The NPPF Revision to Westminster's Core Strategy

Proposed Modifications:
Post-Examination Consultation



2.8 Westminster is a place of contrast, with the poorest residents often living cheek by jowl with its richest. There are significant differences in life expectancy and mortality between and within electoral wards in Westminster. Deprivation is much more concentrated in the northwest and south of the city^{xi}. However, significant progress has been made. 7

partnerships: Since 2004, the level of multiple deprivation in the worst affected wards has decreased, however

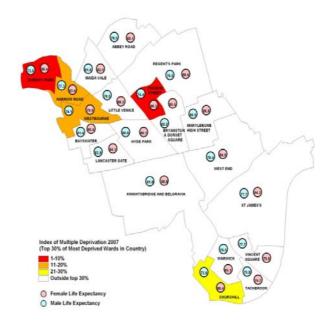


FIGURE 7 DEPRIVATION AND LIFE EXPECTANCY FOR WESTMINSTER'S WARDS, 2007

Westminster still contains some of the most deprived areas in London^{xii}. Index of Deprivation affected wards have improved their national ranking.

2.9 Westminster's housing sector also differs markedly from other areas. Average house prices in Westminster are the second highest in the country. The city has a significant, growing private rented sector, comprising an estimated 43% 46% (the highest in London) of households, compared to 26% 20% for London and only 18% 13% for England as a whole. It has a lower owner-occupier sector at only 31% 32%, compared to London (50% 57%) and England (64% 70%)^{xiii}. The housing sector reflects Westminster's role at the centre of a world city.

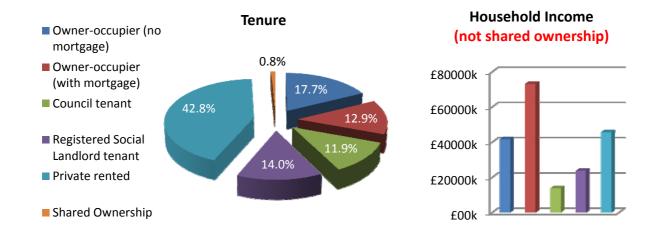


FIGURE 8 HOUSEHOLD TENURE (2011) AND INCOME, 2006 TENURE

towards 2026/27 2025, Westminster will continue to play a key role at the heart of London: the profile of London as one of the world's great global cities city will host three events of the 2012 Olympic and Paralympic Games should continue to bring long-term benefits through visitors, business and investment , ensuring that the work we do provides a lasting legacy for Westminster; we need to make our contribution ing to tackling climate change; rise to the challenge of new economic circumstances, changing markets and employment sectors; and changes in the composition of households and families, and the way people carry out their daily lives. This planning framework must retain those unique characteristics that make Westminster what it is today: its heritage, vibrancy, and mix of activities and places. The following chapters set out this planning framework to deliver Westminster's spatial vision for the future.

ONS Population Mid Year Estimates 2010

ii Business Register and Employment Survey 2010-11 Annual Business Inquiry, 2007

iii City of Westminster Local Economic Assessment Baseline Study, 2011 Business Directory 2008-10

iv Business Register and Employment Survey 2010-11 Office for National Statistics, 2009

^v Business Register and Employment Survey 2010-11 Annual Business Inquiry, 2007

business Register and Employment Survey 2010-11 Annual Business Inquiry, 2007

vii ONS, Annual Population Survey 2010 Office for National Statistics, 2009

viii ONS, Annual Population Survey 2010

ix ONS Population Mid Year Estimates, 2009 Housing Needs Assessment, 2006

^x Estimate based on Office of National Statistics 2006 data, in liaison with Victoria bus station management and core coach station companies

xi Index of Deprivation 2007 Briefing Note Westminster City Council (accessible through Westminster City Council's COWSTAT system)

xii Westminster City Plan 2006-2016

xiii Census 2011 Housing Needs Assessment, 2006

Census 2011

xv Housing Needs Assessment, 2006

xvi ONS Vital Statistics 2006 cited in Public Health Annual Report 2006/2007

xvii London Accident Analysis Unit, London Road Safety Unit, Transport for London Street Management, 2008

Public Health Annual Report 2006/2007 Figure 2.4 and Figure 2.8. It is noted that mortality statistics relating to road safety shown in these figures do not necessarily mean that this was a result of an accident within Westminster. However, the other statistics relate to injuries on Westminster's roads.

xix Towards the year 2010: monitoring casualties in Greater London; Issue 8, August 2008

xx Westminster City Plan 2006-2016

xxi Crime Statistics provided to Westminster City Council by Metropolitan Police, 2008

crime and Disorder Reduction Strategy 2005 – 08 – Priorities reflect this, including those relating to street crime, drug and substance misuse, alcohol related violence and begging.

xxiii Westminster City Plan 2006-2016, page 28

Westminster City Council Metropolitan Police Ward Level Crime Mapping http://bit.ly/KV3CIH Statistics, all recorded crimes, for period March 2012 and Westminster City Council Crime Mapping (2007-08) Violence against the person

xxv Public Health Annual Report 2006/2007

xxvi Urban adaptation to climate change in Europe, EEA Report 2012

- 5. To manage the pressures on the city from its national and international roles and functions, business communities and tourism , including the 2012 Olympic and Paralympic Games and their legacy, and to ensure a safe and enjoyable visitor experience.
- 6. To accommodate the safe and efficient movement of growing numbers of people entering and moving around Westminster by facilitating major improvements to the public transport system, improving the public realm and pedestrian environment, managing vehicular traffic, and making walking and cycling safer and more enjoyable.
- 7. To protect and enhance Westminster's open spaces, civic spaces and Blue Ribbon Network, and Westminster's biodiversity; including protecting the unique character and openness of the Royal Parks and other open spaces; and to manage these spaces to ensure areas of relative tranquillity in a city with a daytime population increased every day by over one million workers and visitors.

WESTMINSTER'S SPATIAL STRATEGY

EMPLOYMENT AND THE ECONOMY

- 2.36 Westminster is projected to accommodate growth in employment of about 19,000 56,000 49,000 people between 2012/13 to 2026/27 2010 and 2024ⁱⁱ. This provision will include 5,000 new jobs in Paddington Opportunity Area, 4,000 in Victoria Opportunity Area, and about 5,000 in the Tottenham Court Road Opportunity Area, including those areas within the London Borough of Camdenⁱⁱⁱ. It is crucial to remove barriers to employment for Westminster's residents, such as a lack of skills and training. This will reduce deprivation and social exclusion, and provide a skilled, local workforce for Westminster's businesses.
- 2.37 Over the life-time of The Core Strategy this plan, Westminster will continue to be one of London's most important office locations. New offices and other B1 business floorspace will be directed to appropriate locations within the Central Activities Zone, primarily the three Opportunity Areas at Paddington, Victoria and Tottenham Court Road, the Core Central Activities Zone, and to specified locations Named Streets within Marylebone and Fitzrovia. This will be delivered in such a way that maintains Westminster's unique mixed use character within Central London, with approximately half 50% of the floorspace across the whole of Core CAZ being office floorspace. Overspill office and other B1 accommodation will be directed to appropriate locations within the North Westminster Economic Development Area, extending the existing office stock being delivered within the Paddington Opportunity Area.
- 2.38 Regional assessments of growth in retail, estimated at 285,000sqm net additional floorspace between 2006 and 2026, have been based on demand assessment rather than capacity and also assume a 1.5% productivity growth, which appears unlikely over the

ⁱ Local and Regional CO² Emissions Estimates for 2005-2009 by local authority, 2011

GLA Economics Working Paper 51 London Office Policy Review 2012

iii London Plan <u>2011.</u> consolidated with alterations, <u>2008</u>

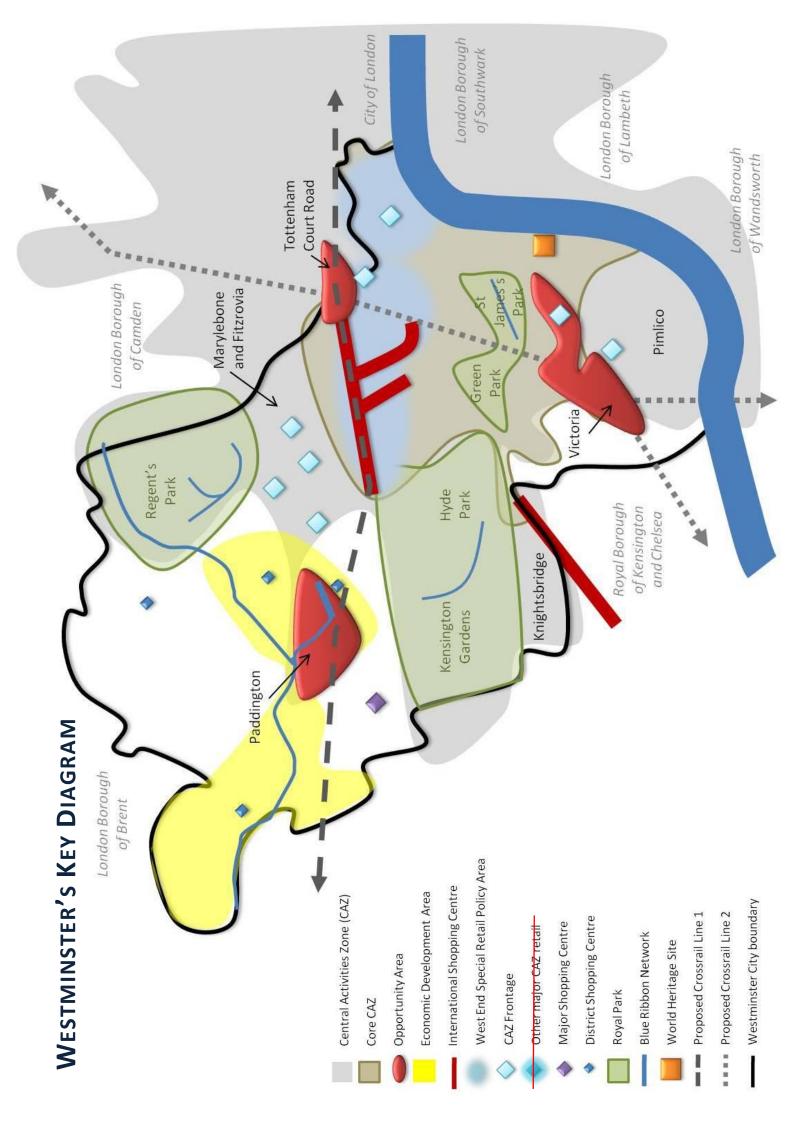
Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, 2009. London Town Centre Assessment, 2004.

^v Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, 2009. London Town Centre Assessment, 2004.

vi London Town Centre Assessment, 2004.

vii Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, 2009.

viii Housing Needs Assessment, 2006



Reasoned Justification

Housing developments need to provide an appropriate mix of units, in terms of unit size, type and tenure, including social and intermediate housing provision, to address Westminster's housing requirements as set out in regional and sub-regional assessments^{xiii}. These assessments include needs for specialist housing such as extra-care units for the elderly and housing for people using wheelchairs, or with other mobility impairments. This approach also 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. Housing mix and specialist housing, including hostels and HMOs, will be considered in detail in the City Management policy Plan.

It is important to safeguard specialist housing because need is likely to increase in the future, particularly with an ageing population. However, this type of accommodation can become obsolete because of its layout, or changes in the delivery of local services or the client group it was intended to serve. Therefore flexibility is required in order to deliver the published strategies of local service providers.

AFFORDABLE HOUSING

- 4.13 Westminster is one of the most expensive places in the country in which to rent or purchase a home, with prices of £5 £10 million not uncommon. Average house prices are double that for the whole of London and over ten times the average Westminster household income^{xiv}. Because of this, Westminster has an acute need for affordable homes, in both the social and intermediate sectors. An additional 5,600 social rented homes (or equivalent product) would be required annually to meet demand^{xv}. There is typically a waiting list of about 5,500 'households in priority need' for social housing, and a further 20,000 households who do not qualify for social housing and cannot afford market housing.
- 4.14 Regional guidance sets out an objective of a 70:30 60:40 split for social and intermediate provision. and this is currently under review. Within this strategic framework, the City Management policy Plan will set out what proportions of social and intermediate housing will be applied to individual schemes.
- 4.15 Unlike other London boroughs, the high price of land in Westminster means that Registered Providers (RPs) are generally unable to purchase land in the city. Westminster, therefore, relies heavily on private housing development to provide opportunities for affordable housing in partnership with RPs RSLs, with such developments accounting for 94% of new affordable homes in Westminster^{xvi}. However, due to the highly built-up nature of Westminster and the shortage of large development sites, 93% of residential

investment and residential land values compare favourably with the commercial market;

- evidence from the 5-15 year housing delivery schedules and discussions with developers and other stakeholders indicate a pipeline of development sites which will achieve affordable housing;
- the introduction of a 1,000 sqm threshold which in the Westminster context is
 effectively a lowering of the 10 unit threshold and will bring more schemes into the
 requirement range;
- having a floorspace proportion rather than a unit proportion, which is expected to increase the number of units provided in individual schemes; and
- working with partners on the Community Build Housing Renewal Programme and other schemes to build new affordable homes on underused housing estate land.

Beyond 2012, the council is confident that these policies, together with the council's Community Build Housing Renewal Programme, will yield an increase in affordable provision to 30% of overall housing delivery. The council will review the impact of these policies in order to sustain and increase this proportion when the Community Build Housing Renewal Programme ends. However, the council will keep the strategic affordable housing target under review to ensure it remains deliverable, including the transition to a Westminster's CIL, the Housing Renewal Programme, national and regional changes and monitoring data through the Authority's Monitoring Report and other evidence base.

Residential planning applications in Westminster are characterised by a predominance of large market units. The average size of a residential unit given permission between 2005/6 and 2007/8 was about 129 sqm, with market units averaging approximately 140 sqm, compared to an average of 70 sqm for affordable housing^{xix}. This means that it is not generally appropriate to use a unit calculation for either the threshold at which affordable housing will be required, or the calculation of the proportion of affordable housing to be provided. Instead, a floorspace calculation for both the threshold and the proportion required will be a fairer method and should increase the proportion and number of affordable homes delivered in the city.

The introduction of a floorspace threshold in addition to the unit threshold is one such mechanism. It will bring more schemes into the requirement range by effectively lowering the previous 10 unit threshold applicable in Westminster, to a threshold reflecting sites' capacity to provide 10 units, whilst leaving the choice open to developers to provide larger units if they so wish. A 1,000 sqm threshold has been tested in the Westminster Affordable Housing Viability Study and is considered to be viable. The Study also assessed the viability

BUSINESS AND EMPLOYMENT

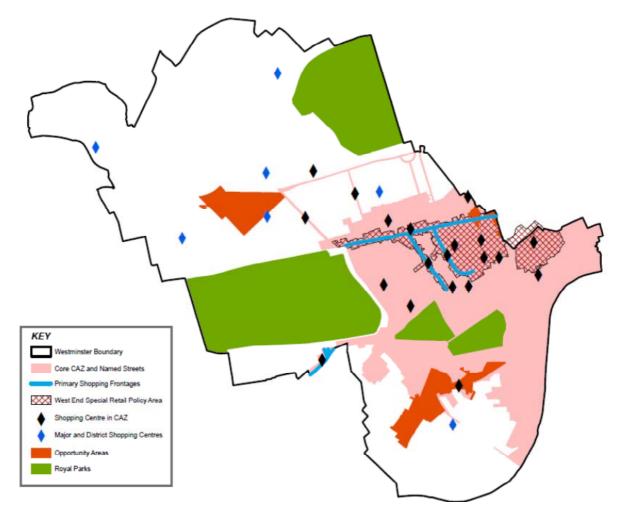


FIGURE 38 BUSINESS AND ECONOMY

- 4.17 The City of Westminster, in the heart of London, plays a definitive role in London's economy, accommodating more jobs than any other local authority, and providing opportunities for investment, enterprise and creativity. Employing over half a million people across a wide range of sectors, the local economy is both significant and diverse. Westminster needs to remain competitive as a business location within a context of increasing globalisation and competition from other European and international cities, and fluctuations in economic circumstances and cycles.
- 4.18 The working population of Westminster is projected to grow by about <u>19,000</u> <u>56,000</u> people between <u>2012/13</u> <u>2011</u> and <u>2031</u> <u>2026/27</u>, to about <u>714,000 in 2031</u> <u>720,000</u>ⁱ. There is significant development for new jobs to be created within the Opportunity Areas. There will be capacity for a further 5,000 new jobs within Paddington (capacity for over 27,000 jobs has already been created), 4,000 new jobs in Victoria, and 5,000 new jobs within Tottenham Court Road (shared with the London Borough of Camden). Increases in jobs are

also sought within the Core Central Activities Zone and North Westminster Economic Development Area, particularly Church Street, Edgware Road and Harrow Road.

- 4.19 Jobs may also be created through the increase in comparison goods retail floorspace. Most of this retail floorspace will be directed to the West End Special Retail Policy Area and, to a lesser extent, other parts of the Core Central Activities Zone including the Knightsbridge International Shopping Centre.
- 4.20 However, there are limits to the level of growth that can realistically be achieved due to the already densely developed built form, transport capacity, the need to retain all areas of open space and the need for new development to be appropriate to its context, particularly in relation to the mix of uses and historic fabric of much of the city. Therefore, growth needs to be directed to the most appropriate locations in Westminster.

POLICY CS18 COMMERCIAL DEVELOPMENT

Commercial Development will be encouraged and directed to Paddington, Victoria and Tottenham Court Road Opportunity Areas, the Core Central Activities Zone, the Named Streets, the North Westminster Economic Development Area and designated Shopping Centres.

Proposals for new commercial uses must be appropriate in terms of scale and intensity of land uses, and character and function of the area.

Reasoned Justification

This policy approach encourages the growth of commercial uses in the context of the already densely built form of predominantly human scale, mixed use character including residential, and the historic fabric of much of Westminster.

Cross-reference to Policies CS3, CS4 and CS5 for the Opportunity Areas, CS6 Core Central Activities Zone; CS8 Marylebone and Fitzrovia; CS12 North Westminster Economic Development Area.

EMPLOYMENT

4.21 Westminster is a city of great wealth and great poverty. A flourishing local economy, and economically active residents are crucial to delivering sustainable development, addressing both economic and social objectives. A key part of this is to give existing and

TOURISM, ARTS AND CULTURE

4.33 Westminster is at the heart of London's visitor economy with an unrivalled range and combination of visitor attractions and hotel accommodation. It is the most visited London borough with over 55 million trips per year^{ix}, with the attraction of iconic heritage sites such as the Houses of Parliament, Westminster Abbey and Buckingham Palace and their many ceremonial events, and as well as a significant cultural, sporting, leisure, entertainment and retail offer. Home to London's theatre district, Westminster has 38 theatres, 60 cinema screens and four concert halls with combined seating capacity for over 50,000 people^x. Westminster, and in particular the West End, is a key economic driver for the whole of London; in 2007 visitors to Westminster spent £6.8 billion^{xi}. The visitor economy, including business tourism, supports employment in the retail, hospitality and entertainment sectors.

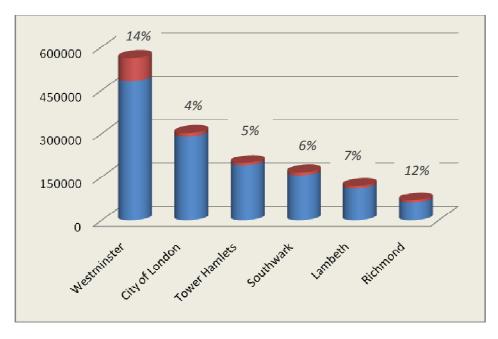


FIGURE 40 TOURISM-RELATED EMPLOYMENT AS A PROPORTION OF ALL JOBS 2007

ARTS AND CULTURE

4.34 Westminster is very fortunate in the richness of its cultural offer – from national and international institutions to the many local and community groups promoting cultural expression – which provides a uniquely diverse range of experiences. Culture, in its widest sense, makes a huge contribution to people's mental and physical well-being, sense of place and community, and learning and education.

GLA Economics Working Paper 51 London Office Policy Review 2012

Westminster City Council LUS 1999 plus 2007 pipeline update to 06/07 and City of London March 2008

iii Market View Report for Central London Offices Third Quarter 2008

^{iv} The Importance of the Historic Environment in Westminster, 2007

^v Demand and Supply of Business Space in London, 2002 <u>London Plan, 2011</u> and London Office Policy Review, 2009 2007

vi Creative Industries Report, 2007

vii Westminster Economic Development Strategy, 2007

viii Creative Industries Report, 2007

^{ix} <u>City of Westminster Local Economic Assessment Baseline Study, 2011</u> Westminster Business Directory 2008 - 2010

^x Numbers of premises – <u>Westminster City Council</u> Land Use survey data (updated 2009). Capacities – West End Entertainment Impact Study, 2001

xi City of Westminster Local Economic Assessment Baseline Study, 2011 Westminster Business Directory 2008— 2010

vii Visit England Annual Survey of Visits to Visitor Attractions 2010 Visit London – London Visitor Statistics 2007/08, tables 6-23 and 6-24

xiii Accessible Hotels in London Study 2010 GLA Hotel Demand Study, 2006

xiv Statement of Licensing Policy, 2011 2008

USES OF NATIONAL AND INTERNATIONAL IMPORTANCE

5.7 Westminster is central to London's world-class capital city status and has many activities and functions that are of international, national or regional importance. In addition to those functions related to the Government and the state, judiciary and faith, there are centres of excellence for higher education and research and medicine, prestigious institutions and professional and business organisations, and world-famous arts and cultural institutions, an international sporting venue and other visitor attractions. Most of these uses are located in the Core Central Activities Zone.

POLICY CS26 BUILDINGS AND USES OF INTERNATIONAL AND NATIONAL IMPORTANCE

Uses of international and/or national importance, and the buildings that accommodate them will be protected throughout Westminster, and new international and nationally important uses encouraged within the Core Central Activities Zone and Opportunity Areas.

Reasoned Justification

These uses, and the buildings that accommodate them, contribute to London's world-class city status and global competitiveness. Many of these buildings also contribute to Westminster's heritage and are important in attracting visitors to the city, and to the London tourist industry as a whole. New uses of international and/or national importance in appropriate locations will enhance the role of Westminster in the heart of London.

PART VI: IMPLEMENTATION

THE PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

6.1 The National Planning Policy Framework includes a presumption in favour of sustainable development which is the 'golden thread' running through both plan-making and decision-taking.

POLICY CS47 THE PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Reasoned Justification

To achieve the optimum balance of economic, social and environmental planning roles which constitute the three dimensions of sustainable development and ensure delivery of this balanced approach a local level. To ensure delivery of sustainable development, including through neighbourhood planning.

target subject to Examination in Public and subject to an early alteration.

The figure below shows past and projected performance against these targets. It also rolls out the target of 770 p.a. beyond the 2021/22 time period of the London Plan to cover the entire Core Strategy time period. This figure shows that, although the target may not be reached in any one year, cumulatively sufficient surplus is built up in other years to cover the target over the longer term. When the new 680 p.a. target was introduced in 2007/08, the surplus that had been built up previously was essentially deleted, although in that year the target was exceeded (1,011 homes were delivered) and therefore a surplus was still recorded for that year. However, when the new 770 p.a. target is introduced in 2011/12, this is not expected to be met in that year (528 homes are projected), but a surplus is built up in subsequent years to come.

Overall, the figure demonstrates that Westminster has always met its London Plan target, and is confident of doing so in the future.

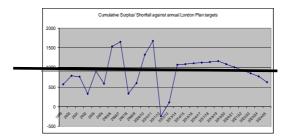




FIGURE 59 HOUSING DELIVERY AGAINST LONDON PLAN TARGETS 1999-2025/26 2026/27 2024/25

Tidal breach flood level

Predicted depth to which flooding will occur for a breach in the tidal flood defence walk. These have been modelled in Westminster's Strategic Flood Risk Assessment.

Tourist attractions

Includes museums and galleries (D1 Non-residential Institutions), theatres (*sui generis*), concert halls (D2 Assembly and Leisure), unique attractions such as London Zoo, Lord's Cricket Ground and Madame Tussards, internationally important cultural institutions, and buildings of state and Royal Palaces (Houses of Parliament, Westminster Abbey, Buckingham Palace, Horse Guards).

Town Centre Use

A use serving visiting members of the public which may be appropriate at ground floor level in a designated Shopping Centre. Town centre uses include A1 retail uses, non-A1 retail uses, health uses, libraries, entertainment facilities, hotels and offices.

Use Class Order

A statutory instrument made by the Secretary of State under section 22 of the Town and Country Planning Act 1990, subsequently amended several times, setting out broad classes of use for land and buildings. Under provisions in the Town and Country Planning (Use Classes) Order 1987 (as amended), a change from one use to another within the same use class does not need planning permission. For example, change from a book shop (A1 Use Class) to a shoe shop (also A1 Use Class) does not require planning permission as they are in the same use class category.

West End International Shopping Centre Designation which collectively describes Westminster's three main shopping streets: Oxford, Regent and Bond (Old and New).

Westminster City Partnership Westminster's Local Strategic Partnership, a non-statutory, multiagency partnership matching the local authority boundary, was launched in 2002 and brings together different organisations including the council, police, Primary Care Trust, and representatives from the voluntary sector and other partnership organisations.

"Westminster City Plan" - Sustainable Community Strategy Westminster's Sustainable Community Strategy as required by the Local Government Act 2000. , and prepared by the Westminster City Partnership.

Windfall development

Development that has not planned for and is not included in the identified Proposals Sites or the rolling housing land supply as set out in Policy 54.

Workshops and studios

Flexible spaces for B1 use that includes features like floor loadings capable of supporting machinery, ceiling heights suitable for the use of machinery and hoists, provision of a goods lift, wide doors and

Improving Historic Soho's Environmental Performance (2012) Sturgis Carbon Profiling LLP.

Published by Westminster City Council, English Heritage and the Soho Community Environmental Fund.

Index of Multiple Deprivation (2011) 2007 Communities and Local Government.

Institutional Uses Study (2012)1999 Westminster City Council.

(Draft) Land for Industry and Transport SPG (2012) Mayor of London.

Libraries, Archives, Arts and Culture and the Registration and Nationality Service Business Plan 2011/2012 2008/2009 (2011)2008 Westminster City Council.

<u>Local and Regional CO₂ Emissions Estimates for 2005 – 2009</u> (2011) Department for Energy and <u>Climate Change.</u>

Local Development Scheme (2012) 2009 Westminster City Council.

Local Economic Assessment Baseline Study (2011) Westminster City Council.

Local Implementation Plan 2011/12 to 2013/14 2005/06 to 2010/11 (2011) 2006 Westminster City Council.

Localism Act 2011

London Biodiversity Action Plan (2007) The London Biodiversity Partnership.

London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (2008) Fordham Research. Published by Greater London Authority in partnership with the London Boroughs.

London Carbon Scenarios to 2026 Report (2006) London Energy Partnership.

London Hotel Demand Study (2006) Grant Thornton and the Leisure and Tourism Organisation. Published by Greater London Authority.

London Office Policy Review (2012 2009) Ramidus Consulting Ltd with Roger Tym and Partners. Published by Mayor of London.

London Plan (2011) consolidated with alterations since 2004 (2008) Mayor of London.

(Greater) London Strategic Housing Market Assessment 2008 (2009) Opinion Research Services. Published by Mayor of London.

London Town Centre Assessment Stage 1: Comparison Goods Floorspace Need (2004) Experian Business Strategies. Published by the Greater London Authority.

London Travel Demand Survey 2007/2008 (2011) 2008 Transport for London.

London View Management Framework (2007) Greater London Authority.

(Draft Revised) London View Management Framework (2009) Greater London Authority.

London Visitor Statistics 2007/2008 (2008) Visit London.