

# HOUSING: NEED, DELIVERY AND QUALITY

## DEVELOPING WESTMINSTER'S LOCAL PLAN



**Booklet No. 1**  
**Westminster City Plan Consultation – City Management Policies Revision**  
**February 2014**



City of Westminster

# 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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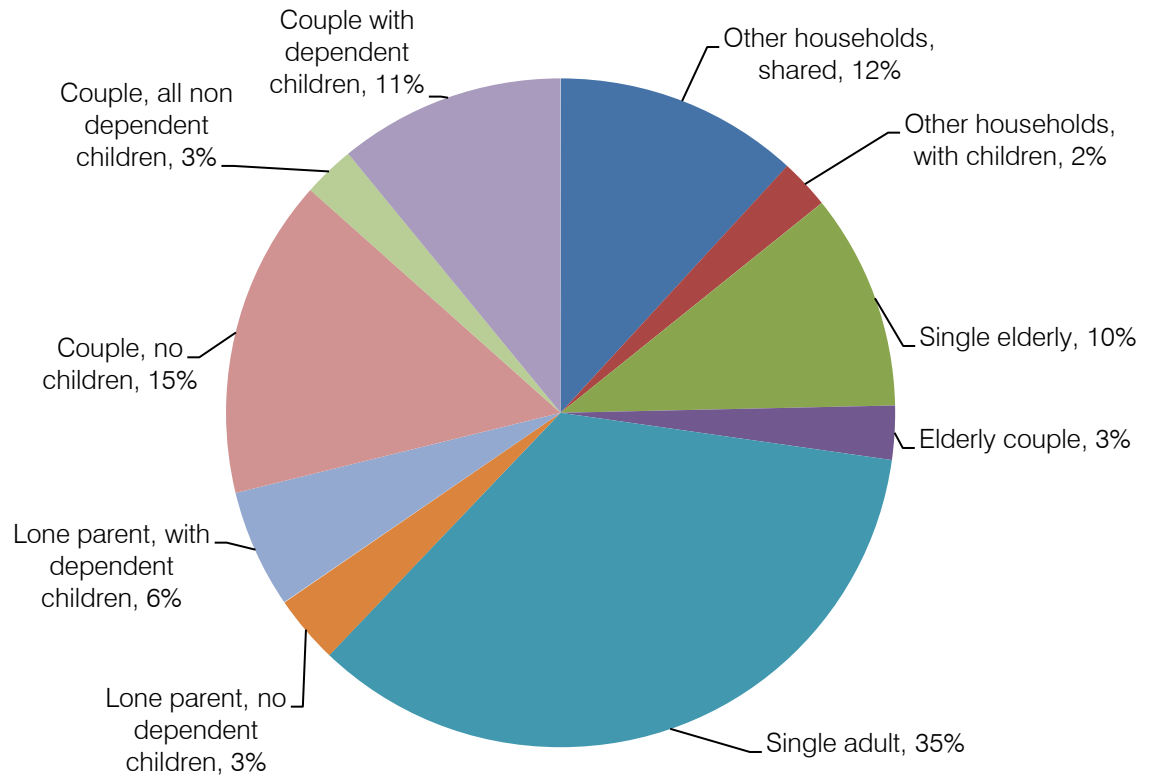
# TRENDS

## WHO LIVES HERE?

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

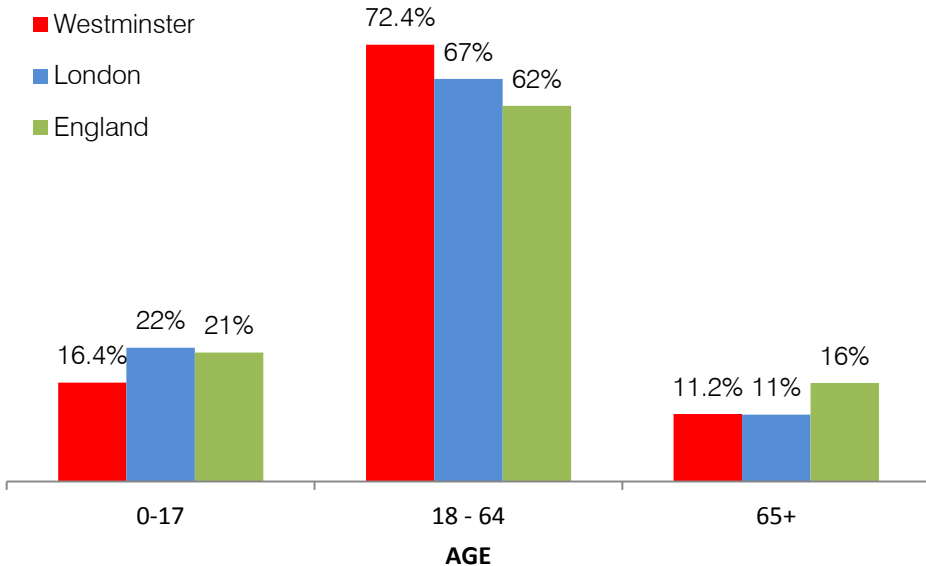
*Census (2011)*

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



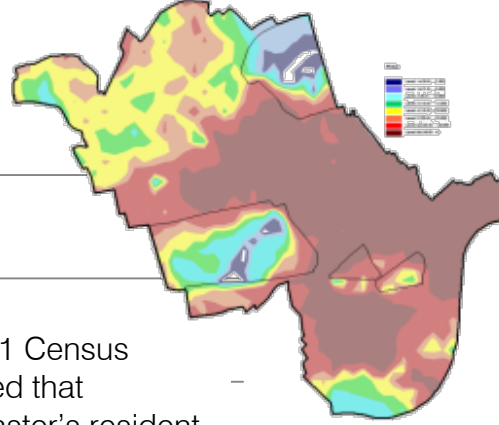
Single adults make up the majority of households in Westminster, although there is a wide variety of household composition, with a cumulative total of 22% with children.

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

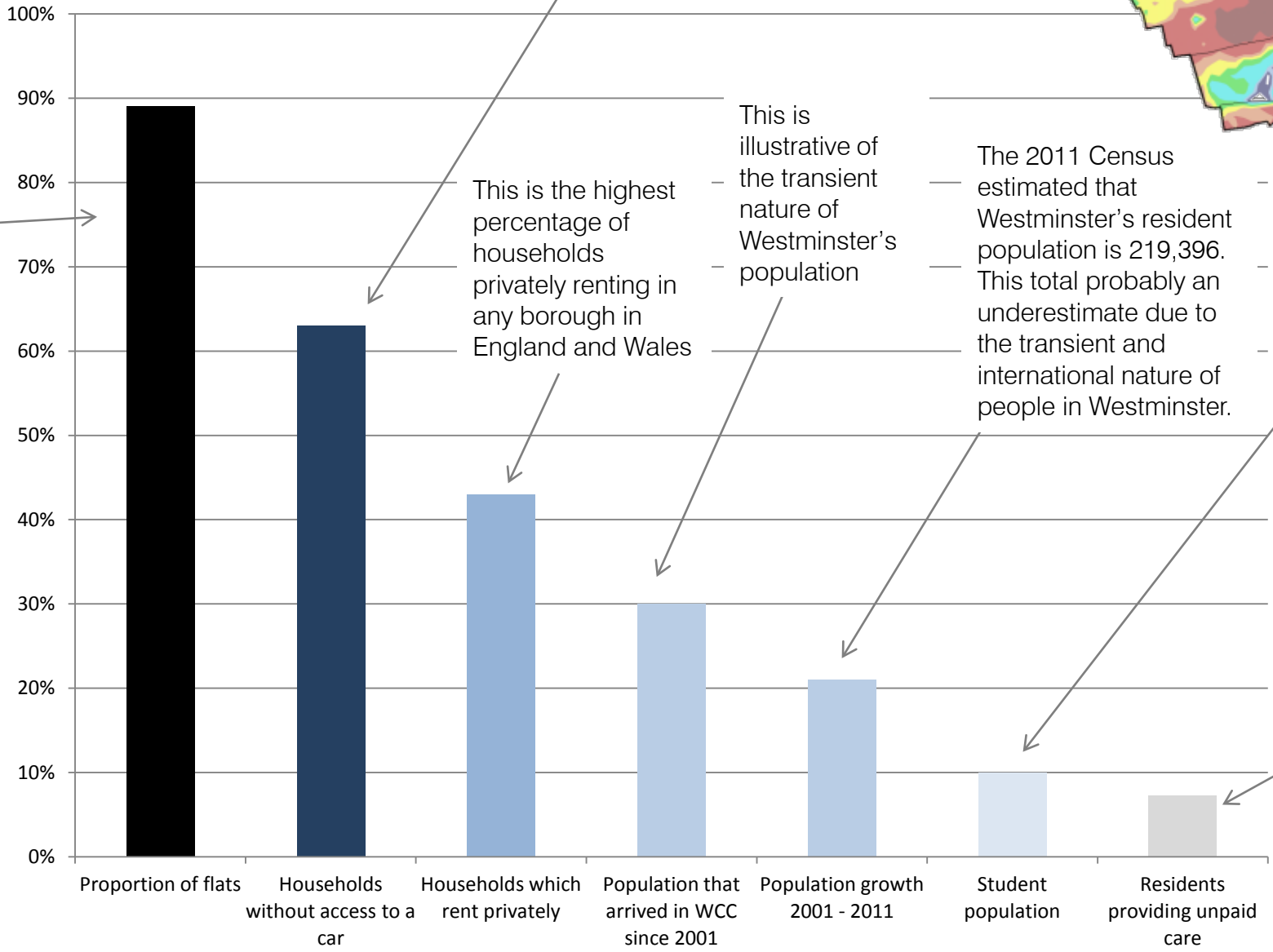


# WHO LIVES HERE?

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.

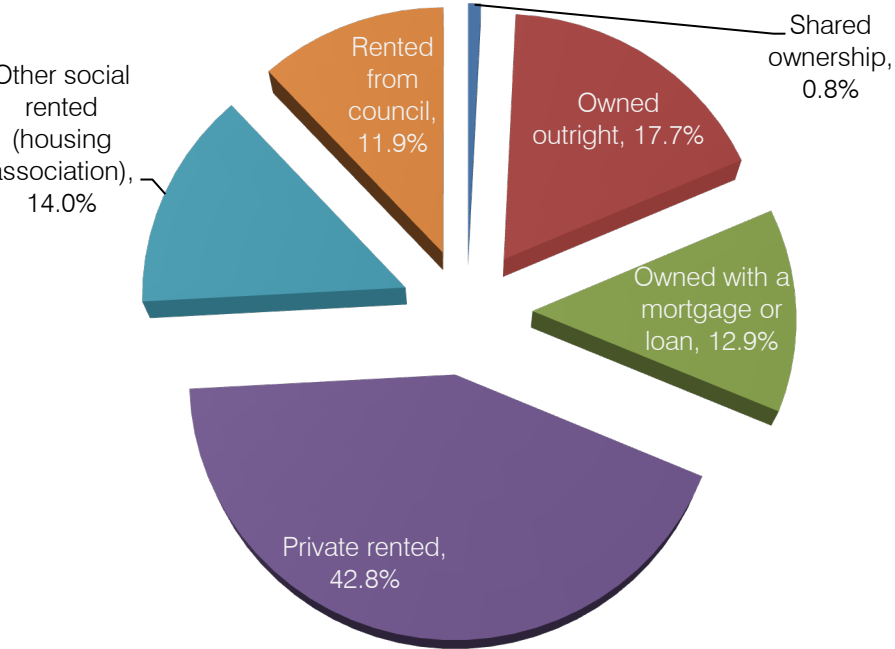
There are six universities, but the student population in Westminster is likely to attend universities across London

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.

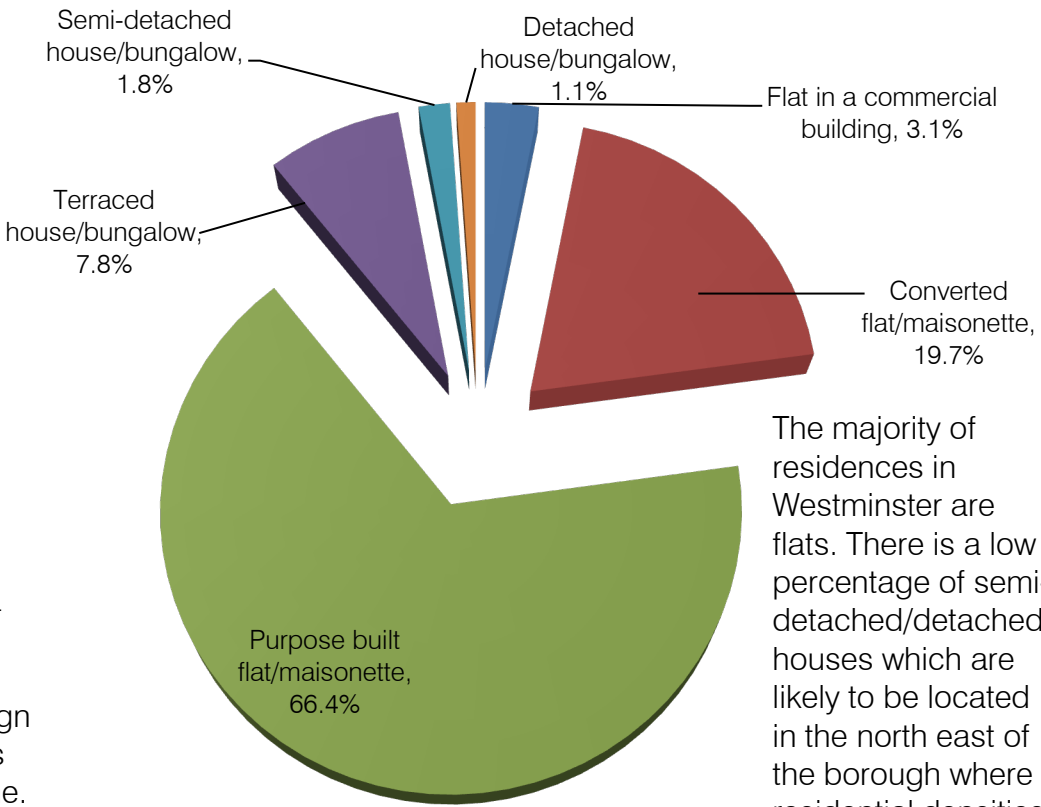
# WHO LIVES HERE?

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.

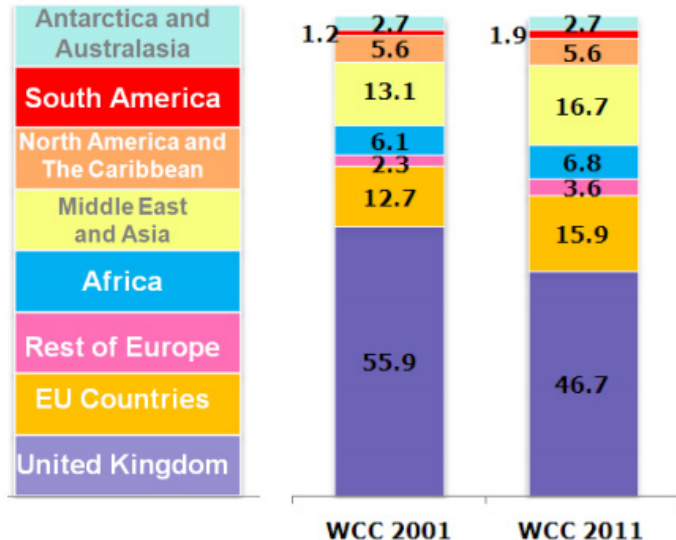


**“10% of the population have lived in the UK for less than 2 years”**

*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.



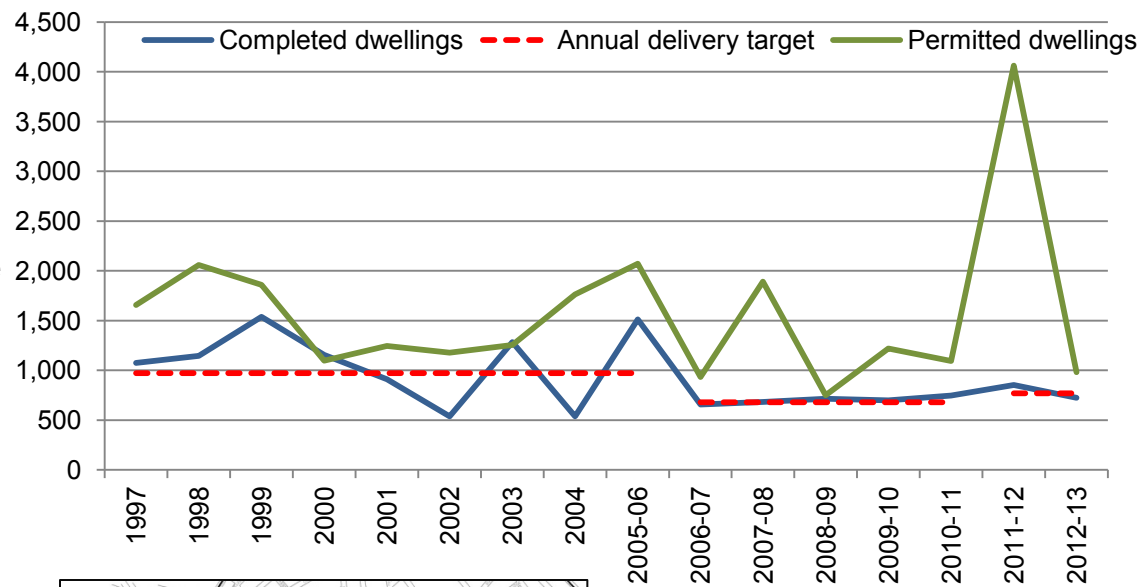
Westminster has a very international population; the proportion of foreign born residents has increased over time.

# HOUSING DELIVERY

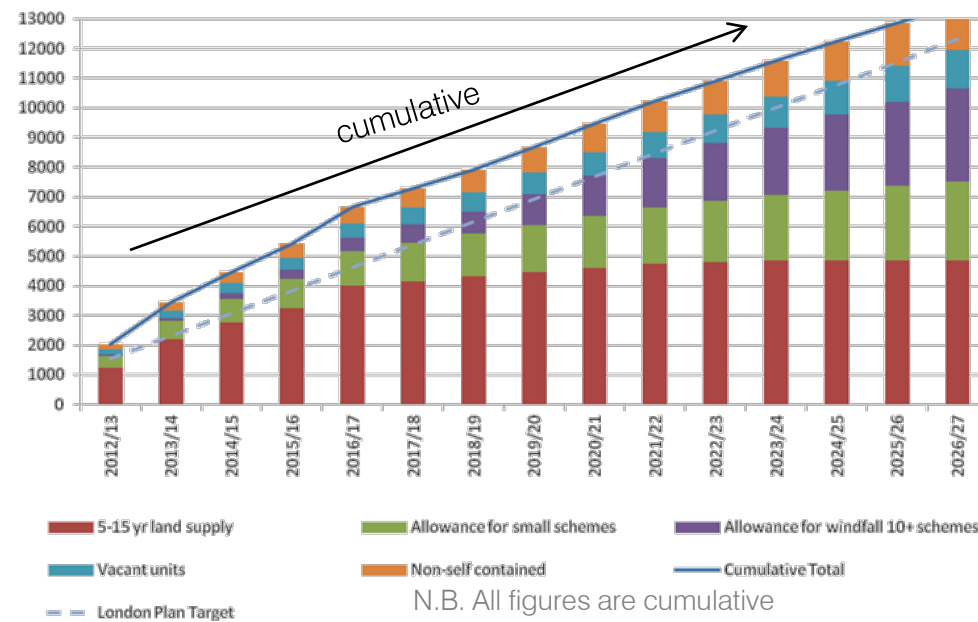
Westminster has a proven track record for excellent levels of housing delivery; over the last 15 years, Westminster has cumulatively delivered 9% **over** the delivery target allocated to the city. However, the pressure is on to deliver more housing within the borough to meet growing demand across London. 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.



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

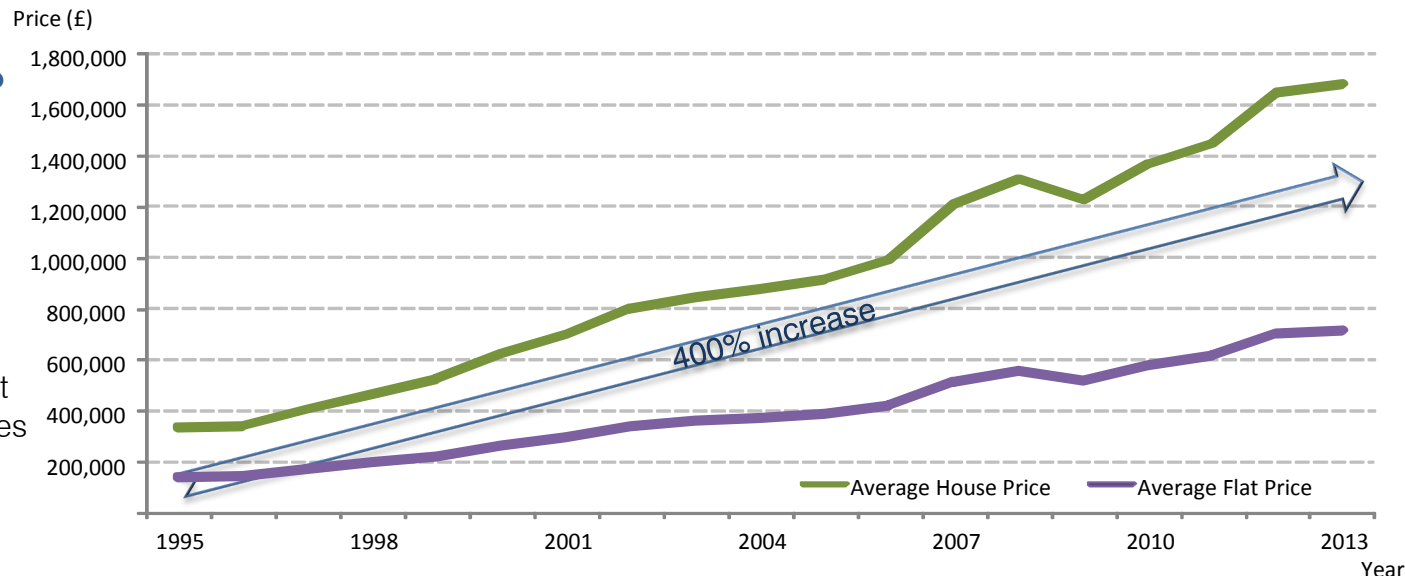




## HOW MUCH AFFORDABLE?

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.

**5,600** 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.

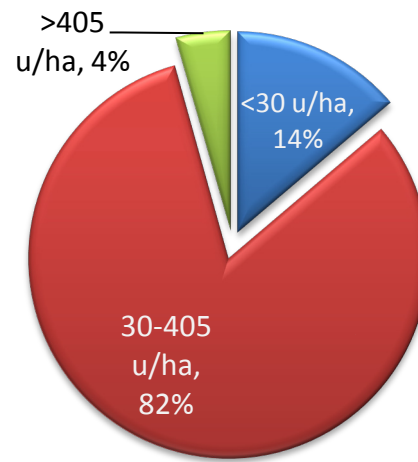
# INSIGHTS

## 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.



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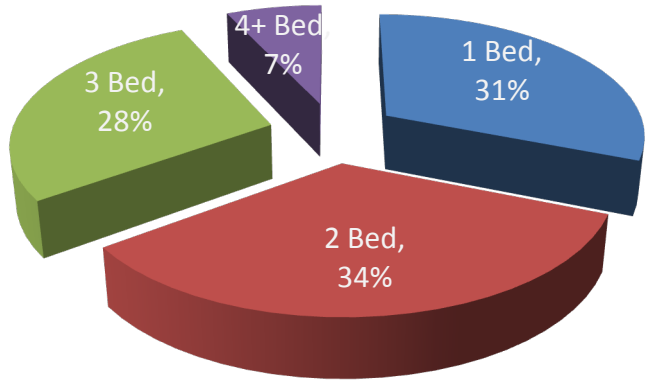
**“Westminster is the 7th most densely populated borough in England and Wales with an estimated residential density of 102 people per hectare”**

*Census (2011)*

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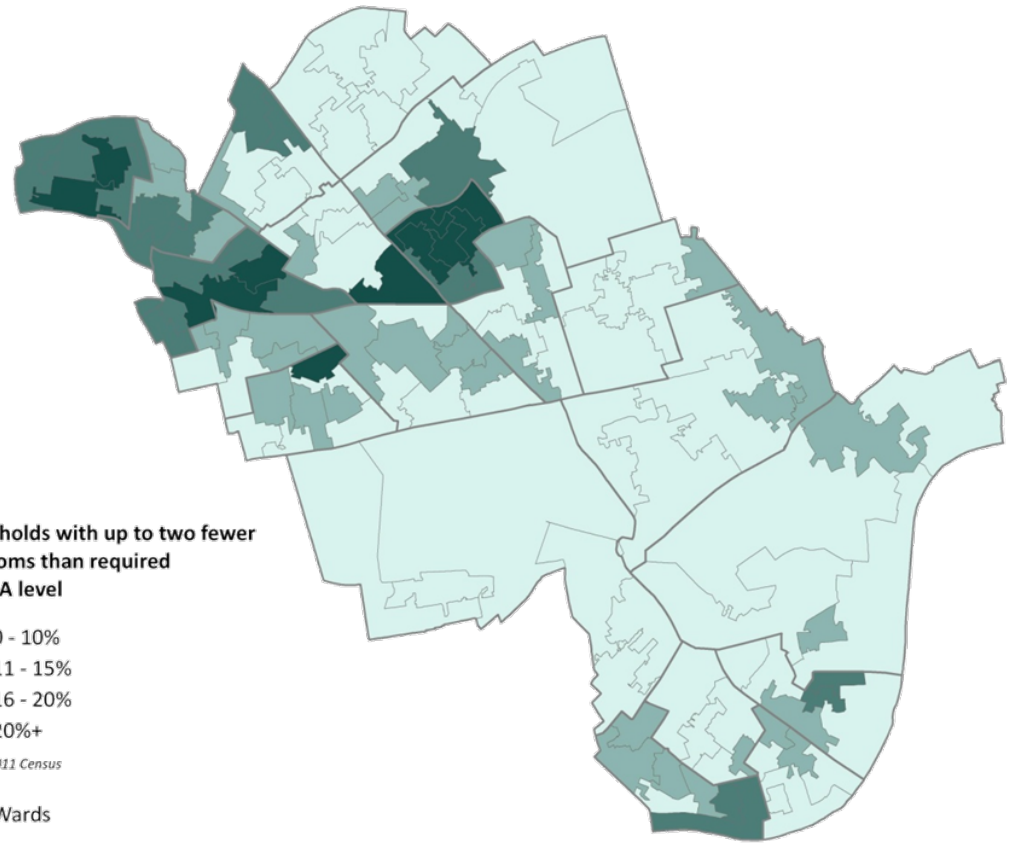
# OVERCROWDING – IS IT A PROBLEM?

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.



**“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.”**

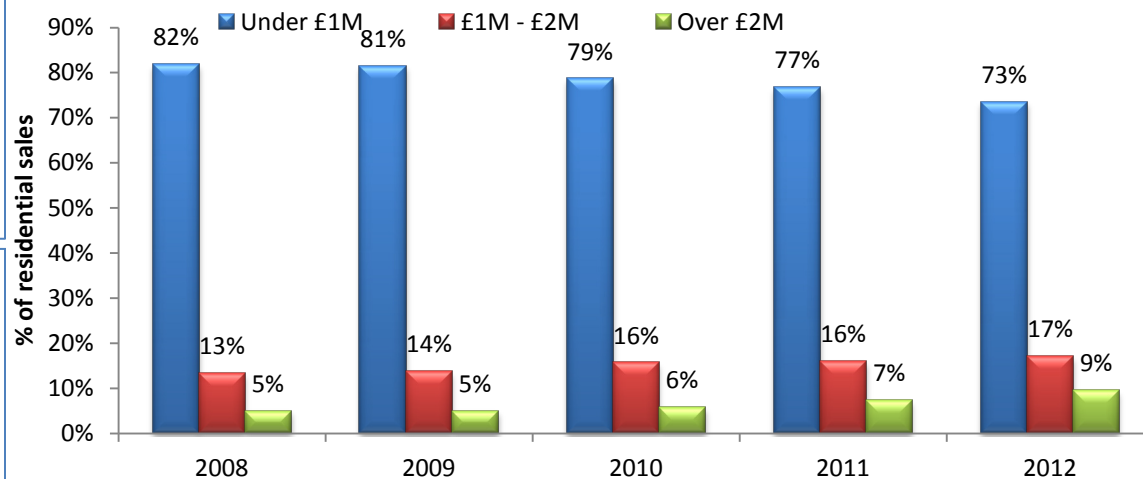
*Cllr Glanz Cabinet Member for Housing (2010-13)*

## 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.

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.

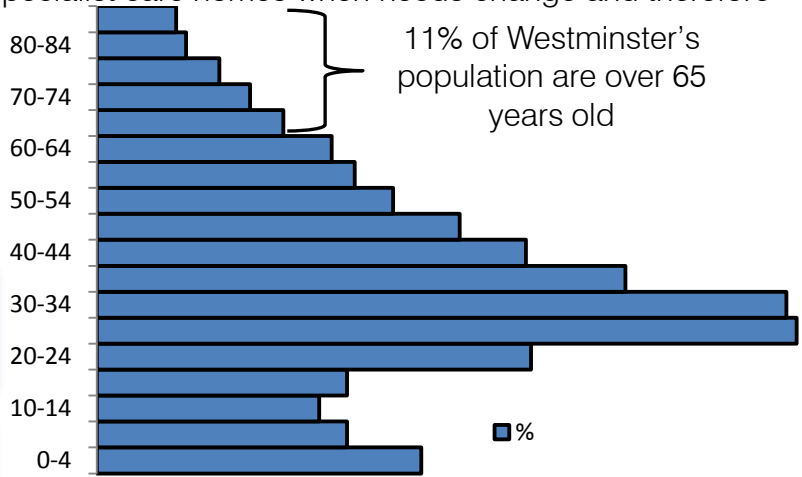
# MEETING SPECIALIST NEEDS – HOMES FOR LIFE

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

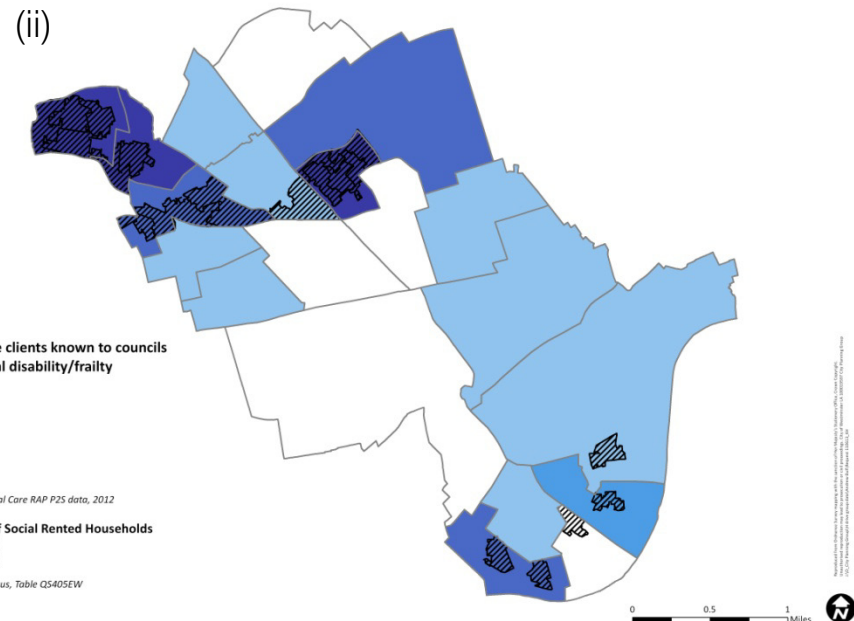
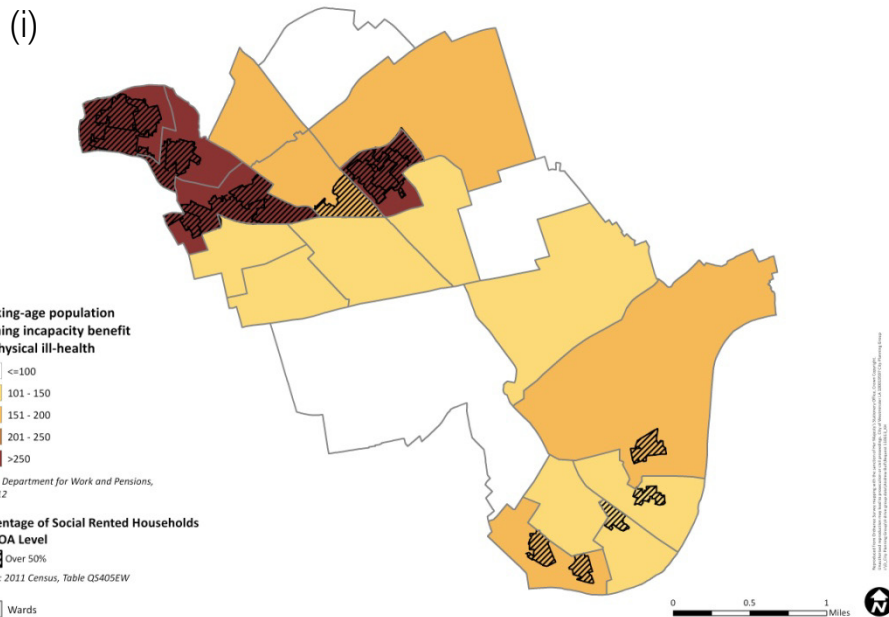
Level threshold access

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%

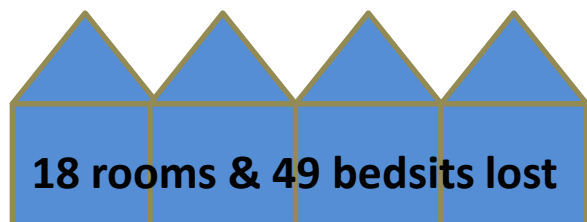
## MEETING SPECIALIST NEEDS – HOSTELS AND HMOs

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.

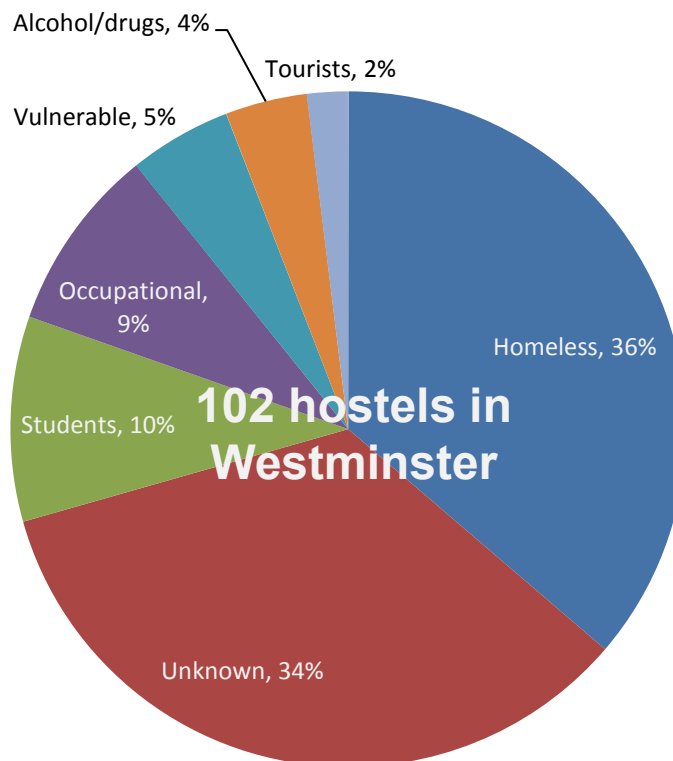
There are 363 HMOs in Westminster, accommodating around **3500** people (*Census, 2011*)

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:



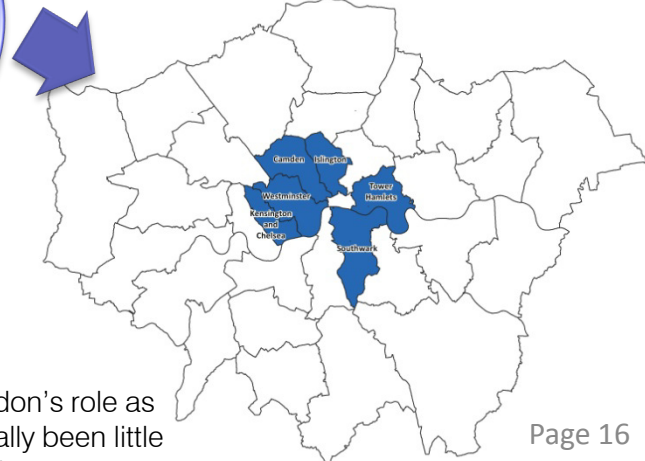
5 HOSTELS converted to private housing in the last six years:



# 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

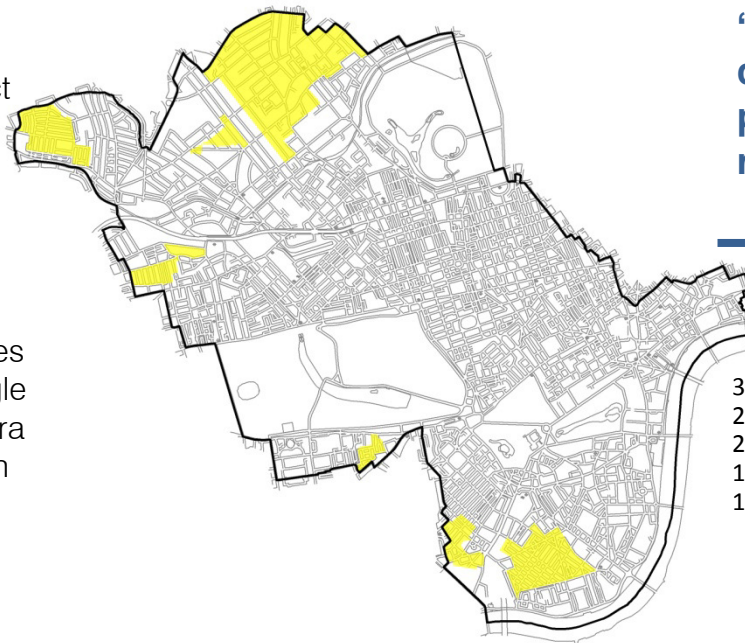


# FAMILY HOMES IN WESTMINSTER

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

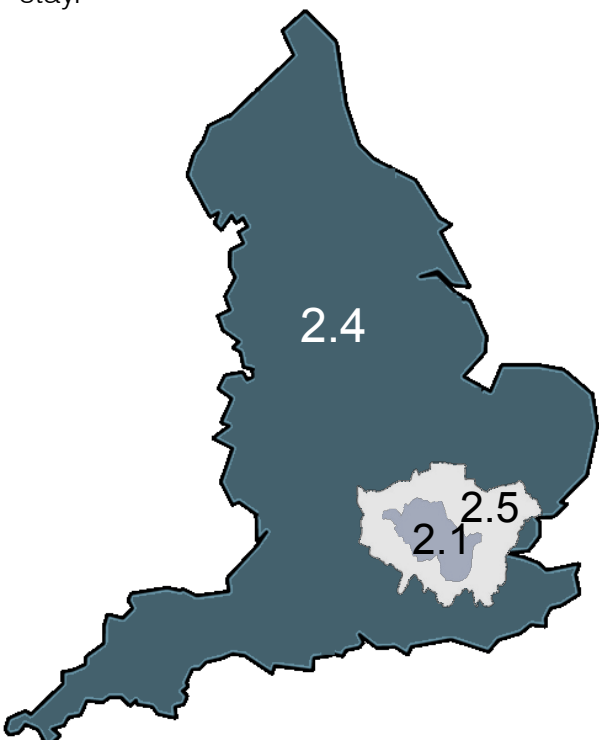
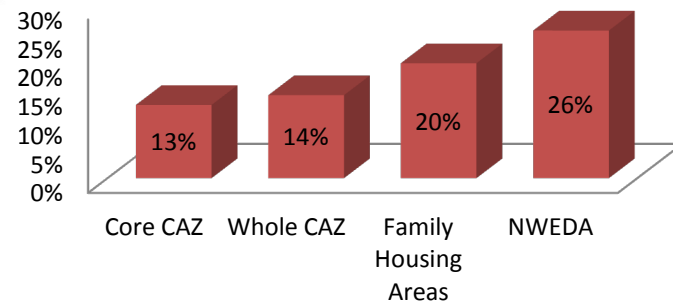
The Housing Needs Survey identified a shortfall of family sized housing in both the private and affordable sector.

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.

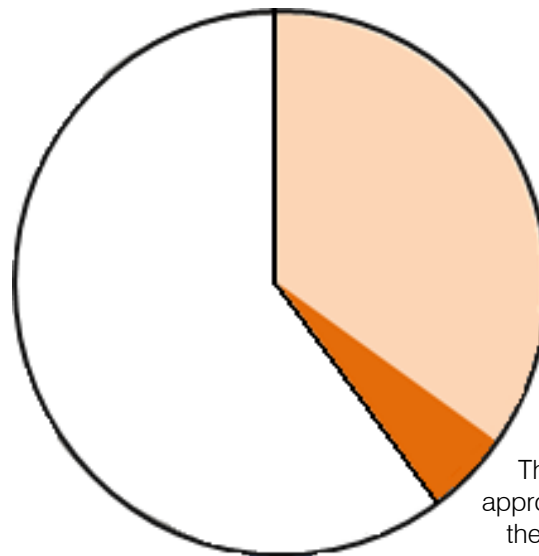


**“Only 45% of approved residential developments since 2007 provided at least a third of their residential units as family sized.”**

**% households in Westminster with children**



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.

Average household size - number of people (Source: Census 2011)

# 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
Inside Central Activities Zone	300-1100	65-405
Outside Central Activities Zone	200-700	45-260

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

**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.

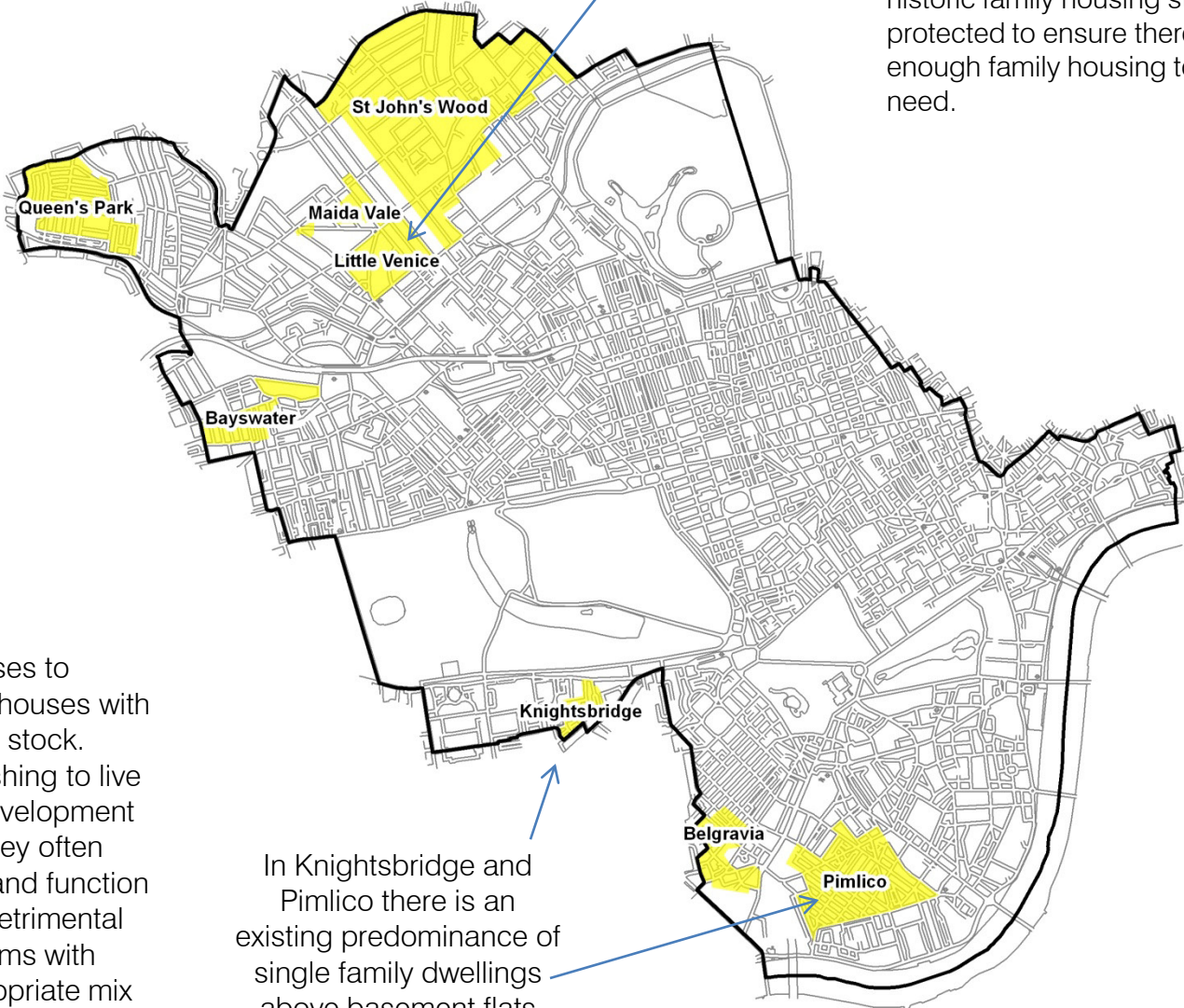
These areas provide the size and type of homes that are important in meeting housing demand in Westminster, and the continued use of these houses as family accommodation makes a positive contribution to the local character. Therefore family sized housing in these areas are protected from conversion into 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.

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 CO<sub>2</sub> 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.

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 5m<sup>2</sup> of internal or external amenity space for each dwelling designed for two persons, and a further 1m<sup>2</sup> 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.

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.

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.

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.



**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.

# SPECIALIST HOUSING cont.

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.

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.

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.

## 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:

- 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.

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

City Planning  
11<sup>th</sup> 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.

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## 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)*