



City of Westminster

Committee Agenda

Title: **City Plan Sub-Committee**

Meeting Date: **Thursday 21st July, 2016**

Time: **6.30 pm**

Venue: **Rooms 10A & 10B - 17th Floor, Westminster City Hall, 64 Victoria Street, London, SW1E 6 QP**

Members: **Councillors:**

Peter Freeman (Chairman)	Jonathan Glanz
David Boothroyd	Andrew Smith
Tony Devenish	



Members of the public are welcome to attend the meeting and listen to the discussion Part 1 of the Agenda

Admission to the public gallery is by ticket, issued from the ground floor reception at City Hall from 6.00pm. If you have a disability and require any special assistance please contact the Committee Officer (details listed below) in advance of the meeting.



An Induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter. If you require any further information, please contact the Committee Officer, Tristan Fieldsend, Senior Committee and Governance Officer.

**Tel: 7641 2341; Email: tfieldsend@westminster.gov.uk
Corporate Website: www.westminster.gov.uk**

Note for Members: Members are reminded that Officer contacts are shown at the end of each report and Members are welcome to raise questions in advance of the meeting. With regard to item 2, guidance on declarations of interests is included in the Code of Governance; if Members and Officers have any particular questions they should contact the Head of Legal & Democratic Services in advance of the meeting please.

AGENDA

PART 1 (IN PUBLIC)

1. MEMBERSHIP

To note any changes to the membership.

2. DECLARATIONS OF INTEREST

To note any Declarations of Interest from members or officers in relation to items on the agenda.

3. MINUTES

To sign the minutes of the previous meeting as a correct record of proceedings.

(Pages 1 - 6)

4. CITY PLAN HOUSING POLICIES

(Pages 7 - 84)

**5. DRAFT UPPER VAUXHALL BRIDGE ROAD SITE
DEVELOPMENT OPPORTUNITY FRAMEWORK (DOF)**

**(Pages 85 -
184)**

**Charlie Parker
Chief Executive
13 July 2016**



CITY OF WESTMINSTER

MINUTES

City Plan Sub-Committee

MINUTES OF PROCEEDINGS

Minutes of a meeting of the **City Plan Sub-Committee** held on **Wednesday 25th November, 2015**, Rooms 3 & 4, 17th Floor, City Hall, 64 Victoria Street, London, SW1E 6QP.

Members Present: Councillors Peter Freeman (Chairman), Jonthan Glanz, David Boothroyd and Andrew Smith

Also Present: Lisa Fairmaner, Lead Spatial and Environmental Adviser, Charlotte Breen, Principal Planning Officer and Reuben Segal, Senior Committee and Governance Officer

Apologies for Absence: Councillor Anthony Devenish

1 MEMBERSHIP

1.1 There were no changes to the membership.

2 DECLARATIONS OF INTEREST

2.1 Councillor Boothroyd declared that he is Head of Research and Psephology for Thorncliffe, whose clients are companies applying for planning permission from various local authorities. He explained that no current clients are in Westminster and if there were he would be precluded from working on them under the company's Code of Conduct.

3 MINUTES

3.1 **RESOLVED:** That the minutes of the meeting held on 22 July 2015 be signed by the Chairman as a correct record of proceedings.

4 (1) POLICY DEVELOPMENT - TALL BUILDINGS AND DESIGN CITY PLAN (2) (REVISION UPDATE - SPECIAL POLICY AREAS

- 4.1 The Sub-Committee had before it a report seeking Members views on Westminster's future approach to taller buildings and draft design policies with a particular focus on alterations and extensions. The report also set out the revisions to the draft Special Policy Area and Policies Map as part of the next pre-submission stage of consultation.

Tall and Higher Buildings

- 4.2 The Committee considered Westminster's future approach to taller buildings with a focus on areas where additional development capacity may be appropriate through higher buildings, and any criteria constraints that may bear on these areas. The committee broadly supported the policy provision that taller buildings should be limited to the Victoria and Paddington Opportunity Areas. The committee considered that taller buildings could be acceptable in the right locations however there were limited opportunities in other parts of the city for such buildings without impacting on heavily residential areas or viewing corridors from parks. The committee also wished to avoid possible 'creep of taller buildings' into such areas.
- 4.3 Given the above-mentioned limitations the committee stated that there was a likelihood that this may lead to a clustering of taller buildings. Members considered that the implications of potential clusters needed to be reflected in the policy together with mitigation measures to avoid negative impacts such as sense of enclosure and shadow lines, reflections and microclimates. It was suggested that weight should perhaps be given to staggering building heights in the immediate vicinity of a taller building to provide a juxtaposition.
- 4.4 Lisa Fairmaner, Lead Spatial and Environmental Adviser, informed the Committee that a question as to whether more space could be provided at base level where there is a higher building design was raised previously in relation to Knightsbridge Barracks. She informed the committee that in some US cities planning policies included a ratio whereby the higher a building projects the more land must be left at ground floor level. The committee was asked to consider whether this provided a potential mitigation to concerns about taller buildings. Members considered that while this was achievable on a greenfield site or when building a new city it was likely to prove difficult to achieve in the city's existing environment.
- 4.5 The committee also provided views on clearer ways of referring to and differentiating between tall and higher buildings in future policy. Members broadly agreed with the approach in the heritage policies of distinguishing tall buildings as being those of around 25-30 storeys and higher buildings as those which are lower than these landmark buildings but still higher than their surroundings. The committee expressed the view that they would not wish to see buildings taller than those that currently existed or were being developed in Victoria or Paddington.

- 4.6 Members reflected on the need for the policy to consider the potential adverse impacts of taller buildings (economic, environmental and social) on sustainable development. It was suggested that the economic record of taller buildings over the long term was mixed. With regard to residential development in higher buildings, members commented that consideration should be given to the implications of incorporating a mix of private and social units as well as the possible impacts for on-street parking provision.
- 4.7 In relation to the issue of greater densification, officers were referred to the fact that this could be achieved through careful design such as the way that the bulk of the building is configured. London County Hall was referenced as a prime example of this.

Design Policies

Alterations and Extensions

- 4.8 Members commented that there were a range of factors which already influenced alterations and extensions to buildings. These included whether a building was in a Conservation Area or had listed status or whether proposals benefited from permitted development rights. National planning policy also required local authorities to help deliver additional living accommodation. Given this, the Committee was of the view that establishing a clear set of criteria in respect of alterations and extensions was challenging.
- 4.9 Whilst it was recognised that the Council would have more control over development due to the large number of conservation areas and listed buildings in the City, members were still unsure whether this would make it possible for the Council to impose a consistent policy.
- 4.10 A variety of views were expressed on individual aspects of the policy as follows:
- 4.11 Roof extensions which disrupt the uniformity of the rooflines – Lisa Fairmaner informed the Committee that as currently worded the policy assesses whether there is disruption to the uniformity to a consistent roofline. Applying the policy strictly was resulting in applications for dormer extensions being refused. This was limiting the ability of families to gain the additional accommodation they required and was leading to residents moving to other parts of London. Members recognised that applications for roof extensions were contentious and had led to disagreements between neighbours. Different arguments are often put forward by residents over which part of the roofline is uniform, that which is infilled or that where there is an absence of extensions. It was suggested that the policy could take its lead from the conservation area audit. One suggestion put forward was that long roof lines should be protected. However, the Committee also questioned whether the Council should resist this at the expense of building taller buildings to meet housing needs.
- 4.12 Subordinate and to the rear – Members commented that defining what was subordinate to an existing building was challenging. Additionally there may be

circumstances where extensions which are not subordinate would be acceptable such as if the proposed extension was sensitive and in keeping with the existing structure. It was suggested that whether an extension was acceptable would depend on the likely impact on neighbouring properties. With regard to rear extensions officers were drawn to the fact that Councillors receive a lot of concerns from residents about the potential loss of daylight and sunlight arising from proposals and these issues should be referenced within the policy. Concern was also raised about the conversion of integral garages into habitable rooms and officers were asked to consider how this could be addressed.

- 4.13 Completed Compositions - it was considered that in order to conserve the historic environment the current approach should not be relaxed to enable more floorspace to be developed. It was put to officers that completed compositions are measurable and failing to protect these weakens the architectural merits of buildings.

Advertisements

- 4.14 The Committee also provided views on advertisements particularly in relation to LED/moving images and flags.
- 4.15 Members noted that large LED/moving images were well established in certain locations such as Leicester Square and Piccadilly Circus; however it was difficult to identify other locations in the City where similar sized displays could be acceptable. These would need to be determined on their merits. Concerns were raised that siting moving displays/video by the roadside could have safety implications as they could distract drivers. It was suggested that the emerging policy on LED/video/moving images needed to reflect such issues. A further concern expressed was that advertisements of this nature can generate significant revenue and where introduced temporarily at a development site could influence developers to delay construction to take advantage of the lucrative income stream.
- 4.16 Lisa Fairmaner informed the committee that the theatre and cinema industries would welcome a transition from physical to electronic posters. The committee was content with this change subject to the images remaining static for a number of weeks at a time rather than rotating.
- 4.17 The committee agreed that the current policy of only allowing one flagpole per large building was too restrictive. It was considered that allowing additional flags would not add to street clutter due to the height at which they would be located. It was suggested that proposals for displaying flagpoles and flags should perhaps include Conduit Street, Grafton Street and Mount Street.

Special Policy Areas and Policies Map Revision

- 4.18 The Committee noted the draft special policy area and policies map revision and provided comments on the revision as part of the next pre-submission stage of consultation.

- 4.19 The committee had previously commented that the retention of the East Marylebone Special Policy Area (SPA) relating to wholesale showrooms was unsustainable and noted the proposed deletion of the SPA.
- 4.20 Members considered that it would be fitting to commemorate the area's heritage as a centre for wholesale showrooms with the installation of a related piece of public art. It was suggested that this could be sited in Market Place which would also help to improve the public realm.
- 4.21 The committee noted the revisions to the Portland Place Special Policy Area to which it had no concerns.
- 4.22 Lisa Fairmaner informed the committee about a change to the Harley Street Special Policy Area where the Council would support the provision of new accommodation for patients using medical facilities in the Harley Street Special Policy Area and/or their families. This would be limited and linked to Harley Street medical facilities predominantly the two major hospitals in the area. In response to questions she confirmed that the policy included specific criteria and that proposals for this accommodation were likely from the Howard De Walden Estate. The committee supported the revision subject to the accommodation being ancillary to the use of the medical facilities.
- 4.23 The committee welcomed the revisions to the Savile Row Special Policy Area. Members acknowledged the need to protect the area's role as an international centre of excellence for bespoke tailoring. Lisa Fairmaner informed the committee that the policy set out what other uses would complement and enhance the bespoke tailoring industry. Tailors working in Savile Row had advised that complimentary commercial uses were preferred to residential which had a detrimental impact on the area's commercial environment.

The Meeting ended at 7.43 pm

CHAIRMAN: _____

DATE _____

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City of Westminster

City Plan Sub- Committee Report

Date:	21 st July 2016
Classification:	General Release
Title:	City Plan housing policies
Report of:	Director of Policy, Performance and Communications
Cabinet Member Portfolio:	Built Environment
Wards Affected:	All
City for All	City of Aspiration: Supporting the building of more affordable homes
Key Decision:	No
Financial Summary:	None
Report Author and Contact Details:	Kimberley Hopkins, Principal Policy Officer, Policy, Performance and Communications khopkins@westminster.gov.uk 020 7641 2935

1.0 Executive Summary

- 1.0 This paper explains some of the current general issues around housing in Westminster as a basis for discussion about the future direction of strategic planning policy. It explains:
- the changes introduced by the Housing and Planning Act;
 - the emerging details about how the Mayor of London intends to implement his housing policies and change to the London Plan;
 - how housing targets are arrived at and the difficulties now faced in meeting objectively assessed needs for housing;
 - changes to housing design requirements i.e. the removal of Lifetime Homes standards and replacement with building regulations and how they will affect the City Council's housing policies; and
 - how all these issues have impacted on the timetable for revisions to the City Plan.

2.0 Recommendation

- 2.1 That members consider the housing issues explained below and debate the issues, raising any concerns that it is considered that changes to the City Plan policies should address.

3.0 The Housing and Planning Act 2016

- 3.1 The Housing and Planning Act 2016 received Royal Assent in May. Among its stated aims are boosting housebuilding and increasing home ownership.
- 3.2 Among its provisions is the introduction of a new affordable housing product aimed at promoting homeownership among younger people. A Starter Home is defined in the Act as a new dwelling to be made available for sale to first time buyers, between the ages of 24 and 40 and sold at a 20% discount of the market value. There will be a price cap in Greater London of £450,000.
- 3.3 The Act imposes a general duty on local authorities to promote Starter Homes through their planning functions (in determining planning applications and in drawing up their local plan). There is a power for ministers to set a "starter home requirement" by regulations, requiring that a proportion of dwellings are starter homes of this kind if planning permission is to be granted. They will be secured by local planning authorities through section 106 agreements. Because delivery will be a requirement of the grant of planning permission (subject to some exemptions and a narrowly defined viability exemption) it will not be negotiable, and will have first call on the value in development that could fund affordable housing. The Government has recently consulted on proposals to set this requirement at 20% of units on residential schemes of 10 units or 0.5 hectares or more. The 2016 Act also provides for payment of commuted sums i.e. enabling Starter Homes to be delivered off site. Again the detail of this is to be set out in regulations.
- 3.4 The "discount" is to be funded by the developer. Ministers have indicated that given this, section 106 contributions for affordable housing and infrastructure should not be sought from Starter Homes and that they will be exempt from the Community Infrastructure Levy. The Government has proposed changes to the NPPF to make discounted market sale products such as Starter Homes a form of affordable housing (in addition to social and intermediate housing).

- 3.5 The implications of the introduction of starter homes in Westminster are difficult to assess until the final scope of the requirement is clearer and the Mayor's role in delivery is clarified (this is dealt with in more detail in section 4). In particular, it is not clear how they will work in high value areas, where the majority of properties are well above the £450,000 cap – or how the market will react to them. Taken with the viability issues that are already a major factor in Westminster, they are likely to have major effects on future delivery of more “conventional” forms of affordable housing (this is a point that the council's response to the Government's proposals has made strongly) – as property consultants Savills have expressed the view that they are *“likely to result in fewer homes delivered for what is currently classified as an affordable tenure”*. Savills consider that Starter Homes may generate no more land value than that of “traditional” affordable housing, particularly in high value areas where to reach the price cap a higher “discount” would be required. In addition, “traditional” affordable housing is typically sold in bulk to housing associations, thereby securing developers' cash flow; this may be less likely to happen with Starter Homes and this could mean that land dedicated to them may return lower values. In short, they conclude that this initiative may have significant effects on development viability that could squeeze other forms of affordable housing and affect overall levels of delivery.
- 3.6 Starter Homes are unlikely to be accessible to the majority of customers on the Council's intermediate housing list – 70% of households needing a one bedroom property have incomes of £40,000 or less. There will also be no “local connection” requirement meaning that Westminster residents will not have priority for starter homes provided here (or funded through commuted sums raised here).
- 3.7 Once Government has fixed the final requirements and the approach that the Mayor may take in terms of the range and delivery of starter homes in Greater London is clearer, there will be a need to revisit the council's evidence base about housing need, and to reassess its affordable housing policy in the light of starter homes having a first call on any value in a scheme available to fund affordable housing.
- 3.8 The 2016 Act also extends the right to buy to housing association tenants. This is to be funded through payments made by local authorities in respect of the proceeds of selling high value council homes when they fall vacant. The Act requires “one for one” replacement of homes sold under the right to buy, although they do not have to be built in the same place or provided on the same tenure as those sold. It also requires replacement of high value council voids on a two for one basis in Greater London and it has been indicated that the sums paid by housing authorities to the Treasury will be set at a level allowing the cost of this to be met. The replacements can be provided by the local housing authority concerned or by the Mayor of London on its behalf; there is no requirement that replacements are built in the same place as the unit sold.
- 3.9 **Do Members agree that a review of the council's evidence base for housing policies (particularly affordable housing) should be undertaken once the Housing and Planning Act Regulations have been published?**

4.0 New Mayoral Policies

- 4.1 Since his election as Mayor of London, Sadiq Khan has been in discussion with boroughs and others regarding implementation of the housing policies in his manifesto and, in particular, arrangements that will be put in place to increase significantly housing delivery across all tenures. It is likely that these discussions will lead to a case put to ministers for additional powers and flexibilities for London to help improve development and, potentially, to new delivery arrangements in the capital to enable provision of new housing – particularly to meet the additional requirement to replace housing disposed of in connection with the Right to Buy and Starter Homes provisions of the 2016 Act.
- 4.2 We will also have to have regard to changes in Mayoral planning policies. The previous Mayor had already started a review of the London Plan, particularly to take account of emerging evidence about housing need and the importance of driving up delivery. It is likely that further details about the programme for London Plan revision and the areas which will change will become available over the next few months. In the meantime work is already underway on assembling updated evidence to support policy; including a new London Strategic Housing Land Availability Assessment (the importance of this is explained in section 5 of this report).
- 4.3 Among the issues being discussed with/by the Mayor are Londonwide approaches to housing delivery and addressing issues like homelessness. These issues fit well with the direction the Council proposed to take in our draft Housing Strategy - in particular greater flexibility to use resources generated in Westminster to fund affordable homes in places beyond our boundaries where we can maximise delivery. It is also likely that there will be discussions about wider financial flexibilities around the Housing Revenue Account and making it easier to reinvest right to buy and other capital receipts.
- 4.4 Changes to Mayoral policy and any arrangements he puts in place to deliver housing across London will have a significant impact on the City Council's planning policies and will be addressed in the second round of revisions referred to in section 8 of this report.

5.0 Housing Delivery Targets

- 5.1 The starting point in developing strategic planning policies on housing is the requirement set by national government in the National Planning Policy Framework (NPPF) that local planning authorities should *“ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”*. This section of the report explains how the Mayor and Westminster (and other London boroughs) develop policies for:
- The **total amount of housing** that should be delivered;
 - within that, **the amount of affordable housing** that should be delivered; and
 - within *that* the proportions of **different types of affordable housing** that should be delivered.
- 5.2 In the NPPF government sets the starting point for boroughs as seeking to meet total housing need in their area for both affordable and market housing. But the other policies in the NPPF also have to be taken into account – for example how much is physically deliverable; the resources available to fund affordable housing; policies on sustainable development; meeting the development needs of business and economic development; and

protection of the historic environment. In particular, the NPPF says that local plans should be aspirational, but realistic and deliverable, with particular reference to the effects policies might have on development viability across the authority's area. The Housing and Planning Act and subsequent Regulations regarding starter homes are likely to cause significant difficulties in local authorities meeting their objectively assessed needs – primarily because there is no local requirement for allocating starter homes, but also because the starter homes requirement is likely to squeeze out any finances available for the delivery of other forms of affordable housing.

5.3 The NPPF also says that planning policies should draw on evidence in two documents:

- A **Strategic Housing Market Assessment (SHMA)** identifying each area's housing needs - the scale and mix of housing the area is likely to need given likely changes in population (including migration), breaking this down by types of housing (including affordable housing and provision for groups like families with children, older people, people with disabilities and service families).
- A **Strategic Housing Land Availability Assessment (SHLAA)** identifying the amount of land that will realistically be available, viable and developable to meet the identified need for housing.

5.4 We also have to take account of the Mayor of London's "**London Plan**". This sets strategic targets for housing delivery with which Westminster's own City Plan legally has to be "in general conformity". These include overall targets for each London borough for delivery of all types of housing. It also requires boroughs to set an overall target for affordable housing (as a number or a percentage of all housing delivered) and separate targets for social/affordable rented and for intermediate housing.

London Plan housing targets

5.5 The most recent London Plan targets were formally published in March 2015 drawing on London-wide evidence of need and land availability. The targets are:

- For an annual average of at least 42,000 additional homes across London. The target for Westminster 2015-2025 is a minimum of 10,677 homes (giving an annual benchmark of 1,068 homes).
- For at least 17,000 more affordable homes per year London-wide.
- For 60% of the affordable housing provision to be social/affordable rent and 40% for intermediate rent or sale.

5.6 The London SHMA sets out evidence about London-wide housing need looking forward to 2035, drawing on the demographic and economic trends in London and developments in the housing market. There is particular uncertainty about future population and household growth at the moment, partly because of the importance of domestic and international migration in London (the latter which may, of course, be affected over the long term by 'Brexit'), and partly because of the unpredictability of the rate at which new households will grow. In recent years the rate at which people have moved into London from the rest of the UK has increased, while out-migration has decreased (net domestic out-migration fell from 100,000 pa at the start of the 2000s to 50,000 in 2012); while there are signs that out-migration has started to pick up again as the economy has recovered the trend is difficult to predict.

5.7 This uncertainty meant that the Mayor looked at three different population scenarios in developing his most recent targets, using the central one to support the London Plan. This shows London's population growing to around 10.1 million by 2036 (an annual increase of

76,000 pa), with growth in the number of households by around 39,500 pa. Taking account of the need to clear backlog need, it estimates an annual housing need in London of 48,841 homes which includes need for 25,624 affordable units of affordable housing.

- 5.8 The London SHLAA is prepared by the GLA in discussion with each London borough. It establishes how much land is available for housing in London and how much can be built on each identified site. It covers sites of 0.25 hectares and larger and makes assumptions about the numbers of units that can be provided on smaller sites. Sites were identified by the Greater London Authority, by boroughs and by landowners and developers in response to a public “call for sites”. For each, potential constraints on development are identified and assumptions made about the timescale over which housing will be delivered. Housing potential is estimated based on public transport accessibility, London Plan standards of development density, London and local policy constraints and development viability.
- 5.9 Taking account of large sites, small sites, returning long-term vacant housing to use and student non-self-contained accommodation this found total capacity across London for 423,887 new units 2015-25. For Westminster the figures were:

Large Sites	4,960
Small Sites	4,667
Long-term vacants returning to use	1,050
Non-self-contained student accommodation	0
TOTAL	10,677

- 5.10 The London Plan housing targets are based on developing all of the sites identified in the London SHLAA. This approach, recognising the very high level of demand compared with the availability of land to meet it, has been taken since the first London Plan was published in 2004. A new SHLAA is currently being prepared by the GLA and new estimates of housing capacity are expected to be released next year, however it is very unclear at this early stage how ‘Brexit’ will impact on in/out migration from London.

Setting targets for Westminster

- 5.11 Westminster’s housing delivery policies are based on the London SHLAA and housing market assessments commissioned by the City Council. Our housing need evidence base is drawn from a [Local Housing Market Assessment \(LHMA\)](#) (2014) – which followed the approach set out in national planning guidance – and a [Housing Market Analysis](#) (also 2014) which has taken account of factors like the importance of migration and the effect this has on demand for housing that make the approach recommended by Government nationally less effective in Westminster. It also provided a “sense check” of the LHMA findings against housing market trends like demand for homes of different sizes. These documents both used the Mayor’s “Central” population projections – for Westminster an annual increase of 740 households¹ between 2011-2036 which translates into a need for 1,100 new dwellings each year 2011-2016 and 800 pa 2016-21 (these include provision making up for past under-provision). The total need for affordable housing is 420 units pa. By comparison, over the past 10 years an annual average of 764 new homes have been completed in Westminster (excluding non-self-contained units and vacant homes returned to use); of these 183 (24%) have been affordable. Changes at a national level to affordable housing policy will affect how far Westminster is able to meet this need.

¹ This is a population projection which is not related to the estimates for housing capacity derived from the Strategic Housing Land Availability Assessment from which the housing target of 1,068 units pa is derived.

- 5.12 There is a range of factors other than need that have to be taken into account in going on to set targets. In addition to viability and the resources likely to be available to fund affordable housing, account has to be taken of the other demands on land that the council has to plan for – such as the additional 655,000 sqm of office space that employment growth will require and the 604,000 sqm of comparison retail space likely to be required in the West End. Policy considerations like international, regional and local heritage designations (including the Westminster world heritage site and protected views of and across the city) also have to be taken into account.
- 5.13 For affordable housing, need is based on an assessment of how many people will be unable to afford to meet their housing needs in the market having regard to prices and incomes and draws on evidence sources like the Council's housing waiting list². The current stock of affordable homes³ is subtracted from this figure to give the future requirement. The Housing Market Analysis suggested a total need for affordable housing of 422 units per year for the next twenty years, split between the types of affordable housing – 180 units of social housing pa and 240 intermediate. National guidance requires that in setting targets the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments.
- 5.14 Taking all of this into account the housing targets that are being considered to underpin both the Housing Strategy and the City Plan are:
- The annual overall target of at least 1,068 set by the London Plan.
 - For affordable housing, given current levels of funding (and likely future constraints) and the high value of land, the 250 pa target included in the draft Housing Strategy. This represents a 37% increase over historic delivery. However this target will need to be reviewed in light of the Housing and Planning Act requirements e.g. for starter homes.
- 5.15 Dealing specifically with affordable housing, the NPPF defines the types of housing that can be treated as “affordable” for planning purposes. These are available to different groups of eligible households defined by the council with regard to local incomes and house prices:
- Social rented housing, for which rents are set nationally
 - Affordable rented housing, intended to be let to households eligible for social rented housing at rents not more than 80% of local market rents.
 - Intermediate housing, for sale or rent, provided at a cost higher than social rent but lower than market levels.
 - The Government is considering adding ‘starter homes’ to this definition (see section 3).
- 5.16 It is because these types of housing are aimed at (and suitable for) different types of household with distinct housing needs that separate targets are set for social/affordable rented housing (aimed primarily at those on the lowest incomes or benefits) and intermediate (currently aimed at households with annual incomes of £18,000-£66,000 (or £80,000 for family homes)). The Mayor's London Plan (Policy 3.11) requires boroughs to set overall

² The starter homes requirement will add a new dimension to how housing need is assessed – particularly given the lack of a local connection test, so need and demand for starter homes in Westminster could come from across London, or even further afield.

³ Sale of higher value voids of council stock will impact upon this calculation in future, although we await detail from the forthcoming Housing and Planning Act Regulations.

affordable housing targets and separate ones for social/affordable rented housing and intermediate.

- 5.17 One of the issues that the council has put forward both in consultation on the City Plan and its draft Housing Strategy is to increase the proportion of intermediate housing in new housing developments from 40% to 60%. This was based on the independent assessment of Westminster's housing market in the Market Housing Assessment (HMA). The independent HMA explains that the intermediate tenure currently makes up just 1% of all households in Westminster (compared to 26% social rent) and that there is a demand for 1,300 intermediate homes over the next five years (compared to 1,180 social homes over the next five years). There are 4,470 applicants on the Waiting List and 3,769 on the Intermediate Housing Register.
- 5.18 The HMA pointed out that given the funding arrangements in place at the time delivery on a scale necessary to meet identified need for social and intermediate housing was impractical, while stressing the need to maximise delivery of all types of affordable housing. It also highlighted the need to address the broad range of need for housing in Westminster, including low to middle income households. Statutory responsibilities the council has to house certain types of household in need in the social sector means that there is limited scope to consider any other type of housing need through social rented housing. The intermediate sector, on the other hand, provides greater flexibility over the type of household which can be offered a property. In particular, it would allow the council to help households on lower incomes - including people vital to running the city's businesses and public services – who are ineligible for social housing and would otherwise not be able to live in Westminster. Given the rough equivalence in need for social housing and demand for intermediate, and the wide difference in the supply of each, it suggested that increasing the amount of new intermediate housing coming forward would be a pragmatic response.
- 5.19 In the past ten years 24% of housing completions in Westminster have been affordable (as defined in the NPPF). If the overall housing target of 1,068 units per year is achieved and 24% is affordable this would result in 256 new affordable units being built each year. If we require 60% of these new affordable homes to be social this would result in 154 new social homes compared to 102 intermediate homes (40% of all new affordable units). If, as the Housing Strategy suggested, the ratio were to be reversed, so 60% of all new affordable units were required to be intermediate then this would mean that 154 homes would be intermediate and 102 social – so there is a potential difference of just 52 units between the two tenures. This approach was proposed in both the City Plan consultation booklet on affordable housing (2015) and in the Council's draft Housing Strategy (2015).
- 5.20 The proposal to modify the ratio in this way received a large amount of support from consultees who responded to these proposals. Consultees recognised the high demand for intermediate housing and the benefits increasing this tenure can bring to Westminster such as allowing low paid workers to live in the city, creating diversity of residents, benefits to the local economy and improved funding for affordable schemes.
- 5.21 It is unclear at this stage precisely how far the changes being made through the 2016 Act will affect the council's housing evidence base and require reconsideration of the policy approach taken so far. These are issues being kept under review by officers and **may be the subject of future presentations to the Sub-Committee if Members feel this would be helpful.**

6.0 Housing Design Standards

- 6.1 The Government has also brought forward major changes to the way housing design standards (such as standards dealing with space, energy efficiency, accessibility and security) are dealt with through the development process, particularly to reduce the number of different design standards adopted by local planning authorities. In general these have been based on moving requirements from the planning system to the building regulation one.
- 6.2 in 2015 the Lifetime Homes Standards were replaced by government with a new set of standards which now form part of Building Regulations. These included nationally described space standards and regulations for access. They are not obligatory, but can be adopted by local authorities if there is sufficient evidence to justify it.
- 6.3 Building Regulation Part M (4)2 is concerned with ensuring dwellings are 'accessible and adaptable', Building Regulation Part M (4)3 is concerned with 'wheelchair user dwellings' and sets out requirements for dwellings to be wheelchair accessible or easily adaptable to residents who are wheelchair users.
- 6.4 A development plan cannot require that both M4 (2) and M4 (3) are applied to the same dwelling. Therefore when the London Plan underwent a minor alteration to include the new Building Regulations and space standards last year, the requirements set out in policy 3.8 are for 90% of dwellings to meet requirement M4(2) and 10% to meet M4(3). Previously 10% of dwellings were expected to be suitable for wheelchair users.
- 6.5 The Minor Alterations to the London Plan also adopted the nationally described space standards which are not that dissimilar from the space standards that existed already in the London Plan, and the policy allows for a departure from the standards in exceptional circumstances where the quality of the design is extremely high.
- 6.6 It is the intention of the Council to also adopt these new standards within the 'main revision' to the City Plan to ensure the quality of new housing being delivered is maintained and to ensure general conformity of Westminster's City Plan with the London Plan.

7.0 Non-self contained housing

- 7.1 Another issue that officers are considering is the role that new "co-living" housing products being brought forward by the market might play in helping meet part of Westminster's housing needs. These typically comprise comparatively small bedsitting rooms and more generous communal space (sometimes including workspaces) and facilities. They are typically aimed at young professionals. Developments of this kind are becoming increasingly common in different parts of London (a recent example is a development by a company called "The Collective" in Old Oak). There has been considerable interest by developers in taking this sort of development forward in Westminster.
- 7.2 These products raise a number of planning policy issues. The living accommodation is typically smaller than the space standards set for self-contained housing in the London Plan and this means that ensuring a very high quality of design and finish is particularly important. Management arrangements need to ensure amenity impacts (and concerns of local residents about these) are minimised, with mechanisms to ensure arrangements to

deal with these issues are kept up over time and through changes in ownership. Consideration would also have to be given to the approach that would be taken to car parking both for residents and operational needs. In policy terms the approach would depend on the use and location (in particular, the public transport accessibility of the site). Cycle parking would also need to be considered.

- 7.3 These products do not themselves fall within the definition of affordable housing. Consideration would also have to be given to how they should be treated in terms of the Council's policies for securing affordable housing from new development.

8.0 City Plan Revisions

- 8.1 As Members are aware Westminster's City Plan is undergoing a series of topic-based revisions. The most recently adopted is the Basements and Mixed Use Revision. The latter updated the housing targets to bring it in line with the new target agreed with the London Plan explained earlier in this report. However it did not introduce any new development management policies for housing or alter any of the existing strategic housing policies.

- 8.2 The council has consulted informally on changes to the detail of planning policy on housing issues through two booklets dealing with:
- Housing need, quality and design (published in 2014)
 - Affordable housing (published in 2015)

These booklets are attached as annexes 1 and 2 to this report respectively.

- 8.3 The housing policies in Westminster's City Plan will need to change to meet new requirements in light of the new legislation and the emerging policies of the Mayor. There is still considerable uncertainty regarding what these new requirements will be exactly as we await detailed regulations to be published (expected later in the year).

- 8.4 There is a need to ensure that policy is as up-to-date as possible – if it isn't, there is the risk that it will be given increasingly little weight in planning appeals. On the other hand, as explained earlier in this report much of the policy landscape is subject to change. Officers consider that the best way to manage these priorities is to progress the housing policies through two separate revisions to the City Plan. The first (as part of a 'main revision' that will see detailed policies on a range of subjects currently in the Unitary Development Plan incorporated in the City Plan) will address housing need, delivery and quality policies (broadly those dealt with in the booklet at Annex 1). This main revision to the City Plan will contain all the 'non-controversial' policies with the hope that this approach will help the Revision to progress through the examination process smoothly.

- 8.5 The affordable housing policies and any future changes to housing numbers are expected to be part of a later revision to Westminster's City Plan, which will be progressed after the main revision is adopted. This will ensure that the main revision to the City Plan is not delayed by waiting for the Housing and Planning Act Regulations to be published.

- 8.6 The housing need, delivery and quality policies will include updates to:
- Strategic Policy S14 Optimising Housing Delivery
 - Strategic Policy S15 Meeting Housing Needs

And new policies:

- CM14.1 Housing Quality
- CM15.1 Housing for Vulnerable People
- CM15.2 Housing for Older People
- CM15.3 Student Accommodation

8.7 The affordable housing revision to the City Plan will: update existing Strategic Policy S16 Affordable Housing; introduce a new method for calculating affordable housing contributions/ payments in lieu, introduce an affordable housing credits system (which will match the adopted mixed use credits system); and set out the proportions of starter homes, social and intermediate housing which are required from developments. The starter homes requirement is likely to come directly from the Housing and Planning Act Regulations – Government has suggested that 20% of new homes will be required as starter homes, but also that exemptions may be able to be applied for in certain areas. This is the detail we await from the Regulations and the reason why these policies cannot be progressed until this is known.

8.6 **Do Members agree with the two-stage approach to the housing policies City Plan revision outlined in this report?**

9.0 Financial Implications

9.1 Work on developing the City Plan is met from existing budgets. There are therefore no direct financial implications associated with the consultation.

10.0 Legal Implications

10.1 The revisions to the City Plan are part of the plan development process as set out in the Town and Country Planning Act 1990 (as amended), The Planning and Compulsory Purchase Act (2004) and the Town and Country Planning (Local Planning)(England) Regulations 2012.

10.2 The Housing and Planning Act 2016 provisions are not all in force yet including the provisions relating to starter homes.

10.3 The remaining legal implications are implicit within the report.

If you have any questions about this report, or wish to inspect one of the background papers, please contact:

Kimberley Hopkins khopkins@westminster.gov.uk Ext. 2935

Annex 1

Housing Need, Delivery and Quality Development Management Policies consultation booklet

Available at:

[http://transact.westminster.gov.uk/docstores/publications_store/Housing%20Need%20Delivery%20&%20Quality%20\(Jan%202014\)%20FINAL%20VERSION%20SIGNED%20OFF.pdf](http://transact.westminster.gov.uk/docstores/publications_store/Housing%20Need%20Delivery%20&%20Quality%20(Jan%202014)%20FINAL%20VERSION%20SIGNED%20OFF.pdf)

Annex 2

Affordable Housing Development Management Policies consultation booklet

Available at:

[http://transact.westminster.gov.uk/docstores/publications_store/Affordable%20Housing%20\(edited%20to%20include%20housing%20market%20assessment%20links%20030215\).pdf](http://transact.westminster.gov.uk/docstores/publications_store/Affordable%20Housing%20(edited%20to%20include%20housing%20market%20assessment%20links%20030215).pdf)

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HOUSING: NEED, DELIVERY AND QUALITY

DEVELOPING WESTMINSTER'S LOCAL PLAN



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Foreword

Cllr Robert Davis DL

From the very start of town planning in this country, answering the question of where people will live, and in what kind of homes, has been one of the fundamental issues for everyone concerned with the process. Understanding the trends that drive demand for housing and the changing needs of particular groups within the community and then ensuring policies are in place to help make sure these needs are met are among the most complex and challenging planning has to address. This is particularly so in a place like Westminster, given our already dense pattern of development and the high land values this brings – and the kinds of housing demands that come with being at the heart of a world

city. Good housing policy cannot simply be about numbers of units. We want to see the development of housing that people are proud to call home and which make a real contribution to the quality of our townscapes. We take particular pride in ensuring high standards of design in Westminster and this applies as much to residential development as it does to the commercial.

This booklet sets out the Council's proposed approach to meeting the high and ever growing demand for housing within Westminster. As well as conventional market housing, it also explains how the council intends to provide for specialist housing needs such as for the elderly and student populations that make Westminster the diverse city that it is. It does not however cover affordable housing policy; this requires more detailed explanation than would be possible in a single booklet of this kind and will be dealt with in a separate booklet in this series.

These are extremely important issues, and I particularly look forward to receiving a wide range of comments on our proposals.



Councillor Robert Davis DL
Deputy Leader, Westminster City Council
Cabinet Member for Built Environment

Introduction

The policies covered in this booklet are:

- Strategic Policy S14 – Optimising Housing Delivery
- City Management policy CM14.1 – Housing Quality
- Strategic Policy S15 – Meeting Housing Need
- City Management policies
 - CM15.1 – Housing for Vulnerable People
 - CM15.2 – Housing for Older People
 - CM15.3 – Student Accommodation

Policies on affordable housing are not dealt with in this booklet. They will be addressed in a further booklet dedicated to the issue to be published shortly.

We would welcome your views on proposed new policy wording, which is shown as underlined or identified as an entirely new policy. Adopted policy is shown in **bold** and is not intended to be altered as a result of this consultation.



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Trends

1. Who lives here?
2. Housing delivery
3. How much affordable?

Insights

1. Density – does it matter?
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3. Prime and Super-Prime Housing
4. Meeting specialist needs – homes for life
5. Meeting specialist needs – people with disabilities
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Regional Policy

1. Mayor's Housing SPG
2. Further Alterations to the London Plan

Recommendations

1. Optimising housing delivery
2. Housing quality
3. Meeting housing needs
4. Specialist housing

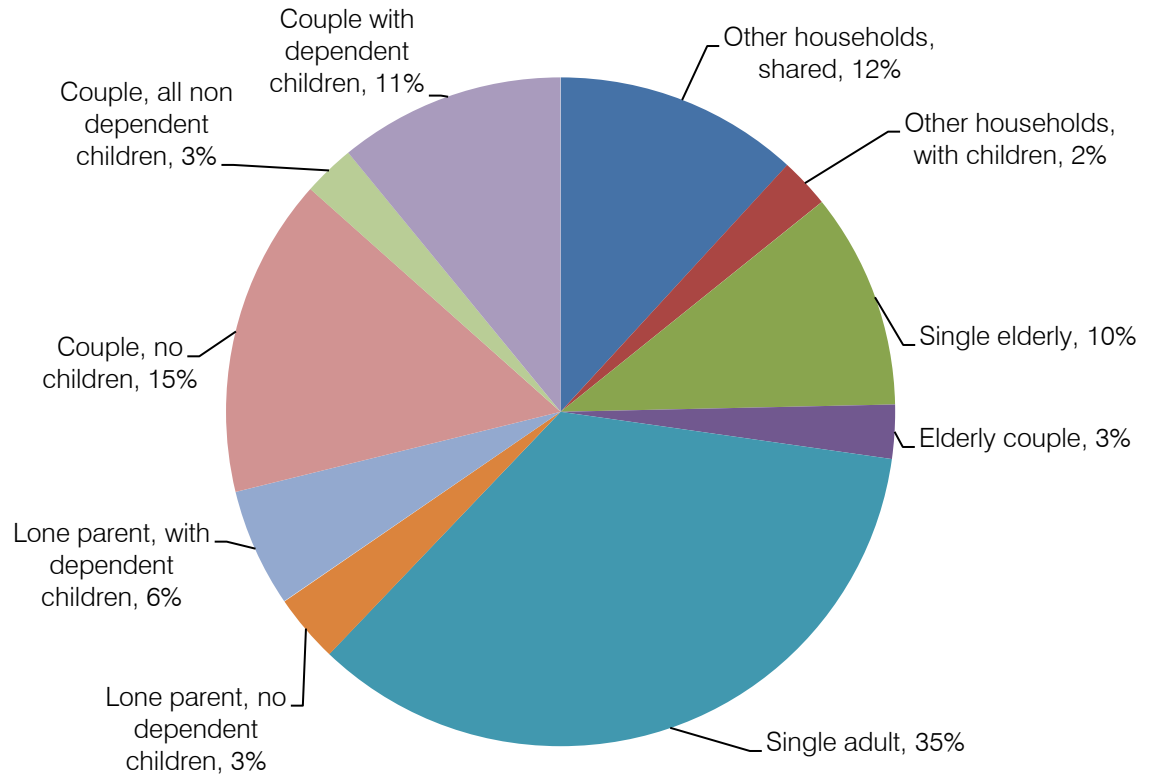
TRENDS

WHO LIVES HERE?

“219, 396 people live in Westminster in 105,772 households.”

Census (2011)

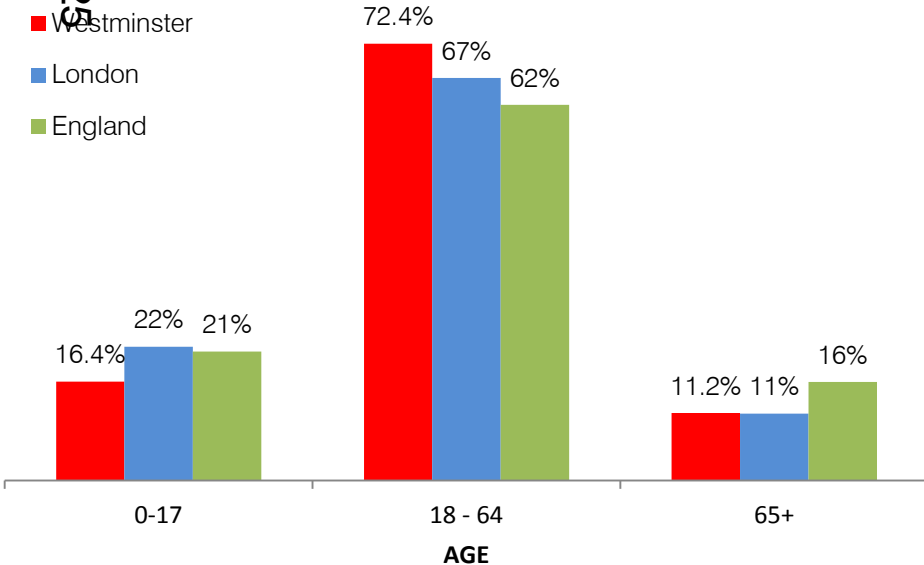
The City Council disagrees with the accuracy of this figure from the Census and estimates that Westminster’s population is closer to 223,858.



Single adults make up the majority of households in Westminster, although there is a wide variety of household composition, with a cumulative total of 22% with children.

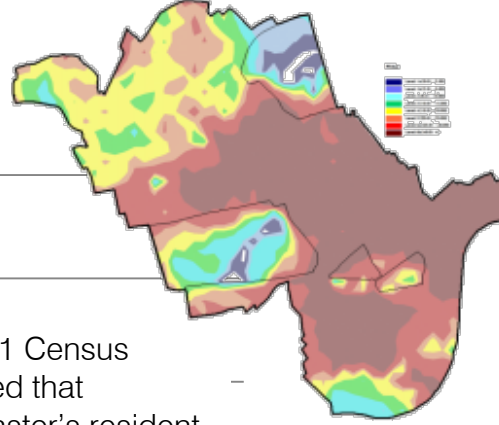
Westminster has proportionately more working age people than London or England, but a similar percentage of elderly population and less children.

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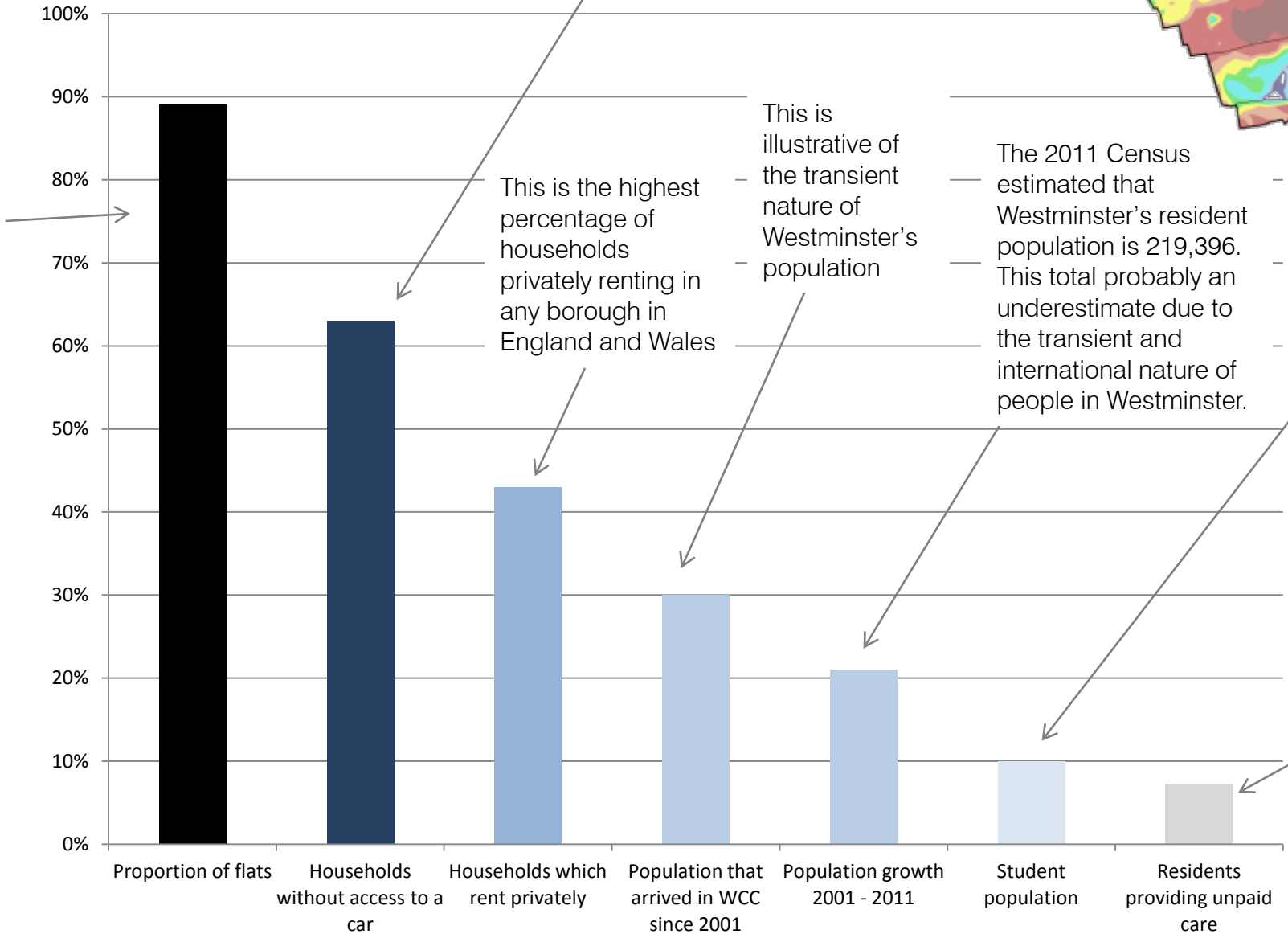


WHO LIVES HERE?

This is higher than the London average (42%) but not surprising given the high PTAL* ratings awarded to most of Westminster (red colours indicate a higher PTAL rating)



This percentage is normal for a central London borough and has not changed since the 2001 Census



This is the highest percentage of households privately renting in any borough in England and Wales

This is illustrative of the transient nature of Westminster's population

The 2011 Census estimated that Westminster's resident population is 219,396. This total probably an underestimate due to the transient and international nature of people in Westminster.

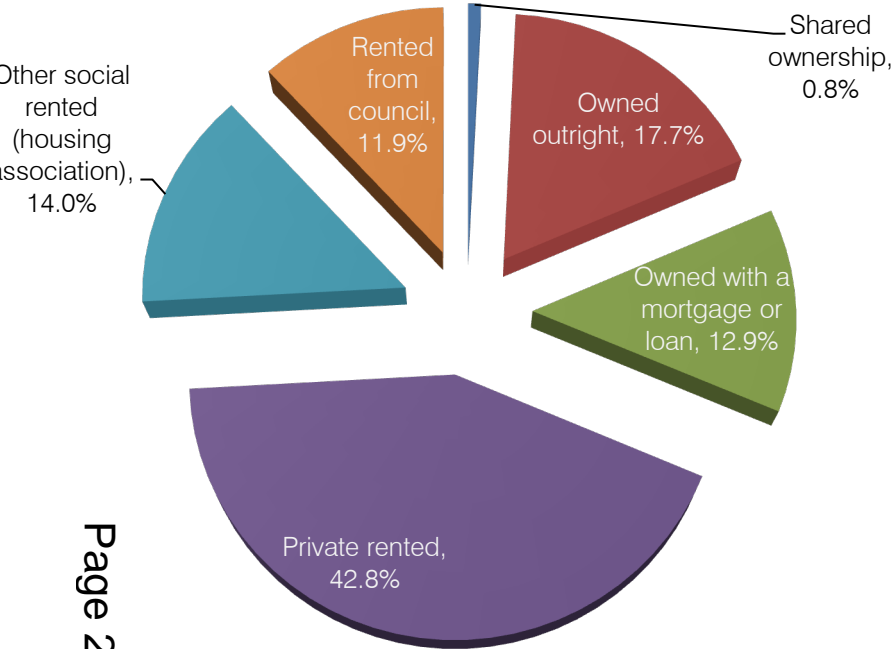
There are six universities, but the student population in Westminster is likely to attend universities across London

This is indicative of the specialist housing need in the borough

*Public Transport Accessibility Level (PTAL) is a method of assessing the accessibility of an area to public transport based on proximity to public transport stops and the service frequency. The highest PTAL score an area can achieve is 6b, indicating excellent access by public transport, the lowest 1a indicating extremely poor access.

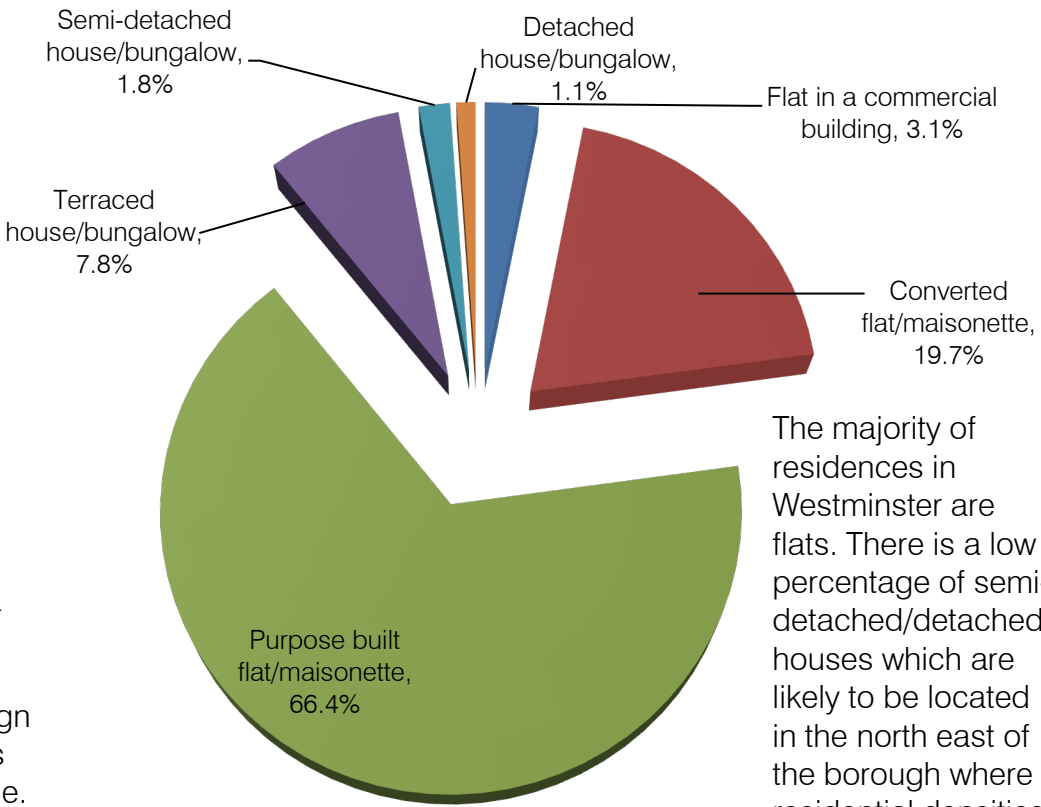
WHO LIVES HERE?

Westminster's residents comprise mainly of private renters, although nearly a third of residents are owner occupiers and the total number of social renters (Council and Housing Association) makes up just over a quarter of the total households.



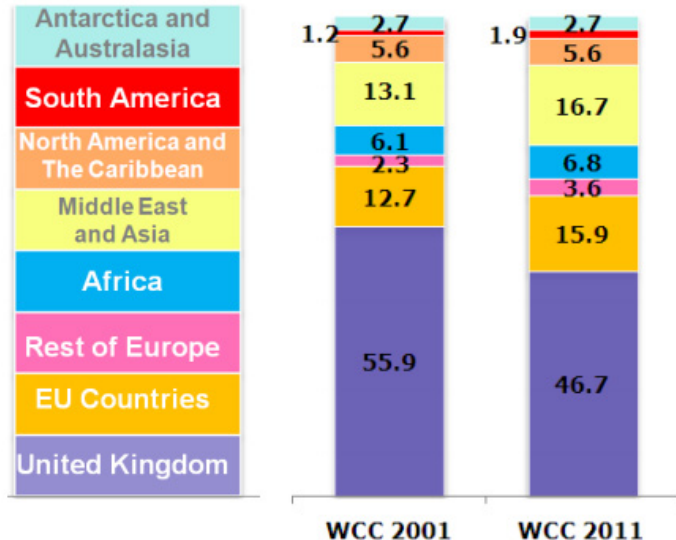
“10% of the population have lived in the UK for less than 2 years”

Office of National Statistics (2011)



The majority of residences in Westminster are flats. There is a low percentage of semi-detached/detached houses which are likely to be located in the north east of the borough where residential densities are lower.

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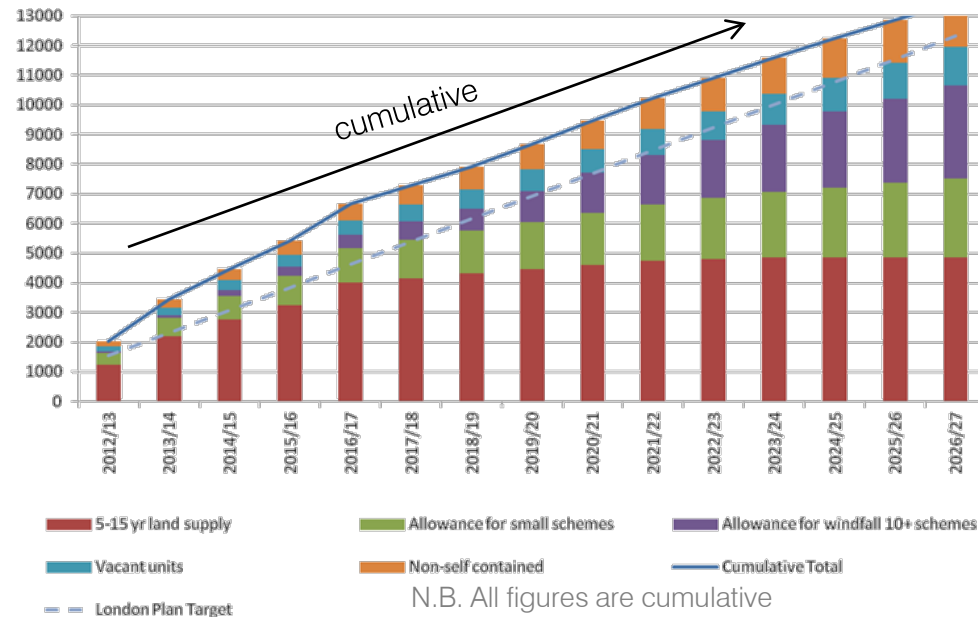
Westminster has a very international population; the proportion of foreign born residents has increased over time.

HOUSING DELIVERY

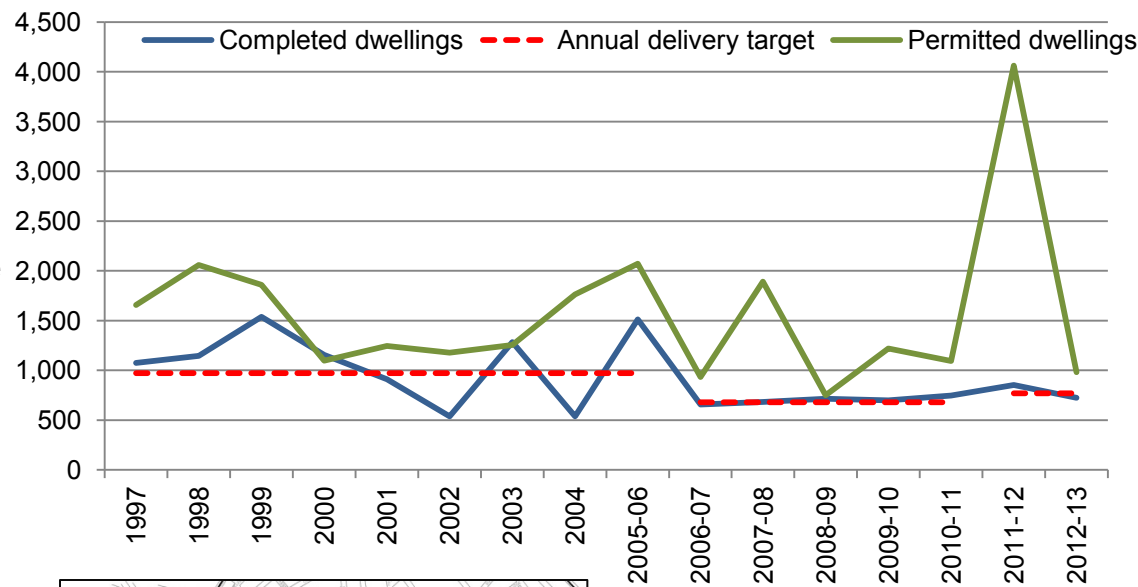
Westminster has a proven track record for excellent levels of housing delivery; over the last 15 years, Westminster has cumulatively delivered 9% **over** the delivery target allocated to the city. However, the pressure is on to deliver more housing within the borough to meet growing demand across London. Westminster's annual delivery target has increased in the Further Alterations to the London Plan (published January 2014) creating a bigger challenge for the council to meet the identified need.

Westminster has also been commended by industry peers for its attitude towards infill development (such as at the Elgin Estate) and for architectural merit (such as at Fermoy Road).

The success of Westminster's approach to housing policy is evident and it is expected that this trend for high delivery will continue over the next 15 years, as shown by the housing trajectory below.



N.B. All figures are cumulative



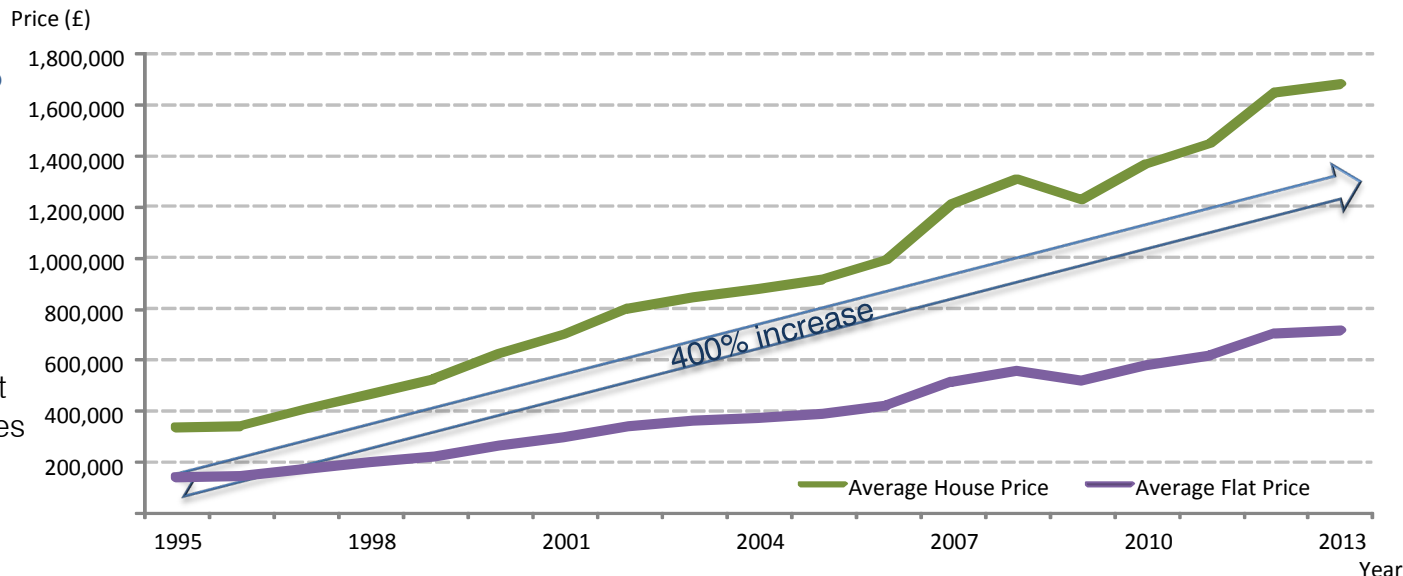
Large scale plans are being prepared for the regeneration of Westminster's housing estates.



HOW MUCH AFFORDABLE?

The residential market in Westminster is very strong and as this graph shows has seen a remarkable increase in value over the last two decades.

Increases in sale value in the residential market has a knock-on effect on land values and makes the delivery of affordable housing increasingly difficult.



The high price of land in Westminster therefore means that Registered Providers (RPs) are generally unable to purchase land in the city. Westminster consequently relies heavily on private housing development to provide opportunities for affordable housing in partnership with RPs, with such developments accounting for 84% of new affordable homes in Westminster.

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600 homes to meet the demand for socially rented homes.

4,200 households in priority need on the waiting list for social housing.

20,000 households fall into the intermediate sector who do not qualify for social housing but cannot afford market housing. This figure is probably much higher due to increasing market values and stagnant incomes.

3,500 households are registered for the 'Homeownership Westminster' scheme.

The other source of affordable housing in Westminster comes from the affordable housing fund. Since 1999 this fund (which is topped up by payments in lieu of (a) affordable housing provision and (b) residential provision to satisfy adopted City Plan S1 Mixed Use) has helped to deliver over 1,300 new affordable homes.

It will be important to have planning policies to help address the need for affordable housing in Westminster, requiring appropriate amounts of housing, but with enough flexibility to ensure that where developers can demonstrate provision is not possible, the next best option is secured. The Affordable Housing policies will be addressed in a later booklet.

A new Local Housing Market Assessment is currently being conducted, the results of which may alter the statistics on this page.

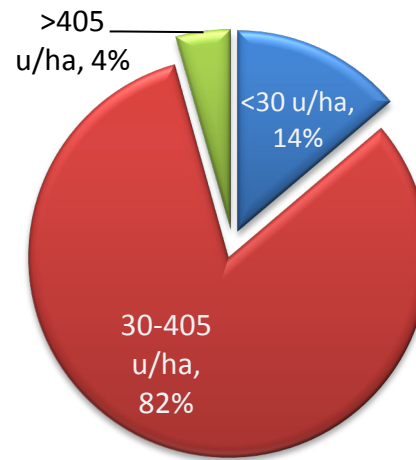
INSIGHTS

DENSITY – DOES IT MATTER?

Density is a measure of the intensity of housing use and can be used to control the scale and massing of buildings, protect local character, and to assist developers in preparing their proposals.

Site optimisation for housing is necessary to meet challenging housing targets. Care and attention is needed to ensure the appropriate level of development for each location, so that sites are neither over- or under-developed. New density boundaries have been created based on whether a site is inside or outside the Central Activities Zone.

The London Plan uses Public Transport Accessibility Level (PTAL) assessments to classify density ranges. Most of Westminster is classified as being above PTAL level 3. Some parts of Westminster, such as the Royal Parks or other areas where residential development is extremely unlikely to take place, have been identified as having a lower PTAL rating.



Most developments in Westminster are above the density range for a suburban area (as defined in the London Plan) but below the upper limit for central areas.

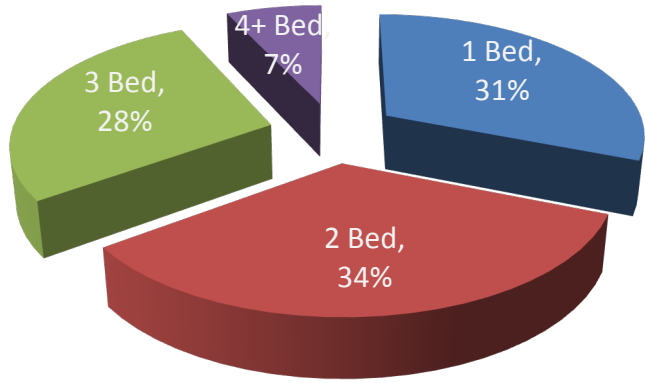


“Westminster is the 7th most densely populated borough in England and Wales with an estimated residential density of 102 people per hectare”

Census (2011)

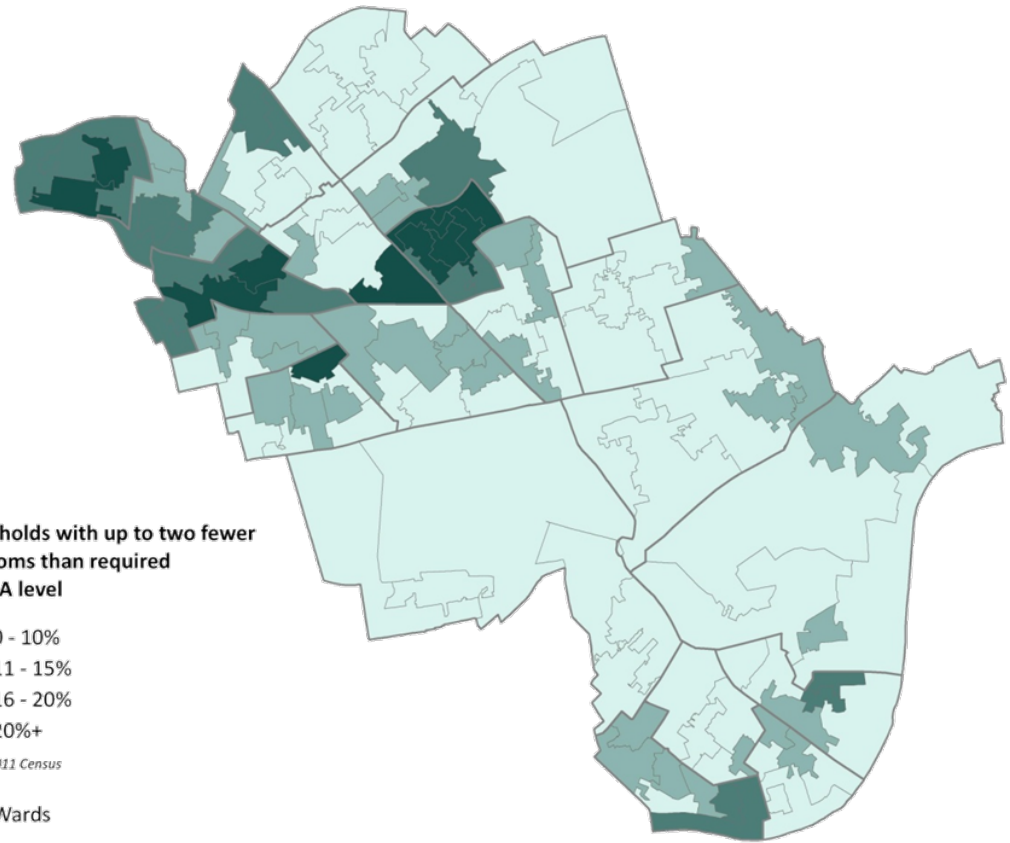
OVERCROWDING – IS IT A PROBLEM?

The Housing Needs Survey 2006 showed a surplus of private one bed units and a large shortfall of family sized units (3+ bedrooms). The pie chart below shows how the UDP policy has been successful in bringing forward more family sized accommodation to redress the balance. However, the 2011 Census revealed that there is still an overcrowding problem, mainly focussed in the north west of Westminster indicating a prevailing need for larger sized properties.



% dwelling sizes permitted in the last six years

Westminster is currently updating its evidence base for market needs to inform its policy on unit size mixes.



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“There is an overcrowding problem in Westminster; there are around 1,000 council tenants who are over-crowded and currently registered for a move to a larger property.”

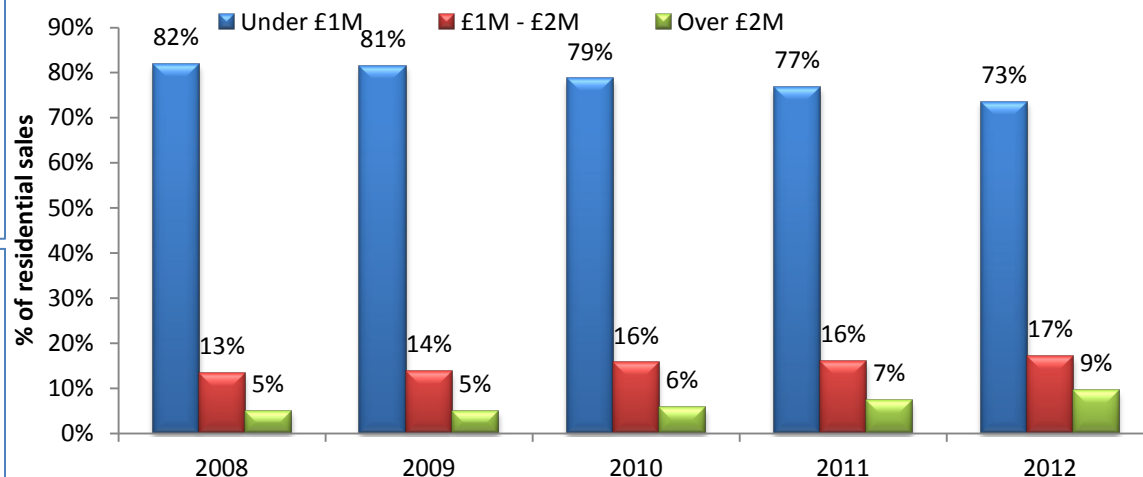
Cllr Glanz Cabinet Member for Housing (2010-13)

PRIME AND SUPER PRIME HOUSING

High value investors undoubtedly contribute to Westminster's economy and by implication London's and its role as a global city attracting international investment. The impacts that investment in Westminster's prime / super-prime housing market have on supply are currently being investigated* including:

- (a) Occupation/ vacancy
- (b) Relationship between occupation and size/value
- (c) Drivers for prime/super prime investment
- (d) Impact on the borough-wide and local economy of prime/super prime residents or vacancy of these units.

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There are limits to how far planning policy can influence the housing market – it cannot interfere in the second hand market, but policies can intervene in extensions to homes (beyond permitted development rights) and the creation of new homes either through construction, change of use or de-conversion.



Westminster's central residential market attracts interest from global investors as well as prime / super-prime investors based in the UK.

People living in Westminster pay a lot of money to live in the city and therefore want decent sized accommodation that meets their needs. The NPPF Revision to the Core Strategy altered Policy CS14 to allow for the loss of one residential unit where two flats are being combined to create a family sized dwelling to meet this demand from existing Westminster residents. Amalgamation of properties in this way is not seen as comparable to prime residential investment.

Investment in prime / super-prime residential units fuels a rise in property prices and it has been reported to lead to high vacancy rates when owners do not occupy their properties for most of the year, if at all, which impacts upon the Council's ability to plan genuinely mixed communities and may have long term effects on our schools, community facilities and local shops and services. It also fails to use the scarce development capacity within Westminster to deliver homes that are actually occupied.

Parts of central London have been desirable places to live for centuries and shops and services have grown up to support and service these high end occupiers. Westminster's 'luxury quarter' and International Shopping Centres (Mayfair, Covent Garden, St. James's, Savile Row, Oxford Street, Regent Street, Bond Street and Knightsbridge, etc.) are such examples.

**If you would like to see a copy of the report when it is complete, please contact the LDF Team.*

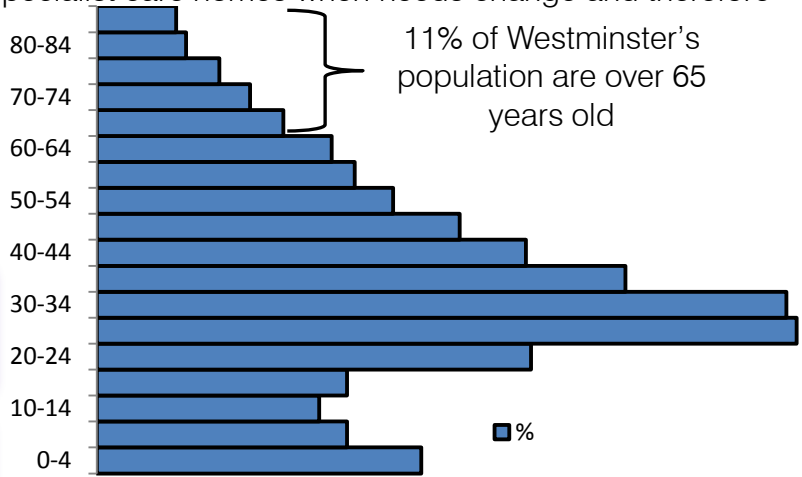
MEETING SPECIALIST NEEDS – HOMES FOR LIFE

Improvements in technology and medical care and increasing prosperity generally mean that people in the UK are living longer. This creates additional demand for housing which is suitable for an older person’s lifestyle and day to day care needs. This is a Londonwide issue, and its importance has been flagged up by the Mayor in his proposed further alterations to the London Plan which include benchmark targets for specialist housing for older people for each borough (110 per year for Westminster).

Changing patterns of delivery mean a move away from development of traditional ‘old people’s homes’ (which tend to be unviable now) towards care packages delivered directly in a person’s home e.g. Extra-Care, enabling individuals to maintain an independent lifestyle whilst still receiving essential tailored assistance. Westminster lacks the provision of market older people’s housing or low cost home ownership solutions to meet this identified need.

Providing homes which are adaptable to meet the different needs people have and which change over their lifetime (e.g. by building to Lifetime Homes Standards) is therefore essential in reducing the requirement to move into specialist care homes when needs change and therefore provides a more sustainable way to support an ageing population.

Westminster currently has 47 older people's housing sites predominantly located in the north-west of the borough and run by Registered Social Landlords, or the Council.



Examples of Lifetime Homes Standards which Central Government recommend are applied to all new build homes:

Space standards that allow for wheelchair circulation

Storage space and space to accommodate visitors/carers

Downstairs toilet and shower where a property is over two levels

Space and building quality to accommodate hand rails

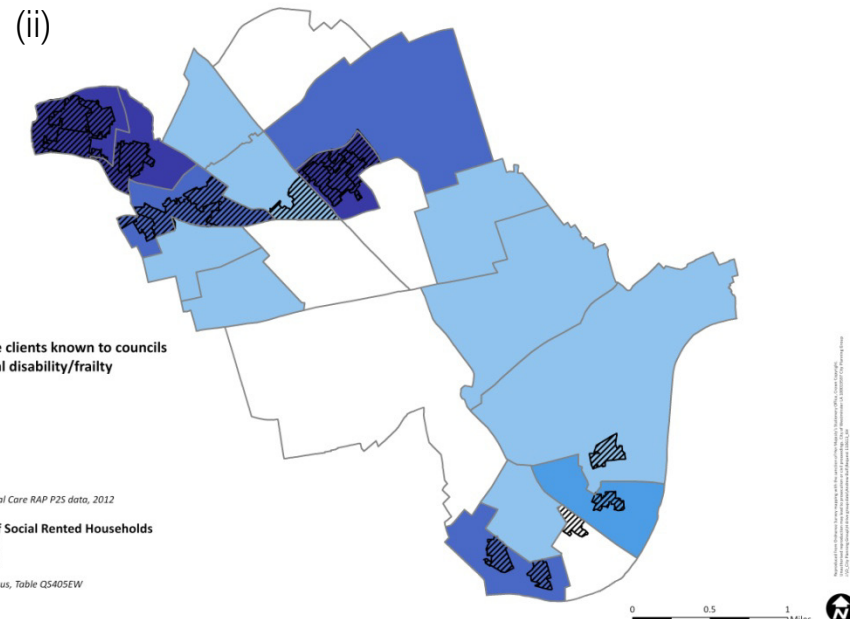
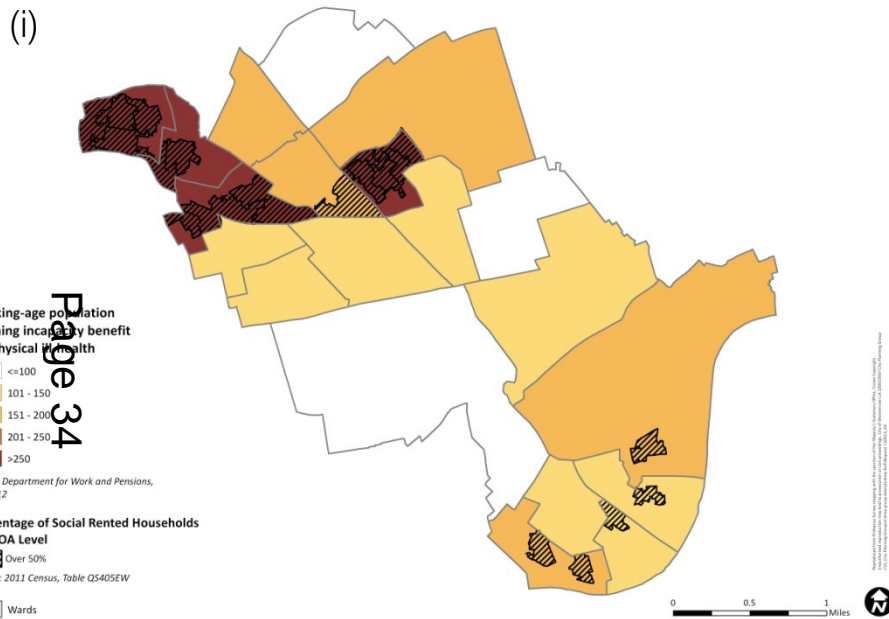
Level threshold access

Affordable to heat

Space for ramps

MEETING SPECIALIST NEEDS – PEOPLE WITH DISABILITIES

The maps below show the spatial distribution of residents in Westminster with (i) physical ill health, (ii) physical disability or frailty (based on the working age population only) and indicates a correlation between physical ill health and concentrations of social housing.



The wide distribution of disability in Westminster shows that a city-wide policy approach is required to ensure quality of life for all. The statistics below indicate that the current UDP policy approach (Policy H 8) *expecting* all new housing units to meet Lifetime Homes Standards (LHS) and provide 10% of all new housing as suitable for wheelchair users has had limited success. This may be due to poor data capture or the prevalence of small residential developments which have greater constraints in meeting the standards. If only developments over 10 units are considered, however, the percentages rise considerably which indicates that small site constraints are a large factor.

	All developments over the last 6 years	Developments over 10 units over the last 6 years
All residential units meet LHS	3%	
Some residential units met LHS	5%	52%
Developments approved where at least 10% residential units are wheelchair accessible/adaptable	7%	25%

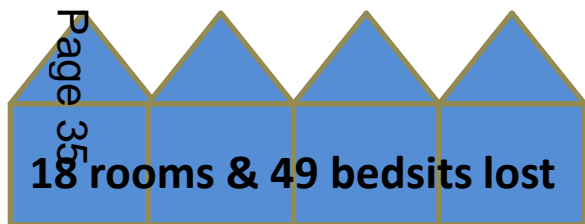
MEETING SPECIALIST NEEDS – HOSTELS AND HMOs

Hostels and HMOs are similar in character but differ in function and their impact on the surrounding area. Although they both cater for groups of unrelated individuals living together with shared amenities e.g. kitchen and bathrooms, a hostel often has an element of care e.g. for the homeless or drug treatment; or for groups with common characteristics (such as students). The population tends to be more transient in this type of accommodation.

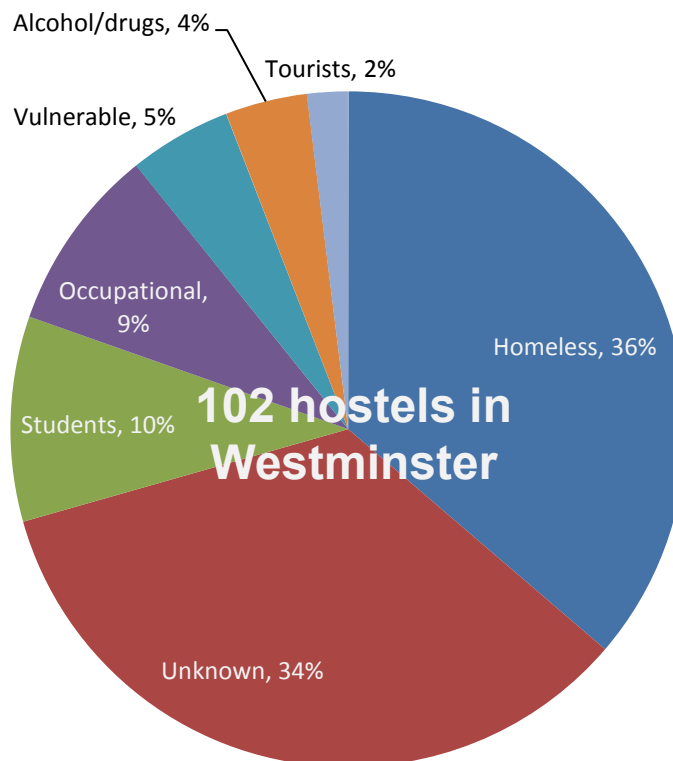
There are 363 HMOs in Westminster, accommodating around **3500** people (*Census, 2011*)

Westminster's policy approach has historically been to protect existing hostels and HMOs for the unique contribution they bring to the city, catering for specialist affordable accommodation. However in recent years some have been lost for redevelopment to private self contained housing.

4 HMOs converted to private housing in the last six years:



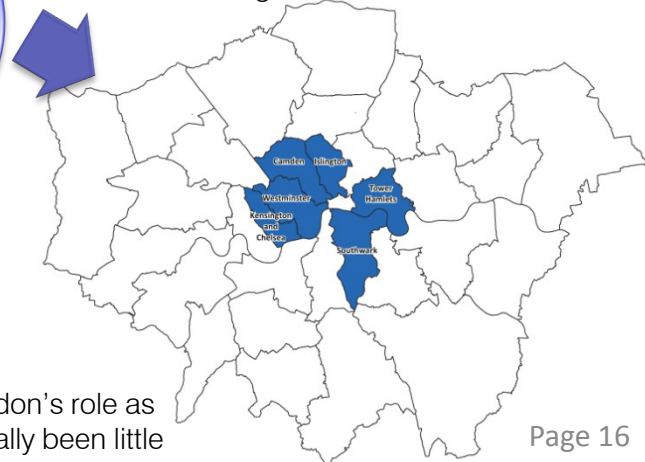
5 HOSTELS converted to private housing in the last six years:



MEETING SPECIALIST NEEDS –STUDENTS

Estimated 2,900 purpose built student rooms & between 1,300 and 3,300 properties privately rented by students in Westminster.

Demand is high despite increased tuition fees, living costs and immigration issues for international students.



60% of London's current student accommodation is located in London's central boroughs. Westminster supports the Mayor's proposal for a more dispersed pattern of student housing across London

- Should rent caps be placed on student accommodation through S106 agreements to ensure it is affordable?
- Will new student accommodation be exempt from CIL liability as universities are registered charities?
- Should student accommodation be subject to affordable housing requirements?
- Should policies apply to all higher education e.g. including private language school student accommodation?

“Over the decade to 2021 the number of students living in London is expected to increase by 2,700 per annum.”

London Plan Housing SPG 2012

The NPPF does not require authorities to recognise students as a specialist housing need



Providing high quality student accommodation is essential to maintaining London's role as a world centre for Higher and Further education; anecdotally there has historically been little demand for student accommodation suitable for people with disabilities.



Development of new student accommodation is limited in Westminster because of the high cost of land and space limitations on campus sites.

Traditionally only first year students occupy purpose built accommodation but there has been an increase in the number of second and third year students living in this type of accommodation because of high rental costs elsewhere. Conversely the lack of purpose built student accommodation forces students into the private rented sector which limits supply for general needs. The London Plan states that providing homes for students should not compromise capacity to meet more general housing requirements.

Where do students live?

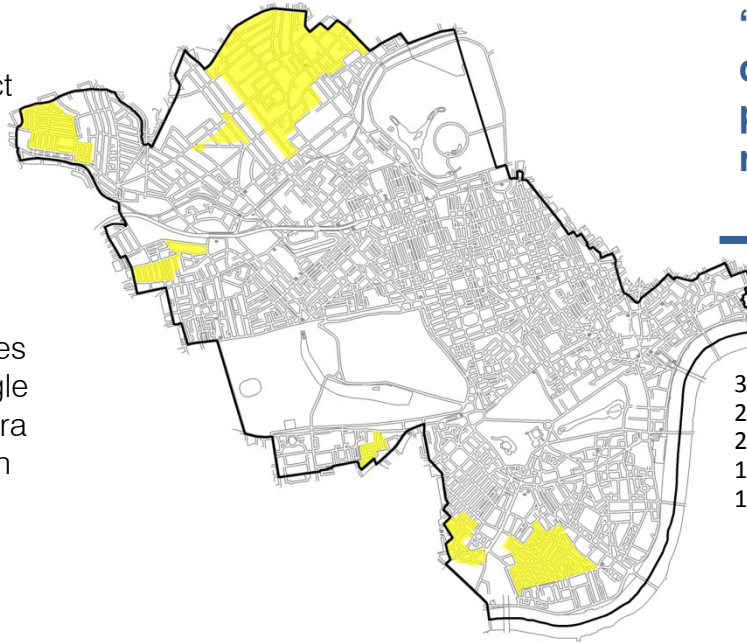
- At home with parents
- Private rented sector
- Halls of residence
- Own their own home

FAMILY HOMES IN WESTMINSTER

Family Housing Areas (shown opposite in yellow) were designated in the UDP to protect concentrations of single family dwellings.

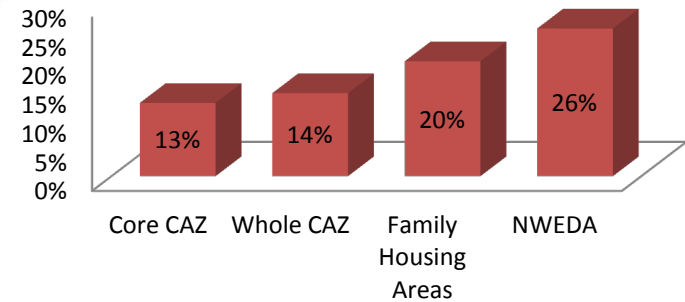
The Housing Needs Survey identified a shortfall of family sized housing in both the private and affordable sector.

Traditional family-style homes can accommodate non-traditional household types e.g. non-related people sharing a home, single parents with access rights who only need extra bedrooms at certain times when their children stay.

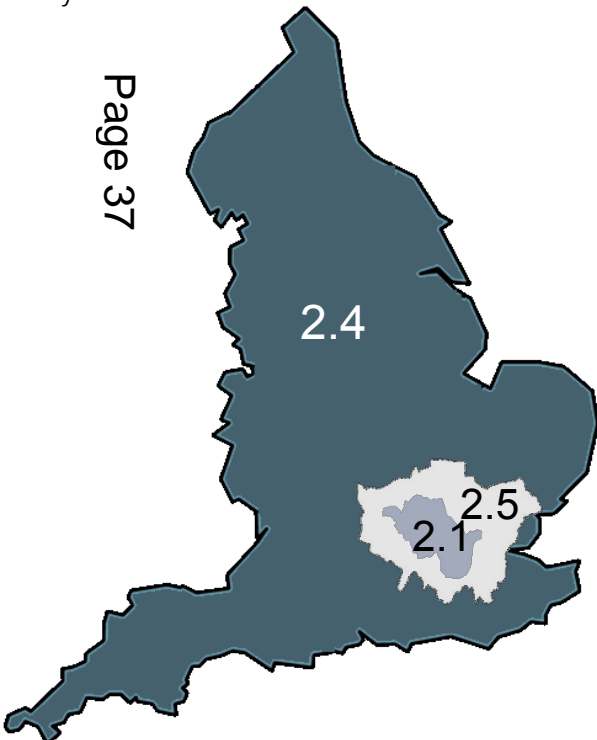


“Only 45% of approved residential developments since 2007 provided at least a third of their residential units as family sized.”

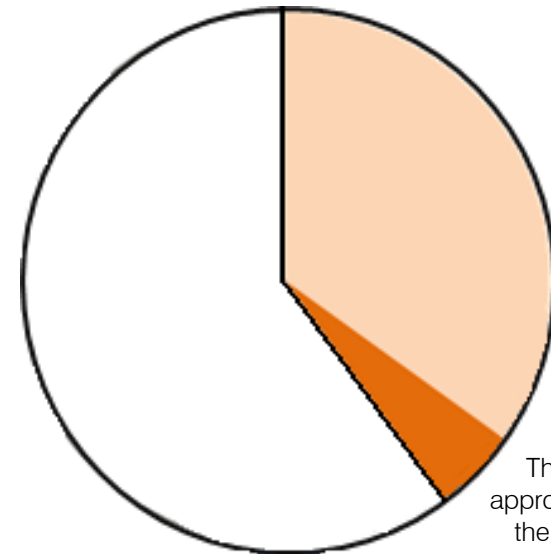
% households in Westminster with children



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Although households are generally smaller in Westminster than in London or the rest of the country there is still a significant proportion of households which include children and therefore a demand for family sized accommodation.



The family housing areas contain about 40% of the total amount of family sized housing in Westminster (about 4,500 homes).

This makes up approximately 5% of the total housing stock.

REGIONAL POLICY

Mayor of London's Draft London Housing Strategy

- **Affordable housing for rent to be Affordable Rent** of which half will be “capped” or low rents on fixed term tenancies, prioritised to those with the highest priority and in low paid work. The remaining half will be “discounted” rent – with rents of up to 80% of market rates. These homes should be targeted to working households and 36% should be family sized.
- All new homes should continue to be built to **London Housing Design Guide** and **Lifetime Homes standards**, with at least 10% **wheelchair accessible**.
- **Older people's housing** should deliver a broader offer such as shared equity and attractive accommodation in mixed tenure developments. The GLA will undertake a review of equity release products to identify best practice.
- The idea of the **London Housing Bank** to assist housing supply on large scale developments is explored, with funding from a range of sources i.e. the public sector, and institutional investors. The GLA could provide loans to develop affordable homes at below market rents for a fixed period, after which they will be sold on.
- The GLA seeks to develop new ‘**Housing Zones**’ where development will be accelerated. These zones could benefit from measures including targeted tax incentives and lighter touch planning. The Mayor has asked government to work jointly on developing options for these zones and the GLA also wants to work with boroughs to identify potential zones and will publish a discussion paper in 2014. There are not expected to be any ‘Housing Zones’ in Westminster.

Further Alterations to the London Plan (FALP)

- **Housing Need:** The London Plan estimates an annual housing need of 49,000 homes between 2015-36 across London. This identified need has resulted in a 39% increase in Westminster's annual housing target: from 770 homes to **1068** homes a year. In 2012/13, 592 housing units were completed in Westminster.
- New support in policy for contribution of the private rented sector in addressing housing needs and increasing delivery.
- **Older Londoners:** Boroughs are required to demonstrate in their local plans that they have identified and addressed “the local expression of need”, informed by benchmarks in the alterations. Those for Westminster are: Private sale: **70** units a year; Intermediate sale: **20** units a year; Affordable: **20** units a year.
- **Students:** could be a requirement for 20,000-31,000 student accommodation places across London. There is support for a more dispersed distribution of future provision away from the areas of greatest concentration in central London. Where student accommodation is not tied to a specific institution, providers should provide an element of “affordable” provision (at rents comparable to those charged by universities).
- **Affordable housing:** No substantive changes to policy. A target of 17,000 units a year is introduced across London.
- **Bringing forward development:** Boroughs are encouraged to work to bring forward “stalled sites”, and to take “realistic and sensitive account” of their viability when seeking section 106 agreements and setting CIL rates.

RECOMMENDATIONS

OPTIMISING HOUSING DELIVERY

Use of appropriate density ranges provides a good guide to ensure that new developments deliver an optimum number of units, whilst ensuring a good overall design and satisfactory residential environment and amenity.

POLICY S14 OPTIMISING HOUSING DELIVERY

The council will work to achieve and exceed its borough housing target set out in the London Plan.

Residential use is the priority across Westminster except where specifically stated.

All residential uses, floorspace and land will be protected. Proposals that would result in a reduction in the number of residential units will not be acceptable, except where:

- the council considers that reconfiguration or redevelopment of affordable housing would better meet affordable housing need;
- a converted house is being returned to a family-sized dwelling or dwellings; or
- two flats are being joined to create a family-sized dwelling.

Proposals for conversion or redevelopment of single family houses to flats will be assessed taking into account the character of the street and area; impact on residential amenity including parking pressure; and the mix of units proposed.

The number of residential units on development sites will be optimised, and should conform to the following density ranges*:

	Habitable rooms per hectare	Units per hectare
<u>Inside Central Activities Zone</u>	<u>300-1100</u>	<u>65-405</u>
<u>Outside Central Activities Zone</u>	<u>200-700</u>	<u>45-260</u>

Residential developments at a density lower than those shown above will not be acceptable apart from in exceptional circumstances.

The density boundaries are not intended to be definitive; a development outside of the CAZ may be suitable for a higher density, likewise a centrally located scheme may better suit a lower density. The ranges should be used as a guideline and each site will be assessed on its own merits including site limitations such as listed building status, small site size etc.

Adopted City Plan Policy S14

The two density zone ranges overlap to allow for flexibility and reflect the existing character and function of different parts of Westminster, from the high density central area, with excellent connectivity and access to shops, services and jobs to the 'quieter' areas e.g. St. John's Wood and Queens Park.

For example if the building is listed and the development would have an adverse impact on the historic character and fabric of the building.

*This is based on London Plan Table 3.2 (excluding PTAL ratings of 0-1).

Detailed design policies which will be addressed in the 'Design' consultation booklet.

Adopted City Plan Policy S14

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POLICY S14 OPTIMISING HOUSING DELIVERY CONTINUED

The council will maintain a publicly available list of deliverable sites for housing development to ensure a continuous five year supply of deliverable sites with a 5% buffer and 6-15 year lists of future developable sites.

Densities exceeding the range for Inside CAZ will only be acceptable if the development is of exemplary design, fully meeting policies S28, CM14.1 and CM28.2 – CM28.6 (inclusive) where relevant.

Proposals for conversion or redevelopment of single family houses to flats will be assessed taking into account the character of the street and area; impact on residential amenity (including other policies in the Plan); and the mix of units proposed.

The use of housing as temporary sleeping accommodation will not be acceptable.

The council will encourage bringing empty homes back into use, particularly those on the 'Heritage at Risk' register.

For example the extra parking pressures created by an increase in residential units

Housing used as unauthorised temporary sleeping accommodation reduces the number of homes available for permanent residents. It also can have a detrimental impact on the neighbouring community as people using residential units as short term holiday accommodation are more likely to keep late hours and require a high level of services leading to more noise and activity at unsocial hours.

OPTIMISING HOUSING DELIVERY cont.

These areas provide the size and type of homes that are important in meeting housing demand in Westminster, and the continued use of these houses as family accommodation makes a positive contribution to the local character. Therefore family sized housing in these areas are protected from conversion into smaller units. This policy approach has successfully been in place since the 1991 UDP.

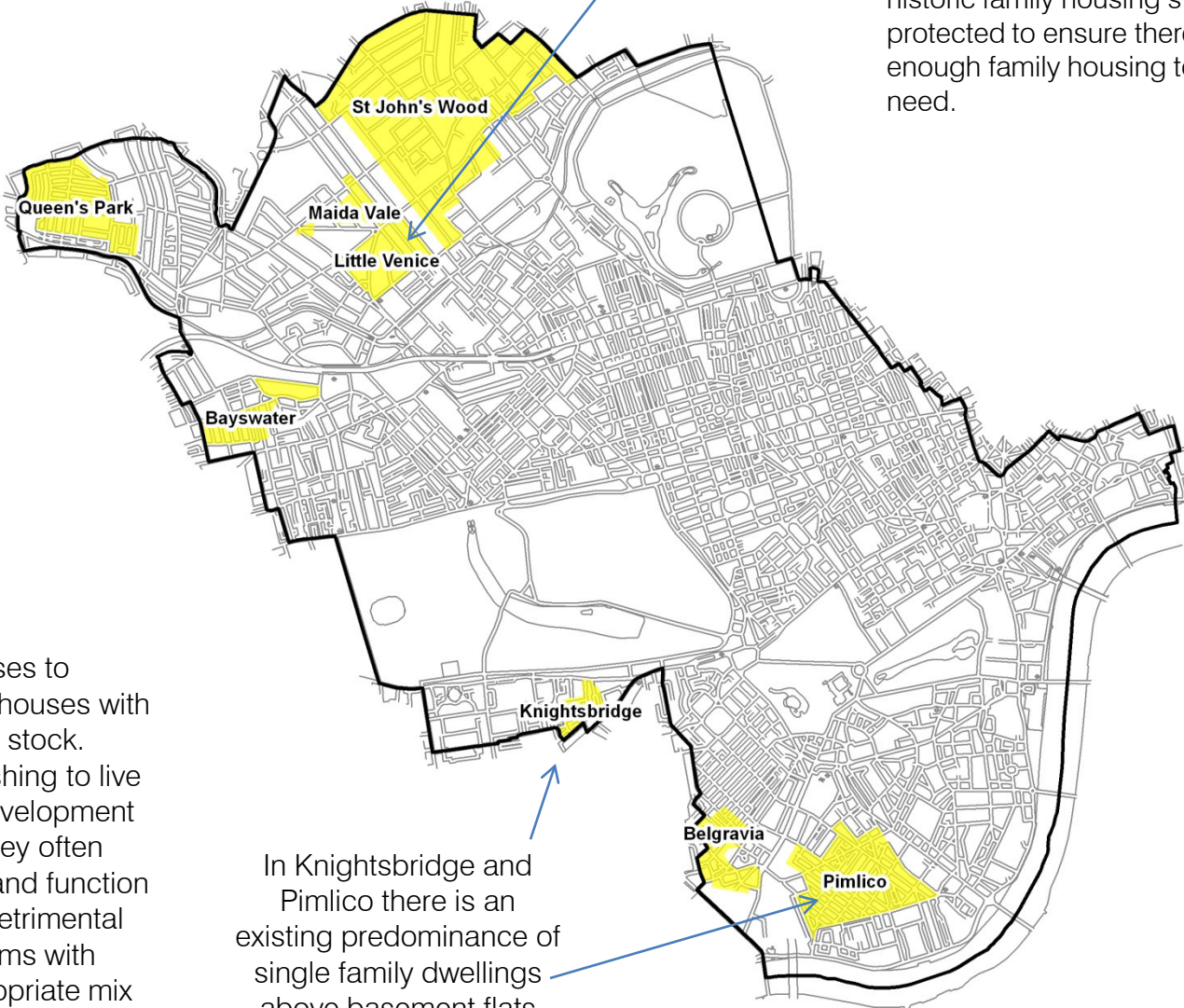
POLICY S14 OPTIMISING HOUSING DELIVERY CONTINUED
In the family housing areas single dwelling houses (and additionally in Pimlico and Knightsbridge single dwellings above basement flats) will be protected from conversion into smaller units.

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In the past the Council has lost single family houses to conversion and redevelopment to flats, and now houses with gardens form only 10% of Westminster's housing stock. These houses can meet the needs of families wishing to live in Westminster and while their conversion or redevelopment would increase the number of residential units, they often make an important contribution to the character and function of conservation areas. Their loss would have a detrimental effect on local neighbourhoods leading to problems with residential amenity and may not provide an appropriate mix and size of units.

This part of Little Venice is proposed as a new family housing area due to the prevalence of single family homes here.

The eight areas identified on this map cover only 10% of Westminster, but contain around half of the total amount of the city's single family housing. It is important that historic family housing stock is protected to ensure there is enough family housing to meet need.



In Knightsbridge and Pimlico there is an existing predominance of single family dwellings above basement flats which the council wishes to protect.

HOUSING QUALITY

Well-designed sustainable housing developments that meet Lifetime Homes standards will contribute to Westminster's distinctiveness, address residents' lifelong housing needs and improve the quality of the natural environment - helping to address and mitigate for the impacts of climate change.

Adopted City Plan Policy S28

NEW POLICY CM14.1: HOUSING QUALITY

All new housing (including changes of use), and where possible, refurbishment of existing housing and extensions, will provide a well-designed, high quality living environment, both internally and externally in relation to the site layout and neighbourhood and be designed to a standard that ensures the health and well-being of its occupants including the following:

1. meet the space standards set out in Figure 28.1;
2. provide unobstructed internal storage space of at least 1.5 sqm for 2 people and an additional 0.5 sqm for every additional person;
3. meet Lifetime Homes Standards and where possible go beyond Part M of the Building Regulations;
4. provide functional and attractive living environments, laid out to minimise disturbance to neighbouring occupiers;
5. provide acceptable daylight and sunlight;
6. be dual aspect particularly in flatted development other than where it can be shown to be impracticable;
7. adequately provide for the privacy of residents;
8. meet appropriate security standards; and
9. maximise opportunities for providing amenity space for residents.

High standards of residential amenity (specifically ensuring adequate sunlight, daylight and privacy) will benefit Westminster's residents in terms of quality of life, health and well-being.

The council will need to be satisfied that there is no design alternative for dual aspect units when south facing single aspect units are proposed. Single aspect units will not be acceptable in areas where units need sealed windows owing to high noise/air pollution. Such units would struggle to achieve the ventilation rates required by Building Regulations to avoid overheating, or would necessitate high powered artificial ventilation (that emits high levels of CO₂ and would be contrary to S28 Design). The council has identified areas most susceptible to noise and air pollution, which will be shown on maps.

Standards for internal parts of dwellings are necessary to ensure adequate space, privacy, security, daylight and sunlight are provided in homes for the health and well-being of occupants.

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Inclusive design and the provision of adequate internal and external space can improve the long-term health and well-being of communities, families and individuals.

Standards applied by the Council include Secured by Design as a minimum for reducing crime, along with other standards such as BS/EN, "Sold Secure" and the guidance of Crime Prevention Through Environmental Design (CPTED).

Well-designed, high quality residential developments will also improve the quality of neighbourhoods and make Westminster a more pleasant location for workers and visitors, thereby benefiting the local economy.

These thresholds imply housing developments on a large scale. If a site of this size cannot accommodate any amenity space, the council will not deem it suitable for quality family housing.

Internal amenity space refers to an acceptable amount of habitable living space

NEW POLICY CM14.1: HOUSING QUALITY CONTINUED

10. New residential development will wherever practicable provide 5m² of internal or external amenity space for each dwelling designed for two persons, and a further 1m² for each additional person.

11. Outside the Central Activities Zone where 20 or more family units or 10 or more affordable housing units of 2 or more bedrooms are created, external play space and facilities will also be required.

In all housing developments of 25 or more dwellings or non-self contained units, the council will require that 10% of the units should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

Standards for the design and sustainability of a building and provision of external amenity space are essential in securing high quality housing which enables occupiers to meet their everyday needs for a safe, healthy and functional living environment, and tackles deprivation issues such as fuel poverty and over-crowding. Communal open spaces promote good relations between communities and can reduce the isolation of residents, particularly the elderly.

There is a shortage of wheelchair homes in London and the number of households requiring this type of accommodation is likely to increase as the population ages and more people with disabilities are cared for in their own homes.

It is important that housing provision for wheelchair users is also made within non-self contained and market accommodation to ensure people with disabilities can access a range of accommodation.

This table conforms to London Plan Policy 3.5

The small studio category is in addition to London Plan space standards and has been successfully applied in Westminster since 1991. It provides affordable accommodation for people who wish to live in a central location who otherwise would not be able to do so.

No. Bedroom	Bedroom mix	Minimum Gross Internal Area
Studio	1 double	37sqm
1 bed	1 double	37sqm 50sqm for social housing
2 bed	2 doubles	70sqm
3 bed	2 doubles, 1 single	86sqm
3 bed	3 doubles	100sqm
4 bed	2 doubles, 2 singles	99sqm
4 bed	3 doubles, 1 single	109sqm

FIGURE 28.1 MINIMUM SPACE STANDARDS FOR RESIDENTIAL ACCOMMODATION

It is vital that exceptional attention is paid to protecting existing residential amenity and providing good quality residential accommodation for future residents of all tenures. Poor quality residential amenity can make homes less attractive to permanent residents and threaten the sustainability of residential neighbourhoods.

Setting the threshold at two or more bedrooms instead of the traditional 3+ bedrooms acknowledges the needs of smaller families who live in two bedroom properties.

No new studio dwellings will be permitted in the social housing sector as there is an existing oversupply and limited demand.

Family sized housing will henceforth be defined as 2 bed+ units which have a floor area of 86sqm or more (i.e. equivalent to a three bed property).

MEETING HOUSING NEEDS

It is important that the dwelling size mix on larger sites takes account of strategic needs in order to ensure that these schemes deliver the homes that are needed.

Adopted City Plan Policy S15

POLICY S15 MEETING HOUSING NEEDS

Residential developments will provide an appropriate mix of units in terms of size, type, and affordable housing provision to contribute towards meeting Westminster's housing needs, and creating mixed communities. The changing roles of different housing sectors, including private rent, in delivering this will be recognised and supported as appropriate.

New market housing should provide at least a quarter of units as family sized.

One and two bed units will not contain single bedrooms and 3+ bed units will contain at least two double bedrooms.

Studio units may be acceptable in market and intermediate housing tenures as a minor proportion (no more than 10%) of the one bed provision, where they can accommodate two people and are well designed to maximise space.

Where requested (on the advice of the Strategic Director of Housing, Regeneration and Property) two and three bedroom Intermediate Housing may be permitted with only one double bedroom where this is made available as shared ownership and is required to make the units more affordable to eligible households.

The amount of family sized housing required has been lowered from the previous policy position (which required 33% of all units to be family sized) reflecting the positive increase in family sized housing the city has seen in recent years. A lower requirement will also increase viability of affordable housing provision where applicable. This is an issue on which the council would particularly welcome comments.

The council recognises the role that studio and one-bed apartments can play in providing comparatively more affordable market homes for single people who wish to live close to their place of work or study.

Residential units with two bedrooms (3/4 habitable rooms) can provide homes for smaller families with children, as well as being an attractive option for adult sharers, and contributes to the provision of homes for families in Westminster.

There is potential for a growth in private renting (see 'Review of Barriers to Institutional Investment in Private Rented Homes' by Sir Adrian Montague.

One bedroom units are inadequate to meet many changing life circumstances, such as meeting a partner or having a child. This can lead to overcrowding and attendant social and health problems. To create flexible and sustainable lifetime homes bedrooms in one and two bed units must be large enough to accommodate two people.

POLICY S15 MEETING HOUSING NEEDS CONTINUED

All specialist housing floorspace and units will be protected to meet those specific needs except where;

- the accommodation is needed to meet different residential needs as part of a published strategy by a local service provider;
- changes of use are to residential care or nursing homes (C2 Use Class), hostel (*Sui Generis* Use Class), Houses in Multiple Occupation (C4 or *Sui Generis* Use Class) or dwelling house use (C3 Use Class).

Hostel and HMO accommodation not subject to policies CM15.1 to CM15.3, will be protected except where:

1. it has a demonstrable adverse effect on residential amenity; or
2. as part of a published strategy by a local service provider, the accommodation is needed to meet different residential needs or it no longer meets contemporary requirements but is being re-provided in a different form to serve the same client group on this or another site in Westminster;
3. the accommodation is poor and not capable of being upgraded;
4. it is being replaced by another form of affordable housing which meets identified needs; or
5. it is surplus to need and has been marketed at a reasonable market rent, price and other terms for accommodation of that use class (or in the case of sui generis for that use) for at least 18 months and there is also no demand from another organisation providing housing for specialist needs in that location.

Provision of new specialist housing will be allowed where:

1. **this would contribute towards meeting local housing needs; and**
2. in the case of hostels and HMOs, it is appropriate in terms of:
 - i. the suitability of the building or site; and
 - ii. the concentration of existing HMOs, hostels and specialist housing for vulnerable people in the local area; and
 - iii. the site is deemed suitable for the intended residents; and
 - iv. there is no negative impact on the amenity of neighbouring residents.

This approach recognises the need for hostel accommodation for vulnerable people, and the role that Houses in Multiple Occupation (HMOs) play in providing affordable accommodation in the city and achieving Lifetime Neighbourhoods.

Flexibility in the loss of hostels and HMOs enables delivery of published strategies of local service providers.

HMOs can become obsolete because of their layout, or changes in the delivery of local services or in the client group it was intended to serve.

It is important to safeguard existing specialist housing because new accommodation of this type is often overlooked in favour of more profitable private residential types despite a likely increase in the need for specialist units over time.

In particular, new accommodation should address flooding and/or overheating hazards which pose a health risk e.g. through adequate ventilation

SPECIALIST HOUSING

The council's Supporting People Strategy has identified strategic targets to increase the range and choice of housing open to people with learning disabilities to enable them to live as independently as possible; and to improve the quality of life and independence of vulnerable people by supporting them to live in their own homes where possible.

NEW POLICY CM15.1: HOUSING FOR VULNERABLE PEOPLE

The council will support applications for accommodation for vulnerable people which meets the needs of the Council department responsible for vulnerable services provision.

The council will resist development that involves the net loss of floorspace of specialist residential accommodation for vulnerable people unless:

1. the accommodation is being redesigned to better meet needs; or
2. the accommodation is needed to meet different residential needs as part of a published strategy by a local service provider.

The loss of HMOs in single houses of less than 400 sqm site area or total floorspace will be permitted where the house is being returned to a single family dwelling, it creates at least two family sized dwellings; or the HMO is being re-provided elsewhere in the city.

This would add to the supply of family homes in the identified areas and benefit their character and function. However, this exception only applies to smaller HMOs (i.e. under 400sqm) in a single dwelling as accommodation over this size, or in flats are less likely to provide permanent homes for families with children.

In particular, new accommodation should address overheating hazards which pose a health risk when units are single aspect with inadequate ventilation.

It is recognised that on occasion, the upgrading of accommodation may lead to a decrease in the number of people that can be accommodated in order to better meet the needs of vulnerable people.

If there is no such demand the site should be used for C3 general housing. All existing affordable housing floorspace will need to be replaced as affordable accommodation.

Where existing homes for older people no longer meet contemporary standards, the council will favourably consider conversion or redevelopment to provide extra-care homes.

The Further Alterations to the London Plan propose benchmarks for the provision of older people's housing in Westminster:

- Private sale: 70pa
- Intermediate sale: 20 pa
- Affordable: 20 pa

The Older People: Housing with Care Strategy (2007) sets out the Council's strategy for older people and aims to ensure that older people are enabled to live in the housing of their choice which is of the highest quality, achieving and sustaining a good quality of life.

There is a lack of private sector and low cost home ownership options for older people's housing.

NEW POLICY CM15.2: HOUSING FOR OLDER PEOPLE

The council will support development of housing for older people, across a mix of tenures including modern sheltered housing and 'extra-care' housing services, provided that it fulfils the aims of the council's older people strategies and meets identified needs.

The development of market-led self contained sheltered housing in Use Class C3 will contribute to the supply of affordable housing in accordance with Policy S16.

The council will resist development that involves the net loss of floorspace of specialist residential accommodation for older people unless:

1. adequate replacement accommodation for older people in Westminster is provided;
2. it can be demonstrated that there is a surplus of accommodation for older people in the area; or
3. the accommodation is needed to meet different residential needs as part of a published strategy by a local service provider.

This policy is concerned with all types of student accommodation: hostels, halls of residence and self contained accommodation which has been specifically allocated for occupation solely by students.

The council wishes to support Higher Educational Institutions in Westminster, and the provision of adequate and appropriate levels of student accommodation helps them to thrive and grow by attracting the best national and international students to Westminster's universities.

NEW POLICY CM15.3: STUDENT ACCOMMODATION
 Existing student housing will be protected. Proposals for new student housing developments must:

1. be for students studying at higher education institutions with a campus in Westminster;
2. not involve the loss of C3 housing;
3. include units to meet the needs of students with disabilities;
4. include adequate shared facilities where non-self contained units are proposed, including communal indoor and outdoor space, kitchen, laundry and storage areas; and
5. when a large number of student units are proposed, provide services and facilities on site to meet the particular needs of students e.g. library, study areas, communal lounges, smoking areas away from the street.

Self-contained C3 student housing units provided for students will be expected to contribute to the supply of affordable housing in accordance with Policy S16.

The demand for student accommodation from both undergraduate and post-graduate students in Westminster continues to grow. But other conventional housing needs are pressing and the council does not wish to lose existing stock.

The council supports the replacement of non-purpose built with purpose built student housing which provides a higher quality living environment for those studying at universities as it frees up housing in the private rented sector that could be used for other residential needs.

On site facilities will help to minimize the impact of new student accommodation on residential amenity. However, proposals for new communal facilities for students must be accompanied by details of management arrangements, formalised through a Section 106 agreement.

Student housing is not classed as affordable housing in the NPPF and there is the risk that should the demand for student accommodation fall away, designated units could be converted to market housing with no payment made into the affordable housing fund. New self contained student floorspace will therefore be treated the same as other self contained housing to ensure there is no loophole created by which affordable housing provision can be avoided.

Westminster has extremely limited capacity for the development of new student housing, with demand outstripping supply. The development of new student housing also represents an opportunity lost for other development, including mainstream housing needs for which there is immense pressure in Westminster. Therefore new student accommodation will only be considered when it serves a Higher Education institution operating in Westminster, and this will be secured in perpetuity by a Section 106 agreement.

Westminster does not have the capacity to meet the needs of institutions outside the borough, and much of the borough's existing needs will still need to be met in other boroughs.

Student accommodation should not be made available for short term letting during the summer holidays and this will be controlled by condition.

Have Your Say

This booklet is part of the informal consultation for developing the statutory policies in Westminster's local plan. It builds on previous consultation on the City Management Plan. Further information can be found [here](#).

This booklet only includes the proposed policy. However, Westminster's local plan will include supporting text based on the text within this booklet. This includes:

- **Page 48** Introductory text, setting out the background to the topic.
- Policy application: guidance as to how the policy will be applied, including details of how things will be measured or calculated etc.
- Reasoned justification: this is an explanation required by law to accompany a policy, setting out why a policy is applied.
- Glossary definitions: the statutory definitions used for terms that are included in the policies.

If you wish to discuss the issues raised in this booklet, please telephone 020 7641 2503.

To comment on anything in this booklet, please email ldf@westminster.gov.uk or write to us at:

City Planning
11th Floor
Westminster City Hall
64 Victoria Street
London SW1E 6QP

Your comments will form part of the statutory record of consultation and will be made available on our website and to the public. Your contact details will not be made available, but we will use them to stay in touch with you about future policy development. If you do not want us to stay in touch, please let us know in your response.

Reading List

Affordable Housing Viability Study (2011)
DTZ
<http://bit.ly/17it3Be>

Lifetime Homes, Lifetime Neighbourhoods. A National Strategy for Housing an Ageing Population (2008)
DWP
<http://bit.ly/12Gln6g>

Westminster Housing Needs Assessment (2006)
Fordham Research
<http://bit.ly/1dCifQ9>

London for Sale? (2012)
Smith Institute
<http://bit.ly/1gy0IPJ>

London Plan (2011)
Greater London Authority
<http://bit.ly/15CedE8>

International Student Property (2012)
Knight Frank
<http://bit.ly/1awBwTa>

Strategic Housing Market Assessment (2010)
ORS
<http://bit.ly/12Glizi>

Older people: housing and care (2007)
Westminster City Council
<http://bit.ly/1dJaqbK>

Supporting People Strategy (2005)
Westminster City Council
<http://bit.ly/1awNVgc>

*Respipe Database
Census (2011)
Office of National Statistics (2011)
CLG Population Projections (2013)*

AFFORDABLE HOUSING

DEVELOPING WESTMINSTER'S LOCAL PLAN



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Foreword

Cllr Robert Davis DL

Delivering enough affordable housing to meet need is a London-wide problem. Westminster has a good track record of affordable housing delivery but it is still a challenge. Westminster is inherently one of the most expensive places in the country in which to rent or purchase a home due to its position at the heart of the capital and prices for residential properties in excess of £1 million are commonplace. Parts of Westminster have always been beyond the means of many, which is acceptable only as long as there are some parts which were *more* affordable. However, with house prices in Westminster rising very steeply and the entry cost of a home now on average 27 times the average wage in Westminster, delivery of more housing units which are affordable is imperative and a pragmatic approach is necessary.

Delivering affordable housing is not simply about numbers of units, but creating mixed and balanced communities too, and an affordable housing policy in Westminster has to be about making the most of the opportunities available for affordable housing and getting the best value possible in the face of a finite source of - very expensive - land.

This booklet sets out the Council's proposed planning approach to meeting the high and ever growing demand for affordable housing within Westminster. The Council is also currently working on its overall housing strategy, and ultimately our planning policy will also need to contribute to meeting that strategy. It introduces how the council intends to operate a credits system to bring more flexibility into the system for housing developers so they can optimise the development opportunities in the city to create a mix of market, social and intermediate housing.

These are extremely important issues, and I look forward to receiving a wide range of comments on our proposals.



Councillor Robert Davis DL
Deputy Leader, Westminster City Council
Cabinet Member for Built Environment

Introduction

The policies covered in this booklet are:

- Strategic Policy S14 – Optimising Housing Delivery
- Strategic Policy S16 – Affordable Housing
- City Management policy CM16.1 – Meeting the Range of Affordable Housing Needs
- City Management policy CM49.3 –Credits

Other policies on housing (need, delivery and quality) are not dealt with in this booklet. They were addressed in an earlier booklet published in March 2014. You can view the Housing Need, Delivery & Quality booklet on our website at: <https://www.westminster.gov.uk/westminsters-city-plan-city-management-policies-revision>

We would welcome your views on proposed new policy wording, which is shown as underlined or identified as an entirely new policy. Adopted policy is shown in **bold** and is not intended to be altered as a result of this consultation.



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Trends & Insights

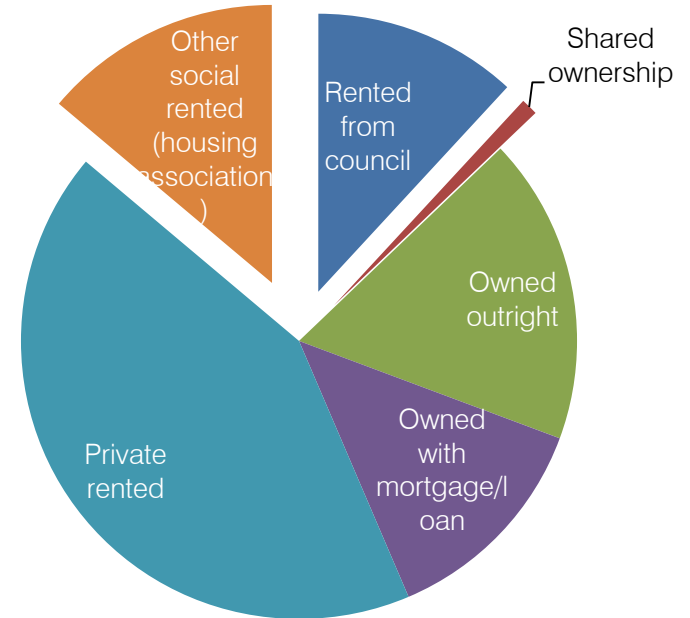
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WHAT IS AFFORDABLE HOUSING?

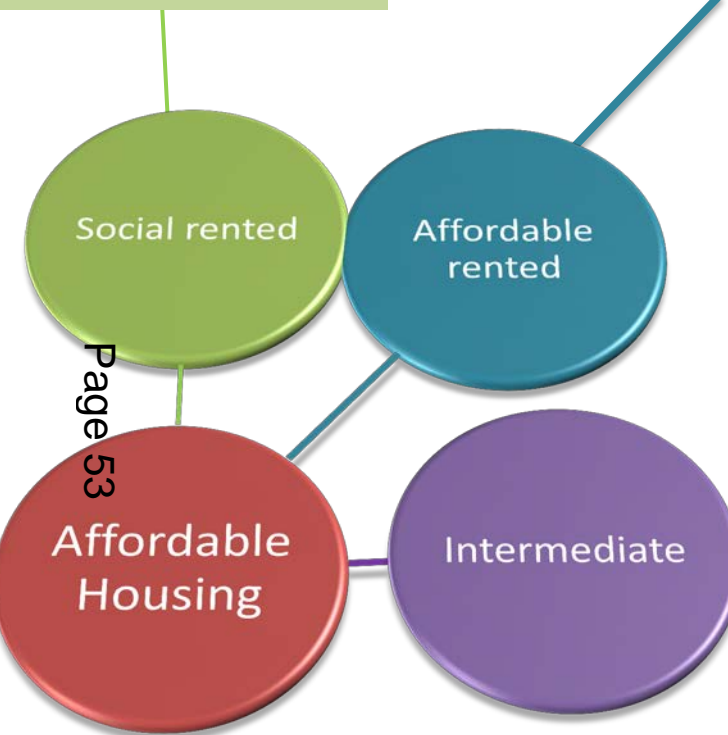
Just over a quarter of residents in Westminster live in a type of affordable housing:



Homes let by the local authority or a Registered Provider to households eligible for social rented housing and subject to rent controls that require a rent of no more than 80% of the local market rent (inclusive of service charges).

Homes for sale or rent at a cost above social rent but below market rent levels. Westminster welcomes a diverse range of intermediate products e.g. shared ownership, joint equity. Eligibility for an intermediate home is based on annual household income between £18,100 and £80,000. In reality there is an overlap between social rented and intermediate households in Westminster because of the criteria used for placing households on the waiting lists in properties.

Homes owned by Westminster City Council or a Registered Provider (defined on page 2) and let for a reduced (target) rent determined through the national rent regime.



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“Housing provided to eligible households whose needs are not met by the market”

“Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.”

NPPF 2012

Key Questions

1. Westminster has recently tended to deliver housing which falls at the two ends of the price spectrum – affordable housing and housing that costs in excess of £1 million. In this context, is there also a role for trying to deliver less expensive market housing, perhaps around £700,000?
2. If so, how would these values be achieved? What type of housing would we be seeking to provide? If the housing was very small to achieve that value range, and most likely to be used as pied-a-terres would this be acceptable?
3. In a high value city such as Westminster, are there other housing models? Can we be more creative to stimulate the market to respond to those squeezed out?

The Council has a statutory duty to provide accommodation for households deemed to be in housing need. Eligibility for social rented and affordable rented housing in Westminster is determined by the Council's Allocation Scheme. Details of the Council's allocations scheme can be found here: http://transact.westminster.gov.uk/docstores/publications_store/2013%20Housing%20Allocation%20Scheme.pdf. But as with all London and many UK authorities demand for affordable housing far outstrips supply in Westminster:

Current Priority for Intermediate Housing*

1. Social housing tenants, armed forces personnel, ex-family quota (sons and daughters of council tenants and leaseholders)
- 2/3. Homeless households, council waiting list
4. Westminster residents
5. People working in Westminster

* The Council's emerging Housing Strategy will review and may revise these priorities.

3,500 households are registered with 'Homeownership Westminster' for intermediate housing in the city.

4,200 households in priority need on the waiting list for social housing.

Backlog of 5,180 households in affordable housing need. The greatest need is for homeless households (over a third) and for 2 beds (a third)

REGISTERED PROVIDERS

Housing associations are independent charities, bodies of trustees or companies established for the purpose of providing low-cost social housing for people in housing need on a non-profit-making basis. Any trading surplus is used to maintain existing homes and to help finance new ones. They may also run shared ownership schemes to help people who cannot afford to buy their own homes outright.

Housing associations provide a wide range of housing, some managing large estates of housing for families, while the smallest may perhaps manage a single scheme of housing for older people.

Much of the supported accommodation in England is also provided by housing associations, with specialist projects for people with mental health or learning disabilities, with substance misuse problems (drugs or alcohol), the formerly homeless, young people, ex-offenders and women fleeing domestic violence.

A Registered Provider (RP), is the term given to housing associations and who are registered and regulated by the Homes and Communities Agency. More information about RPs can be found on the HCA website:

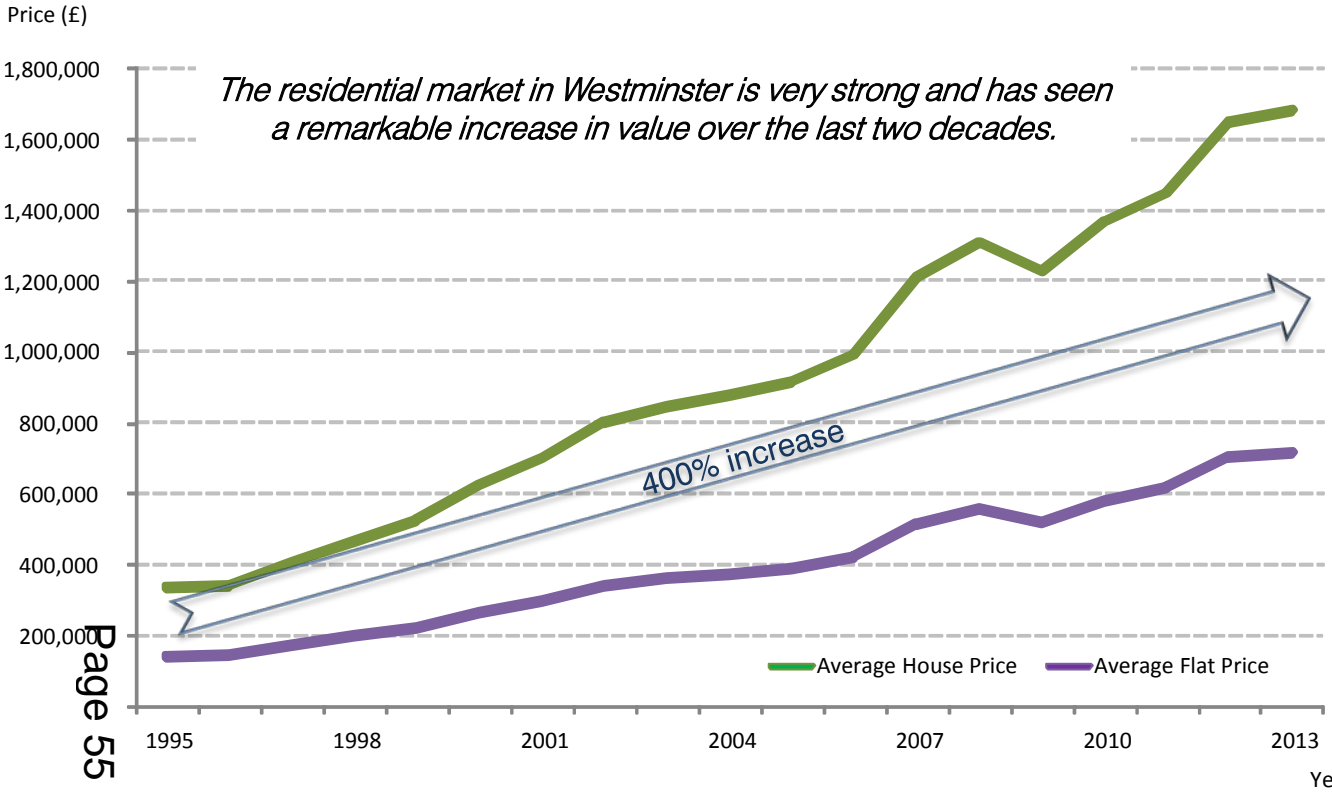
http://transact.westminster.gov.uk/docstores/publications_store/2013%20Housing%20Allocation%20Scheme.pdf.

Some Registered Providers operating in Westminster:

- A2 Dominion
- Central and Cecil
- Family Mosaic
- Genesis
- L&Q
- Network Housing
- Notting Hill Housing
- Octavia Housing
- One Housing Group
- Peabody
- Sanctuary Housing
- Soho Housing
- Waltherton and Elgin Community Homes
- Westminster Community Homes

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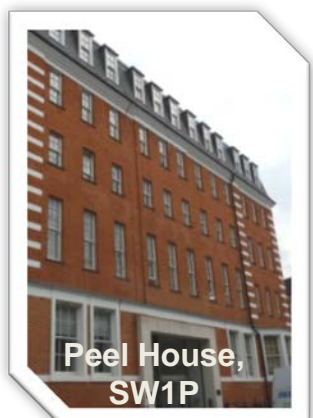
REGISTERED PROVIDERS



Increases in sales values in the residential market has a knock-on effect on land and property and existing use values and makes the delivery of affordable housing increasingly difficult. The high price of land in Westminster means that RPs are generally unable to purchase land in the city. Westminster consequently relies heavily on private housing development to provide opportunities for affordable housing in partnership with RPs, with such developments accounting for 84% of new affordable homes in Westminster. To meet the high and growing demand for affordable housing in Westminster, it is essential that the policy approach continues to require appropriate amounts of housing, but with enough flexibility to ensure that where developers can demonstrate provision is not possible, the next best option is secured.

Page 55

Despite challenges to deliver affordable housing in Westminster, when they are built, the design is of a very high quality as these show:



WHY IS AFFORDABLE HOUSING DELIVERY IMPORTANT IN WESTMINSTER?

1. HOUSE PRICES

“Local authorities should ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area”

Para 47 NPPF 2012

“Every part of the housing market is impacted by the ever-reducing average household size, which leads to a need for more housing units... The failure of supply to keep up with demand for housing units has increased prices faster than salaries, making purchase increasingly unattainable.”

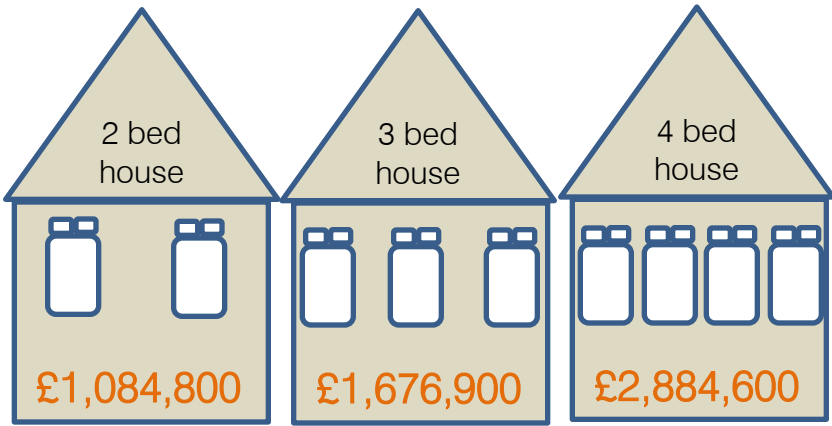
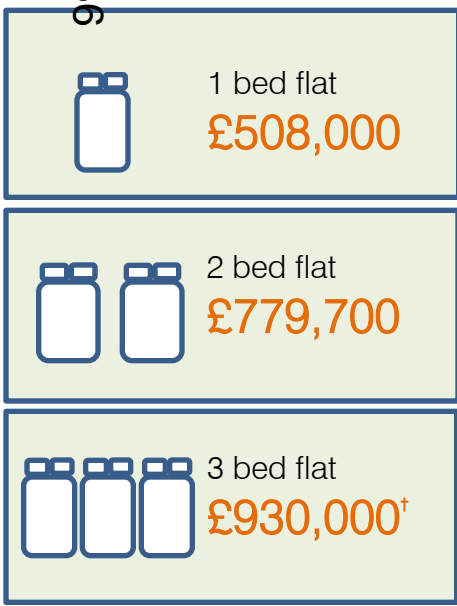
University of Westminster, 2014

Overall London average for buying £513,519**

Westminster is one of the most expensive places in the country in which to rent or purchase a home.

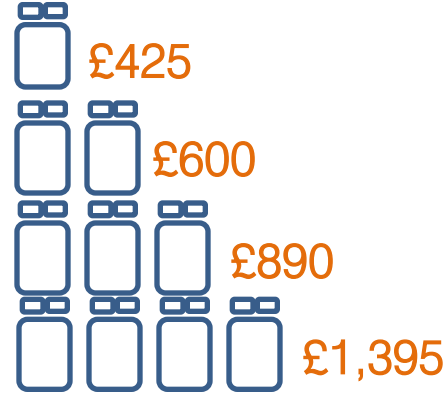
Overall London average for renting £530**

Average Market Prices in Westminster*



(New housing is much less common in Westminster but does occur)

Average weekly rents in Westminster*:



“Communities mixed and balanced by tenure and household incomes should be promoted across London”

Policy 3.9, London Plan

The benefits that a mix of affordable and market housing have are explored later, on page 10.

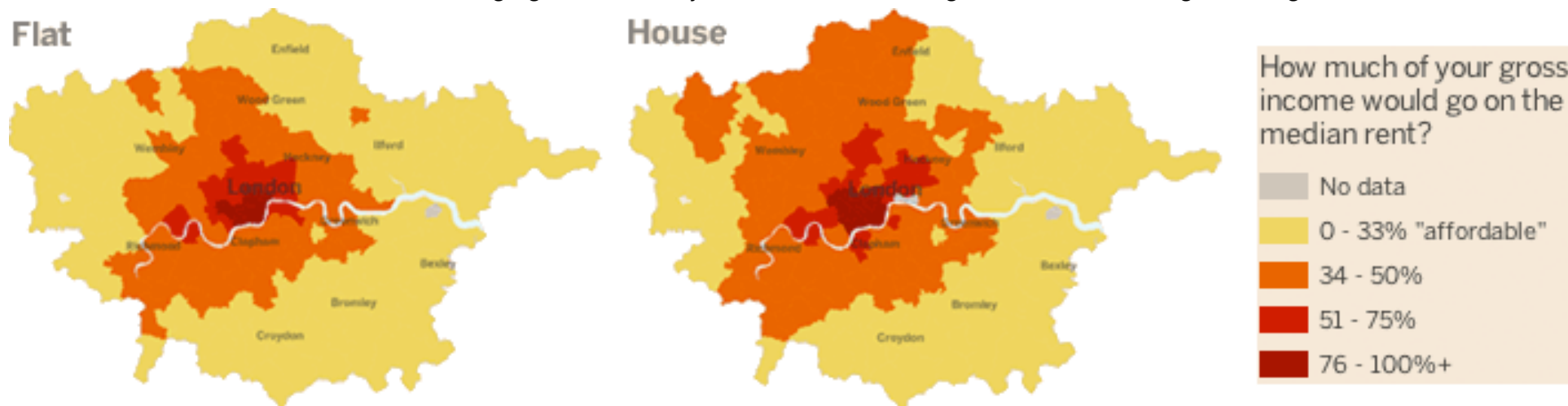
*Source: Hometrack. Three months to March 2014

**Source: London Property Watch April 2014

[†]Source: Median asking price for a 3 bed flat as listed on Rightmove.com

2. HOUSEHOLD INCOMES

Westminster is not unique when it comes to unaffordable housing in London. The two maps* below show how affordable a 2 bed flat and a 2 bed house are across London based on the average graduate salary of £22.4k and housing costs not exceeding 33% of gross household income.



Banks generally only lend about 60-75% of the value of the property** leaving prospective buyers with the challenge of finding 25-40% of the property value as a deposit. Although it is not expected that many first-time buyers could afford to purchase a home in Westminster, it helps to put prices in context, together with the average Westminster wage:

	Average Westminster household	Single first time buyer	First time buyer couple	Median London Household Income
Household income in Westminster	£43,326	£16,060 (London living wage)	£32,120 (London living wage)	£35,740
Average flat (including 4% stamp duty costs)	£810,888 (2 bed)	£528,320 (1 bed)	£528,320 (1 bed)	£810,888 (2 bed)
25% deposit	£202,722	£132,080	£132,080	£202,722
75% loan monthly repayments	£2,068	£2,068	£2,068	£2,068
% of salary spent on mortgage	57%	155%	77%	69%
40% deposit	£324,355	£211,328	£211,328	£324,355
60% loan monthly repayments	£1,626	£1,626	£1,626	£1,626
% of salary spent on mortgage	45%	121%	61%	55%

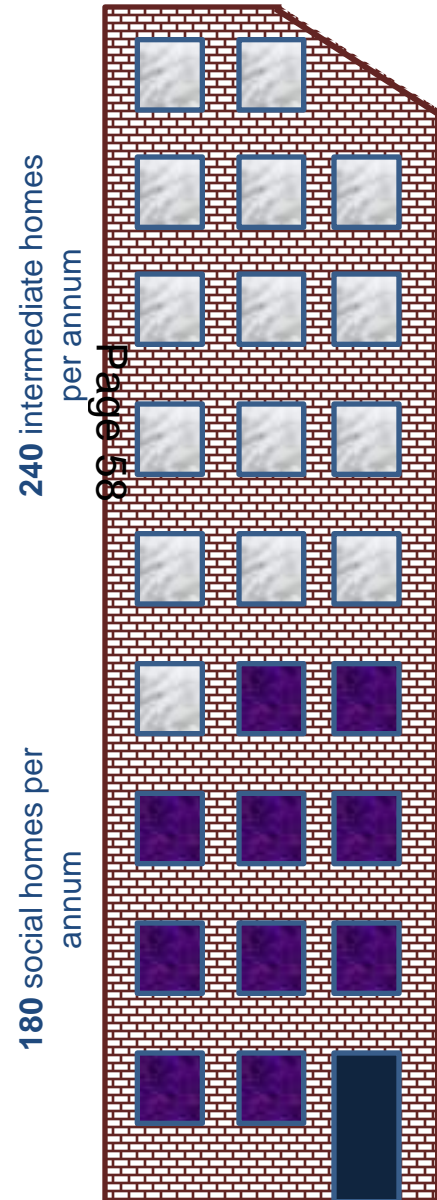
Sources: *Financial Times

**Local Housing Market Assessment 2014

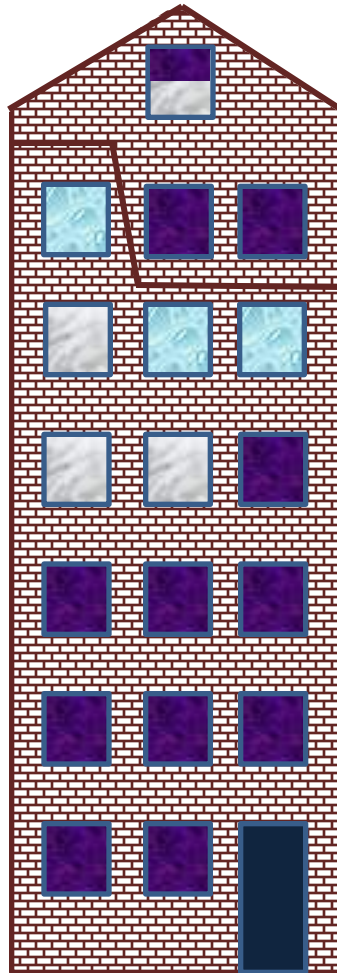
Generally spending 40% of net household income on housing costs is the benchmark for affordability.

NEED

420 affordable units needed per annum



PAST DELIVERY

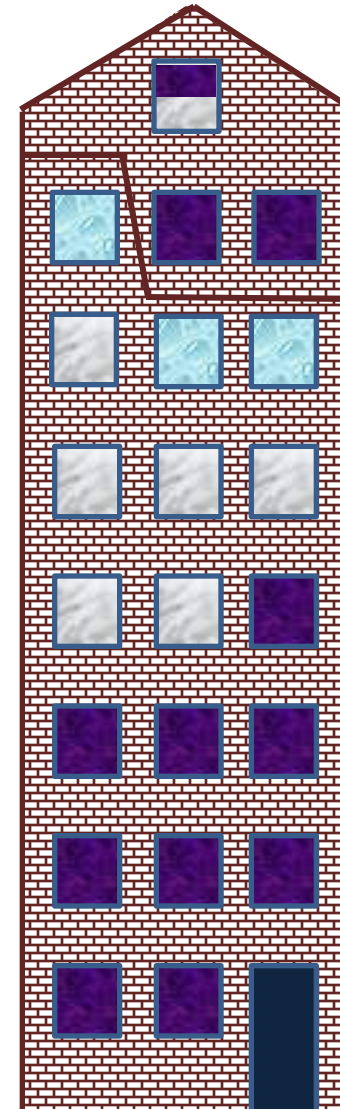


An average of **198** conventional affordable units were delivered per annum made up of **159** social homes and **39** intermediate homes (on average over past 17 years).

A further **58** non-self contained units were delivered on average per annum, which are considered to be non-conventional affordable housing (past 17 years).

An average of **63** spot acquisitions have also added to the affordable housing stock per annum made up of **52** social homes and **10** intermediate homes (on average over past 5 years).

FUTURE PROJECTIONS



255 affordable units would be delivered per annum based on new housing target of 1,068, made up of **153** social homes and **102** intermediate homes based on current 60:40 split

A further **58** non-self contained units and **63** spot acquisitions per year would contribute a further 121 units p.a. bringing the total to an estimated **376** or **90%** of the need, but with a different mix..

AFFORDABLE HOUSING PROVISION

There are 25,000 existing affordable homes in Westminster

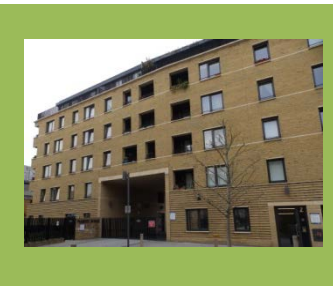
Over 1,600 new affordable homes are in the development pipeline, a 6.5% uplift on the current stock

Over 3,000 new affordable homes have been built since 1997, 22% of all new housing

Examples of recent affordable housing developments

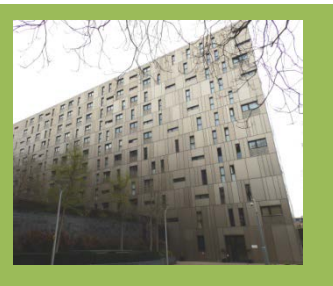
Peabody Avenue

55 affordable units, completed 2011



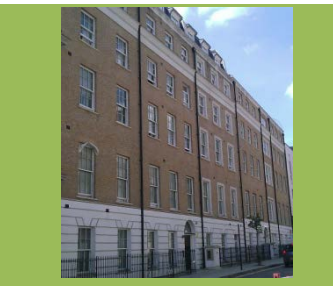
Grosvenor Waterside

267 affordable units, completed 2012

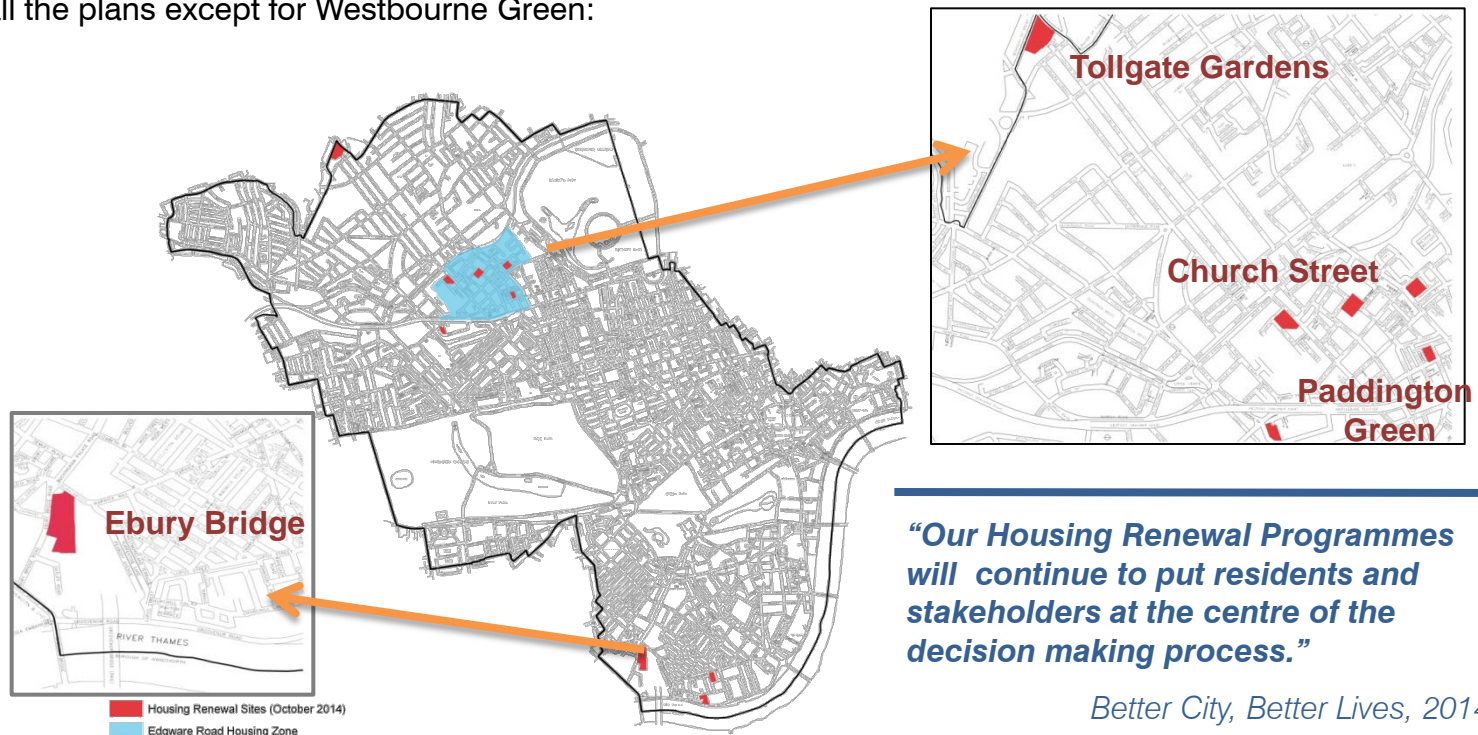
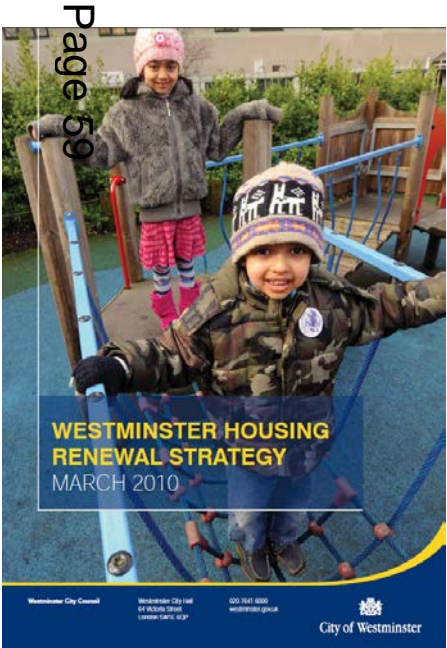


Seymour Place

66 affordable units, completed 2012



Large scale plans are being prepared for the regeneration of five council housing estates and residents have voted in favour of all the plans except for Westbourne Green:



“Our Housing Renewal Programmes will continue to put residents and stakeholders at the centre of the decision making process.”

AFFORDABLE HOUSING PROVISION

The table to the right shows that the adopted policy approach has had some success in securing affordable housing to meet strategic targets in the Unitary Development Plan, Core Strategy and City Plan.

The strategic target for Westminster is currently 30% of all new residential units. This is different to the proportion of affordable housing sought on individual sites, which are based on floorspace and relate to the type and location of development (see page 23).

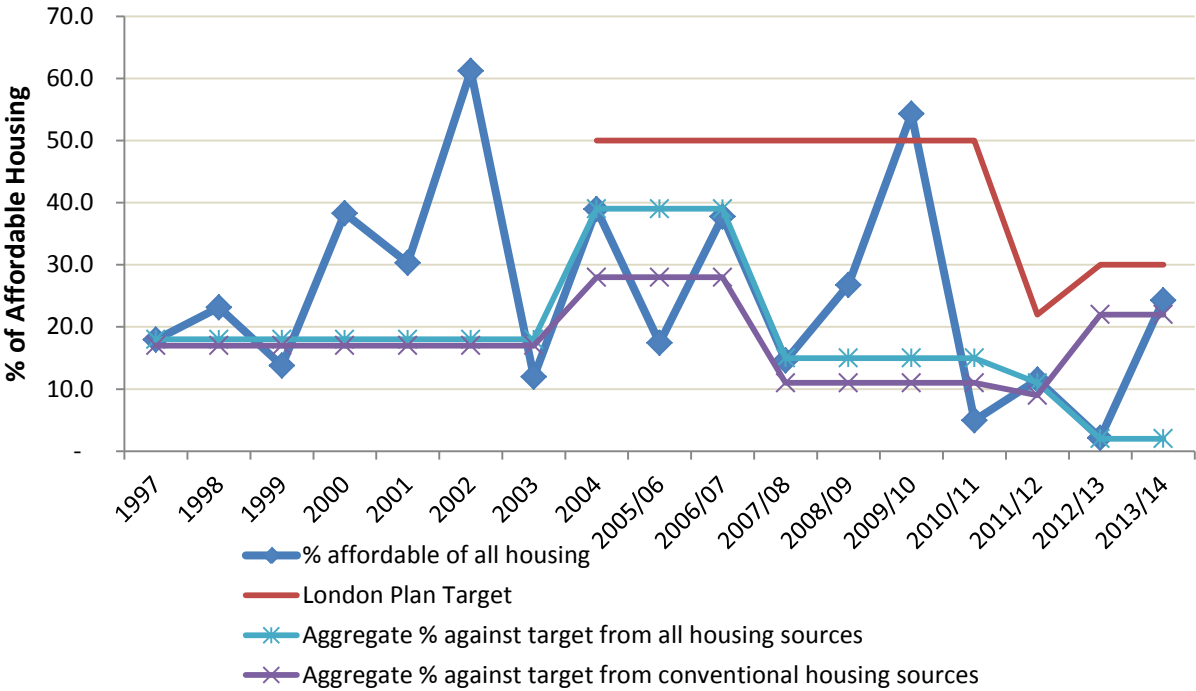
Total affordable housing delivery for 1997-2013/14 was 3,362 affordable units. This is equivalent to 22% of all conventional housing units delivered in Westminster. However, these figures do not include spot acquisitions (where affordable housing providers buy market homes, usually on council estates, and provide them as affordable housing). This programme has provided an equivalent 7% which brings the provision closer to the 30% delivery target.

The new Housing Strategy will help guide affordable housing provision and the new City Plan will reflect this strategy.

Year	Strategic AH target	AH achieved *	AH achieved*
1989 - 1996	None	547	23%
1997 - 2003	"a proportion"	1,812 (2,156)	17% (18%)
2004 - 06/07	50% (London Plan)	480 (1,001)	28% (39%)
2007/08 - 10/11	50%	786 (901)	11% (15%)
2011/12	22%	72 (112)	9% (12%)
2012/13 - 13/14	30%	212 (182)	22% (2%)

* The housing target is actually housing from all sources, including non-self contained housing and bringing vacant homes back into use. The figures in brackets show delivery taking *all* housing sources into account, not just conventional housing. The figure *not* in brackets only relate to conventional housing.

The impact of the previous affordable housing policy was monitored and analysed to arrive at the current strategic target of 30%. The stepped requirements which are based on a proportion of the floorspace (page 23) will maximise the delivery of affordable housing units, and Westminster's contribution towards the Mayor's annual target of 13,200 units across London.



723 affordable units are currently under construction on 30 sites across Westminster.

HOW MUCH AFFORDABLE?

The London Plan doesn't set borough level affordable housing targets: *"boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 13,200 more affordable homes per year"* (London Plan Policy 3.11) – which is approximately 38% of all housing needed over the plan period. In the Draft Further Alterations to the London Plan the amount of new affordable homes required rises to 17,000– approximately 35% of total housing required in the next 20 years.

In April 2014 the Mayor published its updated Housing Strategy which set out a number of ambitions for affordable housing in London including:



- ❖ Delivering 17,000 affordable homes per year (40% low cost home ownership: 60% rented);
- ❖ Halving the number of overcrowded affordable properties;
- ❖ Funding for larger family homes;
- ❖ Greater priority to working households for lettings;
- ❖ Extended funding for increased provision for older people's housing;
- ❖ Encouraging Registered Providers to consider fixed term tenancies to encourage mobility;
- ❖ Environmental retrofitting of all London's affordable housing by 2020.

Westminster has an adopted strategic target for 30% of all new housing units to be affordable and this is considered to be a realistic target to aspire to even in the face of reduced public subsidies and will contribute to the ambitions of the London Plan. It was decided to set the target at 30% based on:

- 5-15 year housing supply schedule of developable sites and associated discussions with landowners and developers.
- evidence that housing in central London has a strong demand as an investment and has not suffered the stagnation in the market experienced by more outlying areas of London and the UK more widely.
- conversion of office to residential use is a growing trend and a substantial source of housing and the mixed use policy brings forward new residential floorspace alongside any commercial development over 200sqm within the Central Activities Zone, – both of which include requirements for affordable housing, where the residential development is of sufficient scale.
- impact of the reduction in Mayoral funding, leading to a possible reduction in affordable units on some development sites.
- impact of City Plan Policy S16 which requests affordable housing in terms of a proportion of floorspace on developments over 1000sqm; and
- delivery of the Council's Housing Renewal Strategy to build new homes on its housing estates.

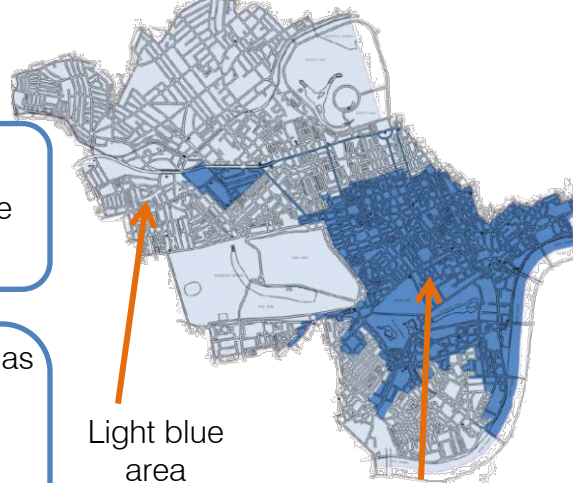
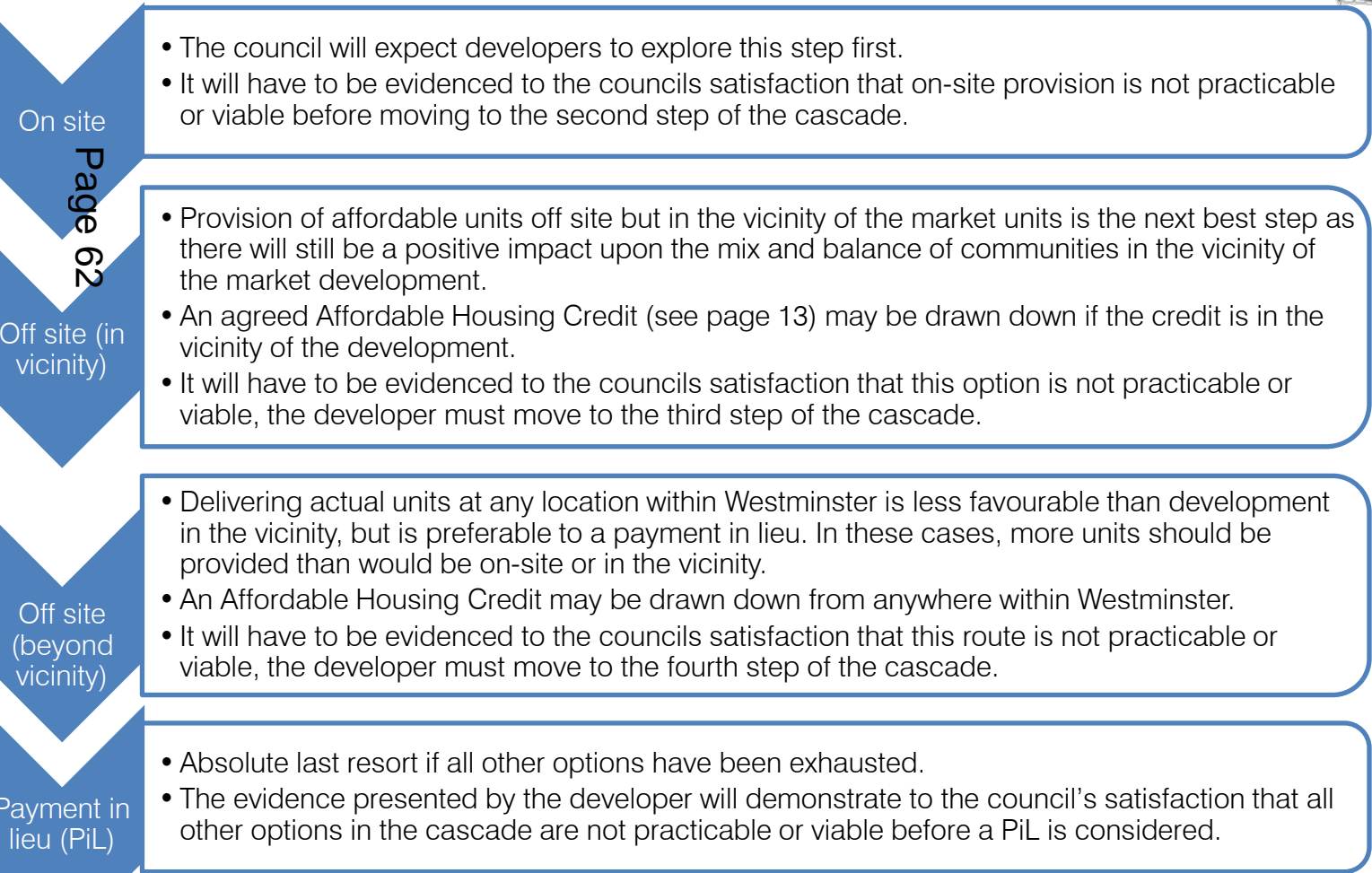
The City Council will continue to monitor performance against this target and keep affordable housing delivery under review.

CURRENT POLICY CASCADE FOR AFFORDABLE HOUSING

If a development proposes 10 or more additional units, or over 1,000sqm of additional residential floorspace a proportion of that floorspace is expected to be affordable.

The proportion that is required is as a percentage of the market housing proposed which is calculated based on (i) the location of the development (whether it is inside or outside the dark blue area on the map below) and (ii) the total amount of new residential floorspace.*

Affordable Housing Cascade



Light blue area where up to 35% of new residential floorspace is required to be affordable.

Dark blue area: Core CAZ, Paddington, Named Streets where up to 25% of new residential floorspace is required to be affordable.

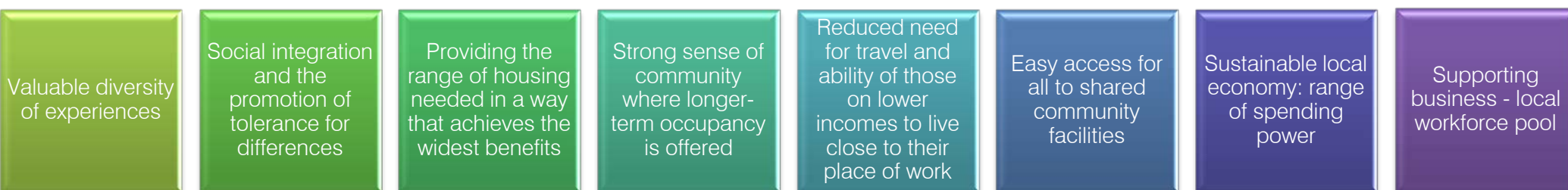
Each stage of the cascade must be fully explored to the council's satisfaction before the next stage will be considered.

*A full explanation of the affordable housing calculation process is given in the [Interim Note on the application of the Affordable Housing Policy](#).

THE REQUIREMENT FOR ON SITE AFFORDABLE HOUSING

Paragraph 50 of the NPPF states that local authorities should set policies for meeting affordable housing needs on site, unless off-site or a payment in lieu can be robustly justified. The council faces a big challenge when it comes to delivering affordable housing in Westminster owing to high existing use values which need to be overcome in order to bring development forward. It is also important to note that generally more affordable housing units can be delivered in lower value areas. Questions arise as to the right balance between maximising the total number of affordable houses delivered and ensuring affordable housing is located across the city, including in more affluent areas.

Placing a range of affordable housing alongside market housing and creating mixed and balanced communities has many sociological and economic benefits:



Economic benefits of different types of housing

Research by Ramidus Consulting has shown that *prime* property owners (homes worth over £5 million) collectively contribute around £2.3 billion a year to the UK economy on their household expenditure alone.

A cost benefit analysis of an intermediate property in Westminster by the University of Westminster shows the economic and social value of the development is approximately £600,000 per year – taking into account money spent in the local economy, and the impact on the local community (through volunteering, charitable giving and civic participation).

Commit to Central London's Future to Benefit Britain: Provide the homes that Central London needs for its workers and modern workspaces for its business

Building Central London's Future: A Manifesto for Growth, City and Westminster Property Associations

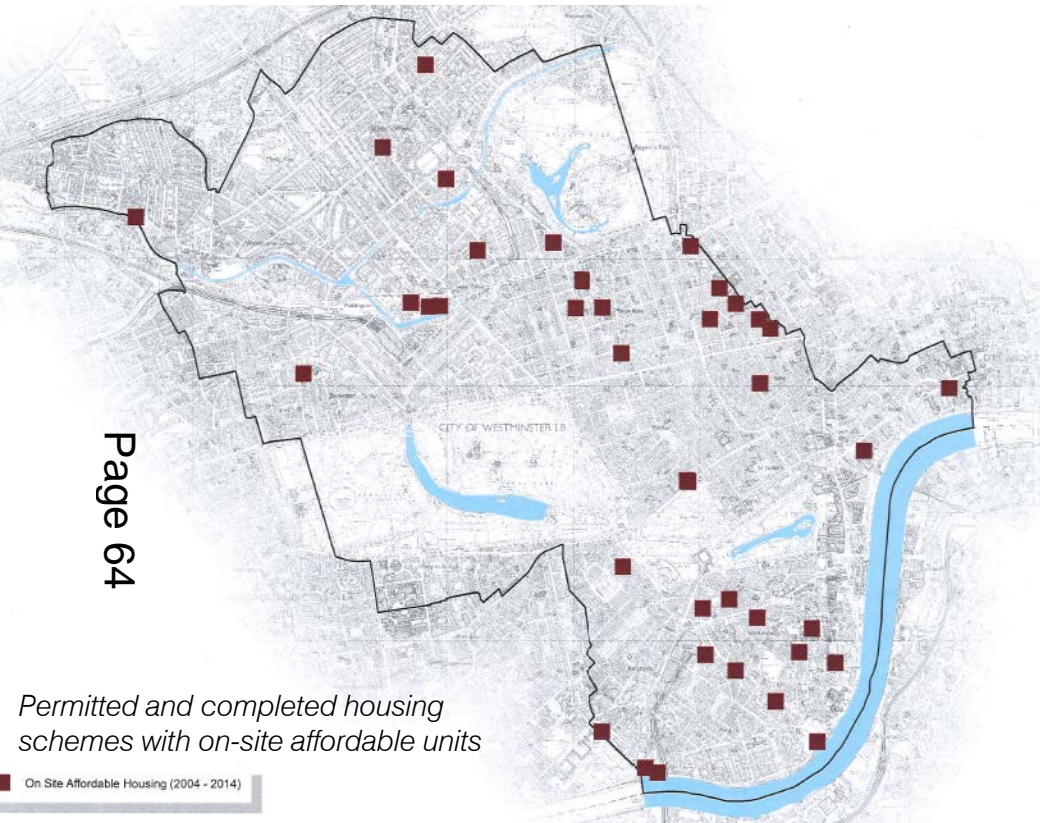
"Diversity and creativity are drivers of innovation and growth at the local and national levels. Intermediate tenure properties change the composition of the local workforce, ensuring continued diversity of economic activities and local communities"

University of Westminster, 2014

Social and intermediate housing improves the composition of the local workforce, ensuring continued diversity of economic activities and local communities.

Westminster benefits from a very diverse economy including jobs with lower pay. These employees are unable to afford market properties in the area. Businesses benefit from a diverse employee base including people who live more locally. This is especially important for jobs with late/early shifts when public transport out of the city is less frequent.

THE REQUIREMENT FOR ON SITE AFFORDABLE HOUSING



52% of all schemes which required affordable housing in the last ten years failed to achieve any affordable units on- or off-site, resulting in payments in lieu. However, 42 residential schemes *did* provide on site affordable housing – totalling a significant 1,443 units across the city.

As the map to the left shows, these schemes are spread widely across Westminster and are not all concentrated in areas of lower land value. Although this equates to only about a quarter of all schemes where affordable housing was required, it clearly demonstrates the effectiveness of the policy approach in securing a range of tenures across the city as a whole.

There is no doubt that more affordable housing is needed. It is recognised that greater numbers of affordable units could be delivered in less affluent areas. In Westminster, these include areas which already have a high concentration of affordable housing and have lower land values. However, we are required to seek on-site affordable housing both by national and London-wide policy, followed by off-site affordable housing if on-site is not possible, and only as a last resort a payment in lieu.

However, even without this top-down requirement, the City Council would still wish to apply this cascade. As these homes have to go *somewhere*, it is unreasonable to suggest that they should be provided in areas that already support the greatest amount of affordable housing. Research has found that social and economic problems are greatly exacerbated at higher levels of affordable housing, and therefore localised deprivation. While the removal of the priority of on-site may lead to more units being developed there because of the lower values, it would not be creating or maintaining mixed and balanced communities, but instead an uneven dispersal of tenures across the city, with residents missing out on all the benefits of mixed tenure living.

In recognition that on-site delivery is not always financially viable or practicable, the cascade remains to ensure that residential developments can still come forward, with delivery off-site if on-site is not achievable, or a payment in lieu as a last option.

AFFORDABLE HOUSING CREDITS

Affordable housing credits are where new affordable housing is built and then used against a planning requirement generated by a later scheme. Credit schemes have already been carried out in Westminster on an *ad hoc* basis, and are provided for in the London Plan. These schemes have delivered better outcomes because the affordable housing has been delivered much earlier than it would have been if it had been forced to wait until the host scheme had been ready to be built. It also meant that the affordable housing delivered could be shared between a number of different sites which were all delivered at different times. A potential negative is that using credits may fail to create mixed and balanced communities, and for this reason it is proposed that they are treated the same as off-site provision in the cascade – they are essentially the same as off-site provision in everything but timing. Credits are preferable to a payment in lieu because they provide the actual housing early on in the development process, and there is a limit as to how many sites can be found by the council to spend accumulated payment in lieu monies.

The purpose of the policy set out in this booklet is to provide a policy framework for managing a credit system, building on the lessons learnt from the *ad hoc* examples already delivered. This will provide certainty for developers in their investment decisions and speed up the planning process by setting out clear standards and requirements. It also enables developers to provide affordable housing over and above their requirements and designate the additional units for future development, benefitting the council with the early delivery of those affordable units.

Credits may be traded. However, the city council needs to be sure that the value of the credit does not escalate between when it is developed and when it is drawn down. This will be achieved by attaching a nominal value* to each credit when it is registered. The developer could trade premium price credits if they choose to, but only the agreed nominal value will be considered by the council when assessing viability of schemes. The nominal value will be part of the viability assessment for the credit scheme.

Care also needs to be taken as credits can distort the market in lower value areas, because the value of the credit site becomes that of the host site (say Mayfair). This 'value creep' makes it even more difficult to deliver affordable housing in Westminster. For this reason the value of a credit site should be in the context of the existing use, and a policy compliant scheme on that site.

“The credit concept conceived and implemented openly, transparently and within lawful land use planning parameters, offers the opportunity to deliver more housing faster.”

Planning in London, 2009

1 Affordable Housing Credit = 1 SQM of completed affordable floorspace which can be ‘banked’ by a developer and ‘drawn out’ at a later date to comply with affordable housing policy requirements.

On-site provision of affordable housing will still be the priority for new developments and developers will have to demonstrate that on-site is not practicable or viable before the draw down of credits is considered.

*A nominal value is a fixed value per unit which rises in line with inflation and reflects only the cost of the actual delivery (land and construction) of the affordable unit.

AFFORDABLE HOUSING CREDITS

Key Questions

4. How can the policy operate to ensure that the difference in value between the provision of affordable housing in a high value scheme and its provision on another lower value site is spent on affordable housing delivery, rather than pushing up values on credit sites and therefore going to landowners? Is this an appropriate aim? What realistic alternative is there?
5. When looking at the nominal value of credits, is a site-by-site assessment more appropriate, or the setting of broad value bands?
6. The purpose of the credit scheme is to bring forward affordable housing earlier than it would otherwise come forward. How can the policy ensure that a credit scheme is bringing forward additional affordable housing that would not otherwise be delivered, and ensure mixed and balanced communities? How can we be sure that the funding for credits is reinvested in affordable housing?
7. How would the nominal value be agreed?
8. Could the council act as a 'clearing house' matching developers with the outstanding credits? What role could the council have in encouraging joint ventures between developers and registered providers to ensure additionality?

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Fermoy Road: Winner of 2013 RIBA London Award



Examples of Affordable Credits schemes which have been piloted in Westminster

32 affordable homes sold at a 20-30% discount of market value. Cost of selling the land held as a credit by the developer against future affordable obligations

74 affordable homes which can be 'drawn down' by the developer against future affordable obligations

Wilton Plaza: Shortlisted for London Planning Award (Best Place to Live) 2010



AFFORDABLE HOUSING CREDITS IN PRACTICE

Developer applies for permission to build affordable housing and to register that floorspace as affordable housing credits.

Permission is granted and the affordable housing floorspace is registered as credits, with a 'nominal value' attached to them.

Affordable housing is built and made ready for occupation and the credits are now eligible to be drawn down.

Developer applies for permission to build market housing which triggers a requirement for affordable housing.

It is demonstrated to the council's satisfaction that on-site affordable housing is not practicable or viable.

Affordable housing credits can be drawn down to satisfy the affordable housing requirements for the market housing.

Page 67

A maximum of 50 units at each new development site can be registered as a credit.

From the date of registration, the credits will have a lifespan of 7 years.

Another developer may buy and use the credits against their own market development.*

On-site cannot be provided so the Affordable Housing Cascade allows for credits to be drawn down as an equivalent to off-site.

A developer can also deliver the affordable housing requirement off-site if they do not own any credits.

See Key Question 18 on page 31

*If a developer chooses to pay over the agreed nominal cost of a credit, that premium will not be taken into account in future viability assessments.

PAYMENTS IN LIEU

The per unit sum (the amount payable per unit of affordable housing required) was originally calculated as the land cost element of the Housing Corporation's Total Cost Indicator (TCI). It was then updated every year to take account of changes in land and construction costs.

Because the Housing Corporation stopped publishing TCIs in 2005, the City Council has annually updated the last published TCI figure using advice from consultants to reflect land price inflation based on the percentage increase in house prices in Westminster using the Land Registry as shown in the table to the right.

The percentage increase was originally used as an amount that would be viable in most cases to avoid viability assessments on every scheme. However this is standard practice now. The payment in lieu figure needs to be a useful guide, but viability is also important.

Year	Per unit sum	% increase on previous year
2005/06	£125,000	-
2006/07	£134,000	7%
2007/08	£147,000	10%
2008/09	£179,000	22%
2009/10	£179,000	0%
2010/11	£185,000	3%
2011/12	£195,000	5%
2012/13	£215,000	10%
2013/14	£229,000	7%
2014/15	£251,000	10%

Key Questions

9. Where it is agreed that a scheme cannot meet its payment in lieu in full, should sales values be reviewed at a later date? If there is a significant increase in the sales values, the council could share any "super-profit" with the developer up to a level of policy compliance? If so, what should "super-profit" be considered to be and what proportion of that "super-profit" be appropriate whilst still ensuring adequate incentive to developers?
10. Is the percentage increase in land value used for annual assessment of the payment in lieu an appropriate measure for affordable housing delivery in the face of average price of just a one bed flat in Westminster now exceeding £500,000?
11. We previously calculated the affordable housing requirement by unit, and therefore the PiL is currently calculated in the same way. As we now take a proportion of the *floorspace* not units, should the payment in lieu also be calculated as floorspace? If so, how do we translate into a floorspace figure?

PAYMENTS IN LIEU – ALTERNATIVE MODELS FOR CALCULATION

The council is considering whether there are other, more appropriate methods which could be used as the basis for the payment in lieu calculation. Views are sought on a number of options (A-F below) or any other options which may come forward through this consultation. The City Council is looking for a payment in lieu that:

1. Reflects the actual cost of delivering the affordable homes through the Affordable Housing Fund, and
2. Is cost neutral compared to on-site, off-site or credits.

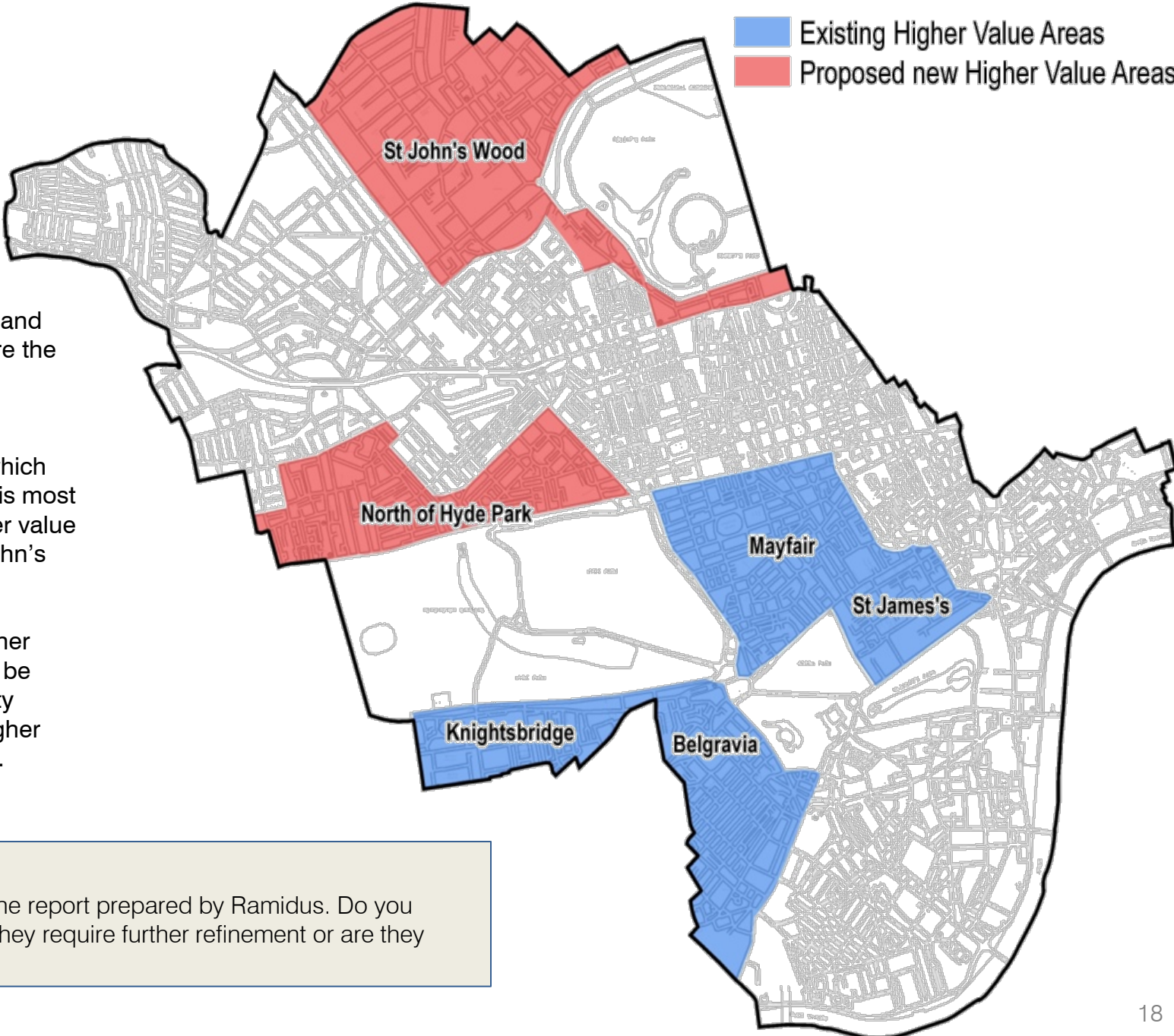
Possible options:

- A. Base the payment in lieu figure on the cost of land and construction to take account of the true cost of delivering the homes. The increase in cost of land would continue to be calculated based on house price increases, and after initial assessment of the average build cost for affordable housing in Westminster, this figure would be increased annually in line with the cost of construction indices published by the Department of Business Innovation & Skills. Each year the new cost of land (increased by the percentage change in house prices) and the new cost of construction would be added together to arrive at the per unit sum.
- B. Use the average price per square metre for a residential unit in Westminster (uplifted in the higher value areas) and add on the cost of constructing an affordable unit.
- C. Use viability assessments for each scheme to calculate the maximum value that can be captured from each scheme up to the maximum amount of floorspace required (up to a maximum of 25% or 35% depending on location).
- D. Use a set value per habitable room required depending on location (a method used by other boroughs).
- E. Use a set value per square metre of affordable floorspace required.
- F. Use the national All-in Tender Price Index published by the Building Cost Information Service of the RICS, as is used by the Community Infrastructure Levy.

PAYMENTS IN LIEU

Higher Value Areas

Existing Higher Value Areas
Proposed new Higher Value Areas



There are four higher value areas (Knightsbridge, Mayfair, St James's and Belgravia) in the current policy where the per unit sum is 33 1/3% higher.

Following research into the prime residential market in Westminster, which has revealed where prime property is most prevalent in the city, two more higher value areas (north of Hyde Park and St John's Wood) are proposed.

In these new and in the existing higher value areas, the payment in lieu will be higher than across the rest of the city acknowledging the considerably higher value of residential floorspace there.

Key Question

12. The new areas are based on the report prepared by Ramidus. Do you agree with the new areas? Do they require further refinement or are they high value across the area?

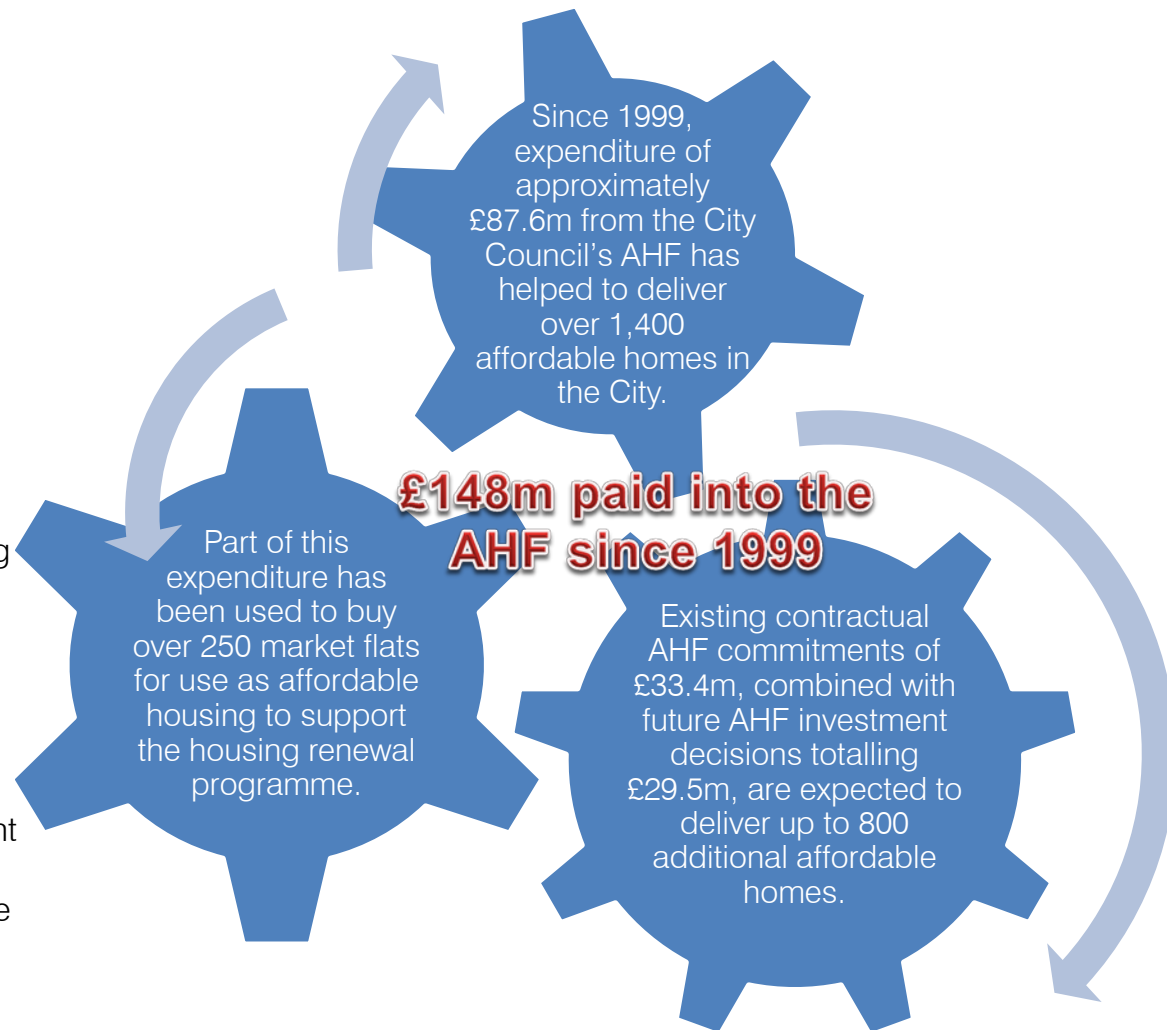
AFFORDABLE HOUSING FUND

Money is paid into to the Affordable Housing Fund (AHF) in lieu of (a) on-site and off-site affordable housing and floorspace and (b) residential floorspace to offset increases in commercial floorspace as required by the mixed use policy.

The AHF is administered by the City Council's Director responsible for housing and is used for the provision of new affordable housing in Westminster. The AHF plays an essential role in the provision of additional affordable housing in Westminster by contributing towards the funding for the Housing Renewal Programme and bridging the 'funding gap' between the GLA funding for new affordable units in Westminster and the Registered Providers (RPs) actual costs of those additional units.

From April 2012, the HCA (Homes and Communities Agency) London functions were devolved to the Greater London Authority (GLA). The GLA have indicated that grant is unlikely to be available for future schemes secured by s106 agreements and that local authorities should assume zero grant for such schemes.

The AHF is, therefore, essential to delivering new affordable homes in Westminster in this new funding environment. The AHF also provides a wider range of affordable housing choice in the City, including the provision of intermediate housing and will play an increasingly important role in delivering the government's new Affordable Rent tenure (see page 1 for definition of this tenure), in the light of the reduced Mayoral grant.



Key Question

13. Given the difficulties in meeting Westminster's entire affordable housing need within the borough, and the London-wide nature of the housing market, what role could affordable housing provided outside Westminster play in making up the shortfall?

THE FUTURE OF THE AFFORDABLE HOUSING FUND

Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a charge on development that creates residential units or new build floorspace.

The money generated can be only used to support infrastructure such as transport schemes and schools that the council, local community and neighbourhoods require to help accommodate new growth from development. This means that planning permissions, planning appeals, enforcement appeals and permitted development could potentially be liable to pay the levy. CIL is a non-negotiable charge payable per square metre for eligible developments and in part replaces the Section 106 (S106) Planning Obligation regime.

Westminster anticipates adopting a CIL in April 2015. Under the current system when a developer presents a housing development for which affordable housing is required, a package of planning obligations are negotiated to make the development acceptable in planning terms e.g. a financial contribution towards transport, new schools, open space etc. The amount of affordable housing (or payment in lieu) required also forms part of the negotiated package of planning obligations.

Once Westminster's CIL is in place the negotiations for contributions to infrastructure will cease to take place – as the set CIL charge per square metre will replace most of the infrastructure payments which previously would have been negotiated. The developer will have to pay the amount of CIL which is required or the development will not be able to commence. Affordable housing is not captured within the Levy and is therefore still negotiable. Negotiations will still take place for section 106 contributions to affordable housing, which is therefore seen as the 'pressure valve' in development viability and there is a risk that because no other obligations will be able to be reduced through negotiation to ensure policy compliant levels of affordable housing are provided, that less units or a lower payment will have to be accepted by the council if the development is to viably proceed. It is noted that Registered Providers must pay for the affordable units, they are not provided for free, and therefore the ability for Registered Providers to afford the units is a key element of viability.

The Mixed Use Policy

The adopted mixed use policy currently requires an equal amount of new residential floorspace alongside new commercial floorspace in the Central Activities Zone over certain thresholds. Where the full or partial amount of residential floorspace required by the policy cannot be provided, the amount of *affordable* housing which should have been provided by the development to satisfy City Plan Policy S16 is calculated and a payment into the Affordable Housing Fund is required in lieu of the provision. Affordable housing is closely related to the provision of commercial floorspace because a range of housing options for people who work in Westminster is needed to support businesses, including those who work anti-social hours or shifts, and contributes to the pool of available labour.

Mixed use developments account for almost 20% of payments into the AHF. The policy approach is currently under review as Westminster has had three successive years of significant losses of offices and there are more, substantial losses in the pipeline. The Mixed Use/Office to Residential consultation booklet (available to view on our website: <https://www.westminster.gov.uk/westminsters-city-plan-city-management-policies-revision>) has introduced a number of options for the future of the mixed use policy, which may significantly reduce the amount of money coming into the AHF through payments in lieu when mixed use development takes place - changes to both policies need to be considered in tandem.

THE FUTURE OF THE AFFORDABLE HOUSING FUND

OPPORTUNITY LOSS FROM THE PRIME HOUSING MARKET

Recent evidence published by the council has demonstrated the extent and nature of the prime residential market in Westminster – the report found that the prime market in Westminster makes up a very small proportion of housing transactions (around 8%) but owners of prime property contribute a very significant sum of money into the local economy – a conservative estimate is approximately £2.3 billion annually. The off-plan sale of prime property in Westminster has also facilitated housing development in the city, as well as associated affordable housing units and section 106 payments towards affordable housing, and necessary infrastructure. Westminster, together with Kensington and Chelsea has always had a role in meeting the market demand for prime housing and are uniquely placed to do so. There is a strong case therefore *not* to develop any policies that would specifically aim to restrict the prime residential market in Westminster.

However, inevitably development for the prime housing market can lead to opportunity losses in terms of housing numbers. While the evidence indicates that there is no *clear* relationship between the floorspace size of a property and the price paid, there will be times when a development results in a lost opportunity for greater housing delivery because super-sized units are delivered to meet demand from prime buyers.


For example, One Hyde Park (shown below) has an approximate density of 96 units per hectare, whereas the London Plan density matrix indicates a site in a high public transport accessibility location such as this should have a density in excess of 140 units per hectare.

Although the council does not want to discourage prime development from taking place in Westminster, it would be perverse for no action to be taken when super-size prime units are developed at the expense of a greater number of smaller units, particularly in the face of a challenging emerging housing target of 1,068 units per year. Therefore it is suggested that a payment in lieu be made on sites with super-sized units to mitigate against the opportunity loss for:

- more homes,
- provision of accommodation to meet the needs for market housing within Westminster
- New Homes Bonus for the benefit of the community, and
- a greater contribution towards meeting the housing target.

Key Questions

14. Should the City Council also look at a policy that requires a range of housing sizes on all sites over a certain threshold, not just super-sized units?



“In meeting demand for Prime property in Westminster, it is inevitable that there will have been missed opportunities to deliver homes of smaller unit sizes”
Ramidus, 2014

RECOMMENDATIONS

This varies the policy suggestions in the Housing Need, Delivery and Quality booklet issued in March 2014.

The units per hectare lower limit has been increased for the central area to better reflect the excellent public transport accessibility.

We have previously consulted on the use of the CAZ boundary for the purpose of determining appropriate density ranges. The consultation comments on this matter are being considered and the use of the CAZ boundary is included here in the interim period while the policy is re-drafted.

The floorspace figure for individual units ensures that super-sized units are not 'masked' by a large number of very small units in the same development resulting in a density within the ranges specified in the table. It is double the London Plan minimum floor area for a 4 bedroom house, and 4 times the nominal value used for a housing unit in the City Plan e.g 1,000sqm is considered to have the capacity to accommodate 10 housing units for the purposes of the affordable housing threshold.

If a building is listed, the higher density ranges may not be appropriate if the development would have an adverse impact on the historic character of the building. For example, where a listed house that has been converted to flats is being de-converted back to the original dwelling house, but that exceeds 400sqm. In very rare cases there may also be instances where a lower density is required to be in keeping with the character and appearance of the Conservation Area.

POLICY S14: OPTIMISING HOUSING DELIVERY
 The council will work to achieve and exceed its borough housing target set out in the London Plan.

The number of residential units on development sites will be optimised, and should conform to the following density ranges*:

	<u>Habitable rooms per hectare</u>	<u>Units per hectare</u>
<u>Inside Central Activities Zone</u>	<u>650-1100</u>	<u>140-405</u>
<u>Outside Central Activities Zone</u>	<u>200-700</u>	<u>45-260</u>

Residential developments at a density lower than those shown above, or individual houses or flats that exceed 400sqm, will be subject to a payment in lieu of the shortfall in housing units, except where the council considers that the significance of a heritage asset would otherwise be compromised. These will be calculated in the same way as the payment in lieu for Affordable Housing and will be made to the Affordable Housing Fund.

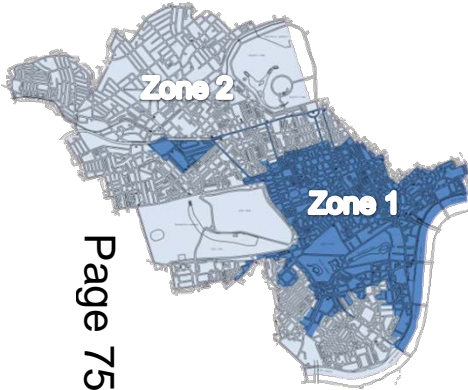
The best vehicle for delivery of the payment in lieu of housing is to use it to deliver affordable housing for which there is a significant and unmet need, and which cannot always be provided when it is sought due to site and viability constraints.

The shortfall will be calculated as the number of additional units that would be required to achieve the required density, or in the case of an individual housing unit, the amount of floorspace that exceeds 400sqm. This will also depend on the way in which we calculate the PiL for affordable housing – see page 17 above.

* This is based on London Plan Table 3.2 (excluding PTAL ratings of 0-1)

This is adopted policy and also a recommendation of the Prime Residential Market in Westminster report by Ramidus.

Affordable housing requirements have a significant influence on the likelihood of development sites being identified and brought forward by landowners and developers and have been set at levels which are considered viable in most cases and are therefore unlikely to discourage development.



A very similar approach has been in operation since 2010 and has worked well.

In some parts of Westminster land has an extremely high existing use value – which means that purchasing land for redevelopment is very expensive. Although profits are likely to be high for new housing development in these areas, the initial high cost of land means that for the development to remain viable, a lower proportion of affordable housing must be provided than would be possible elsewhere in the city.

POLICY S16 AFFORDABLE HOUSING
Affordable Housing and floorspace that is used, or was last used as affordable housing will be protected.
 The council will work with its partners to facilitate and optimise the delivery of new affordable homes, which will be equivalent to at least aim to exceed 30% of all new homes.
 Proposals for housing developments of either 10 or more additional units or over 1,000 sqm additional residential floorspace (**Gross Internal Area**) will be expected to provide a proportion of the floorspace as affordable housing as set out in Table 16.1:

Net residential floorspace (GIA)	Proportion of affordable floorspace required		
	Affordable housing is in Zone 1	Affordable housing is in Zone 2	Affordable housing has a LEUV
1000 - 1249	10%	10%	10%
1250 - 1499	12.5%	12.5%	15%
1500 - 1749	15%	15%	20%
1750 - 1999	17.5%	17.5%	25%
2000 - 2249	20%	20%	30%
2250 - 2499	22.5%	22.5%	35%
2500 - 2999	25%	25%	35%
3000 - 3499	25%	27.5%	35%
3500 - 3999	25%	30%	35%
4000 - 4499	25%	32.5%	35%
4500+	25%	35%	35%

Table 16.1: Proportion of residential floorspace required as affordable housing

Some of this housing will be delivered by developers, some by other means e.g. Housing Renewal projects. It will not all be new housing e.g. spot acquisitions.

The use of GIA instead of Gross External Area (GEA) brings the affordable housing policy in line with Westminster's forthcoming Community Infrastructure Levy charging schedule.

Land with a low existing use value (LEUV) will be assessed on a site by site basis. It has a steeper staircasing because AH provision is more viable than on sites with higher existing use values. LEUV is defined as sites with no existing buildings or limited built development (e.g. car park, sub-station etc) by the general standards of the locality, and sites for which there is little effective demand for their current use other than by their present or most recent occupier.

Incremental increases in the proportion of affordable floorspace required (by 2.5% between each floorspace band in zones 1 and 2, and by 5% on sites with a LEUV) reflects the lower economies of scale on smaller sites.

The expectation is that the price paid for a site will reflect the council's planning policies and affordable obligations – a development proposal made unviable by an inflated price paid for land will not be an acceptable reason to grant planning permission. This is because the contribution levels in the policy have already been viability tested. The council may prefer to leave a site in its current use/form rather than accept a non-policy compliant development because of viability where that use meets other objectives, such as providing employment. For example the council may prefer to keep offices that contribute towards the UK economy rather than accept housing that doesn't meet need.

POLICY S16 AFFORDABLE HOUSING CONTINUED

The affordable housing will be provided in accordance with the cascade below. Applicants are required to demonstrate to the council's satisfaction ~~Where the council considers~~ that ~~this it~~ is not ~~appropriate, practical practicable~~ or viable ~~to provide the floorspace required (in whole or in part), based on evidence presented by the applicant at each step of the policy cascade before they can move to the next.~~

The affordable housing will be provided on site.

The affordable housing ~~should~~ will be provided:

- off-site in the vicinity of the host development or
- by a draw down of the required amount of Affordable Housing Credits (Policy CM16.2) in the vicinity of the market development.

The affordable housing will be provided:

- off-site ~~provision~~ beyond the vicinity of the market development or
- by a draw down of the required amount of Affordable Housing Credits (Policy CM16.2) beyond the vicinity of the market development. ~~will only be acceptable where the council considers~~

Either case will only be acceptable where the council considers that the affordable housing provision greater and:

- provides more affordable housing than would be possible on- or off-site in the vicinity;
- is of a higher quality than would be possible on- or off-site in the vicinity; and
- ~~where it~~ would not add to an existing localised high concentration of social housing ~~as set out in City Management policy.~~

A payment in lieu (PiL) will be made to the council's Affordable Housing Fund.

The Strategic Policy wording has been changed from 'practical' to 'practicable' to more accurately reflect the meaning of the policy – it will need to be demonstrated that on-site delivery is incapable of being put into practice (impracticable)

This is adopted policy. There may be exceptional circumstances where the council considers on-site is not appropriate.

This is adopted policy. 'Vicinity' is not defined to allow for flexibility when dealing with different site circumstances / availability.

The host development is the one which forms the original application triggering the requirement for affordable housing and which is first assessed for whether it can provide on-site affordable housing in whole or part..

Proposals for off-site provision of affordable housing must be agreed with the council at application stage.

See page 25

The payment in lieu policy is under development (see page 17).

Existing concentrations of social housing

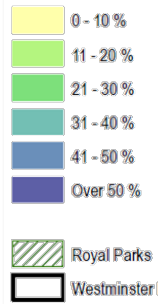
This map shows where social rented housing is concentrated across the city. The areas with over 50% social rented housing are shown in dark blue.

If on-site or off-site affordable housing in the vicinity is not possible, the council would prefer for units to be provided off-site beyond the vicinity rather than a payment in lieu, however it is also important to ensure mixed and balanced communities are created across the city. In particular the council is aware that parts of Westminster already have a high proportion of social rented housing.

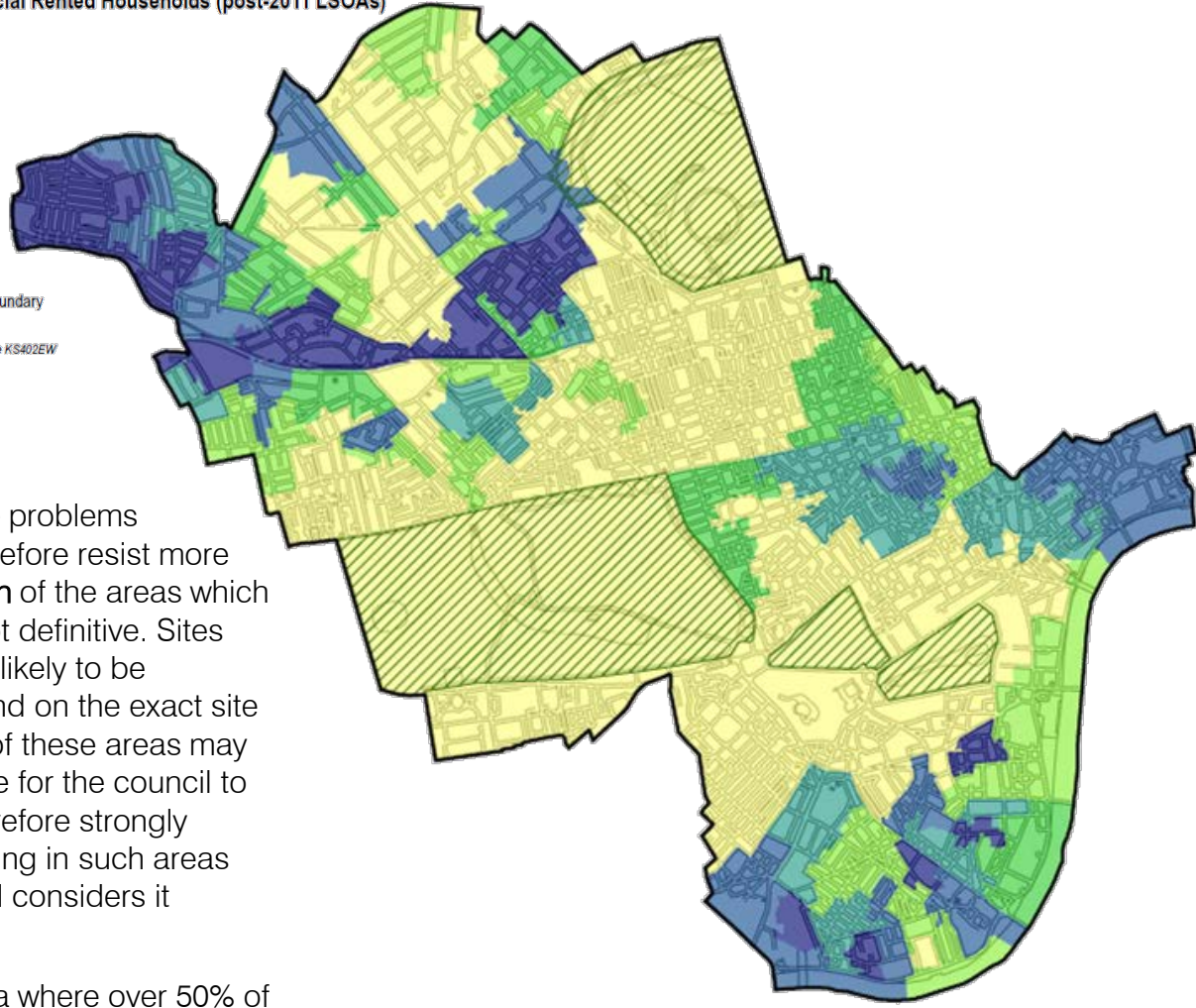
Building affordable housing in such locations can exacerbate problems associated with mono-tenure estates and the council will therefore resist more social housing in such locations. This map gives an **indication** of the areas which are likely to be unsuitable for more social housing, but it is not definitive. Sites within areas with over 50% affordable housing are much less likely to be appropriate for additional affordable housing, but it will depend on the exact site location and circumstances. Similarly sites on the boundary of these areas may also not be appropriate for meeting off-site provision. It will be for the council to determine if the site's specific location is unsuitable. It is therefore strongly advised that applicants who propose off-site affordable housing in such areas seek pre-application advice to determine whether the Council considers it suitable.

If a proposal is made for off-site affordable housing in an area where over 50% of properties are already social rented it may be considered more appropriate in some cases for a higher proportion of intermediate units to be provided. This will provide a better mix of tenure, whilst still securing actual units rather than a payment in lieu for which a site still has to be found.

Percentage of Social Rented Households (post-2011 LSOAs)



Source: ONS, Census 2011, Table KS402EW

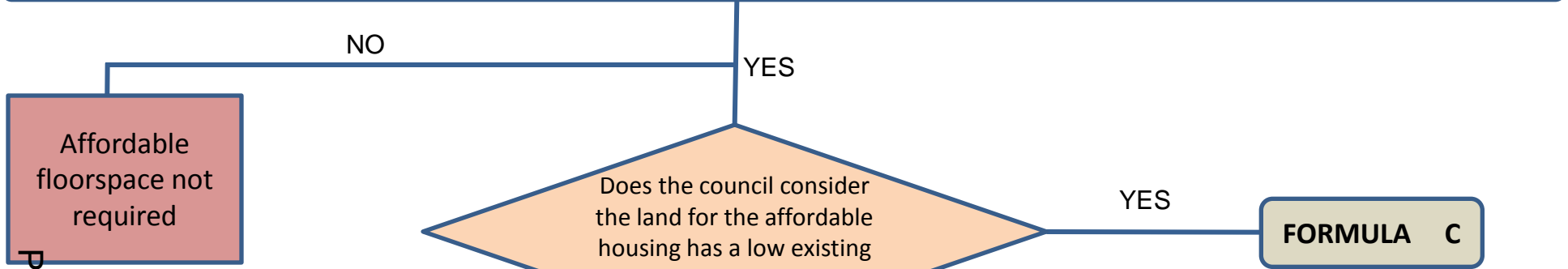


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POLICY S16 AFFORDABLE HOUSING IN PRACTICE

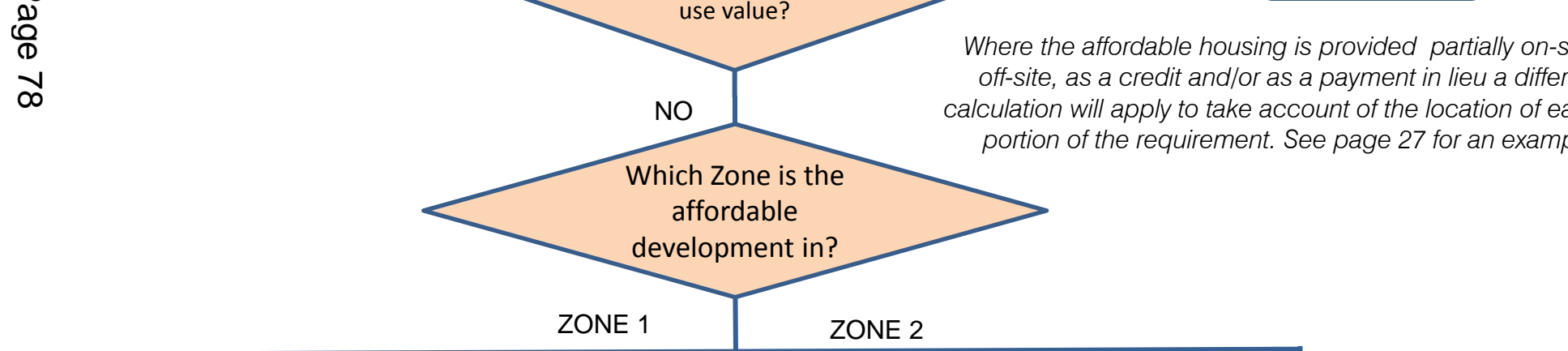
This flow chart will be published on Westminster's website to aid developers in calculating the affordable housing requirement. The website will have a spreadsheet which will automatically calculate the floorspace and payment in lieu requirement when the net residential floorspace is entered.

Development proposes over 10 new residential units or over 1,000sqm new residential floorspace?



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Where the affordable housing is provided partially on-site, off-site, as a credit and/or as a payment in lieu a different calculation will apply to take account of the location of each portion of the requirement. See page 27 for an example.



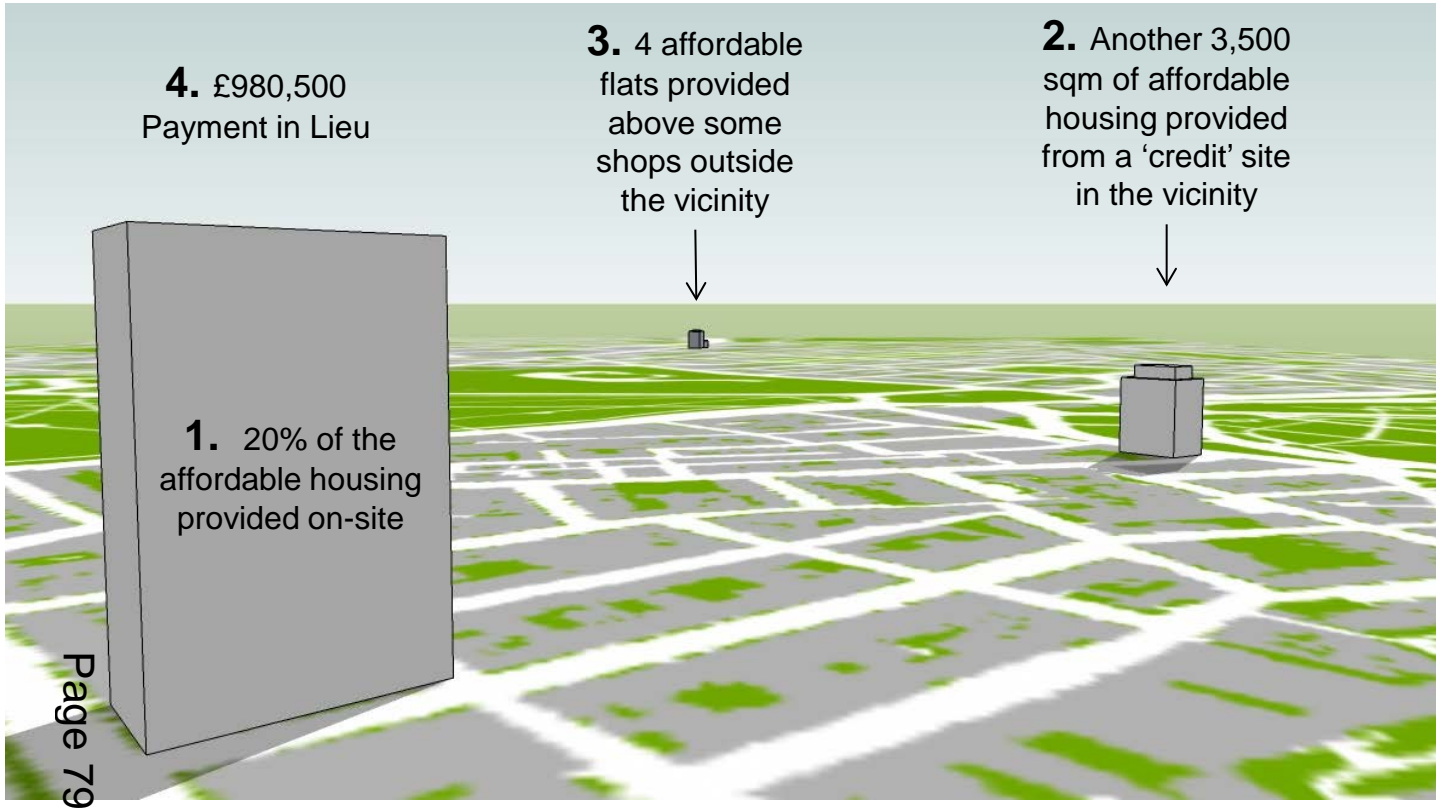
Click here to open the affordable housing calculation spreadsheet and view Formulas A, B and C

Or visit: http://transact.westminster.gov.uk/docstores/publications_store/AffordableHousingCalculation.xlsx

FORMULA A

FORMULA B

AFFORDABLE HOUSING – AN EXAMPLE



This shows a fictional example of a scheme using all of the mechanisms in the affordable housing cascade to deliver the required amount of affordable housing.

It is for a scheme in Zone 1 (see page 10) of 30,000sqm of residential floorspace, of which 20,000sqm is new floorspace (the other 10,000sqm was on the site before it was demolished to be replaced).

However, the off-site provision is in Zone 2 so that proportion has to be calculated as a % of the Zone 2 requirement (see 3. below).

The PiL is based on current requirements which are subject to consultation.

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EXAMPLE SCHEME DETAILS

Total Residential	30,000sqm	
Net Residential	20,000sqm	
AH required (Zone 1)	5,000sqm	25%
AH required (Zone 2)	7,000sqm	35%

CALCULATIONS

	Floor Area	%	Units	
1. On-site AH (Zone 1)	1,000 sqm	20%	10	
<i>Remaining Shortfall</i>	<i>4,000 sqm</i>	<i>80%</i>		
2. Credit (Zone 1)	3,500 sqm	70%	47	
<i>Remaining Shortfall in Zone 1</i>	<i>500 sqm</i>	<i>10%</i>		
<i>Remaining Shortfall in Zone 2</i>	<i>700 sqm</i>	<i>10%</i>		
3. Off-site (Zone 2)	350 sqm	5%	4	
<i>Remaining Shortfall</i>	<i>250 sqm</i>	<i>5%</i>		
<i>Shortfall with uplift</i>	<i>313 sqm</i>	<i>6%</i>	<i>3.9</i>	
<i>Per Unit Sum (current policy – see page 15)</i>				£251,000
4. Payment in Lieu				£980,469

RECOMMENDATIONS

NEW POLICY CM16.1: MEETING THE RANGE OF AFFORDABLE HOUSING NEEDS
 Provision of affordable housing will aim to contribute to the strategic target of 60% of such units for households eligible for social housing and 40% for households eligible for intermediate housing.

Affordable housing will provide the following size mix:

	Social	Intermediate
1 bed	5% (1 double bedroom)	34%
2 bed	40% (2 double bedrooms)	33%
3+ bed	40% 3 bed (half all doubles, half 1 singles) 9% 4 bed (half 1 single, half 2 singles) 6% 5+ bed	33%

Table 16.2 Unit size mix

Key Questions

- Does the strategic target of 60:40 split of social and intermediate housing remain relevant, or should this be reconsidered to grow the intermediate sector, particularly in light of the evidence base set out on page 6 above?
- Should the council retain the flexibility to negotiate a different social:intermediate split, including to overcome viability constraints?
- Intermediate housing currently makes up only 1.5% of Westminster's housing stock and is difficult to deliver because of the financial model of current products. Will this change if there are better products available in the intermediate market?

The percentage of 1 beds in the social sector is very small compared to the results of the Local Housing Market Assessment (2014) which showed a high need for 1 bed units. This is because 50% of existing all affordable housing stock is either studios or 1 beds. Of the 4,200 households currently on the Council Register for social housing about 24% of these households are registered for a studio or 1 bed property (including individuals registered for sheltered accommodation), with half the remaining housing registrants requiring 2 beds and the other half 3+ beds. However, owing to the predominance of studios and 1 beds in Westminster's existing social housing stock, these sizes also represent the highest level of churn. Therefore, the vast majority of current demand from households registered for studio or 1 bed housing can be met from the turnover of existing studio and 1 bed affordable housing stock.

The table below shows the total numbers of existing affordable housing stock owned by Registered Providers that became void and were made available to the Council for letting over the last five years, and percentage levels of these voids that were either studios of 1 beds.

Year	Total relets (all sizes)	Of which studios or 1 bed	% studios/1 beds relet
2009/10	238	153	64%
2010/11	279	176	63%
2011/12	194	123	63%
2012/13	242	150	62%
2013/14	219	165	75%

The percentages for Intermediate provision are aspirational and are not expected to be reflected exactly on every site. This will be particularly true of smaller sites.

Developers are encouraged to partner with a Registered Provider prior to submitting a planning application for affordable units.

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RECOMMENDATIONS

NEW POLICY CM16.1: MEETING THE RANGE OF AFFORDABLE HOUSING NEEDS CONTINUED

Service charges must be minimised. Intermediate affordable housing will be provided across these income ranges:

Eligible Household Incomes	Proportion
Up to the median income level	50%
Between the median and upper quartile income level	25%
Between the upper quartile income and GLA income threshold upper quartile income range	25%

Table 16.3 Eligible intermediate household income

The council wants intermediate schemes to be pitched at a point which is accessible, affordable and sustainable for those who are currently excluded from the mainstream housing market according to their needs and/or aspirations. Therefore intermediate housing must be available to households across these income ranges to achieve affordability and meet the full objectively assessed needs. There is no point only providing housing at the top end of the ranges as this will not meet the needs of households with middle-low incomes. Therefore sub-market rent alongside low cost homeownership options need to be provided.

Developers are required to meet more of the cost of providing affordable housing following the government’s revised funding framework. This makes it even more difficult to break the connection with market value of homes, which skews provision toward the top end of the affordability spectrum. Paragraph 47 of the NPPF requires local authorities to consider and provide for the full objectively assessed needs of eligible households. Income bands are required to enable delivery of a balanced range of intermediate homes.

Affordable housing is defined in the NPPF as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.

Service charges can be a significant proportion of overall housing costs, and if measures are not taken to minimise maintenance costs, can render affordable housing unaffordable. Affordable and market dwellings on the same site should not share common services because the law requires that occupiers receiving the same common services should pay the same service charge regardless of tenure. Charges can be minimised by:

1. ensuring that where possible affordable and market dwellings do not share the same corridors, stairs, lifts or entrance lobbies;
2. designing the communal parts of affordable housing to ensure high quality and durability without high initial or on-going maintenance costs; and
3. the use of management agreements and sinking funds.

The eligible household income ranges are based on average incomes for residents in Westminster and reflect realistic affordability. The income ranges are published in a report produced by Catalyst Housing showing the income profile of intermediate households at 31st March 2014. The income ranges and intermediate waiting list will be published annually on the Homeownership Westminster website.

The percentage proportions shown below are indicative and a steer will be taken from the Affordable Housing Manager or from published guidance as to what proportions are required for individual sites. By way of example, the current income ranges are as follows:

	Up to the median income level	Between the median and upper quartile income level	Between the upper quartile income level and GLA threshold
1 bed	£32,457	£32,457 - £42,400	£42,400 -£66,000
2 bed	£38,000	£38,000 - £49,144	£49,144 -£66,000
3 bed	£35,055	£35,055 -£48,950	£48,950 -£80,000

Credits

NEW POLICY CM49.3 CREDITS

A) Registering Credits

In addition to Policy S1 in the case of mixed use credits and S16 in the case of affordable housing credits, credits must:

1. be agreed as a credit at application stage and registered as a credit at the time of permission being granted;
2. establish a nominal floorspace value for the affordable housing credit in agreement with the council, with each credit equating to 1 sqm;
3. fund the development and maintenance of a credit monitoring database which will be the definitive list of credit sites;
4. not be;
 - a. subject to an extant planning permission for that use;
 - b. be listed in Appendix 1 Proposals Sites with that use as a Preferred Use; or
 - c. in the case of residential mixed use credits, be included on the Housing Land Supply list published in the most recent Annual Monitoring report;
5. comply with the following policies;

Residential Mixed Use Credits	S14 Optimising Housing Delivery; Policy S16 Affordable Housing excluding Payments in Lieu; CM16.1 Meeting the Range of Affordable Housing Needs; and CM14.1 Housing Quality
Commercial Mixed Use Credits	S18 Commercial Development; S19 Inclusive Local Economy and Employment; and where relevant S21 Retail
Affordable Housing Credits	S14 Optimising Housing Delivery; CM16.1 Meeting the Range of Affordable Housing Needs; and CM14.1 Housing Quality

6. in the case of affordable housing credits, not exceed a maximum of 50 affordable housing units registered as credits on each development site, and be provided within Westminster.

In considering if a proposal should be agreed as a credit scheme, the council will take into account the scheme's location, scale and quality and in the case of residential floorspace, the type, tenure, mix and number of units to be provided and the type, tenure and mix of uses/housing in the local area.

Credits should contribute to mixed and balanced communities within Westminster, and should not create large concentrations of mono-tenure development.

It is important that the value is set at the outset to ensure the same value is used when it is drawn down (increased by inflation) rather than escalating values. A nominal value is a fixed value per unit which reflects the cost of the actual delivery (land and construction) of the development.

The cost of administering the credits should be borne by those who use it.

The credit must provide additionality.

The purpose of credits is to optimise the floorspace delivered. For this reason credit development must be policy compliant to ensure it is of the type and quality necessary to off-set requirements of the future host schemes. There may also be instances where a credit proposal would not represent a good development solution and in these cases the council would not accept the proposal for registration.

Payments in lieu are not appropriate because they do not deliver the land for affordable housing and do not contribute to a local mix of tenure and occupier. If a credit scheme cannot deliver the actual affordable housing units required by policy, it is not appropriate for registration as a credit.

This is particularly important in relation to housing type and mix, particularly in relation to affordable housing. Credits aren't linked to any particular unit or floorspace so the overall mix must be appropriate so that each credit/square metre drawn down makes an appropriate contribution to meeting Westminster's housing needs.

NEW POLICY CM49.3: CREDITS CONTINUED

B) Drawing Down Credits

1. In addition to Policy S1 in the case of mixed use credits and S16 in the case of affordable housing credits, when drawing down credits:
2. They must be drawn down within 7 years of registration;
3. The floorspace registered by the credits must be completed, and the completion certificate provided to the council;
4. The nominal value referred to in A) 2. above must be used in any viability assessment for the host scheme;
5. Credits may be pooled from more than one credit scheme, or used in combination with on-site, off-site or payment in lieu provision;
6. The credits must be available for draw down, as follows:
 - i. Credits are allocated to a host scheme at the time the planning application is submitted for that scheme. After this, they are not available for any other host scheme until they are released.
To release credits the council must be notified in writing that:
 - a) the host scheme planning application has been refused and the time for an appeal has expired, or an appeal lost;
 - b) the host scheme planning application has been withdrawn;
 - c) the host scheme has been superseded by an alternative host scheme and the credits are transferred to the latter scheme;
 - d) the host scheme has been superseded by an alternative scheme that does not use the credits; or
 - e) the host scheme's planning permission has expired.
 - iii. Credits can only be drawn down once, and the credit has been drawn down when the council is notified in writing that the host scheme is completed.

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Draw downs must be time limited to ensure that the system is manageable, the nominal values remain relevant and there is a regular turn-over of credits. Seven years allows for construction and subsequent availability for draw down.

The City Council must be satisfied that the floorspace exists and is available for occupation before it can be used as a credit against another site.

By allowing the trading of credits to maximise flexibility available to developers, establishing the nominal value is essential. Each credit will have a **nominal value** per square metre attached to it at the time of registration which will rise in value over time in line with the Retail Price Index. The credit is not specifically linked to any particular piece of floorspace; it is an abstract value. When trading credits, the price of a credit is a matter for negotiation between traders: however, the only value that can be used for site-specific viability assessment host schemes is the nominal value.

The credit scheme must not be used to avoid making an appropriate contribution towards affordable housing. However, where the credit scheme doesn't include sufficient affordable housing, for example in a smaller scheme where the proportion of floorspace required is less, additional floorspace must be provided. This could be provided on-site, off-site, through the transfer of a market unit on the credit scheme to an affordable tenure as agreed by the City Council, or through an affordable housing credit. Payments in lieu are not generally appropriate because they do not deliver the land for affordable housing and do not contribute to a local mix of tenure and occupier. However, where a small shortfall is outstanding, flexibility should be applied.

Clarity is required to ensure the proper management and use of the credit system.

Key Question

18. A limit on the number of credits that can be registered from any one development has been proposed (A4 above) to ensure that credits contribute to mixed and balanced communities. Is 50 units the right number to limit credit developments to?

Credits registration will include the following information:

- the credit site, including an appropriate OS based map with the site outlined in red,
- the planning application reference(s),
- the area of net additional credit floorspace (rounded down to the nearest whole sqm),
- the type of credit and, in the case of residential, the proportion of affordable housing,
- the nominal value of each credit (£/sqm) as agreed with the council.

Have Your Say

This booklet is part of the informal consultation for developing the statutory policies in Westminster's local plan. It builds on previous consultation on the City Management Plan. Further information can be found [here](#).

This booklet only includes the proposed policies. However, Westminster's local plan will include supporting text based on the text within this booklet. This includes:

- Introductory text, setting out the background to the topic.
- Policy application: guidance as to how the policy will be applied, including details of how things will be measured or calculated etc.
- Reasoned justification: this is an explanation required by law to accompany a policy, setting out why a policy is applied.
- Glossary definitions: the statutory definitions used for terms that are included in the policies.

If you wish to discuss the issues raised in this booklet with somebody, please telephone 020 7641 2503.

To comment on anything in this booklet, please email planningpolicy@westminster.gov.uk or write to us at:

City Planning
11th Floor
Westminster City Hall
64 Victoria Street
London SW1E 6QP

Your comments will form part of the statutory record of consultation and will be made available on our website and to the public. Your contact details will not be made available, but we will use them to stay in touch with you about future policy development. If you do not want us to stay in touch, please let us know in your response.

Reading List

- [London's Renting Crisis](#) (Financial Times, 2014)
- [Definition of General Housing Terms](#) (National Planning Practice Guide, 2014)
- [Land Registry House Price Index 2014](#)
- [Affordable Housing Viability Study](#) (DTZ, 2011)
- 2014 DTZ report update
- [London Plan](#) (Greater London Authority, 2011)
- [Draft Further Alterations to the London Plan](#) (Greater London Authority, 2014)
- [Prime Residential Market in Westminster](#) (2014) Ramidus Consulting (2014)
- [Local Housing Market Assessment](#) (Ecorys Consulting, 2014)
- [Westminster Housing Market Assessment](#) (Wessex Economics, 2014) (Full report)
- [Westminster Housing Market Assessment](#) (Wessex Economics, 2014) (Summary report)
- [Mixed Communities in England](#) (Joseph Rowntree Foundation, 2005)
- Developing and sustaining mixed tenure housing developments (Joseph Rowntree Foundation, 2008)
- Respipe Database
- Census (2011)
- Office National Statistics (2011)
- CLG Population Projections (2013)
- [Construction price and cost indices](#) (Department for Business Skills and Innovation)
- Housing policy in high-density global cities (2014) University of Westminster



City of Westminster

City Plan Sub- Committee Report

Date:	21 st July 2016
Classification:	General Release
Title:	Draft Upper Vauxhall Bridge Road site development opportunity framework (DOF)
Report of:	Director of Policy, Performance and Communications
Cabinet Member Portfolio:	Built Environment
Wards Affected:	All
City for All	The draft DOF supports the delivery of all three City For All priorities by creating opportunities for everybody to be active and healthy through improvements to the sports centre (City of Choice), supporting the building of more affordable homes and more employment opportunities (City of Aspiration) and promoting the development of a high quality urban quarter (City of Heritage).
Key Decision:	No
Financial Summary:	Met by existing budgets
Report Author and Contact Details:	Kimberley Hopkins, Principal Policy Officer, Policy, Performance and Communications khopkins@westminster.gov.uk 020 7641 2935

1.0 Executive Summary

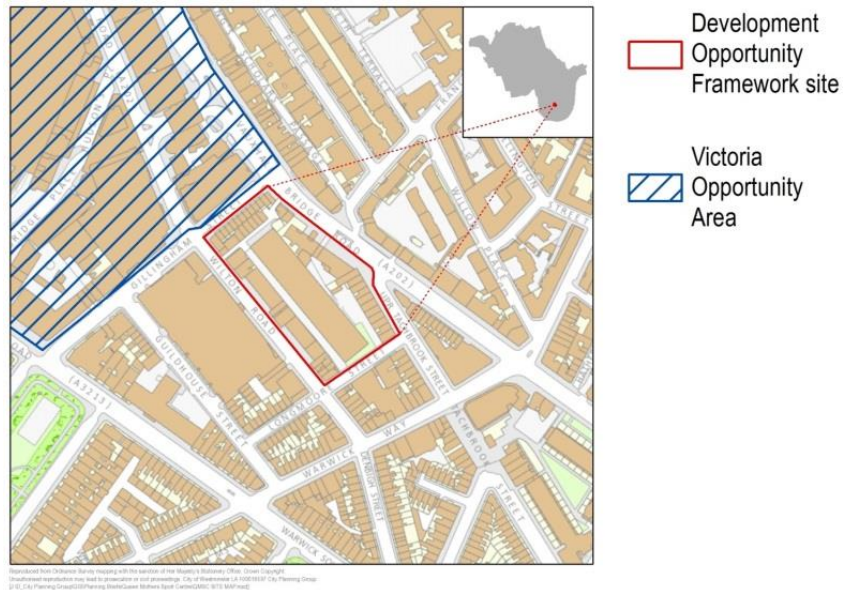
- 1.1 The Queen Mother Sports Centre building and facilities are now 35 years old and in need of modernisation. It is therefore in need of redevelopment to ensure it is able to continue operating and provide a leisure offer meeting modern standards. The redevelopment of the site and building provides an opportunity to improve the facilities and importantly provide a leisure offer that meets modern standards. The wider area around the sports centre would also benefit from regeneration to create an urban quarter more in keeping with the surroundings, that would better meet the needs of local residents and those working in or visiting the Victoria area. To this end the Council considers that a comprehensive approach to development of both the existing centre and its environs is required to promote the proper planning of the area, deliver sustainable development and to complement the strategic importance of the wider Victoria area. This approach will maximise benefit to the area and its residents and enable delivery of a higher quality built environment and public realm in an area where these are currently of comparatively low value.
- 1.2 A 'Development Opportunity Framework' (DOF) has been drafted to set out the character and function of the area and the background to the site. This document is not a blueprint or masterplan; rather it sets out the Council's vision and priorities for the site and sets principles that any redevelopment will be expected to embody. Its purpose is ultimately to guide development proposals as they are drawn up for sites within the DOF boundary. Once formally adopted as a supplementary planning document the DOF would be a material consideration in planning decisions.
- 1.3 It is important to emphasise for the purpose of the discussions at the City Plan Sub-Committee that the DOF is a guide for *any* developer with an interest in the site and is intended to provide transparency for stakeholders about the council's expectations for any development. It does not form part of any planning application or proposal by the Council itself for the site.

2.0 Recommendation

- 2.1 That members review the summary of the DOF below with a view to giving feedback on the priorities, vision and policy requirements identified for development of the site and agree the approach to public consultation.

3.0 Background

- 3.1 The City of Westminster owns the Queen Mother Sports Centre (QMSC) which is situated a few hundred metres from Victoria Station and transport interchange. It is the Council's most popular sports centre, serving the local community and many commuters who work in the Victoria area. It is located just outside the formal boundary of the Victoria Opportunity Area.
- 3.2 While the entrance to the sports facility is located on Vauxhall Bridge Road, the main building is largely located within the centre of an island block surrounded by Wilton Road, Gillingham Row, Longmoore Street, Upper Tachbrook Street and Vauxhall Bridge Road.



3.3 The existing sports centre building is reaching the end of its useful life span and many of the facilities are now out of date. The low quality of the other buildings within the site boundary and the unattractive public realm in which they are set means that there is an opportunity to create a destination people will want to visit rather than pass by. Whole-site development would also provide opportunities to address the lack of permeability through the site, which disadvantages the shopping centre on Wilton Road from drawing in consumers from Vauxhall Bridge Road; and to provide open space in an area of deficiency.

3.4 The requirement for alternative facilities to be sought prior to the existing sports centre being closed for redevelopment is highlighted in the DOF as being of utmost importance and developers must address this in their proposals. This message will be communicated in any publicity material issued to support consultation on the DOF.

4.0 Policy context

4.1 Under planning law, the role of an SPD of this kind is intended to help guide successful development. In keeping with legislation and national policy it cannot and does not change or add new policy but explains and adds further detail to adopted planning policies to help potential developers understand the council's policies and requirements and help them make successful applications. The DOF references the London Plan (2015), Westminster's City Plan: Strategic Policies (2013) and Unitary Development Plan (2007) albeit with a recognition that the latter document is old in policy terms now and will soon be superseded by emerging development management policies.

4.2 Development of the site which follows the guidance in the DOF will contribute to the following strategic objectives of Westminster's City Plan:

- improved quality of life and health and well-being;
- sustainable growth;
- creation of attractive places;
- increased employment opportunities; and
- an increased supply of good quality housing, including the provision of affordable homes.

- 4.3 The site falls within the Pimlico section of the Central Activities Zone (CAZ), is directly adjacent to the Victoria Opportunity Area (VOA), is partially within a CAZ shopping frontage, and partially within the Pimlico Conservation Area. It is also in an area identified as being of public open space and wildlife deficiency. The site contains retail, hotel, residential and social and community uses protected by planning policy.
- 4.4 Given the site's location within the Central Activities Zone and directly adjacent to the Victoria Opportunity Area, policies relating to mixed use and increasing employment and housing opportunities are highly relevant. The DOF explains that the sports and leisure use is protected by planning policy, but redevelopment to provide improved facilities will be welcomed. The DOF also sets out other policy requirements relating to transport, sustainability, open space and design and heritage – as summarised in the table on pages 5-6 below.
- 4.5 Once adopted the DOF will have a formal status in the planning system as a supplementary planning document. It is being prepared through the process set out in the relevant regulations.¹

5.0 Priorities for the site

- 5.1 The Council's vision for this site is for a comprehensive redevelopment to maximise delivery of social and community benefits (including new and improved sports and leisure facilities and open space) for a growing resident and working population; to create a new, high quality urban quarter that improves the experience of all who live, work and visit the area; to provide an attractive new space transforming the site into a destination in its own right; to expand and improve the commercial offer and deliver new residential units to help meet Westminster's housing needs and support the City's growth, complementing the development of the Victoria Opportunity Area.
- 5.2 Six priorities have been identified for development of the site:
- (i) Social and community benefits for local residents and workers.
 - (ii) Redevelopment of the existing sports centre to provide modern accessible sports and leisure facilities which can cater to the needs of a growing local residential population and local workforce.
 - (iii) Increase housing numbers of mixed tenure to contribute to meeting Westminster's housing needs.
 - (iv) Place-making to create improved pedestrian experience by the creation of public space designed to a high quality which creates coherent legible routes through the site.
 - (v) Provision of a mix of commercial uses designed to a high quality to create a destination people will visit rather than pass through.
 - (vi) Ensure a development that enhances the quality of the area through exemplary design and public realm, both through individual elements and as a whole and embodies high environmental standards.

¹ Town and Country Planning (Local Planning) (England) Regulations 2012

5.3 To help to deliver these priorities the DOF sets out a table of policy requirements (shown below) for development of the site:

Theme	Requirements from development at this site
Principles of development	A mix of uses.
	A holistic approach to redevelopment of the whole site.
Sports and Leisure centre	Improved, modern, accessible sports and leisure centre.
	Alternative facilities must be found for sports centre users before redevelopment can commence.
Commercial uses	Contribute to Victoria's emerging status as an office destination.
	Create new jobs.
	Offer employment, training and skills opportunities for local people.
	Replacement of existing office floorspace.
	Provision of affordable business space.
Retail	Replacement of hotel.
	Replacement of existing, and an uplift in, retail floorspace.
	Physical townscape improvements to the shopping centre to enhance the overall shopping experience, viability and vitality of centre.
	Provision of a range of units sizes.
	Existing occupiers of A1/A2/A3/A5 units offered space in the new development.
Residential	Development should not result in a concentration of non-A1 uses and not less than 55% of the frontage length should be in A1 use.
	Increase in residential units at a density appropriate to the site's location and 6B PTAL rating.
	High quality residential units.
	Sustainable residential units in terms of energy and water.
	Units should be fit for purpose during changing life circumstances.
	A third of new units should be family sized (3 or more bedrooms).
	An appropriate amount of amenity space should be provided for residents.
	Development should address play space deficiency.
	35% affordable housing required.
	A mix of intermediate and social tenures in the affordable provision.
20% of units may be required as starter homes.	
Public realm	Units should meet minimum space standards.
	High quality, new attractive and accessible open space creating permeability through the site and a space for people to meet / dwell.
	Improved legibility and way-finding.
Car parking	Improvements to safety for pedestrians e.g. effective and appropriate lighting, improved footpath capacity, pedestrian crossings.
	Provision of unallocated off-street car parking for a proportion of residential units.
	Innovative space-saving ideas for car parking encouraged.
	Car club membership options for residents.
	Space for safe and appropriate servicing and deliveries.
Car parking	Disabled parking spaces.
	Electric vehicle car parking/charging points.

Cycle parking	Promotion of sustainable transport methods by making it easier, safer and more attractive to travel by bike.
	Secure cycle parking / innovative cycle storage solutions.
	Provision of a cycle hub including for example maintenance and repair services.
	Changing / showering facilities for cycle parking provided as part of commercial uses.
	Replacement or new docking stations for the London Cycle Hire Scheme.
Sustainability	On-site renewable energy generation, on-site reduction in carbon dioxide emissions by 20% and 35% over and above the requirements for carbon reduction as set out in Part L of the Building Regulations.
	Connection to local district heating networks.
	Incorporate sustainable urban drainage into the site.
	Managed rainwater attenuation and grey water recycling facilities.
	Biodiversity improvements through greening the public realm.
	Reduction in air pollution.
	Sustainable control of heating through passive solar design and natural ventilation.
	Sustainable design and construction methods.
On-site recycling and composting waste facilities.	
Design	Sustainable and inclusive design and architecture inside and out.
	Incorporate designing out crime principles.
Heritage	Retention of buildings within the Pimlico Conservation Area which make a positive contribution and retention of key features of merit across the site.
	Modern architecture is encouraged in the right context with respect to local heritage and local distinctiveness.
Higher buildings	Should not have a harmful impact on surroundings.
	Not be visible from the Palace of Westminster or in sensitive townscape views.
	Enhance the London skyline.
	Activate the ground floor.
	Incorporate sustainable architectural design.

5.4 Views are sought from Members on whether the draft document provides an appropriate framework for development of the site, including:

- **whether the identified priorities are considered appropriate for the site?**
- **whether the mix of uses proposed is appropriate?**
- **whether the draft document sets an appropriate design and urban realm approach to development of the site?**

6.0 Financial Implications

6.1 Work on developing the supplementary planning document is being met from existing budgets. The consultation on the SPD will be via email and through the post. There will be printing and mailing costs, but these will be met within existing budgets.

6.2 There are therefore no direct financial implications associated with the consultation.

7.0 Legal Implications

- 7.1 The procedure for preparing Supplementary Planning Documents is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and Government policy on the role of Supplementary Planning Documents is set out in the NPPF (2012). The first stage – to which this report relates – is to consult with those affected. The council is then required by Regulation 12 and 35 (public participation) to publish the draft SPD and a consultation statement (setting out the persons consulted at the first stage, the issues they raised and how it is proposed to deal with these in the draft SPD) on its website and make them available at its principal office for a period of at least four weeks. Any person may make representations during this period.
- 7.2 Once adopted, the Supplementary Planning Document will form part of the Council's planning policy framework. Although it will not have the same status as the Unitary Development Plan or Westminster's City Plan: Strategic Policies, it will be a material consideration that can be taken into account in determining planning applications.

8.0 Consultation

- 8.1 An initial consultation will run for at least four weeks in line with the Council's adopted Statement of Community Involvement. Local residents, amenity groups, businesses and other stakeholders will be consulted; a communications plan is being prepared in consultation with ward councillors to ensure that all stakeholders are aware of the consultation and of the deadline for submitting comments. Consultation meetings will be arranged as required. It is hoped that this initial consultation can begin before the end of the summer.
- 8.2 Following the initial consultation period the comments received will be analysed and the DOF edited as appropriate. A statement will be prepared (hopefully in early autumn) setting out the persons that were consulted, a summary of the main issues they raised and how those issues have been addressed.
- 8.3 This statement along with the final SPD (incorporating changes as a result of the initial consultation) will be consulted upon for at least the statutory four weeks required by Regulations and in line with the Council's adopted Statement of Community Involvement.
- 8.4 The SPD will then be formally adopted by the Council – it is hoped that this could take place before the end of the year.
- 8.5 **Are members content with the proposed approach to public consultation on the document?**

If you have any questions about this report, or wish to inspect one of the background papers, please contact:

Kimberley Hopkins khopkins@westminster.gov.uk Ext. 2935

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National

- Building in Context (English Heritage and CABE, 2001):
<https://content.historicengland.org.uk/images-books/publications/building-in-context/buildingincontext.pdf/>
- Building Regulations, Part L (2014):
http://www.planningportal.gov.uk/uploads/br/BR_PDF_AD_L1A_2013.pdf
- Consultation on proposed changes to national planning policy (Department for Communities and Local Government, 2015):
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/488276/151207_Consultation_document.pdf
- Guidelines for Landscape and Visual Impact Assessment, 3rd edition (Landscape Institute, 2013): <http://www.landscapeinstitute.org/knowledge/GLVIA.php>
- Housing and Planning Bill (2015): <http://services.parliament.uk/bills/2015-16/housingandplanning.html>
- National Planning Policy Framework (2012):
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
- National Planning Practice Guidance (2014):
<http://planningguidance.communities.gov.uk/>
- One Public Estate: Unlocking the Value in Public Sector Assets, (LGA and Cabinet Office 2016): http://www.local.gov.uk/documents/10180/7632544/L16-9+OPE+brochure_2016_v06_WEB/0d759737-0057-4dc5-9dd5-d42d6b66a668
- Seeing the History in the View (Heritage England, 2012):
<https://content.historicengland.org.uk/images-books/publications/seeing-history-view/seeing-history-in-view.pdf/>
- Sport England guidance on planning for sporting facilities:
<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>
- Tall Buildings (Heritage England, 2015):
<https://content.historicengland.org.uk/images-books/publications/seeing-history-view/seeing-history-in-view.pdf/>
- Technical housing standards – nationally described space standards (2015):
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/421515/150324_-_Nationally_Described_Space_Standard_Final_Web_version.pdf
- The Buildings of England. London 6: Westminster. (Bradley and Pevsner, 2003)
- The Setting of Heritage Assets (Heritage England, 2015):
<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>

Regional

- Climate Change Mitigation and Energy Annual Report (Mayor of London, 2015):
https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/CCMES%20annual%20report_2013-14_0.pdf
- Cycle Super Highway 5 (Transport for London): <https://tfl.gov.uk/travel-information/improvements-and-projects/cycle-superhighway-5>
- Central Activities Zone SPG (Mayor of London, 2016):
https://www.london.gov.uk/sites/default/files/caz_spg_final.pdf
- Economic development strategy (Mayor of London, 2010):
https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Economic-Development-Strategy.pdf

- Housing SPG (Mayor of London, 2016): https://www.london.gov.uk/sites/default/files/housing_spg_final.pdf
- Housing Strategy (Mayor of London, 2015): <https://www.london.gov.uk/what-we-do/housing-and-land/housing-strategy/mayors-housing-strategy>
- Legible London (Transport for London): <https://tfl.gov.uk/info-for/boroughs/legible-london>
- London Housing Design Guide (Mayor of London, 2010): https://www.london.gov.uk/sites/default/files/interim_london_housing_design_guide.pdf
- London Infrastructure Plan 2050 (Mayor of London, 2014): <https://www.london.gov.uk/file/19038/download?token=1Zj5uQZf>
- London Plan (Mayor of London, 2015): <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan>
- London View Management Framework (Mayor of London, 2012): <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/london-view-management#Stub-100015>
- Mayoral Community Infrastructure Levy (Mayor of London, 2012): <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy>
- Play and informal recreation SPG (Mayor of London, 2012): <https://www.london.gov.uk/file/5270/download?token=LaKt0Dq>
- Social Infrastructure SPG (Mayor of London, 2015): https://www.london.gov.uk/file/22780/download?token=a-BvX_IN
- Sustainable Design and Construction SPG (Mayor of London, 2014): <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/sustainable-design-and>
- Transport Strategy (Mayor of London, 2010): <https://www.london.gov.uk/what-we-do/transport/transport-publications/mayors-transport-strategy>

Local

- Carbon Policy Feasibility Assessment (ARUP, 2013): [http://transact.westminster.gov.uk/docstores/publications_store/WCC_CarbonPolicyFeasibility_FINAL_2013-07-25%20\(2\).pdf](http://transact.westminster.gov.uk/docstores/publications_store/WCC_CarbonPolicyFeasibility_FINAL_2013-07-25%20(2).pdf)
- City For All corporate priorities document (2016): http://transact.westminster.gov.uk/docstores/publications_store/city_for_all/city_for_all_year2_booklet.pdf
- Conservation Areas – A Guide for Property Owners SPG (Westminster City Council, 1994): <http://transact.westminster.gov.uk/spgs/publications/Conservation%20areas.pdf>
- Design matters in Westminster SPG (Westminster City Council, 2001): <http://transact.westminster.gov.uk/spgs/publications/Design%20matters.pdf>
- Development and Demolition in Conservation Areas (Westminster City Council, 1996): <http://transact.westminster.gov.uk/spgs/publications/Development%20and%20Demolition%20in%20Conservation%20Areas.pdf>
- Draft Code of Construction Practice (un-adopted): http://transact.westminster.gov.uk/docstores/publications_store/planning/new_code_of_construction_practice_jan_2016.pdf
- Employment Programme (Westminster City Council, 2015 – 2019): http://transact.westminster.gov.uk/docstores/publications_store/business/employment_layouts.pdf
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- Interim Note on the application of the affordable housing policy (Westminster City Council, 2015):
http://transact.westminster.gov.uk/docstores/publications_store/Interim%20note%20revised%20april%202015.pdf
- Lillington and Longmoore Gardens Conservation Area Audit (Westminster City Council, 2012):
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- Open Space Strategy (Westminster City Council, 2007):
http://www3.westminster.gov.uk/docstores/publications_store/Open_Space_Strategy_March_2007.pdf
- Pimlico Conservation Area Audit (Westminster City Council, 2006):
http://transact.westminster.gov.uk/docstores/publications_store/Pimlico%20CAA%20SPG.pdf
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<http://transact.westminster.gov.uk/spgs/publications/Pimlico%20design%20guide.pdf>
- Public Art in Westminster SPG (Westminster City Council, 2004):
<http://transact.westminster.gov.uk/spgs/publications/Public%20art.pdf>
<http://www.victoriabid.co.uk/publications/>
- Public Realm Strategy (Victoria Business Improvement District, 2014):
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- Repairs and Alterations to Listed Buildings SPG (Westminster City Council, 1995):
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<https://www.westminster.gov.uk/shopping-centre-health-checks>
- Statues and Monuments in Westminster SPD (Westminster City Council, 2008):
http://transact.westminster.gov.uk/docstores/publications_store/S-and-M-FINAL-VERSION-1243433604.pdf
- Trees and Public Realm SPD (Westminster City Council, 2011):
http://transact.westminster.gov.uk/docstores/publications_store/Trees_&_the_Public_Realm_Adopted_Strategy_September_2011.pdf
- Unitary Development Plan (Westminster City Council, 2007):
<https://www.westminster.gov.uk/unitary-development-plan-udp>
- Victoria 2020 A Vision for a Vibrant Victoria (Victoria Business Improvement District, 2015)
- Victoria Area Planning Brief (Westminster City Council, 2011):
http://transact.westminster.gov.uk/docstores/publications_store/Victoria_Area_Planning_Brief_Adopted_July_2011.pdf
- Victoria Retail Health Check (Victoria BID, 2014): <http://www.victoriabid.co.uk/wp-content/uploads/2014/10/Victoria-Retail-Health-Check.pdf>
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- Westminster's City Plan: Strategic Policies (Westminster City Council, 2013): http://transact.westminster.gov.uk/docstores/publications_store/Westminster's%20City%20Plan%20Adopted%20November%202013%20FINAL%20VERSION.pdf
- Westminster's Community Infrastructure Levy (Westminster City Council, 2016): <https://www.westminster.gov.uk/westminster-cil>
- Westminster's Community Infrastructure Levy Regulation 123 List (Westminster City Council, 2015): <http://committees.westminster.gov.uk/documents/s13487/5.%20Appendix%204%20Draft%20Infrastructure%20List%20Regulation%20123%20List.pdf>
- Westminster's Economy Development Management Policies Consultation Booklet (Westminster City Council, 2014): http://transact.westminster.gov.uk/docstores/publications_store/westminster's%20economy%20CM%20Version1.pdf
- Westminster's Energy Development Management Policies Consultation Booklet (Westminster City Council, 2015): http://transact.westminster.gov.uk/docstores/publications_store/Energy.pdf
- Westminster's Heritage, Views and Tall Buildings Development Management Policies Consultation Booklet (Westminster City Council, 2015): http://transact.westminster.gov.uk/docstores/publications_store/Heritage,%20Views%20and%20Tall%20Buildings.pdf
- Westminster's Local Economic Assessment (Westminster City Council, 2014): http://transact.westminster.gov.uk/docstores/publications_store/LEA_V.II_November_2014_FINAL.pdf
- Westminster's Transport and Movement Development Management Policies Consultation Booklet (Westminster City Council, 2014): http://transact.westminster.gov.uk/docstores/publications_store/Transport%20and%20Movement.pdf

The development opportunity site is made up of the following buildings and occupiers:

- 235 & 237 Vauxhall Bridge Road
- 223 Vauxhall Bridge Road (Queen Mother Sports Centre)
- 215 Vauxhall Bridge Road (The Parkinson's Disease Society)
- 2-22 (evens) Upper Tachbrook Street
- 74-77 (consec.) Wilton Road
- 68-73 (consec.) Wilton Road
- 65 Wilton Road
- 56-62 (consec.) Wilton Road
- 63-64 Wilton Road
- 54-55 Wilton Road (Patisserie Valerie)
- 52-53 Wilton Road (Hardcore Lobster and More)

Urban Form

The existing buildings within the site vary in form, age and quality, from the uniform modern mews dwellings found along Gillingham Row that mirror the listed terrace on Gillingham Street, to the larger modern intervention that is the sports centre and commercial buildings along Wilton Road and Vauxhall Bridge Road. The Queen Mother Sports Centre's 'box' type structure creates significant amounts of dead space to its rear, while presenting several dead frontages, which have a detrimental effect on the streetscape and functionality of the site as a whole.



Figure 2.1 East side of Gillingham Row, QMSC to the right¹

The built form of the street block (bound by Gillingham Row, Vauxhall Bridge Road, Upper Tachbrook Street, Longmoore Street and Wilton Road) varies and reflects in part the mix of uses that are present across the site, which in turn reflects the location of the site as a key neighbourhood centre for the Pimlico area, but also one that borders the Victoria Opportunity Area and Core CAZ. The urban form also reflects the piecemeal development that has occurred across the site to date, with larger scale modern, detracting commercial buildings set against retained more historic buildings. The sports centre is set within the site and is not

¹ Image courtesy of Google

visible from the main frontages of Vauxhall Bridge Road and Wilton Road It creates dead frontage elsewhere, and is a sub optimal use of the site as a whole.



Figure 2.2 Longmoore Street frontage²

The site lacks a coherent sense of place and of urban quality. It suffers from poor permeability and presents predominantly dead, inactive frontages and somewhat intimidating spaces particularly on Gillingham Row which provides a poor pedestrian experience and an environment where anti-social behaviour and security issues present themselves. None of the modern buildings contribute positively in architectural terms to the site and surrounding area, having no lasting architectural quality or interest - this represents a significant opportunity for change.

Interspersed around the site are several buildings of greater merit, including the uniform terrace on Upper Tachbrook Street which forms part of the retail frontage (albeit there are many poor quality shop-fronts and a number of vacant units), and a small number of buildings on the junction of Longmoore Street and Wilton Road within the Pimlico conservation area are also of more architectural merit.

The public realm is of generally poor quality around much of the site, low levels of greening are limited to a few trees across the site and a narrow patch of grass around the sports centre (shown in the photograph above), and there are uneven pavement widths.



Figure 2.3 Sports Centre frontage and offices, Vauxhall Bridge Road³

² ibid

³ ibid

Where the pavement is wider on Vauxhall Bridge Road the space is poorly realised and there is no opportunity to dwell. There are also level changes around the site creating access barriers, and parts of the pedestrian environment are in poor repair along Wilton Road, Longmoore Street and Gillingham Row.

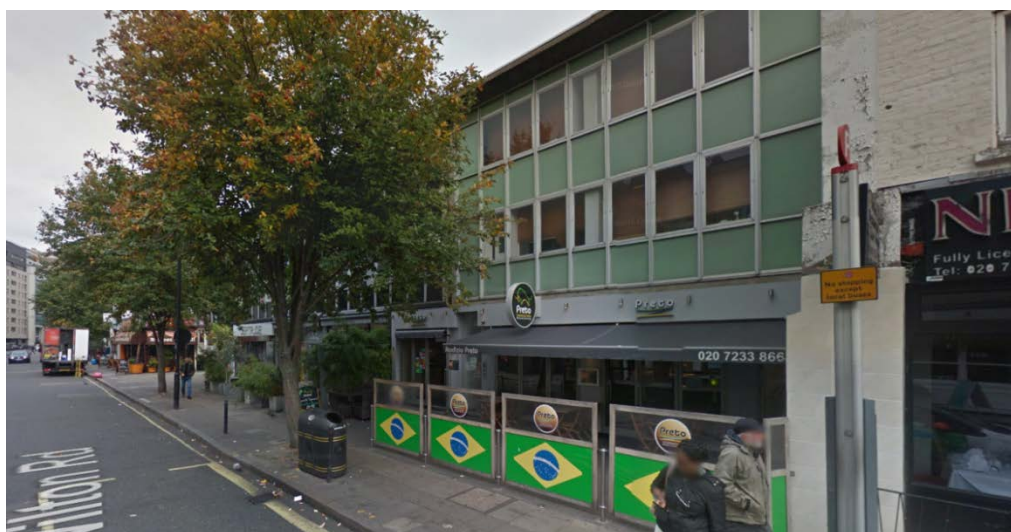


Figure 2.4 Wilton Road Frontage⁴

The building mass of the surrounding area is dictated by the movement network with taller, larger foot-print buildings located near the transport nodes of Victoria Station and along Vauxhall Bridge Road. The buildings surrounding the minor access routes are typically lower (less than five storeys in height) and have a smaller foot print, creating a fine urban grain.

Movement

The Victoria Area Planning Brief (VAPB) recognises the wider Victoria area as a location where movement is a defining feature and where there is a need to generate 'place' and associated spaces of interest and quality. The scale of this development site offers the opportunity to contribute to this need for the Victoria area.

At present there is generally good movement opportunities for pedestrians around the site – Wilton Road, Longmoore Street, Upper Tachbrook Street, Gillingham Street and Vauxhall Bridge Road have pavement wide enough to accommodate conflict-free pedestrian movement despite outside seating associated with existing café uses on some streets. Some of the café uses along Wilton Road also have advertisement boards on the footway, and/or outside seating. The building currently occupied by the Parkinson's Society fronting Vauxhall Bridge Road, and at the northern part of Upper Tachbrook Street is set back from the road leaving unused space serving little purpose except for a few bicycle racks (including Santander Cycle Hire ports).

However, Gillingham Row is a constricted street where there is potential conflict between pedestrians and vehicles owing to a narrow pavement, which is missing for part of the street.

There are walking routes between Victoria and many attractions to the south e.g. Tate Britain, Tachbrook Street market and Millbank Pier – all of which are accessible via Vauxhall Bridge Road and would take pedestrians coming from the Victoria Transport Interchange past the site. The site has the opportunity to become a landmark along the route.

⁴ ibid

Pimlico

The Pimlico area to the south of the site is predominantly residential, with 68% of all floorspace in this area estimated to fall under this use. The residential accommodation throughout Pimlico varies by type and tenure, including a number of long standing housing estates, particularly the Lillington Gardens and Churchill Estates, while the formal squares and highly planned layout of much of the area provides Regency style townhouses and terraces housing single family dwellings and many sub-divided properties providing a number of residential apartments.

Beyond the significant residential provision, the Pimlico area includes a number of local shopping centres around the Pimlico London Underground Station and along Lupus Street, but also some set more within neighbourhoods. These centres provide valuable convenience shopping and local services for residents.

Alongside the commercial centres the area includes the newly built Pimlico Academy, along with other schools and buildings of worship. A number of larger office buildings are located around Pimlico London Underground station, historically housing government departments and other functions.

A number of hotels are also located throughout Pimlico, with a focus along Belgrave Road.



Figure 3.1 Belgrave Road, with Regency architecture typical of Pimlico

A range of materials and architectural styles are present within the area, with white rendered and London stock brick being the predominate material to the south and contemporary glass, metal and colourful render to the north. Roofing material to the south is either slate or concrete tiles, whilst there is no consistent roof form or material to the north.

Trees

Ten trees exist within the development site boundary: on Wilton Road, Longmoore Street, Vauxhall Bridge Road and at the corner of Upper Tachbrook Street and Vauxhall Bridge Road. However only those on Longmoore Street and the corner of Upper Tachbrook Street fall within a conservation area (which affords them protection from removal). The trees on these streets do not warrant a special mention in the Pimlico Conservation Area Audit, but almost all trees within the Conservation Area are protected and formal consent is required before any work can be carried out on trees. The site is also designated as an area for tree planting opportunity in the council's Tree Strategy⁵ so it is expected that existing trees will be retained.

Townscape Character Areas

In order to define townscape character areas which share common features and characteristics, an understanding of the existing townscape elements such as built form (mass and height), movement and materiality, along with historic development was established as part of an initial desk-based review. This has identified, along with consideration of aesthetic and perceptual factors, four townscape character areas (TCA), summarised below:

TCA 1 – Tothill Fields

This TCA is recognised within the Vincent Square Conservation Area as being relatively late in being developed compared to the area that surrounds the Palace of Westminster. This is likely to be due to its location close to the River Thames and the poorly drained nature of the land. Today, the TCA is relatively quiet compared to the adjacent commercial streets of Vauxhall Bridge Road and Victoria Street that abut it. Along with residential buildings there are a number of institutional buildings associated with education, health and charity uses within the TCA. These buildings are typically four to six storeys in height and have either London stock or red brick facades. Vincent Square provides a large area of (private) open space that contrasts with the dense, narrow streets located to the north of the TCA.

TCA 2 – Pimlico

Pimlico has a diagonal grid pattern and associated clear hierarchy of streets and mews, which is reflected within the design of the associated buildings. The TCA contains three to six storey residential buildings with associated shops and offices. This use creates a fine urban grain. The buildings are predominately cream stucco terraced housing with some upper floor facades constructed with London stock brick. The roofs are typically mansard in style. There are also a number of private squares within the TCA. The site is located to the north of this TCA, adjacent to its boundary with TCA3.

TCA 3 - Victoria Station and its Environs

This TCA has a number of major busy vehicular routes and the transport node of Victoria Station. The buildings are typically five storeys or more in height and have large foot prints, creating a dense urban grain that is irregular in layout. The study areas' taller buildings are associated with this TCA and the building and roofscape vernacular varies in style, material and form.

TCA 4 - Lillington and Longmore Gardens

Developed over three phases between 1964 and 1971 the Lillington Estate located to the south of TCA4 set a new standard for the planning and style of high density housing. The Longmoore Gardens Estate was completed in 1980 and although not designed by the same architect it reflects the same characteristics as the Lillington Estate. These characteristics included using a concrete frame and red-brown brick; staggered the facades; and varying

⁵ Trees and the Public Realm – a tree strategy for Westminster (2011)

the roofline. Overall the height of the two estate's buildings address the surrounding built form and rise up from the south east to the north west.

Townscape Character Summary

In summary, the site is located on the edge of 'TCA 2 – Pimlico' with a number of buildings within it responding to the TCA's characteristics. Going forward the emerging scheme needs to consider how it responds to these characteristics and relate to the surrounding mass of the TCA.

Architecture

The Queen Mother Sports Centre is located between a varied group of mid-19th century terraces and late 20th century commercial buildings to the east and a fragmented context of mid-late 19th century and later 20th century buildings the west. It is bound to the north by a much altered early 19th century grade II listed terrace and south by a tall, open metal fence on Longmoore Street. Within the site is the large single storey sports centre building containing a range of swimming pools and recreational facilities. The southeastern and southwestern parts of the site are located within the Pimlico Conservation Area.

Neighbouring blocks include more modern development to the west and the north of the site, again on the fringe and within the Victoria Opportunity Area. The Sainsbury's development to the west is late 20th Century architecture, while Land Securities development to the north of this on Gillingham Street is a recently completed 21st Century modern building.

This Appendix provides a summary of the key planning policy issues that apply to this development site – it is not an exhaustive list and should be read in conjunction with adopted policy.

National policy

The National Planning Policy Framework (NPPF) is the government's guidance for local planning authorities and decision-takers in drawing up plans and making decisions about planning applications. Running throughout the NPPF is the presumption in favour of sustainable development which has three dimensions:

- **Economic** - supporting growth, innovation, infrastructure, building a strong economy;
- **Social** - strong, vibrant, healthy communities, providing housing and local services, supporting health, social and cultural well-being;
- **Environmental** - protecting and enhancing our natural, built and historic environment, improve biodiversity, mitigate and adapt to climate change.

The redevelopment at this site has the potential to contribute to each of these. All policies in the NPPF should be read; however there are some sections which are of particular relevance to this site:

1. Building a strong, competitive economy (i.e. creating jobs and prosperity).
4. Promoting sustainable transport (i.e. facilitating sustainable modes of transport).
6. Delivering a wide choice of high quality homes (i.e. meeting full objectively assessed market and affordable housing needs).
7. Requiring good design (i.e. high quality and inclusive design for all development including public and private spaces, improving the character and quality of an area).
8. Promoting healthy communities (i.e. mixed-use developments, strong neighbourhood centres, delivery of social, recreational and cultural facilities etc., replacement of existing sports and recreational facilities).
12. Conserving and enhancing the historic environment (conserve heritage assets in a manner appropriate to their significance, putting heritage assets into viable use, sustaining and enhancing significance of heritage assets).

The National Planning Practice Guidance offers useful advice to supplement the NPPF. The sections which are of particular relevance to development opportunities at this site are:

- [Design](#);
- [Health and Wellbeing](#);
- [Housing – Optional Technical Standards](#);
- [Travel plans, transport assessments and statements in decision-taking](#);
- [Planning obligations](#);
- [Open space, sports and recreation facilities, public rights of way and local green space](#);
- [Community Infrastructure Levy](#).

Sport England's guidance on planning for sporting facilities may also be worth exploring, as well as Historic England guidance on heritage assets and tall buildings (see Appendix 1 for references).

Emerging national policy

It has been proposed by Government to change the definition of affordable housing in the NPPF to include a wider range of products that can support people into home ownership -

such as starter homes⁶. This is a fundamental shift in national policy and will affect the types of affordable housing which are required on development sites, and what can be viably delivered.

The Housing and Planning Bill 2015 introduces a clause into the Regulations for the Town and Country Planning Act 1990 which provides that planning permission may only be granted for residential development if a requirement for starter homes is met, and regulations are expected to require 20% of new residential developments to be starter homes unless it can be demonstrated that the development will become unviable.

Regional policy

The London Plan is a Spatial Development Strategy and the overarching strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The London Plan 2016 (consolidated with alterations since 2011) forms part of the Development Plan for Westminster, and should be used in conjunction with the council's policies to determine planning applications. The council's local planning policies are in general conformity with the London Plan and as it is a Development Plan Document (DPD) which forms part of the statutory development plan for Westminster, some of its policies can be used directly for determining planning applications.

It is anticipated that following the election of a new Mayor in May 2016, the London Plan will be re-written in full – with publication of a new London Plan timetabled for 2019.

Mayoral Strategies

The Mayor has adopted a number of supplementary planning guidance documents⁷ and other plans and guidance which provide additional detail supplementary to the London Plan policies, or guide how they will be implemented. The Mayoral documents which are of particular relevance to the development opportunities at this development site are:

- **Social infrastructure SPG** (2015) – provides guidance on the provision of sport facilities, developing lifetime neighbourhoods, funding and delivery mechanisms, and stakeholder engagement.
- **Housing SPG** (2016) – provides guidance on increasing housing supply, housing quality (including minimum space standards), density, choice, affordability, and social infrastructure. The **London Housing Design Guide** should also be consulted.
- **Play and informal recreation SPG** (2012) – provides standards for play space provision, advice on creating neighbourhoods and accessibility of facilities.
- **London Infrastructure Plan 2050** (2014) – reinforces an importance on the provision of infrastructure in London including green spaces and roofs, energy and water.
- **Transport Strategy** (2010) – sets out a vision for a world-class transport system, to be achieved through outcome such as enhanced streetscapes and public realm, improving access and connectivity and, wider regeneration through integrating transport and land use planning.

Local policy

Westminster's local planning policies are currently comprised of the City Plan: Strategic Policies (adopted 2013) and the Unitary Development Plan (UDP, adopted 2007). The council is in the process of updating its local plan to insert detailed development management policies in to the City Plan. The UDP contains 'saved policies' which are the

⁶ A home sold to first time buyers under 40 at a 20% discount on market value up to a maximum of £450,000 in London.

⁷ [Mayor's Supplementary Planning Guidance](#)

source for detailed policy until the City Plan is updated with detailed development management policies. Although still relevant, the UDP policies are dated now and where there is a policy conflict the most recently adopted policy takes precedence.

Emerging local planning policy

Some consideration should be had to emerging planning policy, alongside adopted policy. Westminster City Council is currently in the process of updating the City Plan on a topic by topic basis to include detailed development management policies, which will supplement the adopted strategic policies and replace the saved policies in the UDP. Emerging policies can have material weight when determining planning applications, especially once they have been submitted to the Secretary of State for examination.

The first two of these updates are a revision to the mixed use policy (S1) and a new basements policy (CM28.1). The changes to the mixed use policy focusses the requirements for mixed use to the Core CAZ, Named Streets and Opportunity Areas and will mean that residential floorspace may not be required alongside increases in commercial floorspace depending on the scale of the development relative to the existing building being redeveloped. The development site does not sit within the Core CAZ or Named Streets and although currently outside the Victoria Opportunity Area, if this boundary is extended to include this site then the revised mixed use policy would apply here.

The basements revision is mainly concerned with basement extensions to residential properties and is unlikely to impact upon any development taking place at this site. The mixed use and basements revisions have undergone an examination in public and the Planning Inspector's report is awaited. If the policies are found sound the revised City Plan is expected to be adopted in mid 2016.

The next topic area to be revised is the Special Policy Area (SPA) policies which are currently going through the formal consultation process– this site will not be affected by these policies as the site falls outside of the SPA designations.

Following that a revision containing policies on building heights, design and heritage will be undertaken and is expected to go through examination in public in 2017. The resistance to tall buildings across the whole of Westminster is likely to be relaxed in this plan revision to allow for higher buildings in some locations providing it meets certain criteria such as not obstructing strategic or local views. This plan revision is likely to have an impact on how development proposals evolve for this site.

Drafts of the other detailed development management policies are in the process of being written following informal consultation throughout 2014 and 2015 and these policies are expected to go through the examination and adoption process over the next 12-18 months. Significant emerging policy areas include:

- **Housing** – review of residential densities and space standards, policy guiding residential quality and an encouragement of a proportion of smaller units within developments which are more affordable, introduction of affordable housing credits system and starter homes as a form of affordable housing (dependant on the Housing and Planning Bill 2015 receiving Royal Assent and proposed changes to the NPPF taking effect).
- **Decentralised energy networks** – major developments are expected to link up to existing decentralised energy networks where possible, or provision made to enable a link up in future. The development site is approximately 70 metres from the buildings on the Lillington Gardens Estate which benefits from a link the Pimlico District Heating Undertaking (PDHU) and any development proposals will be expected to explore options to connect into the PDHU.

- **Conservation Areas** – development within or affecting Conservation Areas will contribute positively to the character and distinctiveness of the area, and take opportunities to enhance the character, appearance and setting wherever possible.
- **Local shopping centres** – loss of A1 retail outside of core frontages will not be allowed if there will be a detrimental impact on local shopping facilities.
- **Inclusive local economy** – appropriate employment, apprenticeship and training opportunities should be sought on all major developments.
- **Offices and retail** - a range of business workspaces and retail units will be expected to meet the needs of Westminster's enterprise.
- **Parking** – car free development may be suitable under certain conditions, however the parking standard for residential developments is generally 1 or 1.5 spaces per unit depending on the unit size; development proposals with off street parking will provide electric vehicle recharging points.
- **Cycling** – cycle parking will be required with associated facilities for showering and 1 space per 125sqm is likely to be the required standard for parking.

Local Supplementary Planning Guidance and Documents

The council has produced a number of supplementary planning guidance and documents (SPGs and SPDs) which help to interpret adopted policy and guide development. The documents which are relevant to the development opportunities at this development site are briefly summarised below.

Design Matters - This document defines the City Council's expectations for new buildings as positive enduring additions to this unique urban landscape. New additions to the townscape should make a significantly greater contribution to the visual quality of the locality than the building they replace. The document gives examples of what would be considered poor design (building is too dominant, ill proportioned, poorly detailed or ugly) and encourages buildings to be designed so that they are in context with their local surroundings.

It is recognised that some locations will present an opportunity to create new architecture of greater presence than the existing structure, in order to enhance the overall appearance of the group and surrounding area.

The document also provides guidance on siting development within a dense urban environment such as Westminster, creating an acceptable ground level façade/base, elevations, accessibility, plant and roof profiles.

Westminster Way Public Realm Strategy - This is a manual for the design and development of the public realm, explaining the standards and quality that are expected in Westminster. The strategy should be consulted to guide the design of the development –for example it provides guidance on acceptable paving types, lighting, planting and public art.

Conservation Areas – a guide for property owners -This guide explains the purpose of Conservation Areas and outlines what needs to be taken into account when considering development in a Conservation Area e.g. high standard of design, materials, and detailing in order to preserve or enhance the character of the area.

The guide is also a reminder that development proposals close to Conservation Areas will also be assessed in terms of their impact upon the adjacent Conservation Area. As the development site is directly adjacent to the Westminster Cathedral Conservation Area, and a small part of the site falls into the Pimlico Conservation Area, the principles for those Conservation Areas should be considered when development plans are drawn up.

Demolition of a building within a Conservation Area requires planning permission – this includes the demolition of the whole building except the façade. Demolition behind retained façades will be considered in terms of the building’s structural stability, the measures proposed to protect the retained elements during building works and the architectural integrity of the retained elements.

All new development within Conservation Areas should be closely integrated into its surroundings. In some areas modern design is often acceptable if disciplined by its townscape context.

Pimlico Conservation Area Audit

The Pimlico Conservation Area occupies a large area of land north of the River Thames, southwest of Vauxhall Bridge Road and east of the railway line out of Victoria. It is bordered to the south by the Churchill Gardens Estate and to the east by the Lillington and Longmoore Gardens Conservation Area.

Character - The Audit explains that the Pimlico Conservation Area is characterised by its historic street pattern, cream stucco terracing and small parades of shops. It has a distinctive and coherent architecture. None of these distinctive features are to be found in the section of the Pimlico Conservation Area which falls within the development site boundary. Tachbrook Street, just outside the development site boundary, is especially mentioned as a street which causes a distinctive triangular plot owing to the diagonal layout of the street.

Roof profiles are considered to be fundamental to the architectural character of the Conservation Area and roof extensions are noted as unacceptable for parts of the development site.

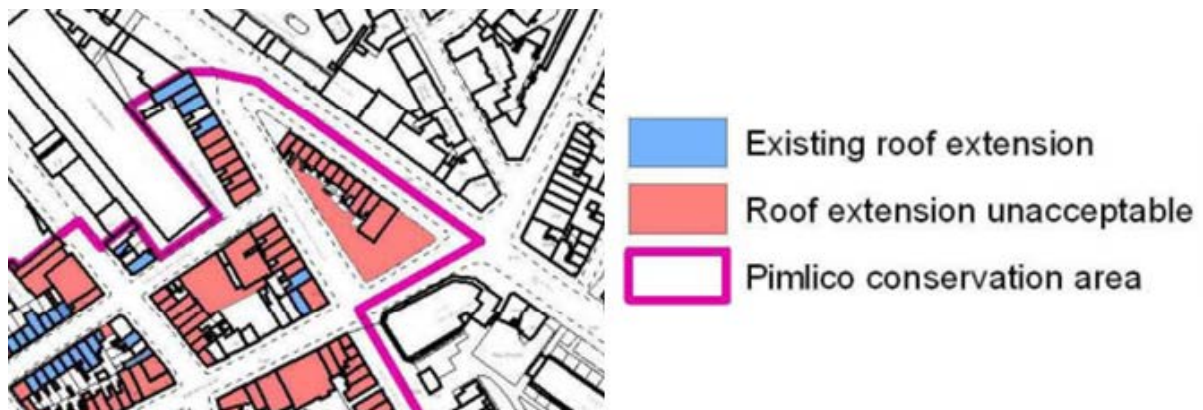


Figure 4.1 Acceptability of roof extensions in the Pimlico Conservation Area

Listed buildings - The Audit also identifies the unlisted buildings of merit which make a valuable contribution to the townscape and/or are of architectural interest. Upper Tachbrook Street and part of Wilton Road have unlisted buildings of merit, as shown in figure 4.3, below. The building at the corner of Longmoore Street and Wilton Road is not identified as having any merit.

The presumption in UDP policy DES 9 (part 2) is that permission will not normally be given for proposals which involve the demolition or partial demolition of buildings which contribute positively to the character and appearance of a Conservation Area.



Figure 4.2 Listed buildings, unlisted buildings of merit and negative features in the Pimlico Conservation Area

Views - No metropolitan views cross the site area. A ‘Local View’ has been identified in the Conservation Area Audit looking south east along Upper Tachbrook Street towards St Saviour’s Church spire and impacts on the view should be assessed as part of a development proposal.

Shop-fronts - Shop-fronts are identified in the Audit as potentially being of great importance to the Conservation Area. The areas of the site which are covered by the Conservation Area designation all have shop-fronts, although the quality of those on Wilton Road is fairly poor and do not add a great deal to the character and appearance of the area. The shop-fronts on Upper Tachbrook Street are notable for their projecting lamps, repeated detail and consistent framework. Original shop-fronts and shop-front detail should be retained wherever possible.

Pimlico Design Guide SPG - This document provides advice for alterations to buildings within the Pimlico Conservation Area and advises that original features or front elevations should be restored or reinstated, and original shop-fronts should be retained.

Westminster Cathedral Conservation Area Audit – The development site is close to the Westminster Cathedral Conservation Area – separated by a single block on Vauxhall Bridge Road. The Conservation Area is dominated by the cathedral itself – a prominent landmark. This, along with the related buildings to the south and the piazza, provides a break in the busy commercial character of this part of Victoria Street. The colourful architecture of the cathedral is in vivid contrast to the post-war buildings which line Victoria Street and creates a transition to the late Victorian architecture in the streets which surround it. The area around the cathedral retains a peaceful and predominantly residential character. This area is characterised by a range of large scale, high-quality mansion blocks, most in red brick.

Lillington and Longmoore Gardens Conservation Area Audit – This Conservation Area is just south east of the development site and directly adjacent to the Pimlico Conservation Area. The character of both Lillington and Longmoore Estates derives from a combination of complex architectural forms and the generous communal gardens and planting around them. Architecturally, the estates are striking in their difference to the Victorian terraces of Pimlico, but they have nonetheless been designed to sit well within their context. The staggered façades and interlinked gardens give the whole a sense of informality, creating an attractive residential environment despite its high density.

Development and Demolition in Conservation Areas - This document explains in detail the application of policies concerning development and demolition in Conservation Areas – which seek to achieve their preservation and enhancement. When considering proposals for demolition within a Conservation Area it is important to establish what contribution the existing building makes to its character or appearance. Some questions which can help identify the contribution individual or blocks of buildings make are:

- Has the building qualities of age, style, materials, or other characteristics which reflect those of at least a substantial number of the buildings in the Conservation Area?
- Does it relate by age, materials, or in any other historically significant way to adjacent listed buildings and contribute positively to their setting?
- Does it, individually or as part of a group, serve as a reminder of the gradual development of the settlement in which it stands, or of an earlier phase of growth?
- Does it have a significant historic association with established features such as the road layout, plots, a town park, or landscape feature?
- Does the building have landmark qualities?
- Does it reflect the traditional functional character of, or former uses within, the area?
- Has it historic associations with local people or past events?
- If a public building, does its use and internal public spaces contribute to the character or appearance of the Conservation Area?

The general presumption is in favour of retaining buildings which make a positive contribution to the character or appearance of a Conservation Area. The guidance also states:

- A building's failure to meet high modern standards is not a sufficient reason to justify its demolition.
- Design of new buildings will be of a high architectural quality, respecting and interpreting the existing character and appearance of a Conservation Area – new buildings must be seen as part of the wider whole.
- Proposals to demolish and redevelop buildings which lie outside but adjacent to the boundary of a Conservation Area should maintain and, wherever possible, enhance the setting of the Conservation Area.

Historic Development

The Pimlico area remained undeveloped until the first half of the 19th century. Prior to this, the area was considered inappropriate for development as it was located along the bank of the Thames, in an area that was prone to flooding. Horwood's Map of London, Westminster and Southwark of 1792-99 (figure 5.1) shows that the area was predominantly open fields and gardens, with small clusters of buildings punctuating the landscape.



Figure 5.1 Horwood's Map of London dated 1792-99

In the mid-1830's, Thomas Cubitt, a speculative developer, took on a number of leases in the area and from 1835, began a comprehensive development scheme. Cubitt's map of Pimlico, circa 1830 (figure 5.2), sets out his plan for the area, characterised by a grid pattern of streets lined by regular terraces of narrow frontage set in blocks, with Warwick Square, Eccleston Square and St George's Square forming focal points. The map shows the development site with development concentrated to its north western end, where the listed properties on Gillingham Street exist today.



Figure 5.2: Cubitt's Map of Pimlico c.1830s

By the 1860s, the majority of development in the area had been completed. The Ordnance Survey (OS) map dating from 1869 (figure 5.3) illustrates that the development site had been fully developed by this date, with narrow terraced properties and mews properties set within a dense and fine urban grain.



Figure 5.3 1869 Ordnance Survey Map

The 1895 OS map (figure 5.4) shows that there was little change to the area surrounding the site, and the configuration of the buildings on the site remained the same. Gillingham Row, situated to the north west boundary of the site, is shown as New Street at this time, Wilton Road is marked as Hindon Street and Longmoore Street is named St Leonard's Street.



Figure 5.4 1895 Ordnance Survey Map

Similarly, by 1913-14, the layout of the buildings within the site had not altered, as illustrated in the 1913-14 OS map (figure 5.5). The most notable change within the immediate surrounding area was the construction of the Peabody Estate to the north east of the Site, built in 1912-14 and designed by Victor Wilkins. The map also shows that Hindon Street had been renamed Wilton Road by this date.



Figure 5.5 1913-14 Ordnance Survey Map

During the Second World War, bomb damage to individual houses and whole streets led to widespread redevelopment, including Lillington Gardens Estate to the south east of the site. The London County Council bomb damage maps show damage along Wilton Road, and highlights that the dense area of housing in the middle of the Site was identified as a 'clearance area'. The 1949 OS map (figure 5.6) illustrates that this area had been cleared, leaving an open space to the centre of the site. The map also shows that the mews properties on Gillingham Mews had been demolished.



Figure 5.6 1949 Ordnance Survey Map

Gillingham Row

Historic maps have been studied to understand the provenance of Gillingham Row (to the rear of the listed terrace on Gillingham Street). The map below shows that Gillingham Row (then called New Street) is historic but also that the current form of development, with mews style properties adjoining the rear elevations of the terrace, is entirely a late 20th century creation.



Figure 5.7 Extract from OS map (circa 1893-95)

The map also demonstrates just how densely developed the site was during the 19th century and, interestingly, confirms that the existing terraced housing on Tachbrook Street would have had a relatively open prospect from Longmoore Street (then St Leonard's Street) due to the presence of Tachbrook Mews, a memory of which is seemingly retained in the existing access route.

As expected, there was some Second World War bomb damage on the Wilton Street frontage (reflected in the 1950/60s buildings currently existing) and the dense area of housing in the middle of the site was identified as a 'clearance area'.

Non designated Heritage Assets: Local Listed Buildings

The City of Westminster does not maintain a register of unlisted buildings of local architectural or historic interest or "local list" (non-designated heritage assets for the purposes of the Framework).

Heritage value of existing non-listed buildings

Vauxhall Bridge Road

Nos.235 & 237 Vauxhall Bridge Road are a much altered pair of mid-19th century stuccoed buildings, situated at the junction of Vauxhall Bridge Road and Gillingham Row. They are arranged over three storeys with basement, and fourth storey accommodated within the mansard roof. A modern glass and steel balustrade is a later addition that encloses a roof terrace. The buildings are not statutorily listed but are within the setting of the Pimlico Conservation Area.



Figure 5.8 Nos. 235 & 237 Vauxhall Bridge Road

The Queen Mother Sports Centre is a light industrial / shed-like structure dating from 1978-81.⁸ The street frontage to Vauxhall Bridge Road is composed of dark glass with black panelling and the rear is a windowless brick faced range of a substantial scale. This element occupies a plot which runs from Gillingham Row to Longmoore Street. It was hastily planned and built leading to its current compromised arrangement, which creates a series of issues around and within the site, in conjunction with the modern piecemeal development that has taken place around it.

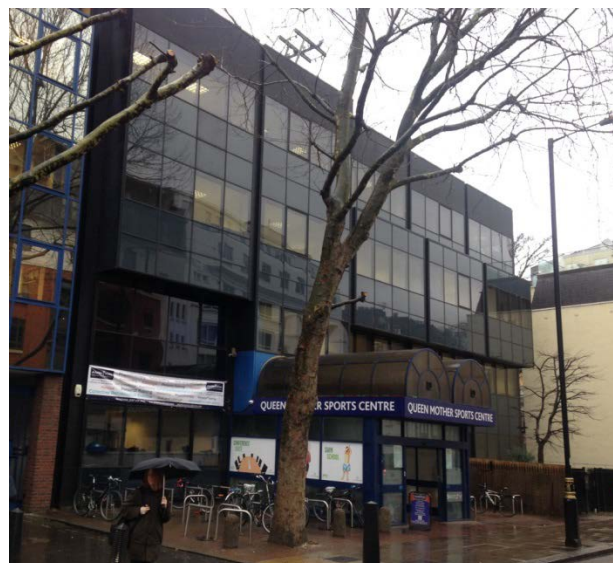


Figure 5.9 Queen Mother Sports Centre

⁸ Bradley, S. and Pevsner, N. *The Buildings of England. London 6: Westminster*, 2003

The building is located within the setting of the Pimlico Conservation Area and the setting of the adjacent grade II listed buildings located on Gillingham Street. The QMSC itself is not located within a conservation area, and is not a listed building; in fact it is one of poor architectural quality that detracts from the character and appearance of the neighbouring conservation area.

No.215 Vauxhall Bridge Road is a late 20th century building, located at the junction with Upper Tachbrook Street. It is constructed of red brick, with a frontage of dark mirrored glazing and blue framing. The upper storey is a brick-clad recessed element, punctuated by a line of windows. It is located within the setting of the Pimlico Conservation Area, but is not considered to contribute positively to the significance of Conservation Area.



Figure 5.10 No.215 Vauxhall Bridge Road

Upper Tachbrook Street

The terraced buildings at Nos.2-22 Upper Tachbrook Street (figure 5.11), situated on the south west side of the road, are typical examples of the early-mid 19th century development of Pimlico and the defining character of the Pimlico Conservation Area in which they are located. The yellow stock brick and stucco properties are three storeys in height, with a range of commercial uses at ground floor (some with good quality examples of traditional shopfronts), and retain original butterfly roof forms, visible from Longmoore Street. The adopted Conservation Area Audit for Pimlico Conservation Area identifies these buildings as making a positive contribution to the Conservation Area.



Figure 5.11 Nos.2-22 Upper Tachbrook Street

Wilton Road

The street block as a whole includes a number of properties of varying age and merit on Wilton Road, some of which are attractive or of some age and could be considered to be of heritage interest and identified by the Council as non-designated heritage assets for the purposes of the NPPF, while others present an opportunity for significant intervention.

Nos.74-77 Wilton Road is a short terrace of two and three storey buildings, located on the north east side of the street. The buildings at Nos.74-76 are a remnant of the of the early-mid 19th century development of Pimlico and are also illustrative of the townscape character of Pimlico Conservation Area in which they are located. The properties are of brick and stucco and composed of two bays. Nos.74-76 Wilton Road are identified within the Pimlico Conservation Area Audit as making a positive contribution to the Conservation Area, albeit their contribution has been adversely affected by later alterations and additions.

No.77 Wilton Road is seemingly a later rebuilding of the end of the terrace and is of a contrasting character utilising red brick with a single large window at first floor. Whilst the scale and massing of the no. 77 Wilton Road is consistent with this part of the Pimlico Conservation Area its contrasting character and materiality mean that the Council have identified the building as making a neutral contribution to the Conservation Area. Accordingly, there is no policy presumption in favour of its retention as a matter of principle.



Figure 5.12 Nos.74-77 Wilton Road

The buildings to the north east side of Wilton Road include mid to late 20th century blocks erected following Second World War bomb damage and associated clearance programmes. Numbers 56-62 and 68-73 (consecutively) Wilton Road are designed in a typical commercial style reminiscent of 'Mid-Century Modernism'. The buildings have glazed frontages with black spandrel panels set in metal frames, and a range of food and beverage uses at ground floor. No.65 has a contrasting appearance, with red cladding and projecting ground floor. The buildings are located within the setting of the Pimlico Conservation Area but are not considered to contribute positively to its significance due to their strongly contrasting character, set back from the traditional building line and materiality. These buildings therefore represent an opportunity for improvement and intervention.



Figure 5.13 Nos. 56 – 62 and 68 – 73 Wilton Road

Nos.63-64 Wilton Road is a much altered and isolated early to mid-19th century stucco property, situated on the north east side of Wilton Road, and flanked by later 20th century development. It consists of two storeys with altered ground floor in commercial usage. The property is located within the setting of the Pimlico Conservation Area and is consistent with its prevailing character. Any contribution to the setting of the Conservation Area is, however, much reduced by the degree of fragmentation of its context, with the associated physical and visual separation, and cumulative impact of successive alterations.

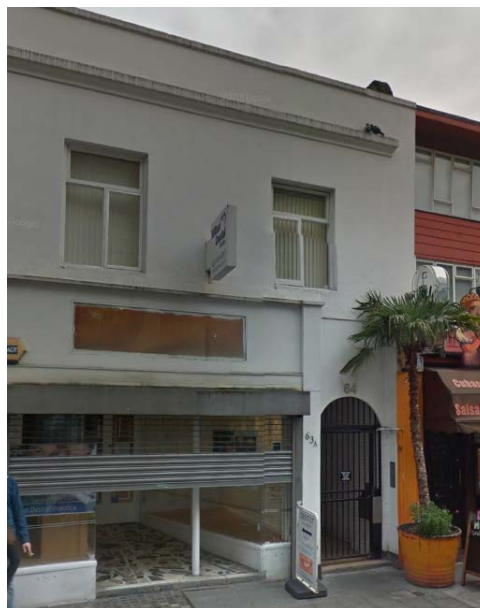


Figure 5.14 Nos. 63-64 Wilton Road

Nos.54-55 Wilton Road is an attractive late 19th/early 20th century detached building, constructed of red brick. The property is composed of three bays, of three storeys with attic storey (largely obscured by a parapet), with commercial use to the ground floor. A decorative cornice separates the first and second floors of the building. The building is sufficiently separated from the Pimlico Conservation Area that it is not considered to form part of its setting.



Figure 5.15 Nos. 54-55 Wilton Road

Nos.52-53 Wilton Road is a two storey building of painted brick, sited on the junction of Wilton Road with Gillingham Row. The property has been converted at ground floor level to accommodate commercial use. Whilst the property is probably of mid-19th century origins it does not form part of the setting of the Pimlico Conservation Area, having been separated by extensive and variable townscape.



Figure 5.16 Nos. 52-53 Wilton Road

Buildings within the vicinity of the building site which could be considered to have potential heritage interest:

- No.172 Vauxhall Bridge Road (The Jugged Hare);
- Nos.34-36 Greencoat Place (Pimlico Telephone Exchange);
- Nos.244-250 Vauxhall Bridge Road;
- Nos.252-256 Vauxhall Bridge Road;
- Nos.258-266 Vauxhall Bridge Road.

Registered Parks and Gardens

Eccleston Square and Warwick Square are grade II Registered Park and Garden located within the vicinity to the south west of the site. Both squares date from the 1830s and 1840s and were designed as part of Pimlico's planning initiative by Thomas Cubitt. Both are situated on land formerly known as the Neat House Gardens and survive little altered.

The wider Victoria area is experiencing character changing economic growth with a substantial amount of new office and retail floorspace being introduced – particularly around Victoria Station, and along Victoria Street. New developments currently under construction at Victoria are by virtue of their scale transforming the built environment, raising the profile of the area and turning Victoria into a vibrant area in which to live, work and shop.

Offices

Victoria has a long established office market, yet the nature of the floor space and occupiers has changed significantly in recent years. The overall trends in Victoria's commercial market show a steady and stable growth in office floorspace in Victoria when compared with the wider West End and Central London. Changing trends by business sector have also been identified with the Media and Tech occupiers continuing to dominate the demand for floorspace in the West End and increasingly in Victoria, which has historically had an association with Government offices. Increasingly, larger international tenants have taken up residence in the Victoria area which is now well established as a location for energy and financial services companies.

The Victoria area offers tenants the opportunity to remain in close proximity of the West End, and provides new buildings and larger more flexible floor plates, with a lower rent than in the West End itself. The regeneration currently taking place has increased the supply of Grade A office floorspace and is contributing towards the improvement of the retail offer currently in place at ground floor levels as part of mixed use development, particularly around Victoria Street. It is nonetheless also contributing towards the anticipated rent uplift. The 56,000 square foot letting at Land Securities' Zig Zag building to Jupiter Asset Management for example is at a rent reported to be circa £80 per square foot - a new record for the Victoria office market (against a £75 per sqft recorded up until now in 2015).

In April 2015 a vacancy rate below 3% for Grade A office floorspace in Victoria had been registered, reaching a historic low. Furthermore, it appeared that non-core locations were becoming increasingly attractive to occupiers and investors. The floorspace availability in Victoria recorded in the first quarter of 2014 (469,000sqft) considerably decreased to 107,000 sqft. Against this Mayfair had recorded an availability of 473,000sqft in the third quarter of 2015.

The area has seen an improvement in its prime yield since 2014 (from 4.50 to 4%⁹) which has remained at 4% since the second quarter of 2015. Furthermore, the above has been contributing towards the displacement of rent sensitive tenants typically occupying less than 5,000sq. ft to areas such as the South Bank and north and east of the City fringes.

Overall, the Victoria office market has seen a decrease in availability and an increase in Grade A office floorspace in comparison to other more expensive and popular locations for office space in the West End such as Mayfair, Knightsbridge and Fitzrovia which recorded a prime rent above £100 per sq ft in 2015 but which have often lacked Grade A floorspace. Rent uplift is nonetheless anticipated in Victoria as a result of various approved schemes.

Retail

Although the wider Victoria area offers a range of retailing that is expected of CAZ areas, up until recently, the retail offer in Victoria largely existed to provide for the day-to-day demands of local workers and transitory population. The main retail offer has been located along Victoria Street which is perceived to have a healthy retail economy which offers a wide range

⁹ A lower yield represents better performance/ a better investment.

of retail offers from small newsagents to high street fashion chains, as well as wide choices of cafes, sandwich shops and restaurants. The proportion of comparison shopping compared to convenience shopping is however below average for Westminster's Shopping Centres in the CAZ, creating an imbalance within the area in terms of offer. The development of Cardinal Place has however managed to broaden this offer.

The wider Victoria area has seen an increase in nearly 10,000sqm in retail floorspace recently (either completed, under construction or in the pipeline), which equates to over 500 jobs. New developments in Victoria are introducing more shopping and eatery options, such as the NOVA scheme which is seeking to provide 'exclusive and eclectic' restaurant and retail brands. This is contributing to Victoria's emerging status as a 'destination' rather than somewhere to just pass through.

Retail rents within the Victoria area are high on average but they vary greatly with some units being let for as little as £160, and others for over £1,000 per square metre per year. Smaller units tend to attract the highest rents per square metre¹⁰.

Warwick Way/Tachbrook Street CAZ Shopping Centre

The development site sits within the secondary frontages of the designated CAZ shopping centre Warwick Way/Tachbrook Street¹¹, and in fitting with this designation much of the ground floor frontage around the site comprises a range of retail units. This is particularly the case on Wilton Road, which houses a number of A3 use class restaurants and cafes of varying quality. The shopping centre as a whole acts as the key neighbourhood wide shopping centre serving residents in Pimlico, but also serving visitors and workers in the Victoria area. The centre includes a range of commercial and leisure functions, with the sports centre acting as a key facility for the local population and community.

The total retail floorspace in Warwick/Tachbrook Street is 17,972sqm across 164 units of varying sizes, with a focus on convenience retail. This has fallen by 16% since 2007 due to the loss of retail units near Vauxhall Bridge Road, where a large new medical centre is now located. Currently the floorspace availability for shops appears limited within the centre, restricting opportunities for diversification and additional shops.

The 2013 Warwick Way/Tachbrook Street Health Check shows that while the area's health was previously classified as neutral the area is now performing well and can now be classified as healthy and thriving. The vacancy rate for the centre is low at just over 3% of units (some of which are located on Upper Tachbrook Street). The report further states that vacancies are down and the mix is improving in line with consumer demand.

The Upper Tachbrook Street frontage also comprises retail units, but includes a number of long term vacant premises, some of which may have changed use to residential. Residential uses are also located at upper floors along this frontage. Continuing up onto Vauxhall Bridge Road, offices are located on either side of the leisure centre entrance.

As the main centre of convenience shopping for the Pimlico area, the shopping centre includes a number of supermarkets including a large modern Sainsbury's market on Wilton Road; a new Waitrose on Warwick Way, in addition to the Tesco located opposite. The shopping centre also accommodates the popular and recently enhanced Tachbrook Street market, which sells a range of produce and incorporates hot food stalls.

The supermarkets are complimented by a range of other convenience shops, with comparison shopping generally not featuring within the centre. A number of national chain

¹⁰ Victoria Retail Health Check 2014

¹¹ See UDP policy SS 6 and City Plan policy S10

coffee shops and restaurants are located in the centre in addition to a number of independent restaurants and café's located throughout the centre, several public houses and a number of A2 class uses including a number of estate agents.

The Warwick/Tachbrook Street area is mostly frequented by residents or workers in the area. The centre therefore mostly caters for its neighbourhood and its current activity addresses primary day to day food related needs to top-up retail requirements. There is a considerable demand for fresh food as well as household requirements. Consumers are also looking for occasional minor comparison goods such as gifts, fashion accessories, smaller fashion items and accessories, as well as household items such as prints and posters and basic kitchen equipment.

Despite an overall consensus between consumers and traders identified in the Warwick/Tachbrook Street health check, the centre could benefit from further investment to increase footfall, physical improvements and diversification of the retail offer. While the economic growth of the wider Victoria Area is encouraging, the benefits are unlikely to be realised within the area unless the site is regenerated and clear linkages between the site and the VOA established. It is recommended that more active ground floor level uses are encouraged as part of any regeneration of the site to improve upon the 'dead' frontages that currently exist around the site and to improve the retail offer. Increased permeability of the site and improvements to the public realm will also improve access to and attractiveness of the CAZ Shopping Centre.

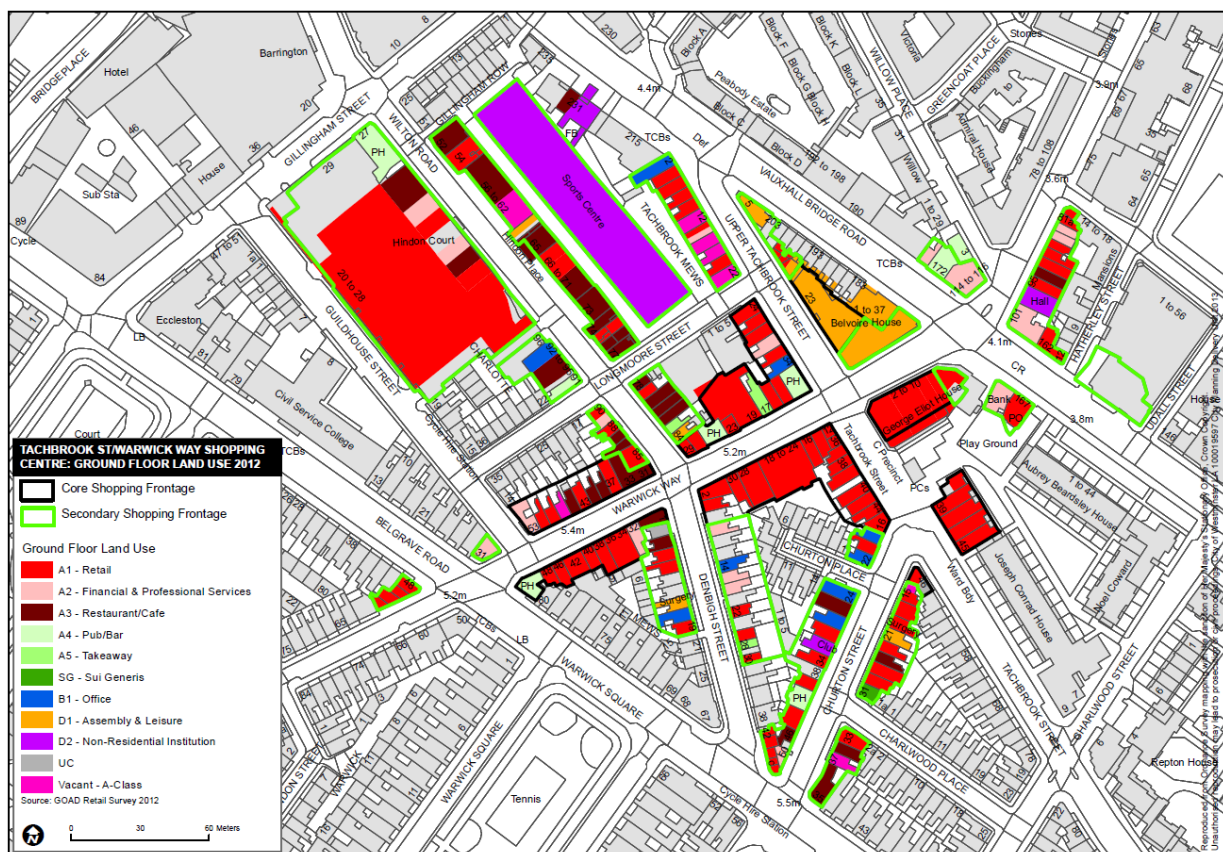


Figure 6.1 Warwick Way/Tachbrook Street CAZ Shopping Centre: Ground Floor Land Use 2012

Given the proximity to Core CAZ and the VOA and the existing commercial function of the site, redevelopment here will no doubt optimise the commercial potential.

Wider office market trends

Since 2014, the office market in London and in particularly in the West End has overall remained healthy and stable. From 2014 until January 2016, the office floorspace take-up of business sector in the West End has fluctuated between 17%-21%. In April 2015, there was a healthy diversity in occupier market with strong cross business sector demand.

Changing trends by business sector that had been evident during the first half of 2014 were further emphasised in 2014's third quarter: in 2014 across the West End, banking and financial services had become the largest source of take-up for office space, accounting for 23%.

However, the average unit size taken by financial occupiers was 5,239 sq ft which is less compared to 6,909 sq ft for Media and Tech and 6,232 sq ft for business services. Figure 6.2 below illustrates the increase and dominance of Media & Tech take-ups. In 2015, the West End was showing a demand from a broad range of business sectors.

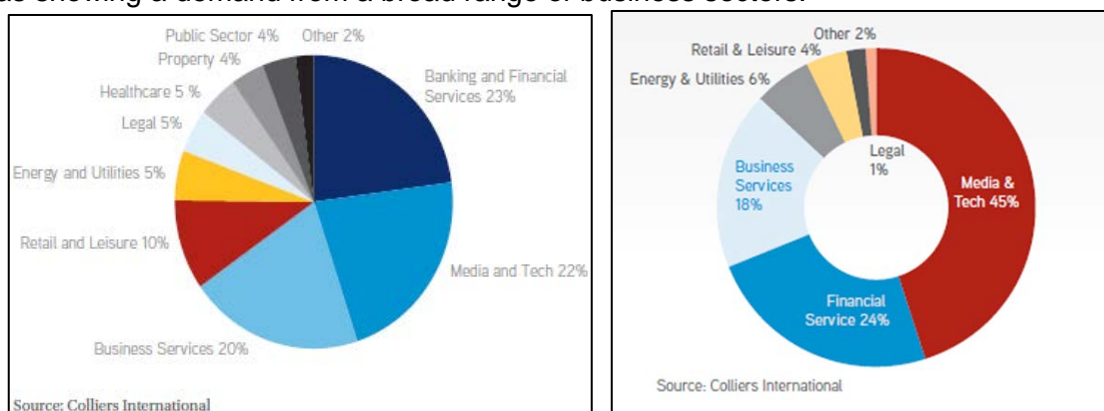


Figure 6.2 West End Take-up by business group Q1-Q3 2014 (left) and 2015 (right)

In the third quarter of 2014 it appeared that emerging locations would continue to look attractive to investors with the prospect of improved returns and by the end of 2015 and the West End had a considerably lower vacancy rate than in the City with 3.4% against 5%. Nonetheless, the West End market saw overall absorption levels turn negative in Q1 2015, but this was due to the number of conversions from office to residential floorspace (225,000 sq ft) for which construction began in the first three months of 2015.

In addition to this, further rental uplift was anticipated in the West End as occupiers were looking at securing space in prospective 'keynote' schemes such as Land Securities' Nova scheme in Victoria, due for completion in mid-2016 where pre-letting has already begun.

Office rents

Figure 6.3 shows how Victoria's office rents compare to the rest of London.

Central London Summary Table								
	TAKE-UP (000S) SQ FT		AVAILABILITY (000S) SQ FT		ALL GRADES **NSA (000S) SQ FT	GRADE A **NSA (000S) SQ FT	PRIME RENTS £PSF	PRIME YIELDS %
	2014	2015	2014	2015	2015	2015	Q4 2015	Q4 2015
WEST END								
New / Refurb	1,942	1,991	884	697	-	-		
Secondhand	3,441	2,747	1,658	1,492	-	-		
*TOTAL	5,383	4,738	2,542	2,189	685	1,563		
Bloomsbury	284	170	35	43	209	217	£69.00	4.00
Covent Garden / Strand	775	746	590	327	102	471	£85.00	3.75
Euston / King's Cross	851	607	117	73	44	-24	£75.00	4.25
Fitzrovia	352	906	220	222	180	258	£85.00	4.00
Knightsbridge	121	134	74	58	16	28	£100.00	3.50
Marylebone	351	274	207	218	-35	32	£105.00	3.50
Mayfair	868	476	548	505	37	99	£125.00	3.25
Paddington	158	277	156	32	119	100	£65.00	4.25
Soho	427	316	76	125	-176	73	£90.00	3.75
St James's	236	329	253	298	37	123	£125.00	3.25
Victoria	659	473	182	166	196	204	£80.00	4.00

Figure 6.3 Central London office market, January 2016 (Colliers International)

Retail

From 2007 until 2014, the number of vacant units in the West End has fluctuated, recently increasing slightly between 2011 and 2014. The average occupied unit size for the West End had reached new peaks in 2014 with 4,342 sq ft. Strong trading performance and consumer pressure for an enhanced store experience have led to an increasing number of larger flagship stores, which is driving this uplift in unit size.

Furthermore, the West End remains an international shopping destination with key department stores which have been the subject of significant investment. Overall, the retail demand is expected to continue to grow creating upward pressure on rents.

In Victoria the vacancy rate per units was lower than in the West End overall in January 2014 and had also more rapidly decreased.

Transport Improvements

The Victoria transport interchange is currently undergoing significant improvement works to provide an improved ticket hall and London Underground station access, and a re-provided bus station at Terminus Place. This is being undertaken in tandem with the NOVA development currently taking place to the north of the station.

The station, while being one of London's most important transport hubs, is operating in excess of its capacity and is therefore under significant stress. This is manifested in terms of pedestrian movement and conflict with road traffic, overcrowding and associated station closures and the impact of coach and bus traffic.

A series of objectives of the Council and TfL relating to the provision of transport in the Victoria area are set out in the Victoria Area Planning Brief.

Parking

The levels of car parking coming forward in recent development proposals in Victoria can guide what may be acceptable at this site, notwithstanding the specific site constraints associated with the site.

Site	Residential Units	Residential Parking	Parking Ratio
Kingsgate House	102	141	1.38:1
55 Victoria Street	54	10	0.19:1
New Scotland Yard	246	189	0.77:1
NOVA Phase 1	170	92	0.54:1
55 Broadway	112	43	0.38:1

Figure 7.1 Recent Residential Car Parking Provision in the Victoria Area

Victoria Opportunity Area

The Victoria Opportunity Area abuts the development site boundary, focusing on the Victoria Transport Interchange, extending east along Victoria Street and south down towards Chelsea Barracks, comprising a number of strategic sites with a combined policy target of providing 4,000 new jobs and 1,000 new homes between 2011 and 2031. This goes in hand with improvements to the transport interchange mentioned above, public realm, open space provision, community facilities and other priorities.

The neighbouring Victoria area is a long established office location and one that is growing in prominence through the various new developments coming forward in the area. As a historic location for government offices, the area is becoming increasingly populated by multinational companies including the John Lewis Partnership, Rolls Royce, Burberry and The Telegraph Media Group.

A number of sites have recently been developed along Victoria Street as illustrated below, including the Zig Zag buildings, comprising offices, residential and retail uses, 62 Buckingham Gate which includes retail and a cinema below high specification offices. The NOVA development around Bressenden Place is a mixed use development under construction, incorporating residential buildings, offices, retail and restaurant uses.

These more recent and emerging developments sit alongside Cardinal Place, completed some ten years ago, which provides open space and significant environmental improvements for the area, a range of retail and restaurant uses, with offices above, adjacent to residential uses.

The Opportunity Area also takes in a range of other sites further east including New Scotland Yard, 55 Victoria Street and Howick Place.

These significant mixed use developments are renewing the Opportunity Area, bringing additional jobs and homes to the area in new landmark buildings. The current and forthcoming mixed use developments demonstrate the emergence of Victoria as a successful commercial office destination in its own right and its desirability as a place to live, work and visit is growing.

With these developments taking place and developer interest high in the area, it is timely to consider the contribution that this development site can make to enhancing Victoria's growth and future sustainability.

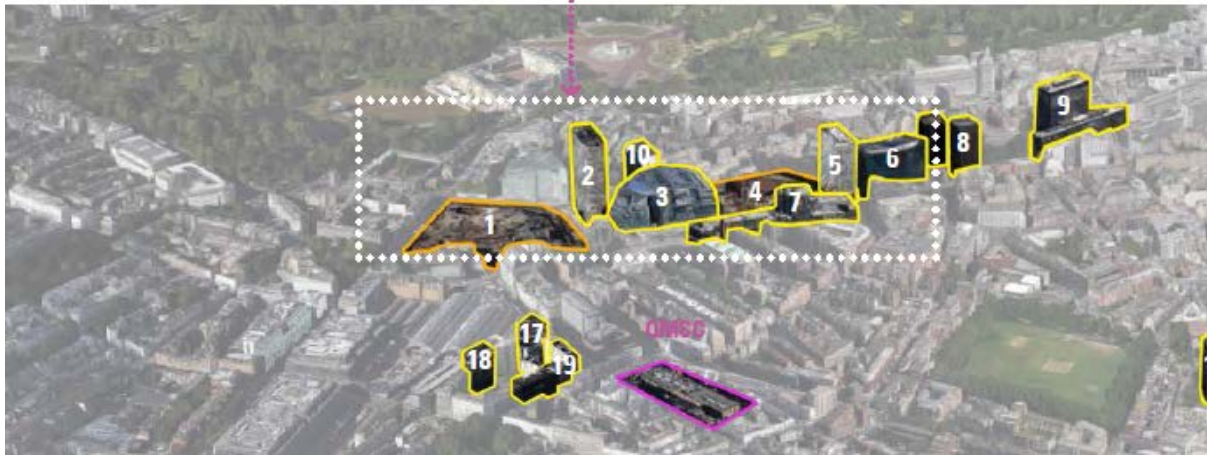


Figure 7.2 Victoria Opportunity Area Developments



1
Nova Victoria
 Building Height - 16 Storeys (est. +90.7m)
 Phase 1
 Retail Area - 80,000 sq.ft
 Office Area - 480,000 sq.ft
 Other Area - 167,000 sq.ft
 Residential - 170 units



2
Portland House
 Building Height - 29 Storeys (est. +101m)
 Retail Area - 11,000 sq.ft
 Office Area - 282,000 sq.ft
 Other Area - 14,000 sq.ft



3
Cardinal Place
 Building Height - 10 Storeys (est.+51.4m)
 Retail Area - 99,000 sq.ft
 Office Area - 554,000 sq.ft
 Other Area - 8,000 sq.ft



4
Kingsgate House
 Building Height - 16 Storeys (est. +53.7m)
 Retail Area - 45,000 sq.ft
 Office Area - 190,000 sq.ft
 Residential - 100 units



5
Westminster City Hall
 Building Height - 21 Storeys (est. +81.2m)
 Retail Area - 7,000 sq.ft
 Office Area - 179,000 sq.ft



6
62 Buckingham Gate
 (Formerly Selborne House)
 Building Height - (est. +64.0m)
 Retail Area - 15,000 sq.ft
 Office Area - 260,000 sq.ft



7
123 Victoria Street
 Building Height - 14 Storeys
 Retail Area - 28,000 sq.ft
 Office Area - 200,000 sq.ft



8
Windsor House - Victoria Street
 Building Height - 18 Storeys
 Office Building



9
New Scotland Yard - Broadway
 Building Height - 21 Storeys
 Office Building



10
20 Palace Street
 Building Height - 18 Storeys
 Residential

Figure 7.3 Victoria Opportunity Area Developments

Demography of Warwick ward

The development site falls within the Warwick ward¹², which has:

- Almost 5% of Westminster's housing stock, although this ward has a lower proportion of residents than other wards.
- The largest tenure in this ward is private rent (35%), followed by private ownership (34%); social rent (28%), and shared ownership (1%).
- The most common household size by a wide margin is one person households (38%), although there are a number of families living in the ward.
- Almost 40% of households under occupy their property and 9% are overcrowded.
- Approximately 80% of adults in this ward took part in one or more sessions of sport or active recreation per week.
- Poor use of swimming and sports facilities with 12% of people using them in the past three months leading up to the City Survey.
- Around 1,000 enterprises and the eighth largest number of employees of all the wards in Westminster with over 20,000 employees.
- The greatest amount of employee growth in 2008-9 of all of Westminster's wards.¹³

Westminster has a growing population and a very high proportion of the population fall into the 25-44 age group¹⁴. Westminster experiences a high level of international and domestic migration into and out of the borough (7% of Westminster residents were living outside the UK a year before the Census day in 2011)¹⁵ With such large annual migration flows, even small changes in the age, sex, and income profile of migrants can generate significant change in the resident profile of the City.

Housing

Within the immediate vicinity of the site¹⁶ the majority of housing is made up of flats, with only 14% of properties being houses, and the tenure trend is similar to those seen across the rest of Westminster: owner occupation is at 39% and privately rented accommodation at 40%.

The most recent Greater London Authority (GLA) household projections for Westminster anticipate household growth of between 15,400 to 21,500 households between 2011 and 2036, and Westminster's housing delivery target is for 1,068 new units per year.

It is expected that by 2031 there will be a three fold increase in the number of people living in Westminster aged over 90. More older people will be living in their own home for longer and this will have been enabled by the market providing new housing products aimed specifically at older people, sometimes linked with elements of care. However, poorer older people will experience difficulties in finding suitable, affordable accommodation in the borough.

The majority of property sales in the last ten years in this location fall into the £600,000 - £1,000,000 price bracket with an unsurprising growing trend over time towards higher prices. Between 2005 and 2013 over 170 properties were sold for less than £500,000 whereas in the last two years there have only been two properties sold under this price¹⁷.

¹² Ward data from Warwick Ward Profile (2015)

¹³ Westminster's Local Economic Assessment (2011)

¹⁴ Westminster Housing Market Study

¹⁵ Westminster Housing Market Analysis

¹⁶ The Lower Super Output Area O22B

¹⁷ Hometrack (2016)

In future across Westminster there are likely to be increasing difficulties for low income people in finding affordable homes, which may put pressure on family-based support networks and exacerbate care costs. There will be a changing model of housing tenure in London with over half of the housing stock in Westminster likely to be private sector rent in the 2030s. If nothing else changes, wages will not keep up with the cost of living (including housing and childcare costs) in central London and fewer low income families will live in the city. Those young people and families who do live in Westminster are likely to be wealthier and there will be fewer lower income families who will be increasingly confined to a small number of neighbourhoods on the edges of the city.

Sports and Leisure. Westminster has over 60 health and fitness centre sites, although only eight are publically owned by Westminster City Council¹⁸, the remainder being private. The city has an under provision of sports halls and synthetic turf pitches but it is well served by health and fitness centres, although there is an identified need for increased provision in line with projected resident and worker population growth.

Parks and Open Space. There are a total of 172 open spaces in Westminster (excluding ten civic spaces) covering an area of 527 hectares, of which 454 hectares have public access (i.e. metropolitan, district and local parks and civic spaces). This equates to 1.86 hectares of publically accessibly open space per 1,000 population. If the city's estimated daytime population numbers of approximately one million workers and visitors is taken into account the provision drops to 0.45 hectares of open space per 1,000 population. The demand for open space is likely to increase as the residential population does, and the need for more city spaces is particularly important at this site which is identified as an area of open space deficiency and as a place which attracts significant numbers of workers and visitors but does not provide external spaces to dwell. This will become a more pressing issue should employment floorspace in the area increase.



Figure 8.1 Existing social infrastructure in the vicinity of the site

Legibility. Provision of Legible London maps and pedestrian environment improvements are identified in the Westminster's Infrastructure Plan as short-term city-wide infrastructure priorities to promote walking and to ensure the needs of vulnerable people, or those with disabilities are catered for. Any redevelopment of the site should contribute to these priorities by creating safe, accessible and attractive public realm (see Appendix 10).

¹⁸ Westminster Infrastructure Plan 2009

Education. There is a shortage of early years childcare facilities across Westminster when compared to the number of under five year olds living in the city, although capacity issues are strongest in wards other than Warwick where this site is located. Westminster's primary schools have excess capacity, whereas the secondary school places available within the city are almost all full.¹⁹ Development of a large number of new family sized units may increase pressure on local secondary schools.

Healthcare. There are 53 registered GP practices in Westminster with a patient GP ratio of around 1,700 patients per GP. Westminster Primary Care Trust serves more than 247,000 registered patients and pressure is increased on primary healthcare services by an increase in residential population. There are currently no health care uses within the site boundary, although not a requirement of development at this site, proposals for new healthcare facilities as part of the redevelopment would be welcome.

It is estimated that the daytime population of Westminster increases to over one million people owing to the influx of workers and visitors to the city. This adds enormous pressure to existing services, such as sports and leisure facilities. Westminster's resident population is growing, and with increases in all commercial floorspace increasing the working population also, the pressures on existing services will continue to grow. This is likely to be felt particularly in the Opportunity Areas where homes and jobs growth is directed.

Redevelopment of the site will be expected to anticipate increased pressures on existing social infrastructure.

¹⁹ Westminster Infrastructure Plan, 2009

Viewpoints

The effect of the redevelopment of the site is likely to be limited to impact on views out of each conservation area, albeit that these are already of a general London panorama, of which the proposed development would be seen as a part of.

This initial viewpoint assessment was based on a preliminary desktop review of local views-associated planning policy of the London Plan and Westminster City Council, including a number of Conservation Area appraisals. It has also been informed by initial field-work, which has established the nature and extent of likely visibility. The whole area was visited and representative viewpoints selected based upon the localised screening effect of built form, land form and vegetation.

The methodology in identifying viewpoint locations follows good practice guidance set out in the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment²⁰. In line with the guidance this review has been undertaken in the winter when tree cover is more limited and the site more visible. The final assessment should also consider the visual effects in summer, where appropriate.

The representative viewpoints are set out in figure 9.1 and the baseline situation summarised in figure 9.2 below.

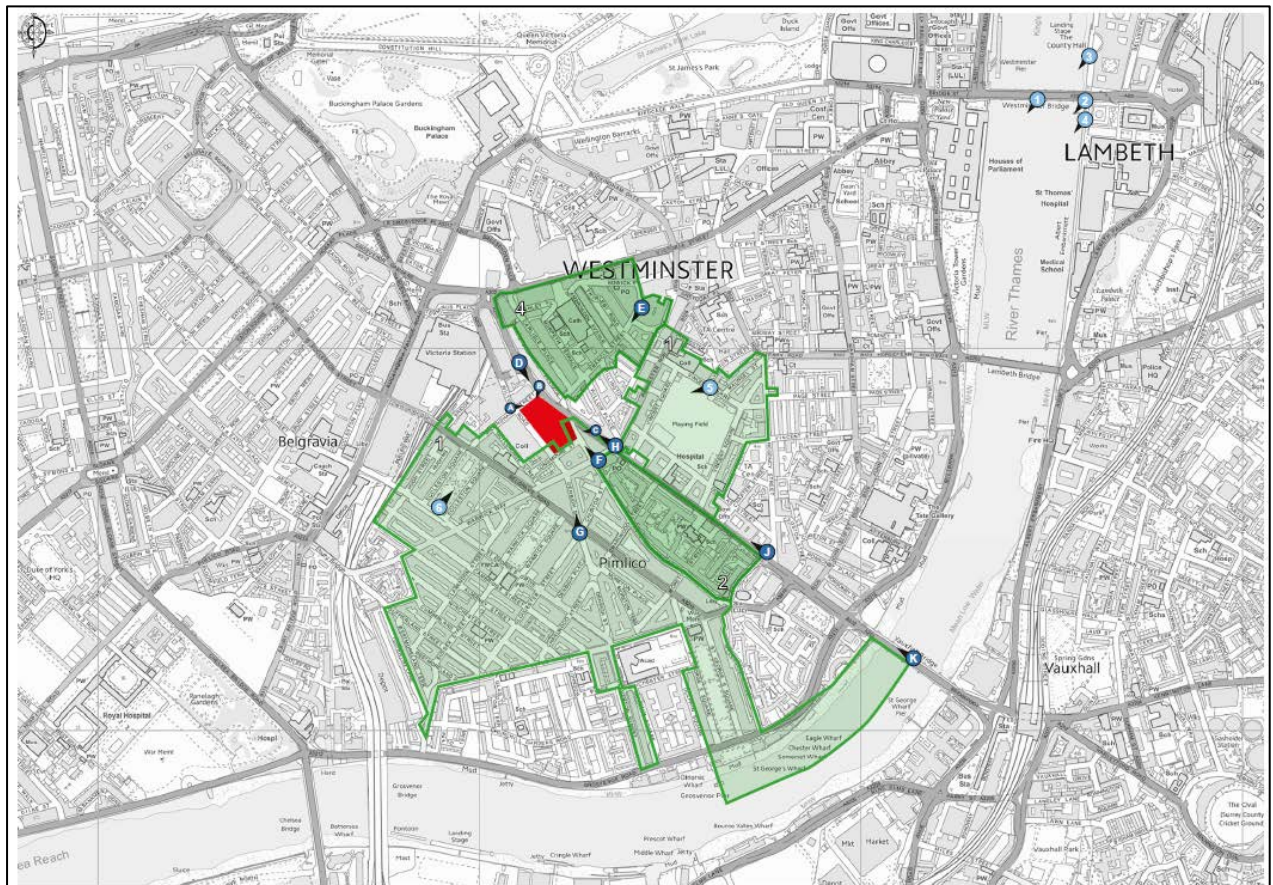


Figure 9.1 Representative Viewpoints

²⁰ Third Edition, 2013

QMSC and the visibility of the associated buildings along with the LVMF and conservation area local views have been established (viewpoints 1-6) with further townscape views being checked as part of a field study (A-K). The former has determined that the existing zone of theoretical visibility (ZTV) is reasonably contained and limited to linear views along streets due to the nature of existing built form.

RP No.	Location
LVMF and Conservation Area views	
1.	Westminster Bridge (centre) – LVMF 18.A.2
2.	Westminster Bridge (east) – LVMF 18.A.1
3.	In front of County Hall – LVMF 21A.1
4.	Albert Embankment – LVMF 22A
5.	North east side of Vincent Square - in line with 'local view 10' of the Vincent Square Conservation Area Audit SPD
6.	Eccleston Square - local view from Pimlico Conservation Area Conservation Area Audit SPD
General townscape views	
A.	West footpath on the junction of Wilton Road and Gillingham Street
B.	East footpath on the junction of Vauxhall Bridge Road
C.	Vauxhall Bridge Road
D.	Vauxhall Bridge Road (north)
E.	East footpath on the junction of Francis Street and Greencoat Row
F.	South footpath on the junction of Warwick Way and Upper Tachbrook Street
G.	South footpath on the junction of Denbigh Street and Belgrave Road
H.	Vauxhall Bridge Road (central – junction with Warwick Way)
J.	Vauxhall Bridge Road (south – junction with Rampayne St)
K.	Vauxhall Bridge Road (centre of the bridge)

Figure 9.2 – Representative viewpoints

Open and Play Space Deficiency

The area acts as a busy and frequently used destination for workers and visitors during the day time while also acting as the key neighbourhood shopping centre. The shopping centre contains a number of restaurants, cafés and supermarkets frequented by these visitors, in addition to the popular street market which incorporates a number of hot food stalls focussed on lunchtime sales. However there is a distinct lack of space for people to dwell and eat lunch for example.

The site is located in an area of open space deficiency and is an identified area of play space deficiency as set out on Westminster's proposals map accompanying the City Plan, and in the maps and plans accompanying Westminster's Open Space Strategy (2007).



Figure 10.1 Open space deficiency

The lack of open space does not facilitate dwelling time in the area beyond the time spent visiting these shops and services, and as such the area would benefit significantly from the provision of open space.

The addition of further housing to the area will increase demand on existing play space, and demand for the provision of new play space. The area, including much of Pimlico is also designated as a priority area for informal play areas.

Therefore, development proposals should seek to address play space requirements in line with Westminster policy.

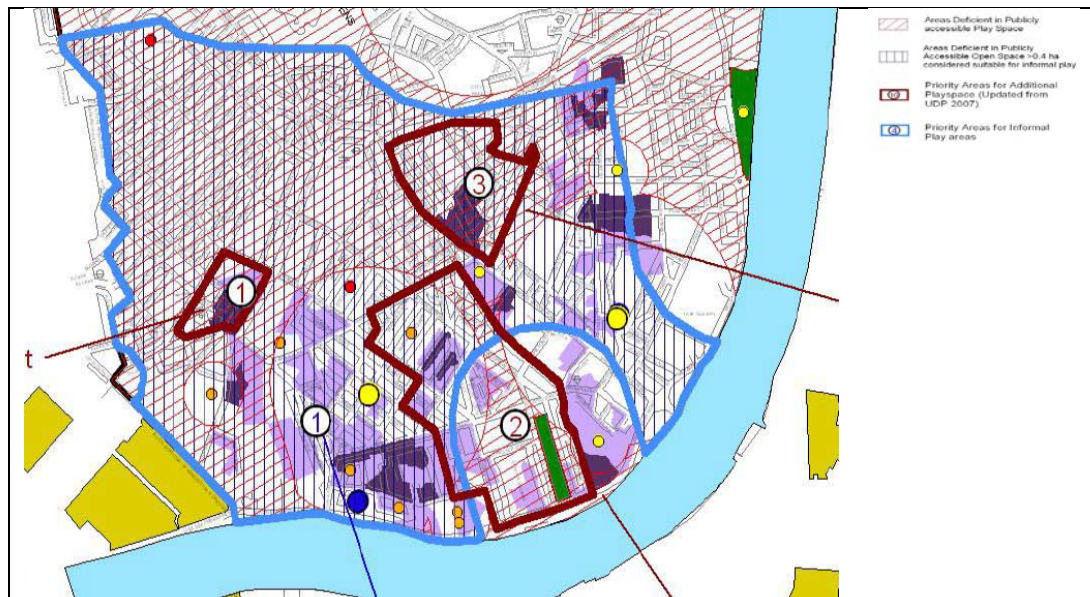


Figure 10.2 Play space deficiency

Public Realm Vision for Victoria

The Victoria BID Public Realm Vision for Victoria was undertaken by Publica on behalf of the Victoria Business Improvement District. The vision includes an assessment of the Victoria area, resulting in a series of recommendations on how the roads, streets, gardens and other public spaces can be improved for all users. It identified 12 guiding principles for developing Victoria's public realm:

- Create a network of related spaces to build a new public character.
- Improve air quality.
- Improve walking routes and pedestrian environment.
- Minimise the impact of traffic and vehicles.
- Improve cycling conditions.
- Enhance trees, greenery and planting.
- Build character, programme events in public spaces and provide play opportunities.
- Ensure public identity through signage and wayfinding.
- Encourage unified, light touch management and oversight.
- Enhance lighting.
- Commission art in public places.
- Adopt a coherent material palette for Victoria.

The aspirations of the Victoria Public Realm Vision should be considered in the context of Westminster policy, and the Westminster Way SPG, which is Westminster's overarching Public Realm strategy.

Westminster Way

The Westminster Way (adopted September 2011) is Westminster's public realm strategy and in hand with Council policies aim to safeguard the architectural and historic character of the city and provide an inclusive environment, in hand with simplicity and in appropriate places, good, modern design. Development proposals should follow the Westminster Way in drawing up public realm and environmental improvements associated with the development site.

The guidance includes a 'Westminster Code' setting out what the Council wants to achieve in streets and open spaces. As such it should inform the selection, design and placement of furniture and surfacing materials with the public realm. The code includes the following rules:

- **Quality:** Of materials, scheme design, implementation, detailing, maintenance.
- **Durability/Sustainability:** Of materials, supporting structure.
- **Character:** In fitting with the City's distinctive street furniture.
- **Clutter Free:** Minimise furniture obstruction, co-location, and only installing new items where absolutely necessary.
- **Continuity:** Replication of historic furniture where appropriate.
- **Containment:** Respect and continue established pattern of geographically distinct furniture items.
- **Context:** Furniture, planting, materials should be informed by character and traditions of context.
- **Co-ordination:** Furniture should be part of the city's coordinated suite.
- **Consistency:** Replacing like for like, removing inconsistency.
- **Cherish:** Protect, preserve and maintain listed and other noteworthy items of furniture.

The guide goes on to set out the evolution of a new project, and distinct sub areas in terms of street furniture character, while then providing detailed practical guidance on a series of public realm topics including paving, lighting and public art.

The Westminster Way is accompanied by a Westminster catalogue of public realm materials and street furniture, as referenced throughout the strategy.

Trees and Planting

In addition to the Westminster Way, the Westminster Trees and the Public Realm SPG – a tree strategy for Westminster should be borne in mind in any proposals.

The Tree Strategy seeks to ensure that, for the benefit of both current and future generations, Westminster's tree stock is planted, and when appropriate replaced, in accordance with contemporary arboricultural best practice, and with careful consideration of its relationship with townscape, amenity, biodiversity and historic character.

In the Tree Strategy, the site area is identified as an area of no unified architectural character, and as such as an area for opportunity in townscape terms, further identified as an area for planting moderation. The guidance goes on to set out practical considerations for planting.

Currently, mature trees are located along Vauxhall Bridge Road and Wilton Road, with the presumption that they should be retained in any development proposals for the site. Proposals should take the opportunity to include further appropriate planting and greening, including the provision of green walls and green roofs where appropriate.

Legible London

To sit alongside any public realm improvements, or improvements to the pedestrian environment, a legibility and signage strategy will be needed. This will encourage walking, and allow pedestrians to move through the site and wider area effectively. It will be an important factor in connecting the site to the Victoria Transport Interchange, other modes of transport, and surrounding areas.

The expectation would be for any public realm strategy to be designed to proactively accommodate the Legible London signage system that has been successfully implemented throughout a large proportion of Westminster. The use of Legible London signage ensures continuity with the rest of Westminster based on the familiarity and success of this approach. All signage should be sensitively and effectively incorporated into the public realm, in line with Westminster's public realm guidance. Figure 10.3 shows the range of Legible London products which are available.

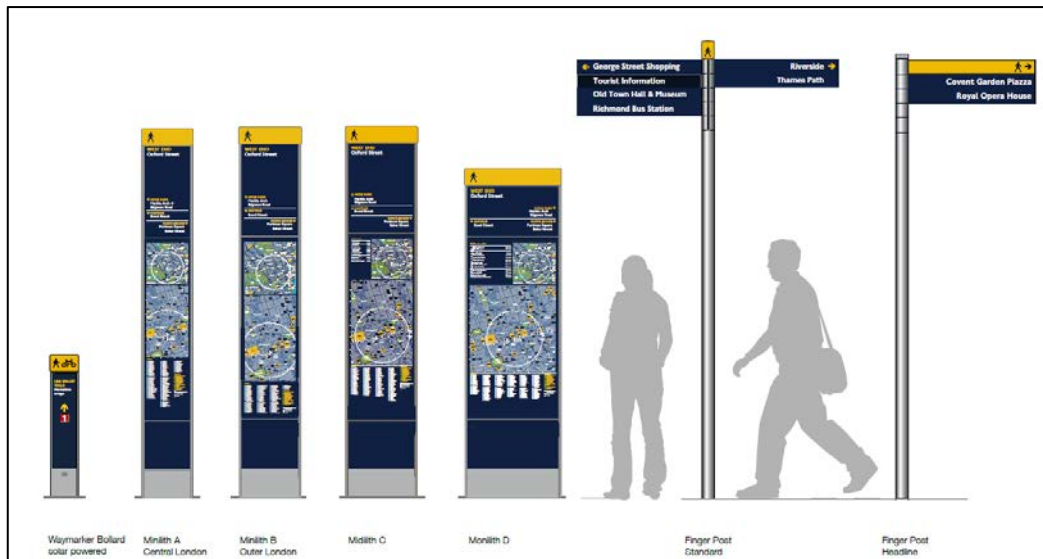


Figure 10.3 Legible London Products

Public Art

Public Art can help to create dynamic and stimulating environments when successfully integrated into a place or proposed development. Proposals should therefore be accompanied by an appropriate, well considered public art strategy, which will make a positive contribution to the streetscape, built environment and public spaces, while not adding visual clutter or confusion to the public realm. The surrounding area towards Victoria station includes a number of sculptures, monuments and other forms of public art, however there is little in the direct vicinity of the site.

Local planning policy²¹ encourages public art to be integrated into the design of new development, and not generally be free standing pieces. Particular importance will be given to gateway locations around the site, while not affecting access and circulation. All public art must be appropriate and define high standards of design in order to ensure that it enhances the appearance and experience of the public realm.

Security and Management of spaces

Any public realm strategy or the creation of any public open space or play space should include active and passive security and management features as appropriate. For example, design should provide passive surveillance and overlooking through the provision of active frontages. Designing out crime principles should be taken forward in all proposals for the site, and in line with Westminster policy.

The provision of any new public spaces should include design measures to minimise the opportunity for anti-social behaviour such as street drinking, street crime and unauthorised street trading. These issues occur at certain points around the site presently, due to the presence of inactive frontages and informal spaces that facilitate such behaviour, such as Gillingham Row.

Management arrangements for public spaces should be set out in a management plan which should also provide details of how management arrangements are to be funded, to be secured through Section 106 agreements as appropriate.

²¹ See City Plan Policy S28 and SPG/Ds on Design Matters, Public Art, Statues and Monuments

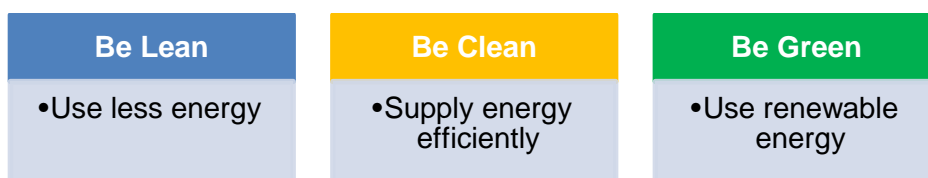
Sustainability and Energy Requirements

In line with sustainable development priorities, any proposals should incorporate exemplary standards of sustainable and inclusive urban design and architecture, in line with Westminster’s strategic design policy S28. As part of this, development will reduce energy use and emissions that contribute to climate change during the life cycle of the development, therefore including both construction and operational phases.

This approach applies to both new build developments which may include demolition, and to the retrofitting of retained, existing buildings where practical and necessary.

Building Regulations

Proposals will be required to conform with Building Regulations in terms of carbon reduction targets and other design standards, and with the Mayor of London’s ‘Be Lean, Be Clean, Be Green’ energy hierarchy as set out in London Plan policy 5.2 for Minimising Carbon Dioxide Emissions.



The following building regulations concerning sustainability should be consulted:

- Part G (water efficiency)
- Part H (adequate surface water drainage)
- Part L (reducing CO₂ emissions, reducing solar gain and efficient operation of buildings as a whole)

BREEAM

The adoption of the BREEAM ‘excellent’ standard should be applied to all newly built commercial properties where possible. Residential development should achieve the highest possible sustainability design standard based on site location and orientation, technological feasibility, financial viability and other site specific considerations.

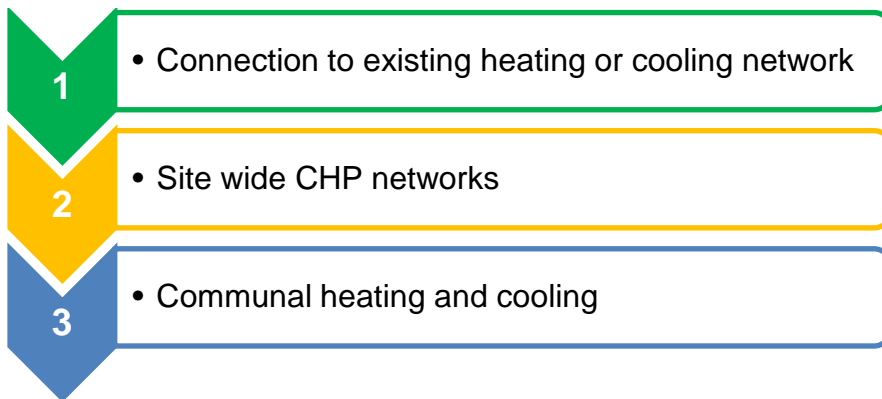
District Heating

It is expected that any redevelopment here would link up to a local district heating network such as that at the ‘NOVA’ development in Victoria, or at the Pimlico District Heating Undertaking (PDHU). PDHU is the largest of four major community heating schemes in the UK and supplies constant central heating and hot water to more than 3,200 flats and private dwellings, schools and offices in the area, including 46 commercial properties.

Consideration needs to be given to what easements/wayleaves would be required in order to make the connections to these systems and an agreement will need to be made with any affected property owners regarding the creation and taking of such rights as are needed to make these connections. Where that is not possible, the Council has powers to acquire such ‘new rights’ compulsorily²². There are also potential procurement issues if the developers are required to carry out works which will need to be addressed.

²² Section 13 of the Local Government (Miscellaneous) Provisions Act 1976

The London Plan encourages the extension of existing decentralised energy networks and sets out the following energy system selection hierarchy²³:



Where it is not possible to connect to an existing network, proposals will be required to provide site-wide decentralised energy generation that has the potential to be extended to serve other development sites in the vicinity. Extending the existing systems could usefully improve the efficiency of the existing systems by using spare capacity and by providing complementary heat demand load patterns, with commercial uses utilising the energy during the day and residential uses utilising the energy in the evening.

Noise

The design of residential and commercial uses will be expected to both protect residents and users from excessive noise and vibration and to keep noise emissions low in line with local policy, and to combat Westminster's exceptionally high noise levels, particularly from traffic and plant on buildings.

Construction

Policy 5.3 of the London Plan seeks the highest standards of design and construction to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime. This policy is accompanied by the Sustainable Design and Construction SPG, both of which should be consulted as proposals are drawn up.

²³ London Plan policy 5.6 and City Plan policy S39

<p style="text-align: center;">STRENGTHS</p> <ul style="list-style-type: none"> • Accessibility and strategic location • CAZ Shopping Frontage • Opportunity Area and Core CAZ adjacency • Daytime and Evening Activity (residents and workers/visitors) • Mix of uses • Upper Tachbrook Street and Gillingham Row 	<p style="text-align: center;">WEAKNESSES</p> <ul style="list-style-type: none"> • Poor public realm • Quality of built environment • Permeability and legibility • Dead frontages and anti-social behaviour • Poor quality leisure, retail and office floor space • Air quality and noise • Open space deficiency • Piecemeal development
<p style="text-align: center;">OPPORTUNITIES</p> <ul style="list-style-type: none"> • Densification and intensification • Place making • Open space creation • Renewal of built environment • Crossrail Line 2 and VTI improvements • Mixed use , sustainable development • Pimlico District Heating Undertaking • Strengthening office and retail market • Innovative approaches to car and cycle parking 	<p style="text-align: center;">THREATS / CONSTRAINTS</p> <ul style="list-style-type: none"> • Air quality and noise pollution • Piecemeal development • Local views • Heritage and conservation

Figure 24 SWOT Analysis of redevelopment at the site

Compulsory Purchase

Appendix 14

The City Council has powers (subject to confirmation by the Secretary of State) under section 226 of the 1990 Act to acquire land compulsorily for “development and other planning purposes”.

Section 226(1) (a) allows the use of these powers if the acquisition will facilitate the carrying out of development, redevelopment or improvement on or in relation to that land.

Section 226(1)(a) is subject to subsection (1A) which provides that the City Council as an acquiring authority, must not exercise the power unless it thinks that the proposed development, redevelopment or improvement is likely to contribute to achievement of the promotion or improvement of one or more of the economic, social or environmental well-being of its area.

The council normally uses these powers in support of its duties either under the housing legislation, in order to remedy poor housing conditions, or in order to overcome problems of use.

A compelling case was put together for the public interests of a compulsory purchase for the NOVA development in 2009 to ensure that the few remaining properties could be acquired and to bring in issues of wayleaves, leases, craneage rights and other issues necessary for the construction of the scheme.

The council will endeavour to involve the local community in discussions concerning the redevelopment of this site and keep stakeholders (residents, businesses and visitors) informed about the progress of development proposals. This appendix briefly explains the stakeholders who are likely to be interested in the development proposals for this site and those who may be worthwhile partners as a scheme develops.

Victoria Business Improvement District (BID)

The aim of the Victoria BID is to bring together the business community to help shape and influence Victoria's future development and infrastructure, positioning Victoria as a vibrant and thriving destination. The BID are actively involved in the promotion of green infrastructure, safe places and economic growth in the Victoria area. Although the site falls just outside the BID area, the BID members are likely to have an interest in any development happening on the boundary, especially given the scale of opportunity at the site and the future extension of the Victoria Opportunity Area boundary.

Victoria Station Review Group (VSRG)

VSRG is an officer-level group comprised of representatives from Transport for London, the Greater London Authority, London Underground Limited, the Victoria Coach Station (VCS), Network Rail and specific developers and chaired by Westminster City Council. Although this site falls beyond the remit of the Victoria Station development works, the VSRG are likely to have an interest in involvement with the redevelopment of this site given its size, proximity and route to the station.

Cross River Partnership (CRP)

CRP is a public, private and voluntary sector run regeneration agency working to spread physical, economic and social wealth across the boroughs of Westminster, the City, Lambeth and Southwark. CRP is represented on the South Westminster Steering Group which oversees the delivery of the renewal plan for the area. As well as its physical environmental and transport regeneration programmes, CRP runs a number of highly successful economic and social programmes. These are targeted at increasing employability, improving skills, strengthening business and education links, supporting businesses, and fostering start up enterprise.

The council would like developers to require their contractors to participate in the Cross River Partnership ['Building London Creating Futures'](#) scheme, to directly employ local people during the construction of developments through the use of Workplace Co-ordinators.

SW1st

SW1st is an employment agency funded through a mix of developer and public contributions which seek to place local people into jobs with both existing employers and those created by the construction and subsequent occupation of the new developments. The council established SW1st to enable the local community to benefit from the employment and training opportunities presented by major developments at Victoria.

Neighbourhood Areas represent the interests of local residents and businesses: the following are in the vicinity of the development site: Pimlico, Victoria (Business Area), Belgravia, Churchill Gardens Estate, Ebury Bridge and Vincent Square (not yet formally designated).

Victoria Interchange Group (VIG)

Formed by residents, the VIG is an unpaid umbrella group open to membership from residents' and tenants' associations in South Westminster and to affiliates who share the

same aims. Over thirty groups, including the Cathedral Area Residents' Group (CARG), the Belgravia Residents' Association, FREDA (Pimlico residents) and Westminster Cathedral are involved in, or working with, VIG.

The Westminster Society

The Westminster Society is a registered charity and amenity society for a substantial part of the southern half of Westminster. Its principal objective is the enhancement and conservation of the amenities of the City of Westminster, this being achieved by stimulating interest in its beauty and historical features, considering new architecture and encouraging the preservation of the river frontage, representing the interests of the residents of Westminster and similar activities.

South Westminster Action Network (SWAN)

SWAN comprises a number of networks embedded in the heart of SW1 including the follow:

- South Westminster Neighbourhood Network
- South Westminster Learning and Employability Network
- South Westminster Housing Network
- South Westminster Youth Providers Forum
- South Westminster Health Network

SWAN has various mechanisms for engaging the community such as the SW1 Neighbourhood Champion Scheme, Community Forum lunches, SW1 Community Newsletter (delivered to over 17,000 households) and the Community website (www.southwestminster.org.uk).

A1 Use Class (A1 retail use)

Shops, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, domestic hire shops, dry cleaners, funeral directors and internet cafés in accordance with the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

A2 Use Class Financial and professional services

Banks, building societies, estate and employment agencies, professional and financial services and betting offices in accordance with the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

A3 Use Class Restaurants and cafés

For the sale of food and drink for consumption on the premises –restaurants, snack bars and cafés in accordance with the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

A4 Use Class Drinking establishments

Public houses, wine bars or other drinking establishments (but not nightclubs) in accordance with the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

A5 Use Class Hot food takeaways

For the sale of hot food for consumption off the premises in accordance with the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

Accessibility

The ability of all people, including elderly and disabled people, those with young children and those carrying luggage and shopping, to reach places and facilities, and to move around and use those places and facilities.

Active frontages

A ground floor frontage which generates passing trade and provides a ‘shop-type’ window display with interest at street level.

Affordable housing

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. *N.B. This definition may include low cost homeownership products such as starter homes in future. See Appendix 4.*

Amenity spaces

Private or public spaces that provide opportunities for informal activities close to home or work and which contribute to the appearance of localities or developments. They are normally small spaces where workers or visitors can relax, areas used for dog walking, play, rest or quiet enjoyment, or merely to provide visual amenity in densely built-up developments.

Biodiversity

The diversity, or variety, of plants, animals and other living things in a particular locality. It encompasses habitat diversity and genetic diversity.

Business Improvement District (BID)

A business led partnership created through a ballot process to deliver additional services to local businesses. Businesses within the partnership contribute by means of an annual levy to develop projects which will benefit businesses in the local area e.g. enhanced local street cleaning, economic development activities within that area.

Central Activities Zone (CAZ)

A diverse area covering Central London and extending across 10 London boroughs, as designated by an indicative boundary in the London Plan. In Westminster, the CAZ comprises eight locally distinct designations as follows: Paddington Opportunity Area; Victoria Opportunity Area; Tottenham Court Road Opportunity Area; Core Central Activities Zone; Marylebone and Fitzrovia; Knightsbridge; Pimlico; and the Royal Parks.

CAZ Frontages

Designated shopping streets within the Central Activities Zone.

Character

The distinctive or typical quality of an area as described by its historic fabric; appearance; townscape; and other land uses.

Code of Construction Practice

A code of practice setting out minimum standards and procedures for managing and minimising the environmental impacts of constructions projects.

Commercial floor space

Comprises A1 Shops, A2 Financial and professional services, A3 Restaurants and cafés, A4 Drinking establishments, A5 Hot food takeaways, B1 Business and all other B uses, C1 Hotels, private C3 hospitals, private D1 Non-residential institutions such as medical care and schools, private D2 Assembly and leisure such as private gyms and clubs, and commercial sui generis uses in accordance with the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

Compulsory Purchase Order (CPO)

Compulsory purchase powers are provided to enable acquiring authorities to compulsorily purchase land to carry out a function which Parliament has decided is in the public interest.

Conservation Area

An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve and/or enhance, designated by the local planning authority under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Conservation Area Audit

The council's appraisal programme for conservation areas, and adopted as Supplementary Planning Documents. Each audit provides the detailed assessment of the character and appearance of an area, the analysis and appraisal of key features and guidance to support the implementation of policies designed to preserve and/or enhance these features. Such features include unlisted buildings of interest, spaces and townscape; materials; uses; and important views. Negative features and management proposals are also identified.

Decentralised energy generation

The generation of electricity near to where it is used, thereby avoiding the wastage of traditional, centralised power stations.

Development

The carrying out of building, engineering, mining or other operations in, on, over or under the land; or the making of any material change in the use of any buildings or other land, as defined in the Town and County Planning Act 1990 (as amended). Unless it is defined under the Act as “permitted development”, planning permission is required for the carrying out of any development of land.

Development Plan

Under the Planning and Compulsory Purchase Act 2004, in Greater London the development plan comprises the spatial development strategy prepared by the Mayor of London (known as the London Plan) and development plan documents prepared under that Act (for Westminster these will comprise the City Plan: Strategic Policies and when they are completed the Development Management Policies also), the unitary development plans prepared by the London Boroughs. If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan, unless material considerations indicate otherwise.

Greater London Authority (GLA)

The GLA is part of the strategic government of London established in 2000. It is made up of a directly elected Mayor of London and a separately elected Assembly. In addition to the Mayor, the Assembly is also able to investigate other issues of importance to Londoners, publish its findings and make recommendations.

Listed building

A building of special architectural or historic interest, as listed under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Listed Buildings are classified into three grades, with Grade I buildings being of exceptional interest, Grade II* being particularly important buildings of more than special interest. Most Listed Buildings are Grade II.

The London Plan

The spatial development strategy for Greater London. This was prepared by the Mayor of London under Part VIII of the Greater London Authority Act 1999 and was originally published by the Greater London Authority in 2004. The London Plan has been through a number of subsequent amendments and revisions, the latest published version is the Minor Alterations to the London Plan 2016. A full review of the London Plan is expected to begin in late 2016 following the election of a new Mayor.

London Underground Limited (LUL)

LUL are a subsidiary company of TfL responsible for operating the London Underground train network. LUL owns in whole or in part more than 250 Underground stations.

Material considerations

A factor which a local planning authority may take into account in making a decision on a planning application. In certain circumstances, such a factor, or a combination of them, may be sufficient to lead the authority to determine the application other than in accordance with the provisions of the development plan. Where that occurs, the factor or factors involved must, by law, be genuine planning matters relating to the development and use of land and must fairly and reasonably relate to the application concerned.

Mayor of London

The Mayor directs the GLA and sets budgets for the GLA, Transport for London, the London Development Agency, the Metropolitan Police and London's fire services. In addition to producing the London Plan, the Mayor prepares plans on issues including transport, environment, culture and land use.

Mayors Transport Strategy

This document was first published in 2001 and details the Mayors proposals for improving transport in London. This was subsequently updated in 2004 and 2006 and most recently in May 2010.

Named Streets

Specific streets in Marylebone and Fitzrovia which are treated as part of the Core Central Activities Zone. These are Edgware Road, Baker Street, Marylebone Road, Portland Place, Park Crescent and Great Portland Street.

National Planning Policy Framework

A document setting out the Government's planning policies for England and how these are expected to be applied, providing a framework within which local and neighbourhood plans can be produced. This document must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.

Non-A1 retail uses

Comprises A2 Financial or professional services, A3 Restaurants and cafés, A4 Drinking establishments (not nightclubs), A5 Hot food takeaways in accordance with the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

Open Space

Includes all parks and gardens, regardless of size (whether public or private); the River Thames and the canals and their towpaths; civic spaces; children's playgrounds, including school playgrounds; ball courts and other outdoor sports facilities; amenity green spaces, such as open spaces on housing estates; churchyards; and community gardens.

Opportunity Areas

Areas defined in the London Plan that provide London's principle opportunities for accommodating large-scale development to provide substantial numbers of new employment and housing opportunities with good public transport accessibility.

Pimlico District Heating Undertaking (PDHU)

PDHU is a community heating scheme where heat is generated at a central boiler house and distributed through a neighbourhood using a network of highly insulated underground pipes. PDHU was established in 1950 using waste energy from Battersea Power Station and became the first combined heat and power system in the United Kingdom.

Planning Brief

A form of supplementary guidance that sets out the council's preferred development options for a site.

Planning obligation

An enforceable contract associated with the use and development of land. This may be either an agreement between a local planning authority and an organisation or individual having an interest in land; or a unilateral undertaking given by an applicant for planning permission. An obligation usually involves a restriction on the use or development of land; or a specific requirement about an operation or activity to be carried out on land; or a requirement that land should only be used in a specified way; or the payment of a sum or sums of money.

Planning permission

A written consent to the carrying out of "development" issued by a local planning authority or, on appeal, by a Planning Inspector or the Secretary of State. The permission is normally subject to conditions and will lapse if the development is not started within a stated period of

time. Planning permission for buildings may be in outline where the principle is approved, subject to the later submission of further applications for the approval of reserved matters.

Planning Practice Guidance

Government guidance and advice for the application and implementation of the National Planning Policy Framework.

Public Art

Permanent or temporary works of art visible to the general public, whether as part of a building or freestanding: can include glazing, freestanding or relief sculpture, facade interventions, water features, lighting, performance, or any other artist intervention in the built environment.

Public Open Space

Land used by the public for recreation or as gardens which enjoys special protection. The loss of public open space is generally not permitted.

Public Realm/Public Space

Public realm (in its broadest definition) relates to all those parts of the built and natural environment - public and private, internal and external, urban and rural - where the public have free, although not necessarily unrestricted, access, including streets, squares and parks.

Registered Providers

Organisation registered with the Homes and Communities Agency. The organisations concerned may be housing associations which are registered charities, or non-profit-making provident societies or companies.

Section 106 agreement

An agreement or undertaking made under s106 of the Town and Country Planning Act 1990 to secure planning obligations.

Secondary Shopping Frontage

Shopping frontage in a Major, District or Local Shopping Centre where there is a mix of A1 and non-A1 retail uses

Social, Community and Cultural Facilities

Most social, community and cultural facilities are in classes C2, D1 and D2 of the Use Classes Order. Such facilities can include social service uses, health facilities, some leisure and recreation facilities such as libraries, theatres and general social uses such as community meeting facilities and community halls etc.

Supplementary Planning Documents (SPD)

Formally adopted policy statements that either elaborate key policies set out in the local plan or set out how policies apply to a particular site. They are prepared to cover particular development topics, or area-based issues, such as planning briefs. SPDs, are a material consideration in the determination of planning applications. These documents were formally known as Supplementary Planning Guidance (SPG).

Transport for London (TfL)

TfL is a statutory corporation which was created in 2000. It is a functional body of the GLA, accountable to the Mayor, and is the integrated body responsible for the capital's transport system.

UDP (Unitary Development Plan)

Plan prepared under Part II, Chapter 1 of the Town and Country Planning Act 1990 by a local planning authority for its area. Westminster's Unitary Development Plan (UDP) was adopted by Full council on the 24 January 2007 and some policies were deleted upon the adopted of the Core Strategy in 2010 (the former name for Westminster's City Plan: Strategic Policies). The majority of Part 2 UDP policies (those that have not been replaced by the City Plan: Strategic Policies) remain current until they are formally deleted and/or replaced by other policies and should therefore be used alongside the City Plan and London Plan policies to determine planning applications.

Victoria Interchange Group (VIG)

Formed by residents, the Victoria Interchange Group Ltd is an unpaid umbrella group open to membership from residents and tenants associations in South Westminster.

Victoria Opportunity Area (VOA)

The Victoria Opportunity Area broadly aligns with and covers a significant proportion of the Victoria Area Planning Brief area including Victoria Station and the Victoria Transport Interchange site. Opportunity Areas provide London's principle opportunities for accommodating large-scale development with substantial numbers of new employment and housing opportunities in areas of good public transport accessibility.

Westminster's City Plan: Strategic Policies

The City Plan is the principal development plan document for determining planning applications in Westminster. Adopted in 2013, it sets out a spatial vision and objectives for development in the city.

Translation Information

Appendix 17

If you would like this document translated into another language or if you would like this information in another format (including Braille or large print) please contact the council giving your name, address, first language and the name of the document you are interested in.

Albanian

Nese e doni kete dokument te perkthyer ne gjuhe tjeter apo e doni kete informacion ne nje tjeter format, ju lutemi te shkruani tek adresa e meposhtme duke dhene emrin, adresen, gjuhen amtare dhe titullin e dokumentit per te cilin jeni te interesuar.

Arabic

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Bengali

এই ডকুমেন্ট বা দলিলটি যদি অন্য কোন ভাষায় পেতে চান অথবা এই তথ্যাদি যদি অন্য কোন ফরম্যাট বা আকারে পেতে চান তবে অনুগ্রহ করে আপনার নাম, ঠিকানা, প্রথম ভাষা এবং যে ডকুমেন্ট বা দলিলটি পেতে আগ্রহী তার নাম উল্লেখ করে নিচের ঠিকানায় লিখুন।

Chinese

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Polish

W razie potrzeby uzyskania tłumaczenia tego dokumentu na inny język lub uzyskania niniejszych informacji w innym formacie proszę napisać pod poniższy adres podając: imię i nazwisko, adres, język ojczysty oraz nazwę dokumentu, którym jest się zainteresowanym.

Portuguese

Caso gostaria que este documento fosse traduzido em outra lingua ou caso gostaria de receber informacao em formato diferente, por favor, escreva para o endereco abaixo dando o seu nome e endereco, sua primeira lingua e o nome do documento no qual voce esta interessado.

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Development Opportunity Framework for site at upper Vauxhall Bridge Road

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DRAFT

1.1 This framework sets out the council’s policy parameters for development of an urban quarter of potentially strategic significance in Westminster, close to Victoria mainline station and transport interchange, within the Central Activities Zone (CAZ) and adjacent to the Victoria Opportunity Area (VOA). It is intended to provide guidance to developers, local communities and other stakeholders about the council’s policy ambitions and requirements for any development here to ensure it maximises the potential to secure local community benefits, creates a high quality place and supports the sustainable development of the Victoria area.

1.2 The framework has formal status in the planning system as a supplementary planning document and will be prepared through the process set out in regulations.¹ It does not add new policy but explains and adds further detail to adopted planning policies to help potential developers understand the council’s policies and requirements and help them make successful applications. It does this by setting out the Council’s clear vision for the site and the guiding principles for development. The report gives an overview of the site context, its current uses, constraints and opportunities, explains what is required by policy and where there is flexibility over what will be acceptable on the site. The report also indicates which documents will be required to support an application for development and is supplemented by detailed analysis in appendices.

1.3 As an adopted Supplementary Planning Document (SPD) the framework is a material consideration in planning decisions. It is to be treated as guidance for developers, not strict instruction which has to be adhered to in every respect. However, development proposals which meet the identified priorities and adhere to the Council’s vision for the site will be viewed favourably.

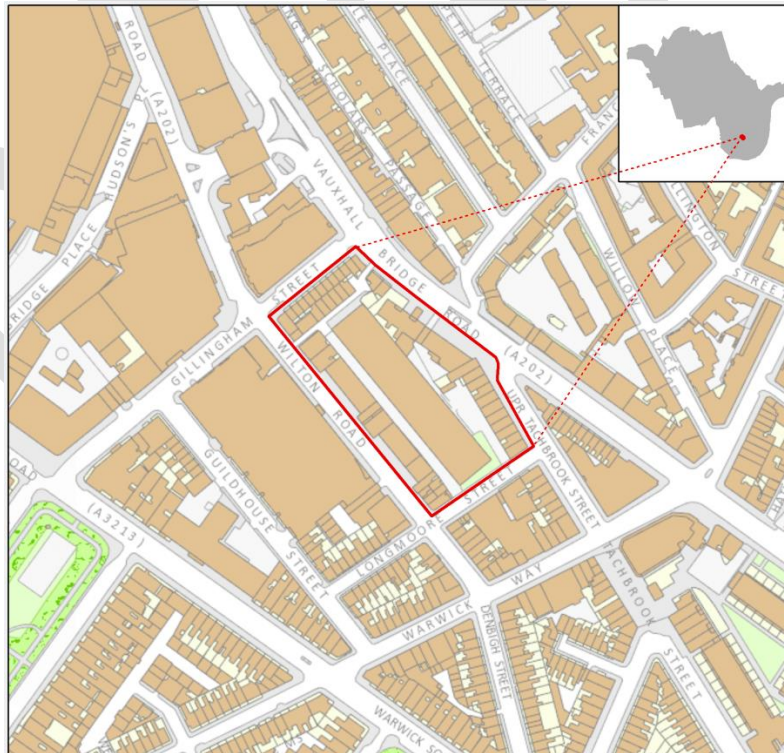


Figure 1. Site map

¹ Town and Country Planning (Local Planning) (England) Regulations 2012

2.1 *The Council's vision for this site is for a comprehensive redevelopment to deliver social and community benefits (including new and improved sports and leisure facilities and open space) for a growing resident and working population; to create a new, high quality urban quarter that improves the experience of all who live, work and visit the area; to provide an attractive new space transforming the site into a destination in its own right; to expand and improve the commercial offer and deliver new residential units to contribute to Westminster's housing needs and support the City's growth, complementing the development of the Victoria Opportunity Area.*

2.2 **Approach**

The Council considers that this site requires a comprehensive approach to promote the good planning of the area and its sustainable development and to complement the strategic importance of Pimlico and Victoria. A comprehensive approach will maximise benefit to the area and its residents. It will also enable delivery of a higher quality built environment and public realm in an area where these are currently of comparatively low value. Piecemeal development, on the other hand, is not desirable on this site – it will not allow the potential of the site to be realised, is likely to result in a lower quality design and public realm and militate against securing key planning objectives such as place-making and a new permeable public open space, which is a key priority.

2.3 Any proposal should aim to meet the vision and strategic objectives for development set out in the National Planning Policy Framework, the London Plan and Westminster's City Plan from which this vision derives:

- improved quality of life and health and well-being;
- sustainable growth;
- creation of attractive places;
- increased employment opportunities; and
- an increased supply of good quality housing.

2.4 The Council will seek to deliver these overall objectives by ensuring that any development maximises benefits against the following priorities:

Priority 1: Social and community benefits for local residents and workers.

2.5 Taken together, development across the site must have at its heart the benefits to local residents and workers As well as the provision of a new improved sports centre and new public realm, improved links between Pimlico and the Victoria Opportunity Area created by redevelopment at this site can bring benefits to the wider community.

Priority 2: Redevelopment of the existing sports centre to provide modern accessible sports and leisure facilities which can cater to the needs of a growing local residential population and local workforce.

2.6 Key to delivery of the first priority will be the upgrading of the existing leisure centre to provide a modern accessible sports centre, facilitating a range of sporting activities, including a new swimming pool, alongside attractive new public realm, creating permeability through the site and improving access to the sports centre.

Priority 3: Place-making to create improved pedestrian experience by the creation of public space designed to a high quality which creates coherent legible routes through the site.

2.7 The pressing need to refurbish, or completely redevelop, the Queen Mother Sports Centre (QMSC) provides the potential for the regeneration of the surrounding area within the identified site boundary. This area is currently under-performing, with poor and inefficient use of the site currently largely comprising low-rise, poor quality commercial properties, laid out in an impermeable arrangement in a wider area characterised by poor quality public realm and environments.

2.8 There is potential to fundamentally rethink the space within the site to break up the existing building blocks and create a new public open space which is attractive, accessible and legible. This would make a step change in the quality of the wider public realm and create much needed 'breathing space' for residents, local workers and visitors, encouraging public life in public spaces and providing a meeting place and forum for people to experience, participate and feel a sense of community.

2.9 An open space in isolation however is of little value unless it can itself drive pedestrian footfall and vitality. To do so we would expect it to serve existing and projected movement desire lines, be safe, be sunlit as far as possible and protected from the wind. Critically it must provide views both in and out, and must link routes that people will consistently want to use throughout the day. A piecemeal development of the site would miss this opportunity and would reinforce the impermeability of the existing building block.

Priority 4: Provision of a mix of commercial uses designed to a high quality to create a destination people will visit rather than pass through.

2.10 The Council wants to see the Victoria area achieve its potential as a top commercial and residential destination which offers an attractive visitor experience. The development potential at this site offers an opportunity to contribute to this wider strategic vision; improved employment opportunities at this site will contribute to the Victoria area's emerging status as an office destination and create an identity for this site in particular.

Priority 5: Increase in housing numbers to contribute to meeting Westminster's housing need.

2.11 Given the size of the site and its excellent links to public transport, the site has considerable potential to deliver a large quantum of new mixed-tenure residential units and it is expected that development at this site will take advantage of that potential. However, units must be of the highest quality and sustainable in terms of energy and water efficiency. The impact of higher density development on the amenity of existing neighbouring residents must also be taken into account in the design of new residential units.

Priority 6: Ensure a development that enhances the quality of the area through exemplary design and public realm, both through individual elements and as a whole and embodies high environmental standards.

2.12 The site is currently occupied by a mixture of relatively low quality buildings which do little to improve the feel or appearance of an area dominated by the busy Vauxhall Bridge Road, to make the best of heritage assets within or adjoining the sites, or contribute to the local public realm. Any development proposal should demonstrate how it will provide high standards of design befitting an area undergoing major change and contribute to the quality of the built environment of the immediate and wider areas of Westminster. Particularly given that the site is currently one of existing low environmental quality.

2.13 Implementing the aspirations for the site is dependent upon a strategic, whole site approach to redevelopment. A more piecemeal development is likely to be incoherent and

will not realise the vision for the site in full or optimise the benefits it could provide against the priorities set out above. The development of the whole site outlined in Figure 1 creates the opportunity for a holistic and comprehensive proposal offering the following benefits:

- provision of a more coherent site in this transitional location between Pimlico and the VOA, linking the areas in terms of function, character and architecture;
- new attractive open space, creating permeability, improvements to legibility and creation of a destination;
- ability to meet a range of strategic and land use objectives, while addressing the key constraints and weaknesses that currently exist within this site boundary;
- renewal of the built environment and public realm;
- a comprehensive approach to the car and cycle parking needs of the site;
- a balanced mix of complementing uses.

2.14 This approach is necessarily dependent upon either a strong partnership and/or joint venture between the owners of the different elements of the site, or single ownership of the site – with the council potentially using its acquisition powers to enable site assembly to support delivery.

2.15 **Alternative Options**

In reaching its preferred approach the council has considered alternative development scenarios:

2.16. Development at the site could exclude the Gillingham Street listed terrace and the modern mews houses to the rear. While this would retain the ability to address many of the site's weaknesses, it would lead to the retention of Gillingham Row, therefore potentially restricting opportunities for a public space of a meaningful scale and undermining a more strategic and holistic approach to movement and permeability through the street block. Owing to the residential nature of the existing buildings on Gillingham Street (which in any case will have to be retained owing to their heritage value) this option would also restrict the scale of development possible at the rest of the site.

2.17 The exclusion of the Wilton Road frontage from the site area would again limit a holistic proposal, entail the retention of detracting modern commercial buildings, restrict the ability to deliver significant improvements to this part of the CAZ shopping frontage and would not realise the vision for the site. Most importantly, this development option would prevent the provision of an attractive open space, which creates permeability and movement through the site from Vauxhall Bridge Road.

2.18 In moving to the preferred development underpinning this document the Council considered the two alternatives set out above. These have been considered against development plan policies; in particular:

- The Spatial Vision and Strategic Objectives set out in Westminster's City Plan: Strategic Policies and the emphasis these place on accommodating sustainable growth, sensitive upgrading of the built environment in ways that enhance the City's heritage and promote improved quality of life, resource efficiency and economic prosperity.
- Principles set out in the London Plan (including the principles of optimising land use and promoting/enabling locations for strategic development in London Plan Policy 8.1 and the lifetime neighbourhood principles set out in Policy 7.1), the Council's aspirations for the site and the good planning of the area.

2.19 Any site configurations that do not address the whole site would severely restrict the ability of development to meet these strategic principles, realise the vision for the site, or deliver the six identified priorities. In particular, more piecemeal approaches to development

are unlikely to bring the community benefits the site has the potential to deliver or to ensure development delivers its full potential in terms of its relationship with, and contribution to, the quality of, its surroundings in keeping with the principles set out in policies 7.1, 7.5 and 7.6 of the London Plan. It:

- would significantly reduce opportunities for new functional public realm;
- would restrict the opportunities that the strategic location of the site presents for much needed improvements to the adjoining shopping centre and a building of sufficient quality to complement both the Victoria Opportunity Area and the more residential area to its south;
- may not deliver a design and wider treatment which complements the heritage assets within the site and surroundings;
- may be unable to support a connection to existing district heating networks, thus putting at risk the sustainability objectives for development.

2.20 The next sections of this document explain the site, the opportunities it presents and the issues development would have to address in more detail. Detailed issues the council considers are particularly important for any development to address are highlighted in ***bold italics***.

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3.1 The site occupies a large island space, approximately 1.1 hectares in size, directly adjacent to the VOA and bounded by five streets – Vauxhall Bridge Road, Wilton Road, Gillingham Street, Longmoore Street and Upper Tachbrook Street. Vauxhall Bridge Road, on the eastern side of the site, is a very busy road forming a route between Victoria and Vauxhall and Stockwell. Wilton Road to the west is an established, busy shopping street characterised by modern development. The only route through the site is currently along Gillingham Row - a narrow, single lane road which does not benefit from full pavements on both sides for pedestrians.

3.2 Over half of the site is taken up by the Council owned QMSC – Westminster's popular sports centre with over 3,000 pre-paid members, serving not only the local community, but many commuters who work in the Victoria area. It is a 1980s development spread over four floors, comprising three swimming pools; the main one being 25 metres long, a smaller 13 metre leisure pool and a 16 metre teaching pool. The centre also has a sports hall suitable for a range of team sports such as badminton, basketball, volleyball and football, as well as group exercise classes; three squash courts, a fully equipped gymnasium, a health suite consisting of saunas and a steam room and changing rooms. Although there are over 60 sports and leisure centres across Westminster, over 74% are operated privately and the QMSC is one of only eight leisure centres owned by the City Council. The QMSC is therefore a key service which has a borough-wide catchment, given the range of sports facilities that it contains

3.3 The sports centre is approaching the end of its life span - iCON Building Consultancy carried out a condition survey in December 2015 and has forecast that the building will require £3.1 million of investment within the next ten to fifteen years to keep it operating. The leisure centre struggles to meet growing demands from an increasing local resident and working population and investment to modernise and increase capacity of the centre is necessary if this growing demand is to be met. The anticipated influx of residents and workers to Victoria may place additional pressure on the existing sports and leisure offer at the QMSC.

3.4 The remainder of the site is made up of a mix of uses, offices (including a small embassy), restaurants and cafés, a dental practice and private healthcare clinic, retailers, including a shoe repair service and hair salon, some residential units above commercial units and a single hotel².

3.5 In Context

To the north of the site is the Victoria Transport Interchange – a busy transit and commercial area comprising Victoria mainline station, the London Underground (District, Circle and Victoria lines) and a bus and coach station. The site sits just outside the border of the VOA and the Core Central Activities Zone (CAZ). The proximity of the site to the VOA is highly relevant – recent development in the immediate vicinity of the site shows that it is functionally similar to the VOA and should the VOA boundary be extended to include this site (see Chapter 7) development here could contribute to the wider objectives for the VOA of new homes and jobs, public realm improvements, a mix of uses and improved sports and leisure facilities. Victoria is evolving into a destination in its own right and it is timely to consider the contribution that this site can make to that evolution and to capitalise on current developer interest in the area.

3.6 Within 450 metres there are nearly 2,000 existing residential units, over 280 new residential units have been built in the last five years and a further 500 have permission or

² The planning uses classes at this site are: A1, A3, A5, B1, C1, C3, D1 and *sui generis*.

are currently under construction. Long established and substantial social housing estates exist nearby, such as Lillington and Longmoore Gardens and Churchill Gardens to the east. The wider Pimlico area has its own distinct residential village character and function as a wider part of the CAZ. This residential character is not particularly mirrored at this site which exhibits a more Core CAZ commercial character. The character and function of the development site is therefore more akin to this busy commercial area to the north, rather than the quieter predominantly residential area of Pimlico to the south which contains small clusters of local uses and is also known for its concentrations of small hotels.

3.7 The Lillington and Longmoore housing estate (partially grade II* listed) provides a residential concentration directly to the south-east of the site. To the south-west of the site is Warwick Way and Tachbrook Street - an identified 'CAZ frontage' in Westminster's City Plan (see Appendix 6). Wilton Road is also adjacent to the site - a local shopping street which benefits from a large modern supermarket.

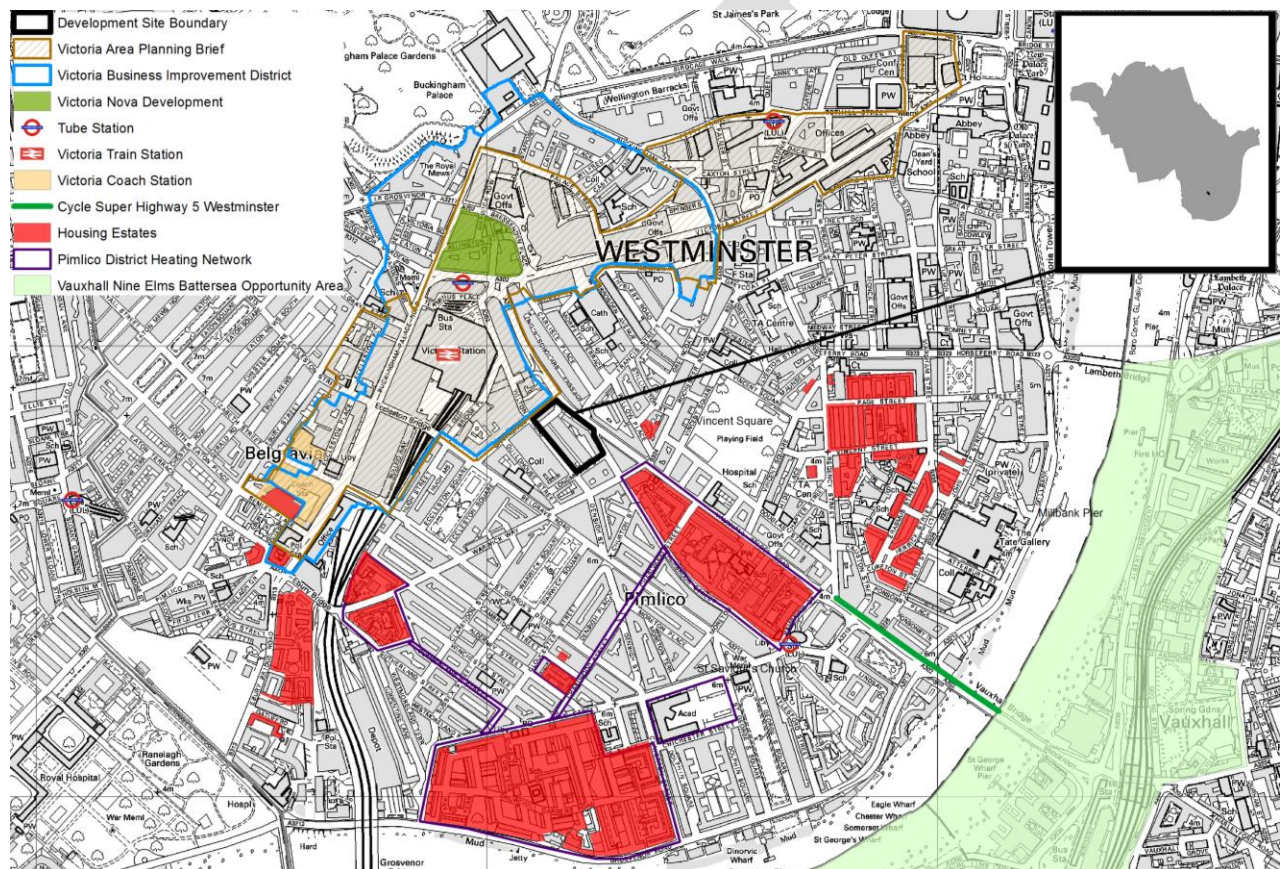


Figure 2. Site Context

3.8 Public Realm

The existing site presents inactive frontages on three sides of the island site. Gillingham Row is an informal road through and around the site that lacks in ground floor activity, presenting an unfriendly space and facilitating anti-social behaviour. To a lesser extent this is true of Longmoore Street, which has a poor public realm dominated by the inactive southern elevation of the sports centre and the unused space between this elevation and the harsh metal railings at the edge of the site.

3.9 The mews street to the rear of Upper Tachbrook Street terrace also provides a dead space, mainly used for informal parking.

3.10 There are no formal residential entrances and little in the way of overlooking to provide security, beyond the large gate which remains permanently open.

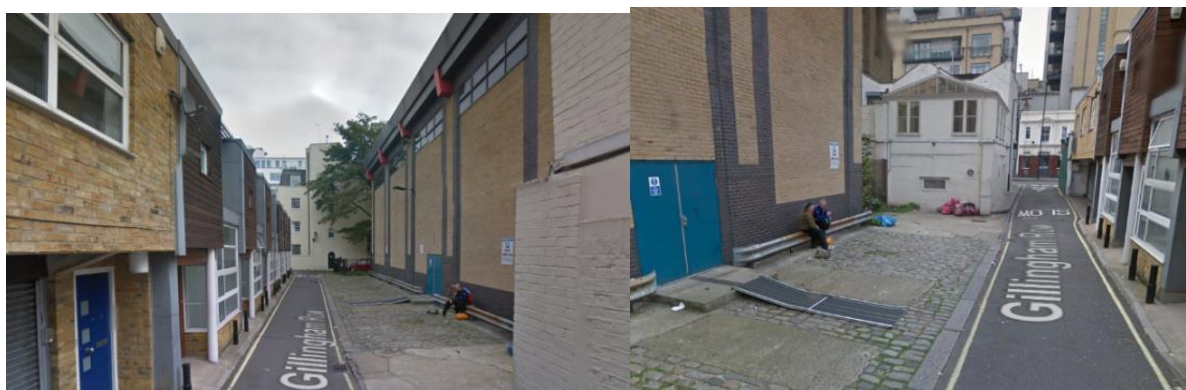


Figure 3. Gillingham Row frontage³

3.11 The Vauxhall Bridge Road frontage is also largely inactive, with ground floor office windows set well back from the street, thereby providing little in the way of surveillance or activity in the evening. This includes the compromised single entrance to the sports centre and unsecure cycle parking. The pavement width and setback of the building provides the opportunity for an improved public realm, incorporating the existing landscaping.

3.12 The environment is marred by noise and vehicle movements, particularly along Vauxhall Bridge Road and to a lesser extent along Wilton Road, while the pedestrian environment is varied and poor in places. The sports centre is accessible only from Vauxhall Bridge Road, lacks visibility and suffers from a convoluted access and internal arrangement.

3.13 Public open space

There is a single compromised access to the existing sports centre and **a lack of public open space at this site** (and in the surroundings).

3.14 The listed buildings in Gillingham Street to the north and the buildings making a positive contribution to the Pimlico conservation area fronting Upper Tachbrook Street, both constrain opportunities for permeability. However, outside of these the Council would expect opportunities to be taken to create routes across the site to and from the new open space.

A place-making approach to holistic redevelopment of the whole site has the potential to open the centre of the site up, create attractive spaces to dwell and connect the various communities. A more formalised link from Vauxhall Bridge Road to Wilton Road would also create permeability through the site, increase footfall to the shopping centre, create a significant improvement on the existing Gillingham Row and Longmoore Street experience for pedestrians and provide the opportunity to promote a comprehensive approach to improving the public realm in the area.

3.15 **A whole site approach additionally provides the opportunity to create an improved connection to both the VOA to the north and to Pimlico to the south through the provision of a variety of uses.**

3.16 Further detailed site description can be found in Appendix 2. A detailed townscape analysis can be found in Appendix 3.

³ Image courtesy of Google

Chapter 4

Heritage and design

4.1 The site has a number of heritage constraints – it is partially situated within the Pimlico Conservation Area, in proximity to a number of listed buildings and close to the following conservation areas: Westminster Cathedral, Lillington and Longmoore Gardens, and Vincent Square.

4.2 Within the site boundary, the terrace at 2-22 Upper Tachbrook Street (which comprises ground floor commercial uses, including a number of vacant or poor quality retail uses, with residential accommodation at upper floors) and 74-76 Wilton Road are identified as unlisted buildings of merit within the Pimlico Conservation Area Audit. They are typical examples of the early-mid 19th century development of Pimlico and the defining townscape character of the conservation area. The contribution the terraces at Upper Tachbrook Street makes extends beyond the contribution of the principal facades but also to the rear elevation and traditional butterfly roof forms, which are highly visible from Longmoore Street.



Figure 4. Buildings that make a positive contribution to the conservation area (shown in yellow)

4.3 *There is a strong policy presumption (at national and local level) for the retention of buildings which make a positive contribution and the Council will be expecting, in the first instance, the retention of these properties as part of any scheme for redevelopment in order to fulfil the statutory duty to preserve or enhance the character or appearance of the conservation area.*

4.4 The property at the corner of Longmoore Street and Wilton Road has been identified as making a neutral contribution to the character or appearance of the conservation area. While there is no policy presumption in favour of its retention, from a heritage perspective ***the quality, scale and character of its replacement are important considerations for the redevelopment of the site and proposals will have regard to its heritage contribution.***

4.5 Listed Buildings

1-25 Gillingham Street, located to the north of the site are grade II listed and a blue plaque at no. 17 highlights the residence at that building of author Joseph Conrad. There is therefore a statutory duty to pay special attention to the desirability of preserving the setting of these buildings. However, whilst these properties originally date from the 1830s they have been

much altered, including what seem to be largely rebuilt rear elevations, late 20th century mews style houses to the rear and a new ground floor front elevation. Notwithstanding this degree of alteration, the properties remain an attractive, symmetrical balanced 'palace fronted' terraced composition. ***The relationship of any development to the rear of these listed buildings, principally when seen together with the front elevation, is an important consideration.***

4.6 There are also a number of other grade II listed buildings in the vicinity of the site (shown in Figure 5), the setting of which will also require consideration. The grade II listed building at 183-203 Vauxhall Bridge Road is of particular note.

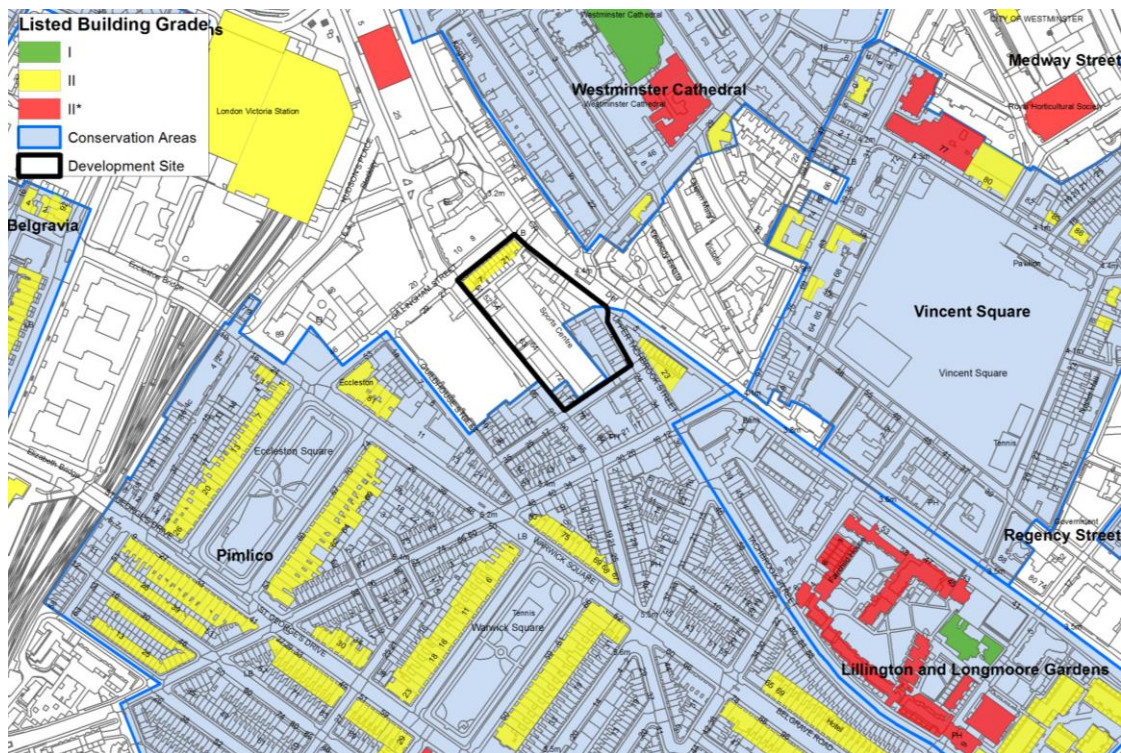


Figure 5. Pimlico Conservation Area and listed buildings

4.7 Buildings detracting from local quality

There are a number of 20th century buildings that do not make a positive contribution to the site's setting and character and indeed contribute to creating a number of constraints around the wider site. 215 Vauxhall Bridge Road and 56-62 Wilton Road, together with the sports centre itself comprise the majority of the street block. Their order and physical state creates issues around permeability and significant amounts of dead and underutilised, publically inaccessible space between buildings (particularly between the sports centre and the Wilton Road block). The poor quality office floorspace does not reflect current demand in the area. There are a number of other older commercial buildings across the site that do not contribute to the character or setting of neighbouring conservation areas and are likely to have no presumption in terms of their retention.

4.8 ***Sensitive redevelopment of the majority of the street block as part of a holistic approach would deliver significantly improved buildings in terms of sustainable architectural design and quality and also the mix of uses that could be contained within them, while addressing related issues that they create due to their current arrangement and orientation, such as site permeability.***

4.9 Views

The site is not located within any identified strategic and local views⁴, falls behind the protected silhouette of the Palace of Westminster in the London View Management Framework (LVMF)⁵ and no 'panorama' or 'townscape' views pass over the site.

4.10 The Lillington and Longmoore Gardens Conservation Area Audit SPD (2012) identifies both local views and glimpsed/townscape views, but the site does not fall within these established views. Depending on scale, development might fall within the local view from Eccleston Square, identified in the Pimlico Conservation Area Audit⁶, and Warwick Square -both grade II Registered Park and Gardens located in the vicinity to the south-west of the site. **The significance of these squares and the contribution they make to the setting of conservation areas will have to be assessed depending on the scale, height and massing of emerging proposals for the site.**

4.11 The Vincent Square Conservation Area Audit⁷ identifies a number of local views and landmarks, including 'local view 10', which looks towards the site from within Westminster School's playing fields pavilion car park (this is not accessible to the public).

4.12 Westminster Cathedral Conservation Area Audit⁸ also identifies metropolitan and local views; however, although the site does not fall within these, development may be visible at an obscure angle to the cathedral, depending on building height.

4.13 **A view point assessment was carried out for this site⁹ and it is considered that the existing visibility of the site is reasonably contained due to the intervening built form, landform and vegetation, depending on the height of the proposal.**

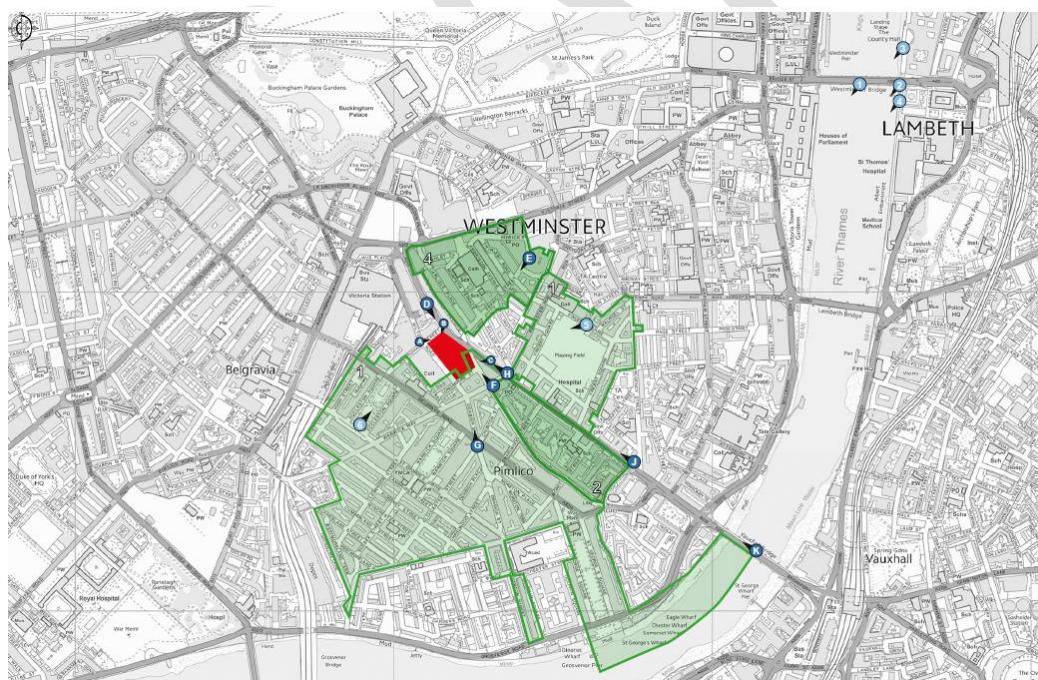


Figure 6. Viewpoint Selection Map

⁴ Identified in the Heritage Views and Tall Buildings Development Management Policies consultation booklet

⁵ River Prospect view between 18A.1 and 18A.2, 21A.1 and 22A in the London View Management Framework Supplementary Planning Document

⁶ Pimlico Conservation Area Audit SPG

⁷ Vincent Square Conservation Area Audit SPD

⁸ Westminster Cathedral Conservation Area Audit SPD

⁹ See Appendix 10

4.14 ***An emerging scheme should be tested through modelling of the selected views to establish whether new development would be visible within the LVMF and conservation area views (representative viewpoints 1-6). Proposals will need to avoid being visible within the protected silhouette of the Palace of Westminster within the LVMF's River Prospect views. Consideration should also be given to the relative visibility of proposals within general townscape views (representative viewpoints A-K – described in Appendix 10) particularly those that fall within conservation areas, or include heritage assets (such as listed buildings).***

4.15 **Building Heights**

The surrounding area contains a range of building heights, as illustrated in Figure 7. There are developments of significant size within a short walking distance of the site, within the VOA reflecting the gateway nature of Vauxhall Bridge Road, leading up to the Victoria transport interchange. The site sits in a transitional area between the lower scale, older buildings to the south in Pimlico and the higher buildings in the VOA to the north. The existing height and massing of the QMSC and surrounding buildings within the development site boundary are considerably lower than neighbouring plots.

4.16 The buildings to the south of the site are predominantly 1-8 storeys in height, with some taller elements lining major roads, such as Vauxhall Bridge Road and Belgrave Road. The more modern listed housing estates on Vauxhall Bridge Road are taller than the terraces found within Pimlico, which is mirrored more in terms of massing to the east and north of Vauxhall Bridge Road.

4.17 The more modern developments to the west and north of the site contain higher and bulkier buildings, particularly along Wilton Road and Vauxhall Bridge Road. The Sainsbury's site to the west is a substantial development taking in the majority of a city block, not dissimilar in site area to this development site. It is stepped back at upper floor levels, providing significant residential floorspace in buildings up to ten storeys and is an example of the transitional character of sites just beyond the VOA boundary which are of substantial size and of a nature similar to the VOA.

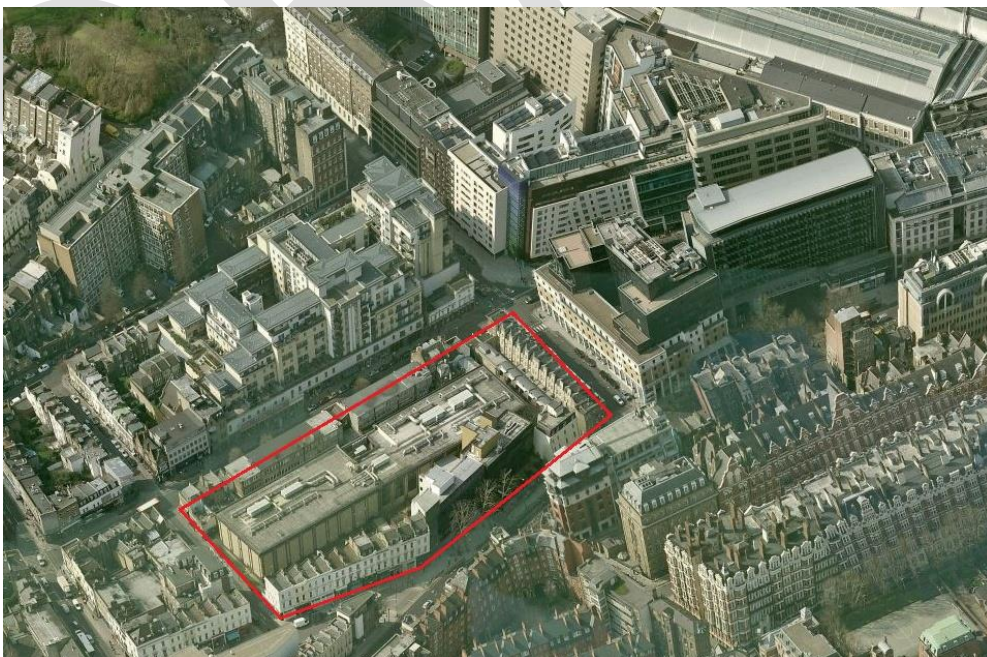


Figure 7. Existing massing around the development site (outlined in red)

4.18 The recent Land Securities development at 20 Gillingham Street to the north-west of the site also provides a higher, more substantial development of similar scale to the Sainsbury's site, and neighbouring commercial buildings on Vauxhall Bridge Road.

4.19 Further north of the site there is significant development taking place around the Victoria Transport Interchange. Many of the new and existing buildings around the station, and extending down Victoria Street are between 15 and 20 storeys in height, in some cases higher, for example Portland House. The new higher buildings reflect the planning policy context and aspirations of the VOA.

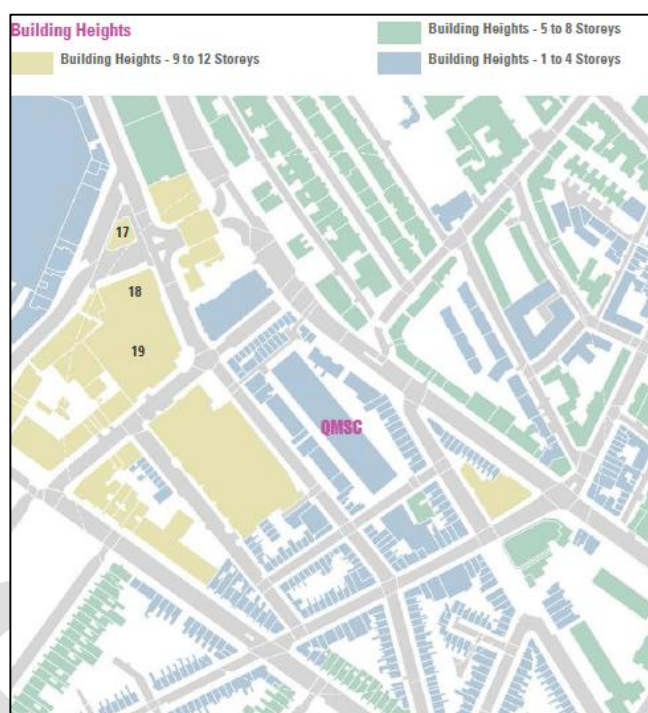


Figure 8. Building Heights around the development site

4.20 Proposals for Higher Buildings at this site

Opportunity Areas are identified within the London Plan¹⁰ as locations suitable for intensification and densification. Westminster's City Plan identifies the VOA as a location which may be suitable for tall buildings, subject to other considerations¹¹. ***The proximity of the site to the VOA and a number of higher neighbouring buildings means that higher buildings would therefore not be out of place on this site, subject to the impact on heritage and views identified in the LVMF and other policies in the City Plan.***

4.21 ***The appropriate design of any higher buildings is important and this will be assessed in terms of the impact upon the character and appearance of conservation areas, listed buildings and local views¹², as well as design quality. The council will be seeking a high standard of architecture and detailed design overall. Any proposals for a higher building in particular should be of the highest sustainable architectural design and quality, should enhance the London skyline, activate the ground floor, provide open space and be an enhancement of the public realm¹³.***

¹⁰ London Plan Policy 2.13

¹¹ City Plan policy S4

¹² See UDP policy DES3

¹³ See also London Plan policy 7.7, the Heritage, Views and Tall Buildings Development Management policies consultation booklet and draft replacement Tall Buildings Guidance produced by CABE and Historic England.

4.22 **Architecture**

The site is located in an area where a number of different townscape and character areas converge, resulting in a lack of uniformity in terms of architectural style, both within the street block and between neighbouring blocks. This variety includes the Victorian terraces of Pimlico, to the modern developments completed in recent years within the VOA¹⁴.

4.23 The site therefore has the opportunity to reflect the best of the key architectural language and character from within and around the site, retaining key features and buildings of merit, while reflecting the location of the site on the fringe of one of Westminster's strategic development areas. Modern architecture is encouraged in the right context, providing it respects Westminster's heritage and local distinctiveness and enriches its world-class city environment. There is a strong justification for a comprehensive development approach to address the architectural irregularities of the site.

4.24 Any application for redevelopment of the site will be required to be accompanied by a Heritage Statement, which sets out the significance of all heritage assets affected by the proposals, including impacts on the conservation areas and in particular, the relationship of the development to the rear of the listed buildings at Gillingham Street and principally when seen together with the front elevation.

4.25 All proposals for taller buildings should be supported by appropriate studies analysing relevant planning issues, covering heritage and views, daylight and sunlight, overshadowing, microclimate, solar glare and other issues as appropriate.

¹⁴ See Appendix 3 for detailed analysis of the surrounding architecture

5.1 Roads

Vauxhall Bridge Road is a wide and heavily trafficked road dominating the townscape. The other roads forming the site boundary provide access between the main road and the surrounding areas and are typically not as busy, narrower, quieter, two-way routes with on-street parking. Gillingham Row runs through the site but it is a quiet, narrow route, without full pedestrian pavement running the length of the street, resulting in safety concerns for pedestrians. ***There is particular scope to improve the quality of the environment for those using the area and the council will look for imaginative responses to its current domination by the road and the issues of noise and air quality to which it gives rise.***

5.2 Any redevelopment of the site must take into account the flow of traffic around the site and the impact access for servicing and delivery will have on the flow of traffic in the area.

5.3 Public Transport

The site falls within Transport for London (TfL) travel zone 1 and has a PTAL rating of 6b (the highest rating possible, indicating excellent public transport accessibility). It is within five minutes walking distance of London Victoria mainline rail station/transport interchange – one of the busiest public transport interchanges in the country, providing long distance links to the UK, including an international link via the Gatwick Express. The debate is not yet settled on whether Heathrow or Gatwick airport will be expanded. If the latter is chosen the increased capacity at this airport may have an indirect impact on this development site in terms of increased passengers moving around the vicinity of the station and a greater need for clear way-finding and high quality public realm.

5.4 The mainline train station and Underground Station serve 137 million and 80 million passengers per year respectively¹⁵. The Victoria Transport Interchange is currently undergoing a major redevelopment to increase the capacity of the underground station and improve facilities.

5.5 The Victoria area also has a strategic position on the road network and is a key node for bus routes across the capital. This development site benefits from six bus routes on Vauxhall Bridge Road and one serving Wilton Road, granting access to many different parts of central London. The Victoria Coach Station, further to the west of the site, additionally provides road travel across the country and to continental Europe.

5.6 The excellent public transport accessibility makes the site ideal for high density residential development (subject to design and amenity considerations) and redevelopment should promote sustainable transport methods.

5.7 Crossrail 2 and High Speed 2

Crossrail 2 is a proposed major transport infrastructure project connecting National Rail networks in Surrey and Hertfordshire with central London for which funding was announced in the Budget in 2016. A Crossrail 2 station is proposed at the western side of Victoria station which will potentially bring more commuters into the area above the very high numbers that are already using the public transport infrastructure. This could have the effect of increasing demand from commuters on the existing sports centre and retail uses. This development site does not fall within the safeguarding zone for Crossrail 2.

¹⁵ Victoria Station Upgrade Environmental Statement: Non-Technical Summary

5.8 The proposed High Speed 2 railway, which links London (Euston) with the Midlands and northern cities, may also have an indirect impact upon this site if commuters travel from Euston to Victoria.

5.9 Car Parking

Given the site's very high public transport accessibility level owing to the proximity to several bus stops and the Victoria Transport Interchange, it is not expected that private car parking will form a significant element of redevelopment proposals in the interests of sustainable development. However in line with adopted policy, it is expected that unallocated parking will be provided for use by residents within the scheme.

5.10 Innovative and space saving approaches to car parking provision will be appropriate and options for lifetime car club membership, on-site car sharing schemes and the potential to share surplus parking spaces with other developments in the vicinity should be explored. Parking ratios in recently approved developments in Victoria are given in Appendix 7 and indicate the levels of parking which may be appropriate for this site.

5.11 Any proposed car parking provision should include disabled parking and active and passive electric vehicle recharging provision in line with London Plan standards. Car parking in support of new commercial uses (except for the provision of disabled parking) will not be permitted, in line with Council policy.

5.112 Cycling

Several proposed cycle Superhighway¹⁶ and Quietway routes pass in the vicinity of the site, however high volumes of traffic use the highway network around the site (which also carries a number of bus routes), therefore creating potential conflict for the large number of cyclists who use routes such as Vauxhall Bridge Road.

5.13 Currently, the site is poorly served by a small number of on-street Sheffield cycle stands on Vauxhall Bridge Road, adjacent to the main sports centre entrance and on Wilton Road, in addition to a cycle hire docking station on Vauxhall Bridge Road. The stands in their current form and arrangement make an inefficient use of public space, and do not provide secure covered facilities. **The inclusion of replacement/new docking stations for the Mayor of London's Cycle Hire scheme should be considered as part of redevelopment of the site¹⁷ and where proposed should be integrated into public realm proposals, while maintaining pedestrian priority.**

5.14 **Any development should make a demonstrable contribution to making it easier, safer and more attractive to travel by bike into and through the area. The promotion of cycling as a key sustainable mode of transportation to and from the site should be a key consideration of any development proposals, with a direct relationship to health and well-being and the primary sports and leisure function of the site. Opportunities should be taken where possible to improve conditions for cyclists, providing separation and security, while not jeopardising pedestrian priority.** There is the opportunity for a cycling hub to be created, offering secure cycle parking and potentially maintenance and repair services in the vicinity of the transport interchange. **Cycle parking should be accompanied by ancillary changing and showering facilities for users as appropriate.**

¹⁶ Cycle Super Highway 5 was recently completed.

¹⁷ London Plan policy 6.9

5.15 London Plan policy requirements¹⁸ would require a significant quantity of cycle spaces to be required as part of development proposals, depending on the uses proposed (i.e. the needs of residents, workers and visitors to the site should be considered) and the quantum of development. **Given the potential cycle storage requirements and constrained size and arrangement of the site, there is the potential for a range of secure and innovative approaches to be explored for both short-stay and long-stay cycle storage that optimise provision, while making the most effective use of space alongside the uses they are serving.** For example Ecocycle storage solutions can be incorporated above ground, below ground or within new buildings.



Figure 9. Impression of above ground Ecocycle storage facility

5.16 Pedestrians

The sports centre and shopping offer (particularly the large Sainsbury's supermarket on Wilton Road and the retail uses on Warwick Way) draw people along Wilton Road and past the site creating significant footfall, likewise many pedestrians are drawn in the opposite direction towards the main transport interchange. However, Wilton Road provides a cluttered and uneven pedestrian experience, with street furniture and bus stops conflicting with shop fronts and tables and chairs in some locations, in addition to poor quality paving and uneven surfaces. **There is conflict throughout the wider area between pedestrians and road traffic which should be addressed by the redevelopment of the site through, for example, the provision of pedestrian crossings, legibility, effective and appropriate lighting, improved footpath capacity at pinch points and the incorporation of designing out crime principles to improve actual and perceived safety.**

Servicing

5.17 The high concentration of commercial activity and retail uses alongside residential uses creates challenges in relation to servicing and deliveries which will be exacerbated by densification of the site. The area's historic urban fabric creates a further level of constraint. **Proposals must therefore develop a servicing and delivery strategy that minimises adverse impacts, reduces traffic and emissions and does not compromise the safety of other users of the public highway or public realm¹⁹.**

¹⁸ Table 6.3 of the London Plan

¹⁹ See City Plan policy S42 and UDP policy TRANS 20

6.1 In line with national planning policy, sustainable development is a strategic objective of Westminster's City Plan and comprehensive redevelopment of this site as a whole offers opportunities to make a significant contribution to Westminster and London's sustainability objectives²⁰.

6.2 Renewable Energy

Renewable energy generation and low carbon energy technology options will be expected as part of the redevelopment to achieve at least 20% reduction of carbon dioxide emissions²¹ to future proof the energy needs of the site and contribute to wider regional sustainability objectives. An energy assessment should accompany all major planning applications, setting out the most appropriate and feasible source of renewable energy generation for that proposal.

6.3 District Heating

It is expected that the development should be self-sufficient in terms of energy demands as far as is practicably possible. Development will connect into existing district heating systems in order to obtain low carbon heat. The substantial NOVA development has a combined heat and power facility which is under-utilised and capable of connecting to other developments to provide energy. Although there are practical restrictions for this site to connect to NOVA (heavily developed sub-surface infrastructure formed of existing utilities, a submerged river, the newly extended Victoria London Underground station ticket halls and the District and Circle line for example), exploration of the feasibility of doing so is strongly encouraged.

6.4 A more immediately practical solution would be connecting to the Council-owned Pimlico District Heating Undertaking (PDHU), which also has combined heat and power facilities to supply low carbon background heat. The site is in close proximity to the Lillington and Longmoore Gardens Estate, which houses a boiler to provide 'top-up' heat to the PDHU. To connect this development site into the PDHU is a simple case of installing a pipe between the site and the estate.



Figure 10. Extent of PDHU (2008)

²⁰ London Plan policy 5.6 and City Plan policy S39

²¹ See City Plan policy S40

6.5 However, while the PDHU has capacity to cope with the additional demand which would be created by development at this site, an additional boiler at Lillington and Longmoore Gardens Estate would be required to reinforce the network. This might give rise to the need for an increased financial contribution from this site to pay for the new infrastructure (over and above the cost of the pipe). Connecting to NOVA or PDHU should provide savings to the site in terms of on-site plant and plant rooms which may be sufficient to justify the full connection cost being borne by the site. The council would welcome discussion with potential developers of approaches that could be made to facilitate these connections (and connections *between* PDHU and NOVA) and might consider use of its resources (such as use of Community Infrastructure Levy (CIL) resources) to support implementation²².

6.6 Greening

Given its importance to mitigating the impacts of climate change and the contribution it makes to the public realm, the council will seek incorporation of urban greening in development of this site, such as new planting in the public realm, and within developments on communal and private amenity space. This will also include the provision of multi-functional green infrastructure, including green and brown roofs, blue roofs, green walls and other appropriate approaches. This type of greening can assist in climate change adaptation through providing cooling, sustainable urban drainage and biodiversity enhancement, in addition to providing visual benefits.



Figure 11. Green wall at Edgware Road station

6.7 Sustainable design and emissions

The council will expect development to embody exemplary standards of sustainable design, including renewable energy solutions. All major developments are required by the London Plan²³ to be 35% over and above the requirements for carbon reduction set out in Part L of the Building Regulations 2013²⁴. If the 35% reduction cannot be reached then the carbon can be offset at a current agreed cost of £2,700 a tonne²⁵, which the Council will

²² See Westminster's Regulation 123 List

²³ The Mayor's Climate Change Mitigation and Energy Annual Report: 2015

²⁴ Building Regulations Part L

²⁵ Carbon Policy Feasibility Assessment, 2013. N.B. This cost is currently under review by the Council to account for the expensive nature of offsetting in Central London.

allocate to offset carbon in other schemes. The Council already has offset funds available and is keen to pilot new technologies and monitor their performance, so we can demonstrate to others that it is possible to achieve significant improvements in building sustainably over and above Government building regulations. ***Any innovative ideas with significant carbon reduction potential and wider applicability in Westminster will be welcomed as part of this proposal.***

6.8 Flooding

The site is within Flood Zone 3 and therefore Sustainable Urban Drainage (SUDs) options should be utilised as part of any redevelopment of the site, along with opportunities for managed rainwater attenuation and discharge explored. Grey water recycling systems, which maximise rainwater harvesting, can have the dual benefit of reducing fresh water usage and reducing surface water flooding.

6.9 Air Quality

The main source of pollution in the Victoria area is road transport and emissions from gas burning boilers. ***As the site falls within a designated air quality management area, the Council will require a reduction in air pollution to meet the objectives for pollutants set out in national strategy and to meet the requirements of City Plan policy²⁶.*** Proposals should be accompanied by an air quality assessment, establishing how they intend to mitigate the detrimental effects of air quality resulting from their proposed development, but also any necessary measures to mitigate existing poor air quality and safeguard potential residents or users of their buildings and spaces. Proposals for biomass boilers will be unacceptable.

6.10 ***Proposals for redevelopment should include, as far as possible, other sustainability measures, such as passive solar design, natural ventilation, photovoltaics, solar water heating, wind and fuel cells and waste disposal.***

6.11 ***Major new development on the scale envisaged is required to provide on-site recycling and composting waste management facilities, except where the Council considers that it is inappropriate or unfeasible to do so²⁷.***

²⁶ See City Plan policy S31

²⁷ See City Plan policy S44

7.1 This chapter describes the planning policies which are relevant to this site and explains how compliance with them will deliver the vision the Council has for its redevelopment and its contribution to delivering wider strategic planning objectives. Westminster's local development plan is made up of the London Plan, Westminster's City Plan: Strategic Policies (2013) and the Unitary Development Plan (saved policies) (2007).

7.2 Social and Community Infrastructure

Provision through development of new social and community infrastructure in general, and sport and leisure facilities in particular, is strongly supported by the City Plan²⁸ and London Plan²⁹, and modernisation of the sport and leisure facilities at the Queen Mother Sports Centre is one of the council's overriding objectives for development of the site. Existing sports facilities are protected from redevelopment to other uses, although redevelopment and enhancement is welcome, particularly where this results in multi-use public facilities³⁰. While the existing facility has significant value, there are a number of shortcomings and opportunities in terms of how it anchors the existing site and interacts with the public realm which any development will be expected to address (see Chapter 3).

7.16 The primary and secondary schools close to the QMSC use the sports centre weekly for physical education classes. ***The redevelopment of the existing leisure centre is a priority for the site to create a modern sports facility to meet growing demands, however it is imperative that alternative facilities are found for the existing users of the centre (particularly the schools) prior to the QMSC closing for redevelopment.***

7.3 Open Space

There is little public open space in the vicinity of the site and the wider Victoria area is designated as an area of open space deficiency, lacking external spaces to dwell. The closest open spaces to the site are private, belonging to Westminster School (the 13 acre Vincent Square) or private residential gardens as illustrated below. The nearest public open spaces are either the roof garden within Cardinal Place, the Cathedral Piazza or Grosvenor Gardens (approximately 400 metres from the site). The wider Pimlico area to the south includes public open space at St George's Square, which is roughly 1 kilometre from the site.

²⁸ City Plan policy S34

²⁹ London Plan policies 3.16 and 3.19

³⁰ London Plan policy 3.19, City Plan policy S34 and UDP policies SOC 1, 7 and 8



Figure 14. Open space

7.4 **Local policy seeks to mitigate additional pressure on open spaces by securing new improved public open space within developments³¹. As part of the site falls within a designated area of wildlife deficiency biodiversity improvements through roof-top gardens and general greening should be provided³², as well as protection from the elements, particularly the effects of microclimates caused by building design, such as down draft. The shopping centre would greatly benefit from the creation of a new, high quality pedestrian-only public space³³, which is a key priority for the site's development and which would improve the permeability of the site.**

7.5 Residential

The site's location within a designated shopping centre and the high PTAL rating of 6b means this is a sustainable location that would support the delivery of higher density residential accommodation, compared to the quieter areas of Pimlico to the south³⁴.

7.6 **New homes are required by policy to be fit for purpose throughout changing life circumstances, of an appropriate density to optimise the land and of a good quality, in particular meeting minimum space standards³⁵.** A third of units are expected to be family sized where possible, with appropriate provision of amenity space for all units. The site is identified as an area of play space deficiency and new children's play space is expected to be provided for developments with over 25 family sized units³⁶. The delivery of residential accommodation is increasingly important to achieve Westminster's housing target of 1,068 units per year and meet local objectively assessed need in terms of size, type and tenure³⁷.

³¹ City Plan policy S35 and UDP policy ENV 15

³² City Plan policy S38

³³ UDP policy TRANS 3

³⁴ A recent government consultation on changes to the NPPF identified commuter hubs as suitable for higher density residential development (see Appendix 1).

³⁵ London Plan policies 3.1 – 3.5, 3.7-3.8, 3.14, 7.1, 7.2 and City Plan policy S29

³⁶ UDP policies H 3, H 5, H 10, H 11 and SOC 6

³⁷ City Plan policies S14 - S16

7.7 Affordable housing

Westminster's adopted affordable housing policies require the provision of a proportion of on-site affordable housing when 10 or more new units are proposed or the new residential floorspace is more than 1,000sqm³⁸. Westminster has a strategic target to deliver 30% of new homes as affordable across the city but requirements for individual sites differ. ***At this site 35% affordable housing is required for developments over 2,500sqm net residential floorspace³⁹. As a general rule 60% of affordable units are expected to be social or affordable rented units and the remaining 40% in intermediate tenure. The exact proportions are agreed with the Council.***

7.8 Affordable housing policies will be significantly altered by the Housing and Planning Bill which is currently proceeding through Parliament, particularly its provisions requiring local planning authorities to promote "starter homes" to facilitate home ownership for first time buyers. The Bill includes powers for ministers to set a requirement for a proportion of starter homes that will have to be provided in new developments (possibly 20% of units). It is very likely that by the time this site comes forward for development, the amount and tenure of affordable housing that is required will be very different from current policy as a result. These changes will impact upon development economics and the amount of social and intermediate tenure units which can viably be provided.

7.9 Mixed Use

The site contains a mixture of existing residential, commercial and leisure uses (including shops, cafés and restaurants), reflecting the location of the site as one that borders the VOA and Core CAZ and falls partially within a shopping centre.

7.10 Regional and local planning policies seek to promote London's World City functions, manage its heritage and enhance the unique international, national and London-wide roles of the CAZ, supporting local as well as strategic mixed uses, ensuring social infrastructure meets residents and visitor's needs and protecting and enhancing predominantly residential neighbourhoods within the CAZ⁴⁰.



Figure 12. Main land uses

7.11 The site falls within the Pimlico section of the CAZ, an area which although identified in Westminster's City Plan as being predominantly residential and where town centre uses which support the local community are supported⁴¹, as part of the CAZ, it is a location where

³⁸ London Plan policies 3.9 – 3.13

³⁹ UDP policy H 4, City Plan policy S16. See also the Interim Note on the application of the affordable housing policy.

⁴⁰ London Plan policy 2.12 and City Plan policy S1.

⁴¹ City Plan policy S10

a rich mix of local and strategic uses are directed to form an attractive and competitive business location⁴² including increases in office floorspace⁴³. In addition to this, given the site's location directly adjacent to the VOA, its function and characteristics are more akin to the Core CAZ. ***It would therefore be appropriate for a mixed use development to take place on this site, with a significant element of residential to complement the site's location in the Pimlico CAZ.***

7.12 Westminster's mixed use policy currently requires residential floorspace to be provided alongside commercial floorspace where a threshold for commercial provision is exceeded, however this policy is currently under revision (adoption expected mid-2016). The new policy removes the priority for residential provision in the Core CAZ, Named Streets and Opportunity Areas, instead seeking to incentivise office and commercial development. Were the VOA boundary extended to include this development site, the revised mixed use policy would apply; however, as it is expected that the site will deliver a mix of uses, including an uplift in commercial floorspace, this policy requirement is unlikely to be a burden.

7.13 Retail

The site is located within the Warwick Way/Tachbrook Street CAZ Shopping Frontage (see Appendix 6) where new retail floorspace is encouraged⁴⁴. Existing ground floor uses around the site and in the immediate vicinity include retail units, cafés and restaurants. Wilton Road and Upper Tachbrook Street fall within the shopping centre's secondary frontage and include clothes shops, photography supplies, a deli and a gift/homeware shop.

7.14 Existing retail and town centre uses are protected by local planning policy⁴⁵ and the presumption for any redevelopment will therefore be to re-provide the existing quantum of retail and town centre floorspace.

7.15 The existing retail environment is of a poor quality; Upper Tachbrook Street is described as the only physical blight in the environmental assessment within the 2013 Health Check for the Warwick Way/Tachbrook Street shopping centre⁴⁶. ***Development proposals should therefore seek to enhance the overall shopping experience, vitality and viability of the centre⁴⁷ through physical improvements to units as well as townscape and public realm improvements⁴⁸.***

7.16 There is an expectation that occupiers of the existing retail units (including restaurants and café uses) within the site will be offered an opportunity to return to a unit within any new development. A range of unit sizes should be provided in accordance with local need and to appeal to independent as well as larger providers. Adopted policy directs that no less than 55% of the frontage length should be in A1 use class and proposals should not create or lead to a concentration of non-A1 units (3 or more) in any individual frontage or parade⁴⁹. Emerging local planning policy seeks to create greater flexibility for secondary frontages, while maintaining the approach to the concentration of non-A1 uses as existing⁵⁰.

7.17 Any proposal would therefore need to agree with the council the how the principle of a mixture of town centre uses on the site will be addressed, , taking

⁴² London Plan policy 2.10

⁴³ London Plan policy 2.11

⁴⁴ City Plan policy S10

⁴⁵ City Plan policy S21

⁴⁶ Warwick Way/Tachbrook Street Shopping Centre Health Check

⁴⁷ City Plan policies S6 and S10

⁴⁸ UDP policy SS 14

⁴⁹ UDP policy S6 and S7

⁵⁰ See Westminster Economy Development Management Policies consultation booklet

account of the policy for the shopping centre and the current mix as set out in the latest town centre 'health check'⁵¹ and updated in the Authority's Monitoring Report.

7.18 Offices

Policies aim to develop a strong, sustainable and diverse economy, supporting inner London regeneration and mixed use development, and enhancing sporting enterprises⁵². The site contains existing modern office floorspace of varying quality along both the Vauxhall Bridge Road and Wilton Road frontages. **The principle of including offices on the site is therefore already established and as the site is within the CAZ and directly adjacent to the Core CAZ and VOA, replacement and improved office floorspace is encouraged** to meet London's strategic aspiration for growth in office provision⁵³. The office stock in the wider Victoria area includes a number of new large floor plate office buildings, which would not be out of place on this site. The Council would also like to see some affordable business space offered as part of a redevelopment⁵⁴.

7.19 New commercial development is expected to provide employment, training and skills opportunities for local people.

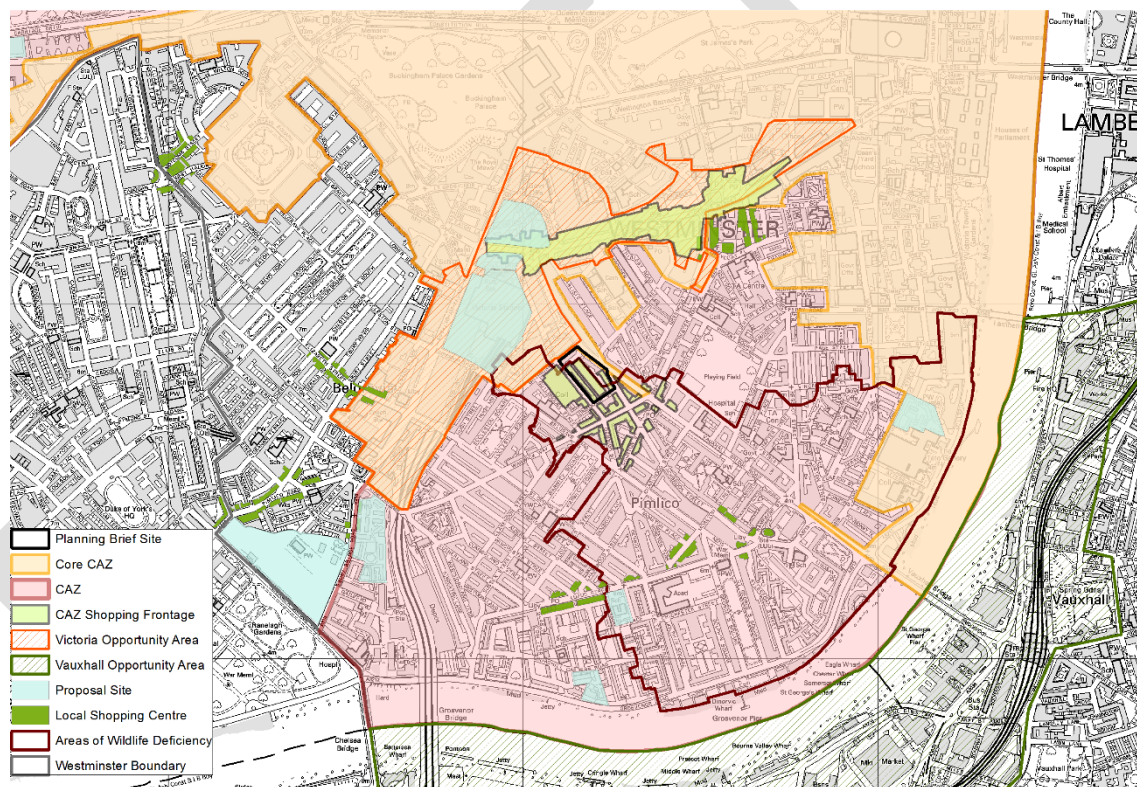


Figure 13. Local policy designations

⁵¹ Westminster Shopping Centre Health Check Reports are available here: <https://www.westminster.gov.uk/shopping-centre-health-checks>

⁵² London Plan policies 4.1, 4.2, 4.6

⁵³ London Plan policy 4.2, City Plan policies S18, S19 and S20 and UDP policy COM 1

⁵⁴ City plan policy S20, London Plan policies 2.9 & 4.1 and City For All 'City of Aspiration' corporate commitment to support start-ups businesses.

7.20 Victoria Opportunity Area

The VOA boundary currently sits directly adjacent to this site along Gillingham Street. It is identified in the London Plan as an area with high public transport accessibility and potential for redevelopment and growth in the number of homes and jobs⁵⁵. The local policy requirements for the VOA⁵⁶ align with the priorities identified for this site e.g. new homes, employment space, improvements to public realm, mixed use and improved sports and leisure facilities. Additionally, the site is functionally similar to the rest of the VOA and is driven by the same market inputs that influence development in the VOA. Recent developments have taken place close to this development site which are also just outside the boundary of the VOA (e.g. the large Sainsbury's supermarket development on Wilton Road), but which are characteristic of the VOA indicating that, although the formal boundary hasn't changed, the VOA is expanding. ***The City Council is therefore considering bringing this development site and its environs into the VOA – which will make the VOA policy a material consideration in the determining of a planning application at this site*** (the weight of which will increase the closer the council comes to formally adopting the boundary revision). ***In any case it is appropriate that the principles of the VOA policy are applied at this site given its proximity, similar character and function to the VOA.***

7.21 Hotel

Existing hotels are protected by local policy⁵⁷ and ***should the hotel, which exists on Gillingham Street, be included in redevelopment plans for the site, the use is expected to be re-provided.***

7.22 Energy and climate change

Increased biodiversity and urban greening at the site will also contribute to strategic climate change objectives, such as reducing the urban heat island effect and mitigating surface water flooding⁵⁸. Sustainable energy uses are encouraged for the design and construction of the building⁵⁹ and the site should link to local decentralised energy networks⁶⁰.

7.23 Transport

Sustainable transport options are supported and encouraged by regional and local policy, including provision of electric vehicle charging points and integrating new development with existing public transport⁶¹. New development at this site should therefore take into account the existing transport infrastructure and the site layout should facilitate easy access and way-finding to public transport, as well as Cycle Superhighways and cycle hire docking stations. Cycling facilities are strongly encouraged (e.g. provision of bicycle storage and showering facilities associated with commercial uses⁶²) and minimum cycle parking standards, in the London Plan should be followed⁶³. Local policy dictates parking standards depending on the number and size of residential properties proposed⁶⁴. (See Chapter 3).

7.24 Design and Heritage

Development to or affecting the setting of a listed building will protect or enhance it, ensuring the features of special architectural or historic interest that they possess are conserved⁶⁵. Likewise, development within a conservation area or affecting the setting of one must

⁵⁵ London Plan policy 2.13

⁵⁶ City Plan policy S4

⁵⁷ City Plan policy S23 and UDP policy TACE 1

⁵⁸ London Plan policies 5.9 – 5.14

⁵⁹ London Plan policies 5.2 - 5.19

⁶⁰ City Plan policy S39

⁶¹ London Plan policies 6.13, 6.1, 6.3 and 6.7

⁶² London Plan policy 6.9 and 6.10, City Plan policy S41 and UDP policies TRANS 9 and TRANS 10

⁶³ Table 6.3 of the London Plan.

⁶⁴ UDP policies TRANS 21, TRANS 22 and TRANS 23. See also emerging policy CM41.10 in Westminster's Transport and Movement Development Management Policies consultation booklet.

⁶⁵ UDP policy DES 10

preserve or enhance its character or appearance⁶⁶. This does not mean that redevelopment at this site is restricted by its heritage assets, but instead that opportunities to conserve or enhance the conservation areas and listed buildings in line with national policy must be embraced⁶⁷.

7.25 New development on this site will be expected to incorporate exemplary standards of sustainable and inclusive urban design and architecture inside and out, resulting in safe, secure environments⁶⁸.

7.26 Owing to the site's proximity to the VOA and the prevailing character or the location, this site may be suitable for a taller building/s subject to the impact on views and heritage. However, taller buildings should not have an unacceptably harmful impact on surrounding heritage and will be designed with respect to the prevailing character of the local area⁶⁹. (See Chapter 4).

7.27 **Conclusion and summary**

The site will be expected to incorporate a mix of uses, including town centre type commercial uses, the re-provision of existing retail space and hotel use to equal those which are in existence on the site. New modern office floorspace will be appropriate on this site. The existing QMSC will be replaced with an improved, modern, sports and leisure offer and an increase in residential units on the site will be expected, including affordable homes.

7.28 There should also be attractive public open space as part of the redevelopment of this site, which will contribute to the site being a destination in its own right, and create permeability between Vauxhall Bridge Road and the Wilton Road shopping frontage.

7.29 The location of the site and its variety of functions represents the opportunity to shape the site and public realm for maximum shared benefit, accommodating various functions in a high quality environment. A holistic approach to the site would lead to proposals that deliver a range of strategic objectives that both build on the site's location on the fringe of the VOA, and strengthen the Pimlico area's key neighbourhood shopping centre.

⁶⁶ UDP policy DES 9 & City Plan policy S25

⁶⁷ See Chapter 12 of the NPPF

⁶⁸ City Plan policy S28 and London Plan policies 7.3, 7.5. and 7.6

⁶⁹ London Plan policy 7.7 and UDP policy DES 3. Also see emerging strategic tall buildings policy in Heritage, Views and Tall Buildings Development Management Policies consultation booklet

Chapter 8

Policy requirements

8.1 This table summarises in policy terms what is expected from development at this site. Text in blue indicates a non-negotiable requirement. The policy references are intended to signpost developers and are in no way an exhaustive list of policies which developers should consult when drawing up a proposal.

Theme	Requirements from development at this site	Policy references
Principles of development	A mix of uses	London Plan policies: 2.12, 4.1, 4.2, 4.3
	A holistic approach to redevelopment of the whole site	City Plan policies: S1, S4
Residential	Increase in residential units at a density appropriate to the site's location and 6B PTAL rating	London Plan policies: 2.13, 3.1 - 3.5, 3.7 - 3.14, 7.1, 7.2 City Plan policies: S4, S14 - S16, S29 Unitary Development Plan policies: H3 - H5, H10, H11, SOC 6
	High quality residential units	
	Sustainable residential units in terms of energy and water	
	Units should be fit for purpose during changing life circumstances	
	A third of new units should be family sized (3 or more bedrooms)	
	An appropriate amount of amenity space should be provided for residents	
	Development should address play space deficiency	
	35% affordable housing required	
	A mix of intermediate and social tenures in the affordable provision	
	20% of units may be required as starter homes	
	Units should meet minimum space standards	
Public realm	High quality, new attractive and accessible open space creating permeability through the site and a space for people to meet / dwell	City Plan policies: S4, S35
	Improved legibility and way-finding	Unitary Development Plan policies: ENV15, TRANS 3
	Improvements to safety for pedestrians e.g. effective and appropriate lighting, improved footpath capacity, pedestrian crossings	
Car parking	Provision of unallocated off-street car parking for a proportion of residential units	London Plan policy: 6.13
	Innovative space-saving ideas for car parking encouraged	City Plan policies: S41, S42
	Car club membership options for residents	See also emerging local strategic

Car parking cont.	Space for safe and appropriate servicing and deliveries	transport policies
	Disabled parking spaces	Unitary Development Plan policies:
	Electric vehicle car parking/charging points	TRANS 20 - 26,
Cycle parking	Promotion of sustainable transport methods by making it easier, safer and more attractive to travel by bike	London Plan policies: 6.9, 6.10
	Secure cycle parking / innovative cycle storage solutions	
	Provision of a cycle hub including for example maintenance and repair services	City Plan policy: S41
	Changing / showering facilities for cycle parking provided as part of commercial uses	Unitary Development Plan policies:
	Replacement or new docking stations for the London Cycle Hire Scheme	TRANS 9, TRANS 10
Sports and Leisure centre	Improved, modern, accessible sports and leisure centre	London Plan policy: 3.19
	Alternative facilities must be found for sports centre users before redevelopment can commence	City Plan policies: S4, S34 Unitary Development Plan policies: SOC 1, 7 & 8
Commercial uses	Contribute to Victoria's emerging status as an office destination	London Plan policies: 2.13, 4.1, 4.2, 4.6
	Create new jobs	
	Offer employment, training and skills opportunities for local people	City For All – City of Aspiration
	Replacement of existing office floorspace	City Plan policies: S4, S18, S19, S23
	Provision of affordable business space	Unitary Development Plan policies: COM 1, TACE 1
	Replacement of hotel	
Sustainability	On-site renewable energy generation, on-site reduction in carbon dioxide emissions by 20% and 35% over and above the requirements for carbon reduction as set out in Part L of the Building Regulations	
	Connection to local district heating networks	
	Incorporate sustainable urban drainage into the site	London Plan policies: 5.6, 5.9 - 5.14
	Managed rainwater attenuation and grey water recycling facilities	
	Biodiversity improvements through greening the public realm	
	Reduction in air pollution	City Plan policies: S31, S38, S39, S40, S44
	Sustainable control of heating through passive solar design and natural ventilation	
	Sustainable design and construction methods	

Sustainability cont.	On-site recycling and composting waste facilities	
Design	Sustainable and inclusive design and architecture inside and out	City Plan policy: S28
	Incorporate designing out crime principles	
Retail	Replacement of existing, and an uplift in, retail floorspace	City Plan policies: S6, S10, S31
	Physical townscape improvements to the shopping centre to enhance the overall shopping experience, viability and vitality of centre	
	Provision of a range of units sizes	
	Existing occupiers of A1/A2/A3/A5 units offered space in the new development	Unitary Development Plan policies: SS6, SS7, SS14
	Development should not result in a concentration of non-A1 uses and not less than 55% of the frontage length should be in A1 use	
Heritage	Retention of buildings within the Pimlico Conservation Area which make a positive contribution and retention of key features of merit across the site	London Plan policies: 7.3, 7.5, 7.6
	Modern architecture is encouraged in the right context with respect to local heritage and local distinctiveness	City Plan policies: S25, S28 Conservation Area Audits Unitary Development Plan policies: DES 9, DES 10
Higher buildings	Should not have a harmful impact on surroundings	London Plan policy: 7.7
	Not be visible from the Palace of Westminster or from townscape views	London View Management Framework
	Enhance the London skyline	
	Activate the ground floor	Emerging strategic higher building policy
	Incorporate sustainable architectural design	Unitary Development Plan policy: DES 3

Chapter 9

Implementation and resources

9.1 Compulsory Purchase

The site is currently in multiple ownerships with Westminster City Council owning the QMSC in its entirety.

9.2 Implementing the aspirations for the site is dependent upon a whole site approach to redevelopment rather than piecemeal development which is likely to be incoherent and will not realise the vision for the site. This is necessarily dependent upon either a strong partnership and/or joint venture between the owners of the different elements of the site, or single ownership of the site.

9.3 Unless a strong partnership approach and shared vision for the area can be drawn up, compulsory purchase of the buildings and land which fall outside the Council's ownership may be necessary to ensure the site is redeveloped to its optimum potential. This would align with the Government's drive to make the most efficient use of public land⁷⁰. Compulsory purchase may be justifiable at this site owing to the obvious positive social and economic change which can be brought about by a whole-site approach to development.

9.4 Some background information to Compulsory Purchase can be found in Appendix 14.

9.5 Community Infrastructure Levy

Westminster's Community Infrastructure Levy (CIL) came into force on 1st May 2016. Westminster's CIL will impact upon the site in two ways – the first is that CIL monies may be able to be spent to fund the redevelopment of the sports centre and some other elements of the site development e.g. utilities infrastructure.

9.6 The site falls within the 'Core' CIL area and sports, leisure and community use would fall under 'all other uses' and therefore incur no CIL charge. Net increases in market residential and commercial floorspace at the site, however, will be liable to pay CIL⁷¹. The following charges per square metre of net floorspace are made against liable developments:

Use	Area		
	Prime	Core	Fringe
Residential (including all residential 'C' use classes)	£550	£400	£200
Commercial (offices; hotels, nightclubs and casinos; retail (all 'A' use classes and sui generis retail)	£200	£150	£50
All other uses	Nil		

Figure 15. Westminster's CIL Charging Schedule

9.7 The Mayor's Community Infrastructure Levy was introduced in 2012 to help finance Crossrail and is a charge of £50 per square metre on qualifying development in Westminster. Medical, education and affordable housing floorspace is exempt from the Mayoral CIL, all other net floorspace is liable.

⁷⁰ One Public Estate: Unlocking the Value in Public Sector Assets

⁷¹ Further information on what types of developments are liable can be found on our website: www.westminster.gov.uk/cil

9.8 Documents and information necessary to support a redevelopment application

- Assessment of the impact of the development on neighbouring amenity.
- Heritage Statement assessing the impact of the development on heritage, in particular: the quality, scale and character of replacement buildings, the impact on the affected conservation areas, listed buildings and views from registered parks and gardens.
- Views assessment and an assessment of proposed taller elements of the development on nearby heritage assets, conservation areas and neighbours.
- Transport assessment analysing the flow of traffic, impact upon cyclists and pedestrians and the impact of servicing and deliveries.
- Air quality assessment which explains how the development will contribute to safeguarding residents or users of the proposed buildings and spaces from poor air quality.
- Study on daylight, sunlight, overshadowing, microclimate, solar glare and other issues as appropriate.
- Tree strategy outlining how the existing trees in the site will be affected by the development and the proposals for improved greening.
- Public art strategy which will explain proposals for public art in the development and how they will make a positive contribution to the streetscape, built environment and public spaces, while not adding visual clutter or confusion to the public realm.
- A management plan for the site which should also provide details of how management arrangements are to be funded or to be secured through Section 106 agreements as appropriate.