?	0	i. As the bus garage would remain on-site, the negative impact on air quality associated with buses will remain. However, although buses create emissions, they also contribute to the reduction of the use of private motor vehicles in London. The site is located immediately adjacent to the Westway which could impact air quality for future occupiers of any new buildings, and this will need to be mitigated through design interventions. Any new buildings will need to be designed with the improvement of air quality in mind. (0). ii. See answer to i above (0).
10. Noise i. Will it reduce noise concerns and noise complaints? ii. Will it reduce noise levels?	-	i. Alternative uses could seek to reduce noise levels and potential complaints associated with buses and users of the site. However, as a commercial-led scheme with some housing, there is the potential for more noise concerns and complaints to be raised due to the impact on residential amenity from future occupiers with the site being so close to the Westway and train line. (-) ii. Noise levels could also be increased as part of the construction process for those within the vicinity of the site. It is expected that as part of redevelopment of the scheme that mitigation measures will be taken to reduce harm on residential and worker amenity, including noise levels (0).
11. Transport i. Will it reduce volumes of traffic? ii. Will it encourage walking and cycling? iii. Will it increase proportion of journeys using modes other than the car?	++	i. Redevelopment of the bus garage to release surplus land could help to reduce volumes of traffic associated with residential and commercial developments. The site is well connected by public transport which users of the site will benefit from and the development will be car-free. That being said, the bus garage will still be retained on site which means buses will still contribute to volume of traffic within

iv. Will it improve public transport accessibility?		the area. However, the site itself helps to support public transport accessibility and contributes to London's transport network, overall reducing volumes of traffic in the city. (+) ii. Activation and expansion of the canal towpath will help to encourage and promote walking and cycling in the area. (++) iii. Part of the site is currently used as a car park for staff which increases the proportion of journeys using private vehicles. Redevelopment of the of the site will help to reduce, if not remove, the car park for staff. The site is well-connected by public transport and will be car-free in line with adopted policy. The site itself helps to support public transport accessibility and contributes to London's transport network to increase journeys using modes other than the car. (++) iv. The site itself helps to support public transport accessibility and contributes to London's transport network (++)
12. Waste i. Will it reduce consumption of materials and resources? ii. Will it reduce household waste? iii. Will it increase recycling, recovery and re-use? iv. Will it reduce construction waste?	-	i. The new scheme will increase consumption of materials and resources during construction and the life of the development. This will be minimised during the construction phase by having site waste management plans, prioritising the use of recycled materials and using innovative waste reduction techniques such as water harvesting/recycling. (-) ii. Increasing the number homes/workspace units on-site will increase household waste however, this can be minimised through providing recycling, food and garden waste bins onsite. Also, workspaces can use green procurement practices and implement low waste practices such as being paperless. (0) iii. The scheme will increase recycling and reuse on-site through providing recycling bins for households and workspaces and using onsite water harvesting to reuse wastewater. (+) iv. See answer to (i). (-)
13. Heritage i. Will it conserve or enhance heritage sites and cultural value? ii. Will it protect strategic views?	+	i. Improved activation of the canal frontage and enhanced accessibility of the site will enhance the Grand Union Canal as a non-designated heritage asset. Building heights and massing however, will need to consider the setting of heritage assets. (+) ii. The redevelopment will continue to protect strategic views. (+)

iii. Will it conserve or enhance heritage assets and their settings? iv. Will it help preserve, enhance and record archaeological features and their settings? v. Will it protect and enhance the setting of the Westminster World Heritage Site?		iii. See answer to i above. (+) iv. No likely impact. (0) v. No likely impact. (0)
14. Public Realm & Townscape i. Will it enhance townscape? ii. Will it encourage exemplary design standards? iii. Will it reduce litter? iv. Will it enhance the quality of public realm? v. Will it improve access and mobility for all equality group strands?	++	i. Redevelopment of the site has potential to enhance the setting of the canal and to improve the immediate townscape. (++) ii. Redevelopment of the site will provide opportunities to encourage any new scheme to be of exemplary design standards. (+) iii. Redevelopment should seek to reduce litter by ensuring bins are incorporated and put within accessible locations. (+) iv. The quality of the public realm will be significantly improved by activating and improving the canal towpath, providing new green and open spaces and ensuring the site is permeable and accessible to all. (++) v. Public realm improvements will be designed in such a way to ensure mobility for all users are taken into account. (++)
15. Open Space i. Will it enhance the quality of open space? ii. Will it improve landscape character? iii. Will it improve access to open space? iv. Will it enhance the green infrastructure network?	++	i. Redevelopment of the site will ensure good quality new green and open spaces are incorporated into the scheme. (++) ii. Redevelopment of the site will contribute to an improvement of the landscape character. (+) iii. Activation of the canal towpath and provision of new green and open spaces can help to improve access to open spaces for future occupiers of the site. Access will also be improved to the canal to facilitate better connections into the Meanwhile Gardens. (++) iv. Activation of the canal towpath and provision of new green and open spaces can help to enhance the green infrastructure network. (++)
16. Employment Opportunities i. Will it improve qualifications, skills or training?	++	i. Retaining use of the bus garage and incorporating commercial floorspace to the north will contribute to improving qualifications, skills or training opportunities. (++)

ii. Will it create new jobs and reduce unemployment? iii. Will it provide jobs for those most in need? iv. Will it improve earnings? v. Will it promote equality of opportunity across the city by tackling barriers to employment?		ii. The site as a bus garage is a source of employment providing jobs and income within the transport service industry. Whilst redevelopment of the bus garage to provide a mixed-use scheme will seek to retain employment opportunities on site, this will be enhanced through the provision of additional commercial floorspace. This will assist in providing new employment opportunities whilst reducing levels of local unemployment. (++) iii. The site is well connected which makes it a suitable location to promote equality of opportunity across the city and providing employment for those most in need who would benefit from jobs in easily accessible locations. (++) iv. Earnings could be improved as employment opportunities from the existing bus garage will be retained and some additional commercial floorspace will be provided. (++) v. The site is well connected which makes it a suitable location to promote equality of opportunity across the city and providing employment for those most in need who would benefit from jobs in easily accessible locations. (++)
17. Economy i. Will it improve business development and environment? ii. Will it improve business resilience and economy? iii. Will it encourage new business start-ups, small businesses and opportunities for local people? iv. Will it promote business in key sectors? v. Will it promote regeneration?	++	i. A commercial-led mixed use scheme could help to improve business development and environment by increasing footfall and providing links to nearby businesses in the area, such as the Great Western Studios. (++) ii. A commercial-led mixed-use scheme could help to improve business resilience and economy by increasing footfall within the area and providing some element of additional commercial floorspace to help boost business resilience in the area. (++) iii. A commercial-led mixed-use scheme will help to encourage start-up businesses and small businesses within the area. The site will complement existing businesses adjacent to the site, such as the Great Western Studios. (++) iv. The site is well served by public transport, shops and services and within the North West Economic Development Area (NWEDA) policy area which supports commercial and residential growth in this area and promotes business in key sectors. (++) v. A commercial-led mixed use scheme could help to promote wider regeneration in the area by providing complementary nearby uses. (++)
Conclusion		

A redeveloped bus garage located south of the site could help release surplus land to the north of the site for a commercial-led mixed use scheme with some provision of homes that could contribute to meeting housing need and economic growth in the area. Comprehensive redevelopment of the site could also have benefits in terms of increased delivery of open and green spaces, permeability, and connectivity along with increasing provision of permeable surfaces to address the risk of surface water flooding. Cumulatively, whilst this option does provide some sustainability benefits, this is not considered to be the preferred, most sustainable option that contributes the most positive effects against the majority of sustainable objectives.

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