



Westminster City Plan 2019-2040 – Examination in Public

Response to Inspector's Matters, Issues and Questions

Representations on behalf of the Church Commissioners for England

Respondent Number: 66

Matter 4 – Housing

Policy 8A Stepping Up Housing Delivery

18) What is the evidence base for the limit of 200sqm Gross Internal Area for new homes (Part B) and is the approach justified?

The Church Commissioners welcome the amendments post submission to Policy 8A to align with the London Plan Housing Target and the addition of Paragraphs 8.10 and 8.11 which recognise the need to provide family sized homes.

The Church Commissioners consider that Part B of the Policy should be amended to take account of the need to provide larger family homes for certain groups. It is proposed that the Policy should be reworded as follows:

“No new homes in Westminster will exceed 200 sq m Gross Internal Area (GIA), except where it is necessary to protect a heritage asset, or to meet the needs of larger family groups.”

In addition, the Church Commissioners support the principle of protecting residential units, floorspace and land. Land use swaps are an important tool in allowing for better utilisation of buildings and land across the Borough whilst ensuring no net loss of residential, units, floorspace and land. The acceptability of land use swaps is alluded to in the implementation and monitoring Section but it should be incorporated into Policy 8.

Policy 9 – Affordable Housing

23) - What is the basis for the target of 35% and the approach to site size thresholds?

The 35% affordable housing target is stated as applying to the total resident floorspace on schemes that exceed the thresholds in Policy 9(B). Given that some sites will have existing residential accommodation, it is more likely to stimulate development if the 35% requirement applies to the net additional housing created. If this were not the case, the current existing asset value would mitigate against investment and development. This aspect of the policy is unlikely to be effective and is therefore not sound.

(26) Is the policy justified in terms of the approach to on site and off-site provision and payments in lieu? Is there sufficient flexibility? Is there sufficient clarity as to how the policy will be implemented in practice, particularly in terms of the calculation of payments in lieu?

The Church Commissioner do not consider the approach to on-site and off-site provision, and payments in lieu, is justified as it is unlikely to be effective.

The City of Westminster faces particular challenges because the opportunity costs of providing affordable housing on-site, in every case, are particularly expensive. This is because of the high value of standing assets in the City of Westminster, the constrained nature of many sites, the constraint

on larger increases in floorspace thus limiting the creation of the necessary affordable housing subsidy, the disproportionately high opportunity costs and the complexity of interlocking land uses, tenures and final investment assets. This means that, if affordable housing is always provided on site, less affordable housing will be produced.

In the central core of the City of Westminster, particularly in the core business areas, it is likely to be more effective to provide affordable housing to enable off-site provision of more homes, including on Council Estates.

The policy as drafted does not provide sufficient flexibility. We suggest that the reference to “in exceptional cases” is removed.

There is also insufficient clarity about how the policy will be implemented in practice, particularly in regard to payments in lieu. The details of the proposed payments in lieu are essential to understanding the effect of the policy and establishing its soundness. They should, therefore, be incorporated within the Plan and subject to consultation and testing, rather than relying upon subsequent guidance.

Policy 10 – Affordable contributions in the CAZ

31) How would the policy affect commercial growth?

The Church Commissioners support securing affordable housing from commercial development provided that a realistic, effective and justified approach is adopted. The Church Commissioners have a serious concern that the scale of the proposed requirement (35%) and associated payment in lieu costs, is unviable and would mean that office and hotel developments within the CAZ are less likely to come forward, in turn limiting growth throughout the City and prejudicing development which is at odds with the strategic spatial aspirations of the Plan. As a result, Policy 10 is unsound. The Church Commissioners support the representations made by the Westminster Property Association ref. 0023 in respect of Policy 10.

Policy 11 – Housing for Specific Groups

44) Are the proposed modifications necessary for soundness? Are any other modifications necessary?

It is considered that the need to market an existing HMO for 18 months in order to change the use to a family sized home is unnecessary and could leave properties vacant which could be easily adapted to housing making the policy ineffective. The Church Commissioners consider that wording at Part C should be amended to:

C. Conversion of purpose-built single-family homes into multiple family homes is welcomed. Family sized homes will be required where a House in Multiple Occupation (HMO) surplus to requirements (as demonstrated by appropriate marketing as an HMO for at least 18 months) is proposed to change to market housing.

Policy 13 Housing Quality

52) Are the proposed modifications necessary for soundness? Are any other modifications necessary?

The Church Commissioners welcome the recognition at Paragraph 13.6 that it is sometimes impracticable to meet national space standards within heritage assets and agree that the standards should be met where possible. Policy 13 Part C should be updated to reflect this recognition for soundness as follows.

“All new homes will meet or exceed the Nationally Described Space Standards (where the units are self-contained). New homes within heritage assets should seek to meet the standards wherever possible.”