

Integrated Impact Assessment

Addendum to the Core Strategy Sustainability Report
NPPF Revision to Westminster's Core Strategy

Final Version



City of Westminster

August 2013

Technical Note for IIA

The IIA Report for the Core Strategy NPPF Revision is an addendum to the Core Strategy Sustainability Appraisal report and its associated Scoping Report. As such a separate scoping report has not been prepared for the IIA, and the Core Strategy Sustainability Appraisal report is being re-submitted as part of the submission documents pursuant to the Town and Country (local plans England) Regulations 2012, Regulation 22.

The IIA has utilised the baseline prepared for the Core Strategy Sustainability Appraisal. However, as part of the preparation of a new baseline for the IIA scoping report in connection with the preparation of Westminster's City Plan the original baseline used for the Core Strategy has been thoroughly reviewed. It is considered that overall the baseline used for the Core Strategy remains relevant for the IIA assessment of the Core Strategy NPPF Revision, with one exception. The publication of the Department of Energy and Climate Change statistics for all local authorities in August 2012 (Department of Energy and Climate Change Dataset 6222) show that over the last few years Westminster has not seen any major reductions in its emissions whereas most other authorities in London have managed to reduce their emissions. This information has been used to inform the IIA assessment changes in Policy CS27 –Design, which now *requires* development to reduce energy use.

An audit of relevant documents and strategies has also taken place and any new publications that are key to the considerations for the thirteen identified topics/areas for the IIA are listed in Appendix 4. The publication of the London Plan in July 2011 has required changes in the Core Strategy NPPF Revision to ensure general conformity with this document, including a revised housing target of a minimum an average of 770 new homes annually, rather than 680.

Non-Technical Summary

The IIA fulfils the requirement for a Sustainability Appraisal and Strategic Environmental Assessment and for an Equalities Impact Assessment. Although not a statutory requirement a Health Impact Assessment has also been included in the IIA, as good practice. This integrated approach avoids the need to undertake and report on separate assessments, seeks to reduce any duplication of assessment work and benefits from a shared understanding of the policies.

This IIA only assesses the amendments to the Core Strategy set out in the NPPF Revision. The Core Strategy Sustainability Appraisal Report (November 2009) and associated Scoping Report, the Equalities Impact Assessment (April 2010) and Health Impact Assessment (April 2010) remain the primary documents for the assessment of the policies in the adopted Core Strategy.

In the main, the proposed changes set out in the NPPF Revision are minor involving the updating of statistics, references terminology, points of clarification, typographical and grammatical errors. However, thirteen areas have been identified where alterations to Policy, Reasoned Justification or supporting text may have sufficient implications to warrant IIA consideration. These are set out below:

- NPPF General/Sustainable development/sustainable economic growth
- Design
- Communications
- Housing (including Affordable Rent and Affordable Housing)
- Heritage
- Neighbourhood Planning
- Duty to cooperate
- Waste
- Business and employment (including training and worklessness)
- Air quality
- Community Infrastructure Levy
- Major infrastructure projects
- Social and Community Infrastructure

Having undertaken a detailed IIA assessment it is considered that overall these identified areas have a neutral impact on the IIA framework of objectives. There are no negative or conflicting impacts identified. The alterations for design (objectives 4, 5 and 6) communications (Objective 17), housing (Objective 4), Neighborhood Planning and Community Governance (Objective 1),

Business and employment (Objectives 4, 16 and 17) have positive scores for those IIA objectives bracketed.

Consultation of the IIA report took place for a 7 week period from 24th July to 14th September 14th September 2012. All contacts on the council's consultation LDF database (2,254 individuals and organisations) were consulted, together with all statutory consultees, ward councillors and neighbouring boroughs. No responses were received in response to the IIA report.

Contents

	Page
Non-technical summary	2-3
Relevant Plans in Westminster	5-8
Requirement for Integrated Impact Assessment	9-10
Appraisal Methodology	
The 12 identified areas/topics considered in the IIA	11
IIA Assessment Framework	11-14
Relevant plans, programmes and Baseline information	15
IIA Appraisal Context	16
Appraisal Summary for 12 identified areas/topics	16-21
Conclusion	21

Relevant Plans in Westminster

1. The Core Strategy

- 1.1 The Core Strategy was adopted on 26 January 2011. It sets out the vision for Westminster up to 2025 and beyond, and puts in place a policy framework to deliver that vision. The Core Strategy was subject to a Sustainability Appraisal which included a Strategic Environmental Assessment (November 2009), Equalities Impact Assessment (April 2010) and Health Impact Assessment (April 2010).

2. The Core Strategy NPPF Revision

- 1.2 The National Planning Policy Framework (NPPF) was published on the 27th March 2012 with immediate effect. To ensure conformity with the NPPF the City Council has now started the process to make alterations to the adopted Core Strategy (the Core Strategy NPPF Revision).
- 1.3 A letter of notification of intent to change the Core Strategy and calling for expressions of interest on what should be included in the document (Regulation 18 of the Local Planning Regulations 2012) was sent to over 2,000 residents, businesses groups and other stakeholders on 1st May 2012 with a consultation period of just over 6 weeks until 15th June 2012. This letter also advertised our intention to revise the Core Strategy to include the development management policies (The City Management Plan Consultation Draft November 2011) within the Core Strategy to create a single planning document for Westminster (the CMP Revision). However, this is a separate process and will be progressed on a different timescale to the NPPF Revision. It is noted that the NPPF Revision only creates a local plan of strategic policies, and more detailed necessary policies will be included through the CMP Revision to make a comprehensive policy framework and local plan for Westminster.
- 1.4 Thirteen responses were received to the Regulation 18 letter. The City Council took these into account along with:
- Changes arising from the NPPF,
 - Changes from the Localism Act or other recent legislative changes,
 - Updates from the London Plan,
 - Other updates such as statistics or fixing grammatical errors.

- 1.5 Given the relatively minor nature of the revisions and that they predominantly arise from external factors or represent factual changes and updates, informal consultation is not considered necessary as the revisions proposed are considered 'sound' meeting the criteria set out in paragraph 182 of the NPPF.
- 1.6 The formal consultation on Core Strategy NPPF Revision (in accordance with Regulation 19 of the Local Planning Regulations 2012) and to seeks views from the Mayor of London as to the general conformity of the NPPF Revision with the London Plan started on 24th July 2012 and run for a period of 7 weeks and 4 days until 14th September 2012. Fourteen responses were received none of which raised matters concerning the IIA.
- 1.7 The schedule of changes in the Core Strategy NPPF Revision is contained in Appendix 1 and the Core Strategy NPPF Revision document can be viewed at www.westminster.gov.uk/ldf

3. The Integrated Impact Assessment for the Core Strategy NPPF Revision

- 1.8 The draft Integrated Impact Assessment (IIA) report documents the assessment of the social, environmental and economic performance of the Core Strategy NPPF Revision, against a set of 17 objectives. These 17 objectives which were identified in the Core Strategy Sustainability Appraisal (November 2009) have been augmented with equality and health objectives and sub-criteria based on the City Council's Equality Impact Assessment and the Single Equality Scheme 2010-2013; Improving Opportunities- Maximising Potential (Consultation Draft 2010) and Westminster's Health and Well being Impact Assessment (October 2006).
- 1.9 This draft IIA only assesses the alterations to the Core Strategy as set out in the Core Strategy NPPF Revision and as such is an addendum to the Core Strategy Sustainability Report. The Core Strategy Sustainability Appraisal Report (November 2009) and its associated Scoping Report, the Equalities Impact Assessment (April 2010) and Health Impact Assessment (April 2010) remain the primary documents for the assessment of policies in the Core Strategy.

4. CMP Revision

- 1.10 Work started in 2008 on the City Management Plan (CMP) as the second Development Plan Document (DPD) in Westminster's Local Development Framework (LDF), to sit

alongside Core Strategy as a separate document and to contain the more detailed criteria against which planning applications will be considered.

- 1.11 Since 2008 there has been extensive consultation on developing the City Management Plan. The council has endeavoured to undertake an open approach to involving communities and stakeholders and has inserted additional consultation stages into the document process to provide opportunities for early involvement.
- 1.12 However, rather than have two separate planning documents, the Core Strategy (NPPF Revision) and the City Management Plan, in line with the NPPF, the council is now working on a single local planning policy document called Westminster's City Plan. This will combine Westminster's City Plan: Strategic Policies and the detailed development management policies (previously developed as The City Management Plan).

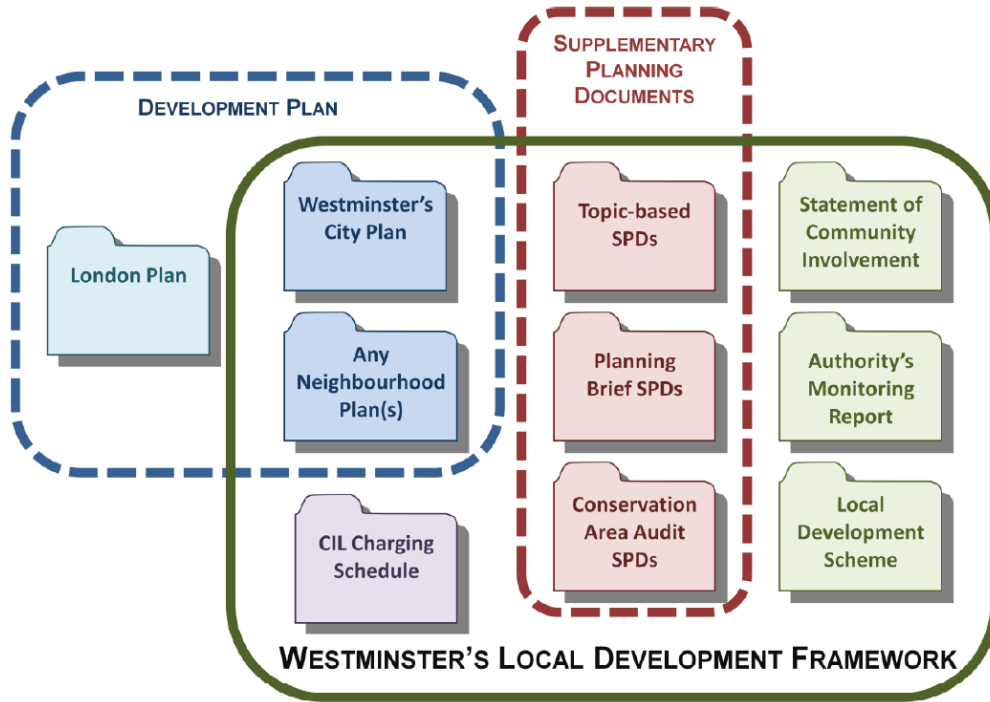
5. Westminster's City Plan (CMP Revision)–IIA Scoping Report

- 1.13 The IIA Scoping Report for Westminster's City Plan (CMP Revision) for the detailed development management policies has been prepared and can be viewed at: http://transact.westminster.gov.uk/docstores/publications_store/IIA%20scoping%20report.pdf
- 1.14 This Scoping Report was subject to consultation with the statutory consultees for a five week period starting 5 October 2012 and ending 9 November 2012. In response, Natural England commented that they were broadly supportive of the document. English Heritage commented that they were generally satisfied with the treatment of the historic environment in the Scoping Report but requested a few minor changes regarding the impact on the pressure of open space for historic buildings and the importance of local views on future conditions. The Environment Agency are generally supportive of the document but have made some comments and recommendations including recognition of the Water Directive Framework, the addition of more water related documents to relevant plans, programmes and strategies and minor changes to the wording of IIA objectives 5, 7 and 8. These requested changes will be considered and changes made as required.

6. The London Plan

- 1.15 The Mayor is responsible for the strategic planning in London, including the preparation of the London Plan. Planning policies in Westminster must be in general conformity with the London Plan July 2011. The London Plan was subject to an IIA in October 2009.

Figure 1 Relationship of the Core Strategy with other relevant plans



2. Requirement for an Integrated Impact Assessment

- 2.1 Under the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) including a Strategic Environmental Assessment (SEA), prepared in accordance with the Strategic Environmental Assessment Directive EC/2001/42 is required for all Development Plan Documents.

Paragraph 165 of the NPPF states that:

A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

- 2.2 The council has a statutory duty to consider the equality impacts of its decisions. The public sector Equalities Duty (section 149 of the Equality Act 2010) came into force on 5 April 2011 which extended the previous duties to cover the following protected characteristics:

Age, Disability, Gender reassignment, Pregnancy and maternity, Race- including ethnic or national origins, colour or nationality, Religion or belief -including lack of belief, Sex and Sexual orientation.

- 2.3 While there is no statutory requirement to undertake a Health Impact Assessment (HIA), the government has clearly expressed a commitment to promoting HIAs at a policy level in a variety of policy documents and they are increasingly being seen as best practice.

- 2.4 The IIA assessment for the Core Strategy NPPF Revision was carried out 'in-house' in May/June 2012 concurrent with the preparation of the NPPF Revision. Consultation on the IIA report took place alongside the Core Strategy NPPF Revision for a 7 week period from 24th July to 14th September 14th September 2012. All contacts on the council's consultation LDF database (2,254 individuals and organisations) were consulted, together with all statutory consultees, ward councillors and neighbouring boroughs. No responses were received in response to the IIA report. This IIA develops that document further.

- 2.5 This IIA only assesses the amendments to the Core Strategy which are contained in the NPPF Revision. For this reason:

The Core Strategy Sustainability Appraisal Report (November 2009) and associated Scoping Report;

http://transact.westminster.gov.uk/docstores/publications_store/Core_Strategy_Sustai

[nability Appraisal March 2010.pdf](#)

[http://transact.westminster.gov.uk/docstores/publications_store/Core Strategy Sustainability Appraisal Appendices March 2010.pdf](http://transact.westminster.gov.uk/docstores/publications_store/Core_Strategy_Sustainability_Appraisal_Appendices_March_2010.pdf)

[http://www3.westminster.gov.uk/docstores/publications_store/Scoping Report Final April 2007.pdf](http://www3.westminster.gov.uk/docstores/publications_store/Scoping_Report_Final_April_2007.pdf)

the Equalities Impact Assessment (April 2010);

[http://transact.westminster.gov.uk/docstores/publications_store/Executive Summary EqIA April2010.pdf](http://transact.westminster.gov.uk/docstores/publications_store/Executive_Summary_EqIA_April2010.pdf)

and the Health Impact Assessment (April 2010)

[http://transact.westminster.gov.uk/docstores/publications_store/HIA April2010.pdf](http://transact.westminster.gov.uk/docstores/publications_store/HIA_April2010.pdf)

still remain the primary documents for the assessment of the policies in the adopted Core Strategy.

Appraisal Methodology

3. The 12 identified areas/topics for the IIA

3.1 The alterations in the NPPF Revision were analysed and minor changes involving the updating of statistics, references and terminology, points of clarification and typographical and grammatical errors were identified as not requiring an IIA given these alterations do not change the meaning or sense of the policy approach in any way. However, thirteen topics/areas were identified where alterations to the Policy, Reasoned Justification or supporting text may have sufficient implications by adding an additional dimension to that part of the Core Strategy, to warrant further sustainability, equalities and health impacts consideration. The 13 identified topics/areas are as follows:

- NPPF General /Sustainable development/sustainable economic growth
- Design
- Communications
- Housing (including Affordable Rent and Affordable Housing)
- Heritage
- Neighbourhood Planning
- Duty to cooperate
- Waste
- Business and employment (including training and worklessness)
- Air quality
- Community Infrastructure Levy
- Major infrastructure projects
- Social and Community Infrastructure

3.2 The schedule of all changes in the Core Strategy NPPF Revision (including paragraph references) is contained in Appendix 1.

4. Assessment Framework

4.1 The establishment of appropriate objectives and indicative guide questions/ sub-criteria is central to the assessment process and provides a way in which the performance of the Core Strategy NPPF changes identified above can be assessed.

4.2 The IIA framework is based on the 17 sustainability objectives identified in the Core Strategy Sustainability Report (November 2009). These objectives were developed by researching specific issues affecting Westminster, through a detailed desk top analysis

and internal discussions and with regard to the council's adopted Unitary Development Plan (January 2007), The London Plan and to ensure they meet the environmental protective's set out in the SEA Directive.

- 4.3 The Sustainability Appraisal framework has however been enhanced to include key objectives from the City Council's Equality Impact Assessment (2008) and the Single Equality Scheme 2010-2013; Improving Opportunities-Maximising Potential (Consultation Draft 2010) and the Health Impact Assessment (2006).
- 4.4 Appendix 2 contains the criteria used for the consideration of the EIA and Health objectives and sub-criteria used in the IIA.
- 4.5 Table 1 below shows the Integrated Impact Assessment Framework used for the assessment of the Core Strategy NPPF Revision, including sustainability, equality and health objectives and sub-criteria.

Table 1 Integrated Impact Assessment Framework

SA(SEA)/HIA/EQIA Objective	SA/HIA/EQIA sub criteria for assessment
1) To create cohesive, inclusive and safe communities	Will it improve access to local services? Shopping? Community facilities? Will it increase ability to influence decision making (neighbourhoods)? Will it encourage engagement in the community activity? Will it empower communities? * Will it promote positive relationships between communities and groups of people? Does it provide equal opportunities for use, function and access to the built environment for all equality groups?
2) To reduce crime and fear of crime	Will it reduce actual crime? ** Will it reduce fear of crime? *
3) To ensure provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	Will it reduce homelessness? * Will it increase range of affordable housing? * Will it reduce number of unfit homes? Will it create high quality homes? ** Will it improve life chances for all equality strand groups?
4) To promote and improve health and well being	Will it help improve health inequalities? Will it reduce death rates? Will it increase participation in sport and leisure activities for all low participation groups? Will it tackle hate crime? Will it provide access to a healthy diet and encourage healthy lifestyles? Will it encourage a physically active lifestyle (helping to reduce obesity)? Will it create healthy workplaces?
5) To reduce greenhouse emissions and support climate change adaptation	Will energy need be met through renewable sources? Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel? * Will it reduce ozone depleting emissions? Will it reduce emissions through retrofitting new technology?

	Will it reduce heat island effects on people and property?
6) To reduce use of natural resources e.g. water, energy	Will it reduce water consumption and improve water efficiency? Will it reduce energy consumption? *
7) To minimise flood risk , promote SUDs, protect surface and groundwater quality	Will it minimise flood risk from all sources of flooding? * Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? Will it reduce combined sewer overflow events?
8) To protect, enhance and create environments that encourage and support biodiversity	Will it protect, enhance and increase biodiversity and protect habitats? Will it reduce preserve SINCS? Will it improve access to and promote educational value of sites of biodiversity interest? Will it conserve and enhance species and habitats?
9) To improve Air Quality	Will it improve air quality? * Will it reduce emissions of key pollutants?
10) To reduce noise and impact of noise	Will it reduce noise concerns and noise complaints? Will it reduce noise levels? *
11) To reduce need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport	Will it reduce volumes of traffic? Will it encourage walking and cycling? * Will it increase proportion of journeys using modes other than the car?
12) To reduce waste production and increase recycling, recovery and re-use of waste	Will it reduce consumption of materials and resources? Will it reduce household waste? Will it increase recycling, recovery and re-use? Will it reduce construction waste?
13) To protect and enhance the historic environment and architectural, archaeological and cultural heritage	Will it protect heritage sites and cultural value? Will it protect strategic views? Will it protect listed buildings and their settings? Will it help preserve, enhance and record archaeological features and their settings?
14) To enhance public realm and street improvements	Will it reduce litter? Will it enhance the quality of public realm? Will it improve access and mobility for all equality group strands? *
15) To protect, enhance and seek opportunities to increase open space	Will it improve open space? Will it improve landscape character? Will it minimise development on Greenfield sites?
16) To ensure equal opportunities to improve local opportunities and support sustainable economic growth?	Will it improve qualifications and skills? ** Will it reduce unemployment? * Will it provide jobs for those most in need? Will it improve earnings? Will it help adults into work and tackle child poverty by increasing number of volunteer parents engaged in employment, education and training?
17) To maintain economic diversity, increase local opportunity and support sustainable economic growth	Will it improve business development and environment? Will it improve business resilience and economy? Will it encourage new business start ups, small businesses and opportunities for local people? * Will it promote business in key sectors? Will it promote regeneration, reducing disparity? Will it provide employment opportunities for out of work residents?

(** coloured asterisks show criteria for HIA (blue) /EQIA (red) assessments)

In the Health Impact Assessment (HIA) element consider the impacts on the groups listed below:

Population groups – HIA	
Children 0-16	Unemployed
Young Adults 16-25	Low Income
Adults 25-65	Homeless / Street Community
Older Adults 65+	Refugees and asylum seekers
	Ethnic groups
People with alcohol and other drug problems	Learning difficulties
People with long term illness	Physical disabilities
People with mental health	Carers
Residents	People who experience domestic violence
Visitors	
<p>For the Equality Impact Assessment (EIA) element consider the following: There are 6 protected characteristics as set out in the Equality Act 2010. These are: Age; Disability; Gender reassignment; Pregnancy and maternity; Race- this includes ethnic or national origins; colour or nationality; Religion or belief –this includes lack of belief; Sex; Sexual orientation (including gender reassignment).</p> <p>The SA guidance requires the interrelationship between the sustainability objectives and any conflicts between the objectives identified. A compatibility assessment of the Sustainability Objectives was carried out in the Core Strategy Publication Draft Sustainability Appraisal Report November 2009 (Figure 7 and tables J. and N).The sustainability objectives were employed throughout the Core Strategy sustainability process and are still considered relevant to form the basis of the IIA framework.</p>	

4.6 Appendix 3 contains the detailed appraisals of the Core Strategy NPPF Revision for the 13 identified, areas of change using the above IIA framework. The final section of this report contains a summary of these assessments.

5. Relevant plans, programmes and Baseline Information

- 5.1 As this IIA assessment is an addendum to the Core Strategy Sustainability Appraisal Report and its associated Scoping Report the IIA has utilised the baseline prepared for these previous documents. However, as part of the preparation of a new baseline for the IIA scoping report for Westminster's City Plan the original baseline used for the Core Strategy has been thoroughly reviewed. It is considered that overall the baseline used for the Core Strategy remains relevant for the assessment of the Core Strategy NPPF Revision. However, the publication of the Department of Energy and Climate Change statistics for all local authorities in August 2012 (Department of Energy and Climate Change Dataset 6222) show that over the last few years Westminster has not seen any major reductions in its emissions whereas most other authorities in London have managed to reduce their emissions. Westminster has the 5th highest carbon emissions in the UK (from carbon emissions that can be addressed through actions of the local authority). These statistics have been used to inform the changes in Policy CS27 –Design in relation to climate change. The publication of the London Plan in July 2011 has required some textual changes in the Core Strategy NPPF Revision to ensure general conformity with this document.
- 5.2 Appendix 4 lists the key documents and strategies, relevant to the Core Strategy NPPF Revision, which have been published since 2009 (the date of the Core Strategy publications draft Sustainability Appraisal). Appendix 5 provides an overview of Westminster's characteristics with the focus on those most pertinent to the alterations.

6. Appraisal Summary for the thirteen identified areas/topics

Appraisal context

- 6.1 The IIA appraisal tables in Appendix 3 set out the details of the impact for each of the twelve identified areas/topics in terms of the 17 objectives in the IIA framework. Each appraisal is referenced with the topic/area reference including the relevant paragraph, Policy or Reasoned Justification contained in the NPPF Revision (included in the schedule of all changes in the Core Strategy NPPF Revision in Appendix 1). Each appraisal includes an overall summary of the impacts and where relevant the short medium and long term positive effects, the cumulative effects, uncertainties/risks and how significant effects will be monitored.
- 6.2 Alternatives for 11 of the identified areas/ topics have not been set out in detail for the following reasons:
- The changes are too minor to require such assessment or alternatives have previously been assessed in the Sustainability Appraisal for the Core Strategy.
 - The changes are required to be in conformity with the Localism Act 2011 and the NPPF and the only alternative is for the council to run the risk of the Core Strategy not being in conformity with the NPPF, which could result in uncertainty in planning and sustainable growth, for development in Westminster.
 - The changes (updating of targets) are required for the Core Strategy to be in general conformity with The London Plan.

However, reasonable alternatives for Appraisal 9, Business and employment (including Training and Worklessness), have been identified because this is a completely new policy and does not fall into any of the categories set out above. Further details on the consideration of reasonable alternatives are contained in the IIA appraisal tables for each of the identified areas/topics.

Summary of the IIA Appraisals

1. NPPF General/Sustainable Development/Sustainable economic growth

Overall Summary: Neutral

6.3 The additional proposed wording throughout the Core Strategy NPPF Revision which refers to the NPPF, sustainable development and sustainable economic growth does not change the fundamental context of the document. The impact of this text is therefore neutral for all IIA objectives.

2. Design

Overall Summary: Neutral/Positive

6.4 The alterations to Policy CS27 Design which now **requires** development to reduce energy use and emissions that contribute to climate change during the life-cycle of the development and ensure the reduction, reuse or recycling of resources and materials including water waste and aggregates, results in a positive score for Objective 5 (To reduce greenhouse emissions and support climate change adaption) as this more prescriptive policy is likely to have a positive impact on reducing greenhouse gas and support climate change in Westminster. There are other incremental benefits from this change in terms of positive outcomes for improving air quality (Objective 9) and reducing consumption of materials and resources (Objective 12) and may, in the long term, reduce death rates (Objective 4 – To promote and improve health and wellbeing).

6.5 Out of all identified changes in the NPPF Revision Climate Change receives the highest number of positive scores for individual objectives in the IIA Framework. The requirement for this policy change is also evidenced by Department of Energy and Climate Change statistics for all local authorities in August 2012 (Department of Energy and Climate Change Dataset 6222).

3. Communications

Overall Summary: Neutral

6.6 This has been given a positive score for IIA Objective 17 because the importance of the communications infrastructure in particular high speed broadband and reliable and sustainable energy to support economic growth was not explicitly recognised in the adopted Core Strategy.

6.7 However the positive impact of the inclusion of this text may be small as planning has no control over energy and limited impact over the installation of equipment where planning permission is not required.

4. Housing/ Affordable Rent/Affordable Housing

Overall Summary: Neutral

- 6.8 Cumulatively the proposed alterations result in a more positive policy approach for Objective 3 –Housing, although the impact is minor. The proposed changes are as follows:

The London Plan now requires Westminster to deliver as a minimum an average of 770 new homes annually (this figure was previously 680).

Policy CS14 – Optimising Housing Delivery includes a change to the wording of the policy as follows: *'to ensure a continuous five year supply of deliverable sites...with a 5% buffer....'*

Policy CS 14 additional text for exception to the loss of residential units where '2 flats are being joined to create a family-sized dwelling'

The Reasoned Justification for Policy CS14 has been amended to state that the inclusion of the windfall and small sites allowances *'reflects the advice in the NPPF as such sites have consistently come forward and will continue to provide a reliable source of housing'*. Windfall housing accounts for 80% of housing delivered in Westminster.

Policy CS16 now states that The council will aim to *exceed 30% of homes to be affordable ...*(this text previously read *The council will achieve at least 22% of new homes to be affordable homes to 2012 and aim to exceed 30% for the remaining plan period*).

Paragraph 4.15 changes the social intermediate split for social and intermediate housing to 60:40, in line with The London Plan (previously 70:30).

Figure 55 includes the additional wording for a new affordable housing product as follows: *Working to develop an appropriate affordable rent product for Westminster*

- 6.9 The changes as set out above result in a positive outcome for IIA Objective 3 in terms of the provision of additional housing units in Westminster.
- 6.10 The addition of new wording to CS 14 which allows the reduction of residential units where 2 flats are being joined to create a family sized dwelling is likely to have only a very minor impact on overall supply. Developers in Westminster have historically been more likely to bring forward smaller residential units which has lead to a shortage of

family sized dwellings in Westminster. Family sized units add to the variety of accommodation in the city and can result in more settled communities.

- 6.11 Negative impacts include additional pressure on infrastructure with an increased residential population. Increased residential development may result in less economic development. However, this depends on market conditions and the relative profit margins of each use.

5. Heritage

Overall Summary: Neutral

- 6.12 There is a neutral impact on all the IIA objectives from the proposed minor amendments to the wording in the text and alterations to the glossary definition for heritage, which will not affect policy outcome.

6. Neighbourhood Planning

Overall Summary: Neutral

- 6.13 The proposed changes result in an overall neutral score in the IIA Framework, however the inclusion of Neighbourhood Planning and Community Governance is very positive for IIA Objective 1, in particular for community cohesion and empowerment. The legislative changes in 2007 allowed the creation of the first modern-day parish council in London (Queens Park, North Westminster). The Localism Act 2011 introduced additional opportunities for community governance, through neighbourhood planning. Neighbourhood plans and neighbourhood development orders will have development plan document status. Enabling local communities (both business and residential) to prepare their own development plan documents and is a significant change in devolving power to local communities.
- 6.14 Westminster's Community Governance Review been subject to its own Equalities Impact Assessment, which is contained in Appendix 6.

7. Duty to cooperate

Overall Summary: Neutral

- 6.15 The Localism Act 2011 places a duty to cooperate for local authorities in relation to planning and sustainable development. The inclusion of the text setting out the duty to co-operate and the list of Westminster's Key Partners in Appendix 3 on the Core Strategy NPPF Revision is considered to have a neutral impact on the IIA objectives. This

is because although now formalised by the Localism Act, the council would in any case continue to work with its neighbours (and recognises that neighborhoods do not conform to local authority boundaries) and maintain a joint approach to cross-boundary issues, on-going partnerships and collaborative work.

8. Waste

Overall Summary: Neutral

- 6.16 The changes in The London Plan for Borough Level Projections which are set out in revised Figure 52 for London wide waste facilities (also in Paragraph 5.77) and the alteration in the wording of Policy CS43 *contribution towards* for boroughs (previously *required to meet*) has a neutral impact on all IIA objectives given these alterations will not result in any change in the fundamental approach and implementation of Policy CS43 Sustainable Waste Management.

9. Business and employment (including Training and Worklessness)

Overall Summary: Neutral

- 6.17 Although neutral overall the proposed amendment to Policy CS 18, which comprise the following additional text to the policy and results in a new policy approach ,has positive scores for economic objectives 16 and 17:

Where appropriate, commercial development will contribute towards removing barriers for local people accessing employment.

Policy CS 18 Reasoned Justification has also been amended as follows:

Westminster is committed to enhancing the quality of life of its residents, and a significant part of this entails removing barriers to the growth of sustainable communities, in the form of access and skills, training and employment to foster economic and social vitality and diversity and diversity, and improved life chances for Westminster's residents

- 6.18 These proposed alterations are positive for IIA economic objectives 16 and 17. In particular for improving qualification and skills, reducing unemployment, providing jobs for those most in need, maintaining economic diversity and meets a number of EIA and HA criteria. Removing barriers for local people accessing employment can have a direct benefit on health and well- being for all equalities groups. As a new policy, reasonable

alternative have been identified and appraised but do not result in any changes to the proposed amendments to CS18.

10. Air Quality

Overall Summary: Neutral

6.19 The supporting text in paragraph 5.30 makes the links between poor air quality and mortality and in paragraph 5.32 between poor air quality and road traffic and although the additional text which explicitly make these links is to be welcomed this has not changed the overall direction and meaning of the Policy CS20 and therefore the impact on all IIA objectives is neutral.

11. Community Infrastructure Levy

Overall Summary: Neutral

6.20 The proposed additional text to paragraphs 5.42-5.44 and in Policy CS32 and associated Reasoned Justification clarifies the detail of the local Community Infrastructure Levy (CIL), with information not available at the time of publication of the Core Strategy. The text does not contain details of CIL charges, which will be contained in a separate document.

6.21 The overall summary is neutral. The changes to the Core Strategy NPPF Revision do not change the emphasis of Policy CS32 Delivering Infrastructure and Planning Obligations and therefore has a neutral impact on IIA objectives.

12. Major infrastructure projects

Overall Summary: Neutral

6.22 The changes to the wording in CS28 are considered on balance have a neutral impact on all objectives in the IIA Framework. The additional text to Policy CS28 as follows: *The development of major infrastructure projects will need to mitigate, avoid or remedy environmental and local impacts, both in construction and operation.* It could be argued that without this additional text harmful environmental and local impacts may have resulted from major infrastructure projects. However on balance given this text just clarifies the approach of CS28 the impact from the alterations is neutral.

13. Social and Community Infrastructure

Overall Summary: Neutral

6.23 The changes to the wording to the Reasoned Justification for CS33 with the addition of the following wording *..or necessary to deliver a new or improved facility* and *..or the planned re-provision of the new or improved facility would not otherwise be viable..*are considered to have a neutral impact on all objectives in the IIA Framework, because this additional text does not change the overall direction of the policy.

7. Conclusion

6.24 The overall impact the impact for the thirteen identified areas/topics in terms of the 17 objectives in the IIA framework is neutral. This overall neutral impact is perhaps not surprising given that the NPPF Revision to the Core Strategy does not set out any significant policy change for growth. Appendix 7 shows an analysis of conflicts and synergies between the twelve identified areas of change in the Core Strategy and the 17 IIA Objectives. There are no negative impacts and no resulting conflicts.

Appendices

Appendix 1 Schedule of Changes: NPPF Revision

Appendix 2 Equalities and Health objectives and sub-criteria for the IAA

Appendix 3 IAA Detailed Appraisals

Appendix 4 Relevant plans programmes and strategies

Appendix 5 Baseline data - facts and figures

Appendix 6 Westminster Communities Governance Review: Equalities Impact
Assessment

Appendix 7 Analysis of conflicts and synergies between Core Strategy NPPF
Revision and IAA Objectives

Appendix 1

Reg 22 NPPF Revision Schedule of Changes

References to the Proposals Map – Appendix 2 WESRPA, Glossary CAZ Frontages, Core Shopping Frontage, District Shopping Centre, International Shopping Centre, Local Shopping Centre, Major Shopping Centre, Primary Shopping Frontage, Proposals Map, Secondary Shopping Frontage, Shopping Centres, Strategic Cultural Areas, Thames Policy Area.	Legal terminology change	This is to be known as the Policies Map.
Paragraph 1.8	Drafting improvement	Amendment to dates for consistency of plan period
Paragraph 1.14	Drafting improvement	Clearer wording
Paragraph 2.16	Drafting improvement	Amendment to dates for consistency of plan period
Figure 10	Update not made	The title of this map should have been changed to refer to the 2011 London Plan
Paragraph 3.21	Drafting improvement	Amendment to dates for consistency of plan period
CS7 RJ	Drafting improvement	Reference to City Plan changed to Westminster’s City Plan
CS14	Drafting error	Joining of 2 flats would not result in more than one dwelling
CS16 RJ	Drafting improvement	Amendment to dates for consistency of plan period
CS16 RJ	Updated timing	The housing renewal dates needed updating to reflect the current programme
Paragraph: 5.22	Improvement identified internally	Impacts affecting the local environment can also impact on workers and visitors
Policy CS29 Cross-reference box	Update	Amend the references to the Proposals Sites
Paragraph 5.44	Drafting error	The limit is on five planning obligations, rather than four as incorrectly referred to at the end of the paragraph
CS33 RJ ¹	Clarification	It is not expected that the

¹ Metropolitan Police

		requirement to retain the social and community floorspace (the final criterion) would apply where this would make the reprovision of new/improved facilities on another site undeliverable. This needed to be clarified.
Paragraph 5.75	Marking up error	The “s” should not have been deleted from the last sentence as there is more than one project i.e. Crossrail 2 and HS2.
Paragraphs: 6.12, 6.13	Drafting error	References to the Core Strategy and Local Plan should have been changed
Paragraphs: 6.10, 6.11	Marking up error	Should not have appeared in the document as has not changed
Titles: ‘Westminster’s Sustainable Community Strategy’ and ‘Neighbourhood Planning and Community Governance’	Marking up error	Incorrectly marked up
Appendix 4 – Housing Delivery	Drafting improvement	Amendment to dates for consistency of plan period
Appendix 4 – Figure 57	Drafting improvement	Amendment to dates for consistency of plan period
Appendix 4 – Meeting Housing Targets	Drafting improvement	Amendment to dates for consistency of plan period
Appendix 4 – Figure 59	Drafting improvement	Amendment to dates for consistency of plan period
Glossary definitions: flood-related infrastructure, Flood Zone 2, Flood Zone 3, General Permitted Development Order, Local Development Framework, Local Development Scheme, local distinctiveness, Local Parks, local service provision facilities, Local Shopping Centre	Marking up error	Should not have appeared in the document as has not changed
Glossary definition: Government Office for London	Marking up error	Incorrectly marked up
Reference: Bespoke Tailoring in London’s West End	Marking up error	Marked up for deletion but should be retained therefore deleted as not subject to change
References: RICS guidance on viability	Consultation response from WPA	Added

Reg 19 NPPF Revision Schedule of Changes

NATIONAL PLANNING POLICY STATEMENT

Westminster's Local Plan	<i>Throughout document</i>
NPPF General	Paragraph 1.7 ² Paragraph 1.8 ³ Paragraph 1.12 Glossary
Sustainable development	Paragraph 1.1 Paragraph 1.8 Glossary
Climate change	Paragraph 2.15 ⁴ Paragraph 2.33 Paragraph 2.53 Paragraph 2.56 Paragraph 5.8 Paragraph 5.14 Policy CS27 Policy CS27 RJ Paragraph 5.22 Paragraph 5.24 ⁵ Policy CS34 RJ Paragraph 5.64 Paragraph 5.66 Policy CS39 RJ
Communications ⁶	Paragraph 2.53 Paragraph 5.40
Housing	Policy CS14 Policy CS14 RJ Appendix 3
Sustainable economic growth ⁷	Foreword Paragraph 1.7 Paragraph 1.8 Policy CS New Inclusive Local Economy and Employment (page 91)

² Verina Glaessner

³ Verina Glaessner

⁴ Environment Agency

⁵ Environment Agency

⁶ St James's Conservation Area Trust

⁷ Barclays Bank, Westminster Property Association

	Policy CS New Inclusive Local Economy and Employment RJ (page 91) New Paragraph – Employment (page 90)
Heritage ⁸	Policy CS24 RJ Glossary
Planning Policy Statements / Guidance	Paragraph 5.24 Paragraph 5.25 Paragraph 5.26 Paragraph 5.27 Policy CS29 RJ Glossary

LOCALISM ACT 2011 ETC

Neighbourhood Planning	Figure 1 Paragraph 1.2 Paragraph 1.10 Cross References Paragraph 6.6 Paragraph 6.7 Paragraph 6.8 Paragraph 6.10 (deleted) Paragraph 6.9 Appendix 3
Authority's Monitoring Report	Figure 1 Paragraph 1.5 Paragraph 4.9 Paragraph 6.16 Paragraph 6.17
Duty to cooperate	Paragraph 6.3 Appendix 3
Registered Providers	Figure 55 Paragraph 4.16 Policy CS16 RJ Appendix 4 Glossary
Affordable Rent	Figure 55
Use Classes Order	Glossary

⁸ Covent Garden Community Association

LONDON PLAN⁹

Targets General	Paragraph 1.13 Paragraph 2.17
Climate change	Paragraph 2.17
Content General	Paragraph 2.16 Paragraph 2.18 (deleted)
Housing	Paragraph 2.40 Paragraph 4.9 Paragraph 4.10 (deleted) Policy CS14 RJ Paragraph 4.18 Figure 56 Appendix 4
Affordable housing	Paragraph 2.18 Paragraph 2.43 Paragraph 4.15 Paragraph 4.17 (deleted) Policy CS16 RJ Figure 55
London Development Agency	Paragraph 2.18 Paragraph 5.63 Figure 55 Appendix 3 Glossary
Views	Paragraph 2.24 Paragraph 5.5
Waste	Paragraph 2.17 Paragraph 2.28 Paragraph 2.50 Paragraph 5.77 Paragraph 5.79 Figure 52 Paragraph 5.80 Policy CS43
Retail	Paragraph 2.38 ¹⁰ Figure 11 Key Diagram Appendix 2 CAZ Frontage
Opportunity Areas	Policy CS3 Paragraph 3.19 Policy CS4 Policy CS5

⁹ Mayor of London

¹⁰ Covent Garden Community Association

	Paragraph 4.4
--	---------------

OTHER UPDATES

Housing and residents ¹¹	Foreword Paragraph 1.5 Paragraph 2.2 Paragraph 2.6 Figure 6 Paragraph 2.8 Paragraph 2.9 Paragraph 2.29 Paragraph 4.1 Figure 36 Figure 37 Policy CS16 Policy CS16 RJ Paragraph 5.73 Proposals Site 34 Appendix 4
Business and employment	Paragraph 2.4 Figure 4 Paragraph 2.5 Figure 5 Paragraph 2.36 Paragraph 2.37 Paragraph 4.20 Paragraph 4.24 Paragraph 4.26
Retail	Paragraph 2.38 ¹² Policy CS5 RJ Policy CS7 incl RJ Paragraph 3.27 ¹³ Paragraph 3.31 ¹⁴ Paragraph 3.32 ¹⁵
Tourism, arts and culture	Paragraph 4.34 Paragraph 4.36 Paragraph 4.37 Policy CS22 RJ
Entertainment	Paragraph 4.38

¹¹ Knightsbridge Association

¹² Covent Garden Community Association

¹³ Covent Garden Community Association

¹⁴ Covent Garden Community Association

¹⁵ Covent Garden Community Association

Mixed use in Core CAZ	Paragraph 2.20
Environment and climate change	Paragraph 2.15 Paragraph 2.16
Training and worklessness	Paragraph 2.36 Paragraph 2.58
Housing Renewal Programme	Paragraph 2.43 Paragraph 2.59 Policy CS16 RJ Figure 55 Proposals Site 5 Proposals Site 21 Proposals Site 22 Proposals Site 23 Proposals Site 24 Proposals Site 25 Proposals Site 28 Proposals Site 29 Proposals Site 33
Crime	Paragraph 2.13
Heritage and views	Paragraph 5.5
Air Quality	Figure 44 Paragraph 5.30 Paragraph 5.32
Transport	Paragraph 5.68 Paragraph 5.72 Paragraph 6.2 Proposals Site 1 Proposals Site 6 Proposals Site 9 Proposals Site 10 Proposals Site 11 Proposals Site 14 Proposals Site 17
Better City, Better Lives	Foreword
Olympics	Foreword Paragraph 2.16 Objective 5 Paragraph 4.37 Policy CS22 RJ Figure 56
Named Streets	Paragraph 2.37 Paragraph 3.39 Policy CS8 Policy CS19 Policy CS20 RJ Policy CS22 Glossary
Community Infrastructure Levy	Figure 1

	<p>Paragraph 1.6 Paragraph 2.54 Paragraph 5.41 Paragraph 5.42 Paragraph 5.43 Paragraph 5.44 Policy CS32 Policy CS32 RJ Figure 55 (Mayoral CIL for Crossrail)</p>
Major infrastructure projects ¹⁶	<p>Paragraph 2.46 Paragraph 2.48 Paragraph 3.21 Policy CS5 RJ Policy CS28 Paragraph 5.75 Policy CS42 Policy CS42 RJ Paragraph 5.84 Paragraph 5.86 Policy CS45¹⁷ Glossary</p>
City Management Plan	<p>Paragraph 1.1 Paragraph 1.2 Paragraph 1.8 Policy CS1 RJ Policy CS2 RJ Policy CS3 RJ Policy CS4 RJ Paragraph 3.55 Policy CS12 Policy CS14 RJ Paragraph 4.15 Policy CS15 RJ Policy CS16 Policy CS16 RJ Policy CS24 RJ Policy CS25 RJ Policy CS27 RJ Paragraph 5.22 Paragraph 6.13 Figure 55</p>
Westminster City Partnership	<p>Contents Page Cross References Paragraph 1.9 Paragraph 5.40</p>

¹⁶ Transport for London

¹⁷ Thames Water

	<p>Paragraph 6.1 (page 152)</p> <p>Paragraph 6.3 (page 152)</p> <p>Paragraph 6.4 (page 152)</p> <p>Paragraph 6.12</p> <p>Appendix 3</p> <p>Glossary</p>
Local Area Renewal Partnerships	<p>Paragraph 2.8</p> <p>Paragraph 2.58</p> <p>Figure 54 (deleted)</p> <p>Paragraph 6.11 (deleted)</p> <p>Appendix 3</p>
Typos / other	<p>Paragraph 1.1</p> <p>Paragraph 1.2</p> <p>Paragraph 1.4</p> <p>Westminster's Spatial Vision</p> <p>Introduction to Spatial Objectives</p> <p>Paragraph 2.56</p> <p>Paragraph 3.55</p> <p>Paragraph 3.65</p> <p>Paragraph 5.39</p> <p>Paragraph 5.47</p> <p>Proposals Site 3</p> <p>Proposals Site 7</p> <p>Proposals Site 8</p> <p>Proposals Site 9 (deleted)</p> <p>Proposals Site 12</p> <p>Proposals Site 13</p> <p>Proposals Site 18</p> <p>Proposals Site 19</p> <p>Proposals Site 21 (deleted)</p> <p>Proposals Site 20</p> <p>Proposals Site 24 (deleted)</p> <p>Proposals Site 31</p> <p>Appendix 3</p> <p>Glossary</p> <p>References</p>

SITE CHANGES

This section provides maps showing changes that will be made to the proposals map for Westminster's Core Strategy to support the NPPF Revision Consultation Draft. Maps 1 to 10 show new sites that have been added to Appendix 1 as Proposals Sites. Map 11 shows the 3 sites that are proposed to be deleted from Appendix 1, and therefore from the proposals map.

Changes to the proposals sites also affects other maps within the Core Strategy. If the changes are progressed after the Regulation 19 consultation, these other maps will also need to be amended to add/remove the sites. The specific map references for each site is shown in brackets below.

1. **New CAZ Shopping Frontage: Charing Cross Road** (changes already shown in Key Diagram and Figure 38 Retail)
2. **Proposals Site 21: Site bounded by Shroton street, Cosway Street, Bell Street and Stalbridge Street** (Figure 29 NWEDA)
3. **Proposals Site 22: Site bounded by Luton Street, Bedlow Close, Capland Street and 60 Penfold Street** (Figure 29 NWEDA)
4. **Proposals Site 23: Site bounded by Edgware Road, Hall Place and Crompton Street (known as Parsons House North)** (Figure 29 NWEDA)
5. **Proposals Site 24: Site bounded by Lilestone Street and Lisson Grove** (Figure 29 NWEDA)
6. **Proposals Site 25: Westbourne Green, bounded by Grand Union Canal and Westbourne Green Park** (Figure 29 NWEDA)
7. **Proposals Site 28: Ebury Bridge** (Figure 26 Pimlico)
8. **Proposals Site 29: Southern Westminster** (Figure 26 Pimlico)
9. **Proposals 33: Tollgate Gardens** (Figure 33 St John's Wood)
10. **Proposals Site 34: Knightsbridge/ Hyde Park Barracks** (Figure 24 Knightsbridge)
11. **Deleted Proposals Sites** (Figure 29 NWEDA and Figure 17 Victoria)

Appendix 2

Equalities and Health objectives and sub-Criteria for the IIA: Based on The Single Equalities Scheme, Equalities Impact Assessment (2008) and Health and Well-being Impact Assessment (2006)

Equalities

There are 6 protected characteristics as set out in the Equality Act 2010. These are: Age; Disability; Gender reassignment; Pregnancy and maternity; Race- this includes ethnic or national origins; colour or nationality; Religion or belief –this includes lack of belief; Sex; Sexual orientation (including gender reassignment).

Westminster's draft Single Equalities Scheme contains five criteria where planning policy may have some influence, these are as follows:

1. Educational Attainment

Improve the educational attainment of looked after children and ensure the educational needs of pupils with disabilities and Special Educational Needs (SEN) continue to be met.

Improve educational attainment and meet education needs of all children (including those with disabilities and Special Educational Needs).

2. Health and well-being

Reduce levels of childhood obesity particularly amongst vulnerable groups including black and minority ethnic groups and those from low income background groups.

Increase participation in sport and leisure activities for all low participation groups (e.g. older people, those with limiting disabilities, those on low income, Black and Minority ethnic groups and young women).

- Address high levels of housing need and homelessness amongst ethnic minorities.
- Address poorer life chances and lower life expectancy amongst rough sleepers.
- Increase housing provision for people with learning disabilities.

3. Economic well-being

Help adults into work and tackle child poverty by increasing the number of vulnerable parents engaged in employment, education and training.

Reduce the number of young people not in education, employment or training.

4. Staying safe

Tackle hate crime.

5. Place –shaping and Community

Foster an inclusive Westminster community and improve access for people with sensory or mobility impairments in the public realm and managing the highway network to ensure that disabled people can get about. Enhance neighbourhoods most in need of renewal, by improving housing and economic opportunities in areas with improved community facilities and attractive neighbourhood environments.

Based on the above criteria and the objectives in the council's Equality Impact Assessment the following key equality objectives have been formulated and used in the Integrated Impact Assessment.

1. Community Cohesion/ Place Shaping Objective

To ensure development contributes to creating cohesive inclusive communities by encouraging social interaction between groups.

- Will promote positive relationships between communities or groups creating a more inclusive community?
- Improve access for people with sensory or mobility impairments in the public realm and managing the highway network to ensure that disabled people can get about.
- Enhance neighbourhoods most in need of renewal, by improving housing and economic opportunities in areas with improved community facilities and attractive neighbourhood environments.

2. Economic Well-being Objective

To improve access to education, training and employment opportunities across equality groups in Westminster.

- Will it increase the number of young people in education, employment or training?
- Will it improve educational attainment and meet education needs of all children (including those with disabilities and Special Educational Needs)?
- Will it help adults into work and tackle child poverty by increasing the number of vulnerable parents engaged in employment, education and training?

3. Deprivation Objective

To maintain and encourage sustainable economic growth and support needs of groups in the renewal areas.

- Will it provide employment opportunities for out of work residents in the renewal areas?
- Will it support the delivery of Local Area Renewal Partnership renewal plans to meet the needs of deprived groups in these communities?

4. Health & Wellbeing Objective

To increase the development of a range of housing, open spaces, green infrastructure, sports and leisure facilities that maintain and help to encourage healthy lifestyles and promotes well-being in Westminster's community.

- Reduce levels of childhood obesity particularly amongst vulnerable groups including black and minority ethnic groups and those from low income background groups.
- Increase participation in sport and leisure activities for all low participation groups (e.g. older people, those with limiting disabilities, those on low income, Black and Minority ethnic groups and young women).
- Address high levels of housing need and homelessness amongst ethnic minorities.
- Address poorer life chances and lower life expectancy amongst rough sleepers.
- Increase housing provision for people with learning disabilities.
- Tackle hate crime
-

Health and Wellbeing

The following objectives are based on the Westminster Health and Well-being Impact Assessment (October 2006):

Impacts considered on the following groups:

Population groups – HIA	
Children 0-16	Unemployed
Young Adults 16-25	Low Income
Adults 25-65	Homeless / Street Community
Older Adults 65+	Refugees and asylum seekers
	Ethnic groups
People with alcohol and other drug problems	Learning difficulties
People with long term illness	Physical disabilities
People with mental health	Carers

Residents	People who experience domestic violence
Visitors	

Health Impact Assessment Objectives.

Lifestyle Objectives

To encourage development that will encourage healthier lifestyle choices across Westminster.

- Will it provide access to a healthy diet?
- Will it encourage a physically active lifestyle?
- Will developments encourage the safe and responsible consumption of alcohol?
- Individual empowerment .

Live Work Factors

To protect and enhance the quality of the local environment and the public realm by reducing pollution and promoting sustainable transport.

- Will it improve the quality of the local environment?
- Will it improve internal and external air quality?
- Will it improve access through better pedestrian / cycle routes and sustainable transport?
- Will it reduce noise pollution

Socio – economic Factors

To ensure buildings and spaces create a range of healthy and safe, living and working environments.

- Will it promote community safety?
- Will it reduce crime, fear of crime and disorder?
- Will it create safer places which lead to a reduction in accidents?
- Will it improve access to education, training and employment?
- Will it promote healthy workspaces?
- Access to arts and leisure
- Access to services
- Will it improve housing conditions?

1. Integrated Impact Assessment: NPPF General in paragraphs 1.7, 1.8, 1.12 and Glossary; Sustainable development in paragraphs 1.1,1.8,1.12; 4.23 and Glossary; Sustainable Economic Growth in Forward and paragraphs 1.7 and 1.8.			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it promote positive relationships between communities and groups of people?	0	
	• Does it provide equal opportunities for use, function and access to the built environment for all equality groups?	0	
	• Will it empower communities?	0	

	<ul style="list-style-type: none"> • Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> • Will it reduce actual level of crime?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce fear of crime?* 	0	
	<ul style="list-style-type: none"> • Will it tackle hate crime? 	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	<ul style="list-style-type: none"> • Will it reduce homelessness?* 	0	
	<ul style="list-style-type: none"> • Will it increase a range of affordable housing?* 	0	
	<ul style="list-style-type: none"> • Will it reduce the number of unfit homes? 	0	
	<ul style="list-style-type: none"> • Will it result in high quality homes?*** 	0	
	<ul style="list-style-type: none"> • Will it improve life chances for all equality strand groups 	0	
4. To promote and improve health and well – being	<ul style="list-style-type: none"> • Will it help health and equalities?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce death rates? 	0	
	<ul style="list-style-type: none"> • Will it improve access/movement? 	0	
	<ul style="list-style-type: none"> • Will it encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it increase participation in sport and leisure activities for all low participation groups? 	0	
	<ul style="list-style-type: none"> • Will it provide access to a healthy diet and encourage healthy lifestyles? 	0	

	<ul style="list-style-type: none"> • Will it encourage a physically active lifestyle (helping to reduce obesity)? 	0	
	<ul style="list-style-type: none"> • Will it create healthy workplaces? 	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> • Will energy need be met through renewable sources? 	0	
	<ul style="list-style-type: none"> • Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?* 	0	
	<ul style="list-style-type: none"> • Will it reduce ozone depleting emissions? 	0	
	<ul style="list-style-type: none"> • Will it reduce emissions through retrofitting new technology? 	0	
	<ul style="list-style-type: none"> • Will it reduce heat island effects on people and property? 	0	
6. To reduce the use of natural resources e.g. water, energy	<ul style="list-style-type: none"> • Will it reduce water consumption? 	0	
	<ul style="list-style-type: none"> • Will it reduce energy consumption?* 	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> • Will it minimise flood risk from all sources of flooding?* 	0	
	<ul style="list-style-type: none"> • Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> • Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> • Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> • Will it preserve SINCS? 	0	

	<ul style="list-style-type: none"> • Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> • Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> • Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> • Will it reduce emissions of key pollutants? 	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> • Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> • Will it reduce noise concerns and complaints? 	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> • Will it reduce traffic volumes? 	0	
	<ul style="list-style-type: none"> • Will it encourage walking and cycling?* 	0	
	<ul style="list-style-type: none"> • Will it increase proportion of journeys using modes other than a car? 	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> • Will lead to reduced consumption of materials and resources? 	0	
	<ul style="list-style-type: none"> • Will reduce household waste? 	0	
	<ul style="list-style-type: none"> • Will increase recovery recycling and re-use? 	0	
	<ul style="list-style-type: none"> • Will reduce construction waste? 	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> • Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> • Will it protect strategic views? 	0	

	<ul style="list-style-type: none"> Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> Will reduce litter? 	0	
	<ul style="list-style-type: none"> Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> Will it improve open space?* 	0	
	<ul style="list-style-type: none"> Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> Will it improve qualifications and skills?*** 	0	
	<ul style="list-style-type: none"> Will reduce unemployment?* 	0	
	<ul style="list-style-type: none"> Will provide jobs for most in need?*** 	0	
	<ul style="list-style-type: none"> Will improve earnings? 	0	
	<ul style="list-style-type: none"> Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training? 	0	

17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	0
	• Will improve business resilience and economy?	0
	• Will it encourage new business start ups and opportunities for local people?*	0
	• Will it promote business in key sectors?	0
	• Will it promote regeneration, reducing disparity?**	0
	• Will it provide employment opportunities for out of work residents?	0

For the **EIA** the following protected characteristics were considered:

Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation

Coloured asterisks **show SA sub-criteria also relevant to **EIA** and **HA** consideration

IIA Assessment

Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –

Overall Summary 0

The additional wording in the text provides an update to take into account the NPPF. This additional wording however does not fundamentally alter the sustainability of

the Core Strategy NPPF Revision. The adopted Core Strategy was subject to Core Strategy Sustainability Appraisal Report (November 2009), an Equalities Impact Assessment (April 2010) and Health Impact Assessment (April 2010). The impact of this text is therefore neutral for all IIA objectives.

Reasonable Alternatives

There are no reasonable alternatives because without the changes the council may run the risk of the Core Strategy not being in conformity with the NPPF.

Long Term positive effect – N/A

Short term – N/A.

Long term negative effects – N/A

Mitigation/Change to plan – N/A

Cumulative effects – N/A

Uncertainties/risks – N/A

Monitoring significant effects – N/A

2. Integrated Impact Assessment: Design Core Strategy NPPF Revisions in the following paragraphs: 2.15, 2.33, 2.53, 2.56, 5.8, 5.14, 5.22, 5.24, 5.64, 5.66 and Policy CS27 and Policy Reason Justifications for CS27, CS34 and CS39.

Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
------------------------------------------------	-------------------------------------------------------------	-------	----------

1. To create cohesive, inclusive and safe communities	<ul style="list-style-type: none"> • Will improve access to local services? 	0	
	<ul style="list-style-type: none"> • Shopping? 	0	
	<ul style="list-style-type: none"> • Community facilities? 	0	
	<ul style="list-style-type: none"> • Will in increase ability to influence decision making (neighbourhoods)? 	0	
	<ul style="list-style-type: none"> • Will it promote positive relationships between communities and groups of people? 	0	
	<ul style="list-style-type: none"> • Does it provide equal opportunities for use, function and access to the built environment for all equality groups? 	0	
	<ul style="list-style-type: none"> • Will it empower communities? 	0	
	<ul style="list-style-type: none"> • Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> • Will it reduce actual level of crime?* 	0	
	<ul style="list-style-type: none"> • Will it reduce fear of crime?* 	0	
	<ul style="list-style-type: none"> • Will it tackle hate crime? 	0	
3. To ensure the provision of appropriate housing types to	<ul style="list-style-type: none"> • Will it reduce homelessness?* 	0	

reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it increase a range of affordable housing?*	0	Positive policies to reduce greenhouse gas emissions may in the long run reduce death rates. There is some evidence of higher levels of infant mortality where greenhouse gasses have increased.
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes?*	0	
	• Will it improve life chances for all equality strand groups	0	
4. To promote and improve health and well – being	• Will it help health and equalities?*	0	
	• Will it reduce death rates?	+	
	• Will it improve access/movement?	0	
	• Will it encourage healthy lifestyles?	0	
	• Will it increase participation in sport and leisure activities for all low participation groups?	0	
	• Will it provide access to a healthy diet and encourage healthy lifestyles?	0	
	• Will it encourage a physically active lifestyle (helping to reduce obesity)?	0	
• Will it create healthy workplaces?	0		

5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> Will energy need be met through renewable sources? 	+	<p>The NPPF places a requirement on Local Planning Authorities to adopt proactive policies and plans to mitigate and adapt to climate change. To support these aims the following alterations have been made to the Core Strategy in the Core Strategy NPPF Revision version. The wording of Policy CS27 has been changed from Development should to Development will. This is a major and positive alteration in terms of seeking to reduce greenhouse gas emissions in Westminster and therefore London as a whole.</p>
	<ul style="list-style-type: none"> Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?* 	+	<p>The wording of Policy CS28 Health Safety and Well being has been changed to include the words <i>The development of major infrastructure projects will need to mitigate, avoid or remedy environmental and local impacts, both in construction and operation.</i></p>
	<ul style="list-style-type: none"> Will it reduce ozone depleting emissions? 	+	
	<ul style="list-style-type: none"> Will it reduce emissions through retrofitting new technology? 	+	
	<ul style="list-style-type: none"> Will it reduce heat island effects on people and property? 	+	<p>For Policy CS34 Open Space, the RJ has been amended to include the words <i>reduce the impact of the urban heat island effect.</i></p>

			<p>Energy Infrastructure Paragraph 5.64 includes the following new words in terms of Heat and power networksparticularly for Westminster, these networks are a significant part of the strategy to deliver radical reductions in greenhouse gas emissions.</p> <p>Policy CS39 Renewable Energy RJ This now reads The use of renewable energy will enable development in Westminster to contribute <i>to the necessary radical reduction in greenhouse gasses.</i></p> <p>Westminster has the 5th highest carbon emissions in the UK from actions that can be addressed through actions of the local authority. Historically Westminster has always had the highest emissions in London, and over the last few years Westminster has not seen any major reductions in its emissions whereas</p>
--	--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			most other authorities have managed to reduce emission. In 2010 Westminster's carbon emissions reached 3,213 kilo tonnes from 3,045 in 20098 and 3,314 in 2005. (Information from Department of Energy Climate Change for all local authorities. Department of Energy and Climate Change August 2012 Dataset 6222).
6. To reduce the use of natural resources e.g. water, energy	• Will it reduce water consumption?	+	
	• Will it reduce energy consumption?*	+	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	• Will it minimise flood risk from all sources of flooding?*	0	Paragraph 5.24 additional text has been added to state <i>'and develop strong policies to reduce risk'</i> This is an update to the previous reference to PPS 25, which has now been replaced by the NPPF.
	• Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?*	0	
8. To protect, enhance and create environments that encourage and support biodiversity	• Will it reduce combined sewer overflow events?	0	
	• Will it protect, enhance and increase biodiversity and protect habitats?	0	
	• Will it preserve SINCs?	0	

	<ul style="list-style-type: none"> • Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> • Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> • Will it improve air quality? * 	+	
	<ul style="list-style-type: none"> • Will it reduce emissions of key pollutants? 	+	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> • Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> • Will it reduce noise concerns and complaints? 	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> • Will it reduce traffic volumes? 	0	
	<ul style="list-style-type: none"> • Will it encourage walking and cycling?* 	+	
	<ul style="list-style-type: none"> • Will it increase proportion of journeys using modes other than a car? 	+	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> • Will lead to reduced consumption of materials and resources? 	+	
	<ul style="list-style-type: none"> • Will reduce household waste? 	+	
	<ul style="list-style-type: none"> • Will increase recovery recycling and re-use? 	+	
	<ul style="list-style-type: none"> • Will reduce construction waste? 	+	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> • Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> • Will it protect strategic views? 	0	

	<ul style="list-style-type: none"> • Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> • Will it help preserve, enhance and record archaeological features and their settings? 	0	
	<ul style="list-style-type: none"> • Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> • Will reduce litter? 	0	
	<ul style="list-style-type: none"> • Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> • Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> • Will it improve open space?* 	0	
	<ul style="list-style-type: none"> • Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> • Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> • Will it improve qualifications and skills?*** 	0	
	<ul style="list-style-type: none"> • Will reduce unemployment?* 	0	
	<ul style="list-style-type: none"> • Will provide jobs for most in need?*** 	0	
	<ul style="list-style-type: none"> • Will improve earnings? 	0	
	<ul style="list-style-type: none"> • Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training? 	0	

17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	0	
	• Will improve business resilience and economy?	0	
	• Will it encourage new business start ups and opportunities for local people?*	0	
	• Will it promote business in key sectors?	0	
	• Will it promote regeneration, reducing disparity?**	0	
	• Will it provide employment opportunities for out of work residents?	0	
<p>For the EIA the following protected characteristics were considered:</p> <p>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation</p> <p>Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration</p>			
<p>IIA Assessment</p> <p>Major positive ++ , Minor positive + Neutral 0, Minor negative - Major negative - -</p> <p>Overall Summary</p> <p>The changes to the Core Strategy resulting from the NPPF are most positive for IIA Objective 5. The alterations to Policy CS27 Design now requires development to</p>			

reduce energy use and emissions that contribute to climate change during the life-cycle of the development and ensure the reduction, reuse or recycling of resources and materials including water waste and aggregates. There are other benefits to this policy approach in terms of positive outcomes in terms of Improving air quality (Objective 9) and reducing consumption of materials and resources (Objective 12) and may in the long term reduce death rates (Objective 4). The Core strategy (NPPF Revision) along with further detailed policies will provide a proactive strategy to deliver low carbon and renewable energies for Westminster and its built environment at the development and neighbourhood scale, in accordance with NPPF requirements.

Reasonable Alternatives

The NPPF states 'that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions....'The wording of Policy CS27 which has been changed from Development **should** to Development **will**, helps fulfil this requirement and seeks to ensure compliance with the NPPF.

Long Term positive effect – Positive policies to reduce greenhouse gas emissions may in the long run reduce death rates.

Short term – The policies will help in the reduction of greenhouse gas emissions

Long term negative effects – Could impact negatively on the historic built environment if not sensitively installed. It is recognised there are challenges to in achieving on site renewable generation`

Mitigation/Change to plan – The policy approach includes consideration of practicability and appropriateness of on-site renewable. Detailed policies and supporting guidance will be provided within the City Management Plan and Sustainable Buildings Supplementary Planning Document.

Cumulative effects – To achieve an end objective of reducing greenhouse gas emissions there needs to be a critical mass of these developments in Westminster.

Uncertainties/risks – Developers will usually argue that development which will reduce energy use and emissions that contribute to climate change during the life-cycle of the development will affect the viability of their scheme.

Monitoring significant effects – Levels of greenhouse gas emissions, including percentage reduction of carbon dioxide emissions, heat monitoring, levels of energy usage from exhaustible resources.

3. Integrated Impact Assessment: Communications Core Strategy NPPF Revisions in the following paragraphs: 2.53 and 5.40.

Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	<ul style="list-style-type: none"> • Will improve access to local services? 	0	
	<ul style="list-style-type: none"> • Shopping? 	0	
	<ul style="list-style-type: none"> • Community facilities? 	0	
	<ul style="list-style-type: none"> • Will in increase ability to influence decision making (neighbourhoods)? 	0	

	<ul style="list-style-type: none"> • Will it promote positive relationships between communities and groups of people? 	0	
	<ul style="list-style-type: none"> • Does it provide equal opportunities for use, function and access to the built environment for all equality groups? • 	0	
	<ul style="list-style-type: none"> • Will it empower communities? 	0	
	<ul style="list-style-type: none"> • Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> • Will it reduce actual level of crime?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce fear of crime?* 	0	
	<ul style="list-style-type: none"> • Will it tackle hate crime? 	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	<ul style="list-style-type: none"> • Will it reduce homelessness?* 	0	
	<ul style="list-style-type: none"> • Will it increase a range of affordable housing?* 	0	
	<ul style="list-style-type: none"> • Will it reduce the number of unfit homes? 	0	
	<ul style="list-style-type: none"> • Will it result in high quality homes?*** 	0	
	<ul style="list-style-type: none"> • Will it improve life chances for all equality strand groups 	0	
4. To promote and improve health and well – being	<ul style="list-style-type: none"> • Will it help health and equalities?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce death rates? 	0	
	<ul style="list-style-type: none"> • Will it improve access/movement? 	0	

	<ul style="list-style-type: none"> • Will it encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it increase participation in sport and leisure activities for all low participation groups? 	0	
	<ul style="list-style-type: none"> • Will it provide access to a healthy diet and encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it encourage a physically active lifestyle (helping to reduce obesity)? 	0	
	<ul style="list-style-type: none"> • Will it create healthy workplaces? 	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> • Will energy need be met through renewable sources? 	0	
	<ul style="list-style-type: none"> • Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?* 	0	
	<ul style="list-style-type: none"> • Will it reduce ozone depleting emissions? 	0	
	<ul style="list-style-type: none"> • Will it reduce emissions through retrofitting new technology? 	0	
	<ul style="list-style-type: none"> • Will it reduce heat island effects on people and property? 	0	
6. To reduce the use of natural resources e.g. water, energy	<ul style="list-style-type: none"> • Will it reduce water consumption? 	0	
	<ul style="list-style-type: none"> • Will it reduce energy consumption?* 	0	

7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> • Will it minimise flood risk from all sources of flooding?* • Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> • Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> • Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> • Will it preserve SINCs? 	0	
	<ul style="list-style-type: none"> • Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> • Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> • Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> • Will it reduce emissions of key pollutants? 	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> • Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> • Will it reduce noise concerns and complaints? 	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> • Will it reduce traffic volumes? 	0	
	<ul style="list-style-type: none"> • Will it encourage walking and cycling?* 	0	
	<ul style="list-style-type: none"> • Will it increase proportion of journeys using modes other than a car? 	0	
12. To reduce waste production and increase recycling, recovery and	<ul style="list-style-type: none"> • Will lead to reduced consumption of materials and resources? 	0	

use of all waste	<ul style="list-style-type: none"> • Will reduce household waste? 	0	
	<ul style="list-style-type: none"> • Will increase recovery recycling and re-use? 	0	
	<ul style="list-style-type: none"> • Will reduce construction waste? 	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> • Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> • Will it protect strategic views? 	0	
	<ul style="list-style-type: none"> • Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> • Will it help preserve, enhance and record archaeological features and their settings? 	0	
	<ul style="list-style-type: none"> • Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> • Will reduce litter? 	0	
	<ul style="list-style-type: none"> • Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> • Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> • Will it improve open space?* 	0	
	<ul style="list-style-type: none"> • Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> • Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities	<ul style="list-style-type: none"> • Will it improve qualifications and skills?*** 	0	

for education, training and employment and support sustainable growth	• Will reduce unemployment?*	0	
	• Will provide jobs for most in need?***	0	
	• Will improve earnings?	0	
	• Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training?	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	+	As part of Infrastructure- Paragraph 4.40 now states <i>This includes the necessary communications infrastructure particularly high speed broadband, and reliable and sustainable energy supply necessary to support economic growth.</i>
	• Will improve business resilience and economy?	+	
	• Will it encourage new business start ups and opportunities for local people?*	+	
	• Will it promote business in key sectors?	+	
	• Will it promote regeneration, reducing disparity?***	+	
	• Will it provide employment opportunities for out of work residents?	+	
<p>For the EIA the following protected characteristics were considered:</p> <p>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation</p> <p>Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration</p>			

IIA Assessment

Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –

Overall Summary 0

The changes to the Core Strategy resulting from the NPPF are positive for IIA Objective 17. Delivery of improved communications is necessary to enable Westminster and London as a whole to compete internationally in terms of business and supports economic growth.

Reasonable Alternatives

Paragraph 43 of the NPPF states that in preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. As this is required there is no alternative but to provide this text..

Long Term positive effect – Sustainable economic growth in Westminster

Short term – Sustainable economic growth in Westminster

Long term negative effects –

Mitigation/Change to plan – None required

Cumulative effects – May encourage new businesses and increased opportunities for local people and in particular employment opportunities for out of work residents
(EIA)

Uncertainties/risks – As Westminster improves its communications infrastructure, other parts of London, the UK and the world will also improve. Planning may have limited control over the installation of equipment where planning permission is not required

Monitoring significant effects – AMR, Westminster (City of) Local Economic Assessment Baseline Study (2011)

4. Integrated Impact Assessment: Housing, Core Strategy NPPF Revisions in Policy CS14 and associated Reasoned Justification and Appendix 3 also includes alterations resulting from changes in The London Plan in paragraphs 2.18, 2.43 and Policy CS14 RJ; Figure 56 and Appendix 4. Affordable Rent Core in Figure 55. Affordable Housing (alterations resulting from changes in The London Plan) in paragraphs 2.43, 4.15, Policy CS16 RJ and Figure 55.

Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	<ul style="list-style-type: none"> • Will improve access to local services? 	0	
	<ul style="list-style-type: none"> • Shopping? 	0	
	<ul style="list-style-type: none"> • Community facilities? 	0	
	<ul style="list-style-type: none"> • Will in increase ability to influence decision making (neighbourhoods)? 	0	
	<ul style="list-style-type: none"> • Will it promote positive relationships between communities and groups of people? 	0	

	<ul style="list-style-type: none"> • Does it provide equal opportunities for use, function and access to the built environment for all equality groups? 	0	
	<ul style="list-style-type: none"> • Will it empower communities? 	0	
	<ul style="list-style-type: none"> • Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> • Will it reduce actual level of crime?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce fear of crime?* 	0	
	<ul style="list-style-type: none"> • Will it tackle hate crime? 	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	<ul style="list-style-type: none"> • Will it reduce homelessness?* 	+	<p>The London Plan requires Westminster to deliver as a minimum an average of 770 new homes annually (this figure was previously 680).</p> <p>Paragraph 2.43 and the RJ for Policy CS16 now states that Westminster will seek to maximise the delivery of affordable housing and <i>exceed 30% of new housing being affordable over the plan period.</i></p> <p>Paragraph 4.15 changes the social intermediate split for social and intermediate housing to 60;40 in line with The London Plan (previously</p>
	<ul style="list-style-type: none"> • Will it increase a range of affordable housing?* 	0	
	<ul style="list-style-type: none"> • Will it reduce the number of unfit homes? 	0	
	<ul style="list-style-type: none"> • Will it result in high quality homes?*** 	+	
	<ul style="list-style-type: none"> • Will it improve life chances for all equality strand groups 	0	

			<p>70:30)</p> <p>Figure 55 includes the additional wording <i>Working to develop an appropriate affordable rent product for Westminster</i>. To meet needs through additional flexibility.</p> <p>Policy CS14 – Optimising Housing Delivery includes a change to the wording of the policy as follows: <i>to ensure a continuous five year supply of deliverable sites...with a 5% buffer...</i></p> <p>Policy CS 14 additional text for exception to the loss of residential units where ‘2 flats are being joined to create a family-sized dwelling’.</p> <p>Windfall housing accounts for 80% of housing delivered in Westminster. The RJ to Policy CS14 has been amended to state that the inclusion of the windfall and small sites allowances <i>reflects the advice in the</i></p>
--	--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<i>NPPF as such sites have consistently come forward and will continue to provide a reliable source of housing...</i>
4. To promote and improve health and well – being	• Will it help health and equalities?*	0	Access to housing for the homeless will reduce death rates. It may also have a positive impact for those who are currently living in overcrowded or unhealthy housing .
	• Will it reduce death rates?	0	
	• Will it improve access/movement?	0	
	• Will it encourage healthy lifestyles?	0	
	• Will it increase participation in sport and leisure activities for all low participation groups?	0	
	• Will it provide access to a healthy diet and encourage healthy lifestyles?	0	
	• Will it encourage a physically active lifestyle (helping to reduce obesity)?	0	
	• Will it create healthy workplaces?	0	
5. To reduce greenhouse gas emissions and support climate change adaption	• Will energy need be met through renewable sources?	0	
	• Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*	0	
	• Will it reduce ozone depleting emissions?	0	
	• Will it reduce emissions through retrofitting new technology?	0	

	<ul style="list-style-type: none"> Will it reduce heat island effects on people and property? 	0	
6. To reduce the use of natural resources e.g. water, energy	<ul style="list-style-type: none"> Will it reduce water consumption? 	0	
	<ul style="list-style-type: none"> Will it reduce energy consumption?* 	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> Will it minimise flood risk from all sources of flooding?* Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> Will it preserve SINCs? 	0	
	<ul style="list-style-type: none"> Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> Will it reduce emissions of key pollutants? 	+	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> Will it reduce noise concerns and complaints? 	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and	<ul style="list-style-type: none"> Will it reduce traffic volumes? 	0	
	<ul style="list-style-type: none"> Will it encourage walking and cycling?* 	0	

the use of public transport	<ul style="list-style-type: none"> Will it increase proportion of journeys using modes other than a car? 	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> Will lead to reduced consumption of materials and resources? 	0	
	<ul style="list-style-type: none"> Will reduce household waste? 	0	
	<ul style="list-style-type: none"> Will increase recovery recycling and re-use? 	0	
	<ul style="list-style-type: none"> Will reduce construction waste? 	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> Will it protect strategic views? 	0	
	<ul style="list-style-type: none"> Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> Will reduce litter? 	0	
	<ul style="list-style-type: none"> Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open	<ul style="list-style-type: none"> Will it improve open space?* 	0	

space throughout the borough	<ul style="list-style-type: none"> • Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> • Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> • Will it improve qualifications and skills?*** 	0	
	<ul style="list-style-type: none"> • Will reduce unemployment?* 	0	
	<ul style="list-style-type: none"> • Will provide jobs for most in need?*** 	0	
	<ul style="list-style-type: none"> • Will improve earnings? 	0	
	<ul style="list-style-type: none"> • Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training? 	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> • Will improve business development and environment? 	0	
	<ul style="list-style-type: none"> • Will improve business resilience and economy? 	0	
	<ul style="list-style-type: none"> • Will it encourage new business start ups and opportunities for local people?* 	0	
	<ul style="list-style-type: none"> • Will it promote business in key sectors? 	0	
	<ul style="list-style-type: none"> • Will it promote regeneration, reducing disparity?*** 	0	
	<ul style="list-style-type: none"> • Will it provide employment opportunities for out of work residents? 	0	
<p>For the EIA the following protected characteristics were considered:</p> <p>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation</p>			

Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration

IIA Assessment

Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –

Overall Summary 0

The changes resulting from the NPPF and The London Plan result in a positive outcome for IIA Objective 3 in terms of the provision of additional housing units in Westminster. The addition of new wording to CS 14 which allows the reduction of residential units where 2 flats are being joined to create a family sized dwelling is likely to have only a very minor impact on overall supply as this event does not occur that often. Developers normally prefer to bring forward smaller sized units which has historically lead to a shortage of family sized accommodation in Westminster.

The consultation version Sustainability Appraisal found the changes to be positive for the affordable housing sub-criteria In Objective 3. However, further consideration of the changes in the NPPF revision means that the changes to Policy CS16 are of a minor nature and will not result in any significant positive effects. The assessment of this matter has therefore now been included as neutral.

Reasonable Alternatives

There are no reasonable alternative to the NPPF policy revisions which have been dictated by alterations to targets in the London Plan. A reasonable alternative to the additional wording in CS14 would be to have the original wording in CS14 (business as usual) and the sustainability appraisal assessment for this is set out on pages 70-75 of the Core Strategy Sustainability Appraisal Appendix.

Short/Medium/Long Term positive effect – An increase in the required provision of residential units in Westminster.

Short/Medium/Long term negative effects – Additional pressure on infrastructure with an increased residential population. Increased residential development may result in less economic development.

Mitigation/Change to plan – Policy CS33 ensures the construction of social and community uses alongside residential growth.

Cumulative effect – None identified

Uncertainties/risks – Depends on developers bringing forward schemes.

Monitoring significant effects – AMR

5. Integrated Impact Assessment: Heritage Core Strategy NPPF Revisions in Policy CS24 RJ and Glossary.

Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	<ul style="list-style-type: none"> • Will improve access to local services? 	0	
	<ul style="list-style-type: none"> • Shopping? 	0	
	<ul style="list-style-type: none"> • Community facilities? 	0	
	<ul style="list-style-type: none"> • Will in increase ability to influence decision making (neighbourhoods)? 	0	
	<ul style="list-style-type: none"> • Will it promote positive relationships between communities and groups of people? 	0	
	<ul style="list-style-type: none"> • Does it provide equal opportunities for use, function and access to the built environment for all equality groups? 	0	
	<ul style="list-style-type: none"> • Will it empower communities? 	0	
	<ul style="list-style-type: none"> • Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> • Will it reduce actual level of crime?*	0	
	<ul style="list-style-type: none"> • Will it reduce fear of crime?*	0	
	<ul style="list-style-type: none"> • Will it tackle hate crime? 	0	

3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it reduce homelessness?*	0	
	• Will it increase a range of affordable housing?*	0	
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes?***	0	
	• Will it improve life chances for all equality strand groups	0	
4. To promote and improve health and well – being	• Will it help health and equalities?***	0	
	• Will it reduce death rates?	0	
	• Will it improve access/movement?	0	
	• Will it encourage healthy lifestyles?	0	
	• Will it increase participation in sport and leisure activities for all low participation groups?	0	
	• Will it provide access to a healthy diet and encourage healthy lifestyles?	0	
	• Will it encourage a physically active lifestyle (helping to reduce obesity)?	0	
	• Will it create healthy workplaces?	0	
5. To reduce greenhouse gas emissions and support climate	• Will energy need be met through renewable sources?	0	

change adaption	<ul style="list-style-type: none"> Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?* 	0	
	<ul style="list-style-type: none"> Will it reduce ozone depleting emissions? 	0	
	<ul style="list-style-type: none"> Will it reduce emissions through retrofitting new technology? 	0	
	<ul style="list-style-type: none"> Will it reduce heat island effects on people and property? 	0	
6. To reduce the use of natural resources e.g. water, energy	<ul style="list-style-type: none"> Will it reduce water consumption? 	0	
	<ul style="list-style-type: none"> Will it reduce energy consumption?* 	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> Will it minimise flood risk from all sources of flooding?* Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> Will it preserve SINC's? 	0	
	<ul style="list-style-type: none"> Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> Will it reduce emissions of key pollutants? 	0	

10. To reduce noise and impact of noise	• Will it reduce noise levels*	0	
	• Will it reduce noise concerns and complaints?	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	• Will it reduce traffic volumes?	0	
	• Will it encourage walking and cycling?*	0	
	• Will it increase proportion of journeys using modes other than a car?	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	• Will lead to reduced consumption of materials and resources?	0	
	• Will reduce household waste?	0	
	• Will increase recovery recycling and re-use?	0	
	• Will reduce construction waste?	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	• Will protect heritage sites and cultural value?	0	Amendments to wording in CS24 RJ as follows: To compete effectively with other major, world class cities in the built environment must be respected and refurbished sensitively as <u>in a manner</u> appropriate <u>to its significance</u> .
	• Will it protect strategic views?	0	
	• Will it protect listed buildings and their settings?	0	
	• Will it help preserve, enhance and record archaeological features and their settings?	0	
	• Will it help preserve, enhance and record archaeological features and their settings?	0	
			Amendments to wording in the Core

			<p>Strategy NPPF Revision Heritage assets Glossary Definition as follows:</p> <p><u>A building, monument, site place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. See Designated heritage assets. Other heritage assets may be identified by the local planning authority (including local listings.</u></p> <p>The following wording has been deleted,</p> <p>Inherited assets which people identify and value and which reflects their evolving knowledge, culture, beliefs and traditions. Can include Conservation Areas, Listed Buildings, Unlisted Buildings of Merit, historic parks, gardens and squares, archaeological deposits and World Heritage Sites.</p>
14. To enhance public realm and street environment	<ul style="list-style-type: none"> • Will reduce litter? 	0	

	<ul style="list-style-type: none"> • Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> • Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> • Will it improve open space?* 	0	
	<ul style="list-style-type: none"> • Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> • Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> • Will it improve qualifications and skills?*** 	0	
	<ul style="list-style-type: none"> • Will reduce unemployment?* 	0	
	<ul style="list-style-type: none"> • Will provide jobs for most in need?*** 	0	
	<ul style="list-style-type: none"> • Will improve earnings? 	0	
	<ul style="list-style-type: none"> • Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training? 	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> • Will improve business development and environment? 	0	
	<ul style="list-style-type: none"> • Will improve business resilience and economy? 	0	
	<ul style="list-style-type: none"> • Will it encourage new business start ups and opportunities for local people?* 	0	
	<ul style="list-style-type: none"> • Will it promote business in key sectors? 	0	
	<ul style="list-style-type: none"> • Will it promote regeneration, reducing disparity?*** 	0	

	<ul style="list-style-type: none"> • Will it provide employment opportunities for out of work residents? 	0	
<p>For the EIA the following protected characteristics were considered: Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation</p> <p>Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration</p>			
<p>IIA Assessment</p> <p>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</p> <p>Overall Summary 0</p> <p>There is a neutral impact on the IIA objectives from the amendments to the wording for heritage The changes will have no impact on the policy outcome.</p> <p>Reasonable Alternatives</p> <p>The wording in the glossary has been changed to be in conformity with the definition for Heritage asset in the NPPF. There is no reasonable alternative to this approach.</p>			
<p>Long Term positive effect – N/A</p> <p>Short term – N/A</p>			

Long term negative effects – N/A

Mitigation/Change to plan – N/A

Cumulative effects – N/A

Uncertainties/risks – N/A

Monitoring significant effects – N/A

6. Integrated Impact Assessment: Neighbourhood Planning: Changes resulting from the Localism Act 2011 as follows: Core Strategy NPPF Revision Figure 1; Paragraphs 1.2; 1.10; 6.6; 6.7; 6.8; 6.10 (deleted); Paragraph 6.9 All Neighbourhood Planning and Community Governance) and Appendix 3.			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	Inclusion of Neighbourhood planning in the Core Strategy NPPF Revision version Paragraph 1.2 additional text: <i>Neighbourhood Plans can also be prepared at the local level by communities. These plans only apply to the area which the local group represents, but within these areas, the neighbourhood-level policies have the same statutory weight as other policies in this and the London plans. More information about neighbourhood planning can be found</i>
	• Shopping?	0	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	++	
	• Will it promote positive relationships between communities and groups of people?	++	
	• Does it provide equal opportunities for use, function and access to the built environment for all equality groups?	++	
	• Will it empower communities?	++	

			<i>in Part V.</i>
	<ul style="list-style-type: none"> Will it encourage engagement in community activity 	++	Paragraph 1.10 <i>Westminster's Local Plan is a Development Plan Document. Together with the London Plan and any <u>Neighbourhood Plan(s)</u> or <u>Neighbourhood Development Orders</u>, these three documents make up the statutory development plan for the city.</i>
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> Will it reduce actual level of crime?*** 	0	
	<ul style="list-style-type: none"> Will it reduce fear of crime?* 	0	
	<ul style="list-style-type: none"> Will it tackle hate crime? 	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	<ul style="list-style-type: none"> Will it reduce homelessness?* 	0	
	<ul style="list-style-type: none"> Will it increase a range of affordable housing?* 	0	
	<ul style="list-style-type: none"> Will it reduce the number of unfit homes? 	0	
	<ul style="list-style-type: none"> Will it result in high quality homes?*** 	0	
	<ul style="list-style-type: none"> Will it improve life chances for all equality strand groups 	0	
4. To promote and improve health and well – being	<ul style="list-style-type: none"> Will it help health and equalities?*** 	0	
	<ul style="list-style-type: none"> Will it reduce death rates? 	0	

	<ul style="list-style-type: none"> • Will it improve access/movement? 	0	
	<ul style="list-style-type: none"> • Will it encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it increase participation in sport and leisure activities for all low participation groups? 	0	
	<ul style="list-style-type: none"> • Will it provide access to a healthy diet and encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it encourage a physically active lifestyle (helping to reduce obesity)? 	0	
	<ul style="list-style-type: none"> • Will it create healthy workplaces? 	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> • Will energy need be met through renewable sources? 	0	
	<ul style="list-style-type: none"> • Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?* 	0	
	<ul style="list-style-type: none"> • Will it reduce ozone depleting emissions? 	0	
	<ul style="list-style-type: none"> • Will it reduce emissions through retrofitting new technology? 	0	
	<ul style="list-style-type: none"> • Will it reduce heat island effects on people and property? 	0	
6. To reduce the use of natural resources e.g. water, energy	<ul style="list-style-type: none"> • Will it reduce water consumption? 	0	
	<ul style="list-style-type: none"> • Will it reduce energy consumption?* 	0	

7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> • Will it minimise flood risk from all sources of flooding?* • Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> • Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> • Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> • Will it preserve SINCs? 	0	
	<ul style="list-style-type: none"> • Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> • Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> • Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> • Will it reduce emissions of key pollutants? 	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> • Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> • Will it reduce noise concerns and complaints? 	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> • Will it reduce traffic volumes? 	0	
	<ul style="list-style-type: none"> • Will it encourage walking and cycling?* 	0	
	<ul style="list-style-type: none"> • Will it increase proportion of journeys using modes other than a car? 	0	
12. To reduce waste production and increase recycling, recovery and	<ul style="list-style-type: none"> • Will lead to reduced consumption of materials and resources? 	0	

use of all waste	<ul style="list-style-type: none"> • Will reduce household waste? 	0	
	<ul style="list-style-type: none"> • Will increase recovery recycling and re-use? 	0	
	<ul style="list-style-type: none"> • Will reduce construction waste? 	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> • Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> • Will it protect strategic views? 	0	
	<ul style="list-style-type: none"> • Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> • Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> • Will reduce litter? 	0	
	<ul style="list-style-type: none"> • Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> • Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> • Will it improve open space?* 	0	
	<ul style="list-style-type: none"> • Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> • Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities	<ul style="list-style-type: none"> • Will it improve qualifications and skills?*** 	0	

for education, training and employment and support sustainable growth	• Will reduce unemployment?*	0	
	• Will provide jobs for most in need?***	0	
	• Will improve earnings?	0	
	• Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training?	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	0	
	• Will improve business resilience and economy?	0	
	• Will it encourage new business start ups and opportunities for local people?*	0	
	• Will it promote business in key sectors?	0	
	• Will it promote regeneration, reducing disparity?***	0	
	• Will it provide employment opportunities for out of work residents?	0	

For the **EIA** the following protected characteristics were considered:

Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation

Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration Also see EIA for the Community Governance Review in Appendix 7 . The Cabinet Report 15 April 2012 can be found here: http://transact.westminster.gov.uk/committee/index.cfm?c_docs=Cabinet/2012/16%20April%202012

IIA Assessment

Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –

Overall Summary 0

The inclusion of Neighbourhood Planning and Community Governance in the Core Strategy –NPPF Revision is very positive for IIA Objective 1, in particular for community cohesion and empowerment. This may have a positive impact on Equalities and Health sub-criteria by encourages positive relationships within the community and a more inclusive built environment.

Reasonable Alternatives

The Localism Act 2011 introduced neighbourhood planning and the associated local planning documents –neighbourhood plans and neighbourhood development orders. There is no reasonable alternative to this statutory requirement.

Short/Medium and Long Term positive effect – Legislative changes in 2007 allowed the creation of the first modern-day parish council in London (Queens Park, North Westminster). The Localism Act 2011 introduced additional opportunities for community governance, through neighbourhood planning. A neighbourhood forum or parish council can prepare planning documents. Neighbourhood plans and neighbourhood development orders will have development plan document status. Enabling local communities (both business and residential) to prepare their own development plan documents is a significant change in devolving power to local communities.

Long term negative effects – None foreseen at this stage.

Mitigation/Change to plan – The Core Strategy NPPF Revision now includes reference to Neighbourhood Planning and Community Governance.

Cumulative effects –Will depend on the take up of parish council’s and neighbourhood forums in Westminster.

Uncertainties/risks – This will depend on the take-up of parish council’s and neighbourhood forums in Westminster and how these local communities wish to develop in the future.

Monitoring significant effects – Legal obligation to oversee the process and through joint working.

7. Integrated Impact Assessment: Duty to cooperate: Changes resulting from the Localism Act 2011 in Paragraph 6.3 and Appendix 3.			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including	Score	Comments

	EIA and HIA		
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it promote positive relationships between communities and groups of people?	0	
	• Does it provide equal opportunities for use, function and access to the built environment for all equality groups?	0	
	• Will it empower communities?	0	
	• Will it encourage engagement in community activity	0	
2. To reduce crime and fear of crime	• Will it reduce actual level of crime?*	0	
	• Will it reduce fear of crime?*	0	
	• Will it tackle hate crime?		
3. To ensure the provision of appropriate housing types to	• Will it reduce homelessness?*	0	

reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it increase a range of affordable housing?*	0	
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes?*	0	
	• Will it improve life chances for all equality strand groups	0	
4. To promote and improve health and well – being	• Will it help health and equalities?*	0	
	• Will it reduce death rates?	0	
	• Will it improve access/movement?	0	
	• Will it encourage healthy lifestyles?	0	
	• Will it increase participation in sport and leisure activities for all low participation groups?	0	
	• Will it provide access to a healthy diet and encourage healthy lifestyles?	0	
	• Will it encourage a physically active lifestyle (helping to reduce obesity)?	0	
	• Will it create healthy workplaces?	0	
5. To reduce greenhouse gas emissions and support climate change adaption	• Will energy need be met through renewable sources?	0	
	• Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*	0	

	<ul style="list-style-type: none"> Will it reduce ozone depleting emissions? 	0	
	<ul style="list-style-type: none"> Will it reduce emissions through retrofitting new technology? 	0	
	<ul style="list-style-type: none"> Will it reduce heat island effects on people and property? 	0	
6. To reduce the use of natural resources e.g. water, energy	<ul style="list-style-type: none"> Will it reduce water consumption? 	0	
	<ul style="list-style-type: none"> Will it reduce energy consumption?* 	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> Will it minimise flood risk from all sources of flooding?* Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> Will it preserve SINCs? 	0	
	<ul style="list-style-type: none"> Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> Will it reduce emissions of key pollutants? 	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> Will it reduce noise concerns and complaints? 	0	

11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	• Will it reduce traffic volumes?	0	
	• Will it encourage walking and cycling?*	0	
	• Will it increase proportion of journeys using modes other than a car?	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	• Will lead to reduced consumption of materials and resources?	0	
	• Will reduce household waste?	0	
	• Will increase recovery recycling and re-use?	0	
	• Will reduce construction waste?	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	• Will protect heritage sites and cultural value?	0	
	• Will it protect strategic views?	0	
	• Will it protect listed buildings and their settings?	0	
	• Will it help preserve, enhance and record archaeological features and their settings?	0	
	• Will it help preserve, enhance and record archaeological features and their settings?	0	
14. To enhance public realm and street environment	• Will reduce litter?	0	
	• Will it enhance the quality of public realm?	0	

	<ul style="list-style-type: none"> • Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> • Will it improve open space?* 	0	
	<ul style="list-style-type: none"> • Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> • Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> • Will it improve qualifications and skills?*** 	0	
	<ul style="list-style-type: none"> • Will reduce unemployment?* 	0	
	<ul style="list-style-type: none"> • Will provide jobs for most in need?*** 	0	
	<ul style="list-style-type: none"> • Will improve earnings? 	0	
	<ul style="list-style-type: none"> • Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training? 	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> • Will improve business development and environment? 	0	
	<ul style="list-style-type: none"> • Will improve business resilience and economy? 	0	
	<ul style="list-style-type: none"> • Will it encourage new business start ups and opportunities for local people?* 	0	
	<ul style="list-style-type: none"> • Will it promote business in key sectors? 	0	
	<ul style="list-style-type: none"> • Will it promote regeneration, reducing disparity?*** 	0	
	<ul style="list-style-type: none"> • Will it provide employment opportunities for out of work residents? 	0	

For the **EIA** the following protected characteristics were considered:

Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation

Coloured asterisks **show SA sub-criteria also relevant to **EIA** and **HA** consideration

IIA Assessment

Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –

Overall Summary 0

Westminster Council works closely with its neighbouring boroughs and other partners. For the Core Strategy this included the preparation of joint evidence base, delivery of area-based public realm improvements, and co-ordination of regeneration projects and designated shopping centres near borough boundaries. The Localism Act Places a duty to cooperate in relation to planning sustainable development. The inclusion of the text setting out the duty to co-operate and the list of Westminster's Key Partners in Appendix 3 is considered to have a neutral impact on the IIA objectives. This is because although now formalised by the Localism Act 2011 Westminster would in any case continue to work with its neighbours (and recognises that neighbourhoods do not conform to local authority boundaries) and maintain a joint approach to cross-boundary issues, design, streetscape and public realm improvements. On-going partnerships will continue to be important.

Reasonable Alternatives

The duty to cooperate is a statutory requirement set out in the Localism Act 2011 and in the NPPF and there are no reasonable alternatives to this approach.

Short/Medium and Long Term positive effect – N/A

Long term negative effects – N/A

Mitigation/Change to plan – N/A

Cumulative effects –N/A

Uncertainties/risks – N/A

Monitoring significant effects – The duty to cooperate needs to be monitored through the AMR

8. Integrated Impact Assessment: Waste (changes resulting from The London Plan) in the following paragraphs: 2.28, 2.50, 5.77, 5.79, 5.80, Figure 52 and Policy CS43.			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	

	<ul style="list-style-type: none"> Community facilities? 	0	
	<ul style="list-style-type: none"> Will it increase ability to influence decision making (neighbourhoods)? 	0	
	<ul style="list-style-type: none"> Will it promote positive relationships between communities and groups of people? 	0	
	<ul style="list-style-type: none"> Does it provide equal opportunities for use, function and access to the built environment for all equality groups? 	0	
	<ul style="list-style-type: none"> Will it empower communities? 	0	
	<ul style="list-style-type: none"> Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> Will it reduce actual level of crime?*** 	0	
	<ul style="list-style-type: none"> Will it reduce fear of crime?* 	0	
	<ul style="list-style-type: none"> Will it tackle hate crime? 	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	<ul style="list-style-type: none"> Will it reduce homelessness?* 	0	
	<ul style="list-style-type: none"> Will it increase a range of affordable housing?* 	0	
	<ul style="list-style-type: none"> Will it reduce the number of unfit homes? 	0	
	<ul style="list-style-type: none"> Will it result in high quality homes?*** 	0	
	<ul style="list-style-type: none"> Will it improve life chances for all equality strand groups 		

4. To promote and improve health and well – being	• Will it help health and equalities?***	0	
	• Will it reduce death rates?	0	
	• Will it improve access/movement?	0	
	• Will it encourage healthy lifestyles?	0	
	• Will it increase participation in sport and leisure activities for all low participation groups?	0	
	• Will it provide access to a healthy diet and encourage healthy lifestyles?	0	
	• Will it encourage a physically active lifestyle (helping to reduce obesity)?	0	
	• Will it create healthy workplaces?	0	
5. To reduce greenhouse gas emissions and support climate change adaption	• Will energy need be met through renewable sources?	0	
	• Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*	0	
	• Will it reduce ozone depleting emissions?	0	
	• Will it reduce emissions through retrofitting new technology?	0	
	• Will it reduce heat island effects on people and property?	0	
6. To reduce the use of natural resources e.g. water, energy	• Will it reduce water consumption?	0	

	<ul style="list-style-type: none"> Will it reduce energy consumption?* 	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> Will it minimise flood risk from all sources of flooding?* Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> Will it preserve SINCs? 	0	
	<ul style="list-style-type: none"> Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> Will it reduce emissions of key pollutants? 	+	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> Will it reduce noise concerns and complaints? 	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> Will it reduce traffic volumes? 	0	
	<ul style="list-style-type: none"> Will it encourage walking and cycling?* 	0	
	<ul style="list-style-type: none"> Will it increase proportion of journeys using modes other than a car? 	0	

12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> Will lead to reduced consumption of materials and resources? 	0	
	<ul style="list-style-type: none"> Will reduce household waste? 	0	
	<ul style="list-style-type: none"> Will increase recovery recycling and re-use? 	0	
	<ul style="list-style-type: none"> Will reduce construction waste? 	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> Will it protect strategic views? 	0	
	<ul style="list-style-type: none"> Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> Will reduce litter? 	0	
	<ul style="list-style-type: none"> Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> Will it improve open space?* 	0	
	<ul style="list-style-type: none"> Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> Will it minimise development in Greenfield sites? 	0	

16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	• Will it improve qualifications and skills?***	0	
	• Will reduce unemployment?*	0	
	• Will provide jobs for most in need?***	0	
	• Will improve earnings?	0	
	• Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training?	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	0	
	• Will improve business resilience and economy?	0	
	• Will it encourage new business start ups and opportunities for local people?*	0	
	• Will it promote business in key sectors?	0	
	• Will it promote regeneration, reducing disparity?***	0	
	• Will it provide employment opportunities for out of work residents?	0	

For the **EIA** the following protected characteristics were considered:

Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation

Coloured asterisks ***show SA sub-criteria also relevant to **EIA** and **HA** consideration

IIA Assessment

Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –

Overall Summary 0

The changes in The London Plan for borough Level Projections set out in Core Strategy NPPF Revision Figure 52 and to London wide facilities in Paragraph 5.77 and contribution towards for boroughs Policy CS43 (previously *required to meet*) have a neutral impact given these alterations to the text will not result in any change in the fundamental approach and implementation of Policy CS43 Sustainable Waste Management.

Reasonable Alternatives

These changes were made to ensure the Core Strategy is in general conformity with the wording and targets for waste in the London Plan. There are no alternatives to this approach.

Long Term positive effect – N/A

Short term – N/A

Long term negative effects – N/A

Mitigation/Change to plan – N/A

Cumulative effects – N/A

Uncertainties/risks – N/A

Monitoring significant effects – N/A

9. Integrated Impact Assessment: Business and Employment (Other Updates) in Paragraph 4.26. Training and worklessness (Other Updates) Paragraph 4.23 and Policy CS18 including RJ.

Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it promote positive relationships between communities and groups of people?	0	

	<ul style="list-style-type: none"> • Does it provide equal opportunities for use, function and access to the built environment for all equality groups? 	0	
	<ul style="list-style-type: none"> • Will it empower communities? 	0	
	<ul style="list-style-type: none"> • Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> • Will it reduce actual level of crime?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce fear of crime?* 	0	
	<ul style="list-style-type: none"> • Will it tackle hate crime? 		
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	<ul style="list-style-type: none"> • Will it reduce homelessness?* 	0	
	<ul style="list-style-type: none"> • Will it increase a range of affordable housing?* 	0	
	<ul style="list-style-type: none"> • Will it reduce the number of unfit homes? 	0	
	<ul style="list-style-type: none"> • Will it result in high quality homes?*** 	0	
	<ul style="list-style-type: none"> • Will it improve life chances for all equality strand groups 	0	
4. To promote and improve health and well – being	<ul style="list-style-type: none"> • Will it help health and equalities?*** 	+	Removing barriers for local people accessing employment can have a direct benefit on health and well-being for all equalities groups. There is a link between deprivation and reduced mortality rates.
	<ul style="list-style-type: none"> • Will it reduce death rates? 	0	
	<ul style="list-style-type: none"> • Will it improve access/movement? 	0	
	<ul style="list-style-type: none"> • Will it encourage healthy lifestyles? 	0	

	<ul style="list-style-type: none"> Will it increase participation in sport and leisure activities for all low participation groups? 	0	
	<ul style="list-style-type: none"> Will it provide access to a healthy diet and encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> Will it encourage a physically active lifestyle (helping to reduce obesity)? 	0	
	<ul style="list-style-type: none"> Will it create healthy workplaces? 	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> Will energy need be met through renewable sources? 	0	
	<ul style="list-style-type: none"> Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?* 	0	
	<ul style="list-style-type: none"> Will it reduce ozone depleting emissions? 	0	
	<ul style="list-style-type: none"> Will it reduce emissions through retrofitting new technology? 	0	
	<ul style="list-style-type: none"> Will it reduce heat island effects on people and property? 	0	
6. To reduce the use of natural resources e.g. water, energy	<ul style="list-style-type: none"> Will it reduce water consumption? 	0	
	<ul style="list-style-type: none"> Will it reduce energy consumption?* 	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface	<ul style="list-style-type: none"> Will it minimise flood risk from all sources of flooding?* Will it reduce property damage due to storm 	0	

and ground water quality	events/ heavy rainfall by improving flood resistance and flood resilience?*		
	<ul style="list-style-type: none"> Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> Will it preserve SINCs? 	0	
	<ul style="list-style-type: none"> Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> Will it reduce emissions of key pollutants? 	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> Will it reduce noise concerns and complaints? 	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> Will it reduce traffic volumes? 	0	
	<ul style="list-style-type: none"> Will it encourage walking and cycling?* 	0	
	<ul style="list-style-type: none"> Will it increase proportion of journeys using modes other than a car? 	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> Will lead to reduced consumption of materials and resources? 	0	
	<ul style="list-style-type: none"> Will reduce household waste? 	0	

	<ul style="list-style-type: none"> Will increase recovery recycling and re-use? 	0	
	<ul style="list-style-type: none"> Will reduce construction waste? 	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> Will it protect strategic views? 	0	
	<ul style="list-style-type: none"> Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> Will reduce litter? 	0	
	<ul style="list-style-type: none"> Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> Will it improve open space?* 	0	
	<ul style="list-style-type: none"> Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support	<ul style="list-style-type: none"> Will it improve qualifications and skills?*** 	++	Policy CS 18 (Core Strategy NPPF Revision) has been amended with the
	<ul style="list-style-type: none"> Will reduce unemployment?* 	++	

sustainable growth	<ul style="list-style-type: none"> • Will provide jobs for most in need?*** 	++	<p>following additional text:</p> <p><u>Where appropriate, commercial development will contribute towards removing barriers for local people accessing employment.</u></p> <p>The RJ has also been amended with the following text:</p> <p><u>Westminster is committed to enhancing the quality of life of its residents, and a significant part of this entails removing barriers to the growth of sustainable communities, in the form of access and skills, training and employment to foster economic and social vitality and diversity and diversity, and improved life chances for Westminster's residents.</u></p>
	<ul style="list-style-type: none"> • Will improve earnings? 	+	
	<ul style="list-style-type: none"> • Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training? 	+	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> • Will improve business development and environment? 	++	
	<ul style="list-style-type: none"> • Will improve business resilience and economy? 	+	
	<ul style="list-style-type: none"> • Will it encourage new business start ups and opportunities for local people?* 	++	
	<ul style="list-style-type: none"> • Will it promote business in key sectors? 	+	
	<ul style="list-style-type: none"> • Will it promote regeneration, reducing disparity?*** 	++	

	<ul style="list-style-type: none"> • Will it provide employment opportunities for out of work residents? 	++	
<p>For the EIA the following protected characteristics were considered:</p> <p>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation</p> <p>Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration</p>			
<p>IIA Assessment</p> <p>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</p> <p>Overall Summary 0</p> <p>This new policy is very positive for IIA objectives 16 and 17. In particular for improving qualification and skills, reducing unemployment, providing jobs for those most in need, maintaining economic diversity and meets a number of EIA and HA criteria in terms of access to work and improving health and wellbeing.</p> <p>Reasonable Alternatives</p> <p>The reasonable alternatives to this approach are set out below.</p>			
<p>Long Term positive effect – Increased employment opportunities for residents and improved quality of life and wellbeing.</p> <p>Short term – improved access for local people to employment.</p>			

Long term negative effects – None foreseen.

Mitigation/Change to plan – N/A

Cumulative effects – Improved life chances for Westminster residents.

Uncertainties/risks – Economic growth in Westminster is dependent on the wider economy.

Monitoring significant effects – AMR and Westminster’s Growth Strategy.

Reasonable Alternatives

- A. No policy (business as usual) an ad- hoc approach to the provision of initiatives that provide employment training and skills development.
- B. A more prescriptive policy approach which would set out the types of application this approach would apply to and how much each development should contribute.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
A	Yellow	Yellow	Yellow	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Red	Red	
B	Yellow	Yellow	Yellow	Green +	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green ++	Green ++	

Commentary

- A. Option A is neutral for most IIA criteria but is negative for Objectives 16 and 17 in particular by not providing for training and skills development and providing employment opportunities and tackling inequalities. There is a link between deprivation and the lack of life chances and health and wellbeing, in particular mortality. For this reason this alternative receives a negative score for Objective 4.
- B. Option B is neutral for most IIIA criteria but is positive for Objectives 4, 16 and 17 and has the same overall score for these objectives and equalities sub-criteria as the proposed new policy (above). Developers subject to a more prescriptive approach as set out in Option B may however argue that such an approach would render schemes unviable and result in schemes not coming forward. This level of detail would be inconsistent with the strategic nature of the other policies in the plan and arguably should be developed for inclusion with the City Management policies.

10. Integrated Impact Assessment: Air Quality Other Updates in Paragraphs 5.30 and 5.32

Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	<ul style="list-style-type: none"> Will improve access to local services? 	0	

	• Shopping?	0
	• Community facilities?	0
	• Will it increase ability to influence decision making (neighbourhoods)?	0
	• Will it promote positive relationships between communities and groups of people?	0
	• Does it provide equal opportunities for use, function and access to the built environment for all equality groups?	0
	• Will it empower communities?	0
	• Will it encourage engagement in community activity	0
2. To reduce crime and fear of crime	• Will it reduce actual level of crime?***	0
	• Will it reduce fear of crime?*	0
	• Will it tackle hate crime?	0
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it reduce homelessness?*	0
	• Will it increase a range of affordable housing?*	0
	• Will it reduce the number of unfit homes?	0
	• Will it result in high quality homes?***	0

	<ul style="list-style-type: none"> • Will it improve life chances for all equality strand groups 	0	
4. To promote and improve health and well – being	<ul style="list-style-type: none"> • Will it help health and equalities?*** 	0	Additional wording has been added in the text <i>Evidence shows that at least 3,500 people in London die prematurely each year due to poor air quality (although this figure could be as high as 8,000) and that particularly vulnerable individuals could have their lives cut short by up to 9 years....This impact on mortality is generally attributed to long term exposure to fine particle pollution.</i>
	<ul style="list-style-type: none"> • Will it reduce death rates? 	0	
	<ul style="list-style-type: none"> • Will it improve access/movement? 	0	
	<ul style="list-style-type: none"> • Will it encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it increase participation in sport and leisure activities for all low participation groups? 	0	
	<ul style="list-style-type: none"> • Will it provide access to a healthy diet and encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it encourage a physically active lifestyle (helping to reduce obesity)? • Will it create healthy workplaces? 	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> • Will energy need be met through renewable sources? 	0	
	<ul style="list-style-type: none"> • Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?* 	0	
	<ul style="list-style-type: none"> • Will it reduce ozone depleting emissions? 	0	
	<ul style="list-style-type: none"> • Will it reduce emissions through retrofitting new technology? 	0	
	<ul style="list-style-type: none"> • Will it reduce heat island effects on people and property? 	0	

6. To reduce the use of natural resources e.g. water, energy	• Will it reduce water consumption?	0	
	• Will it reduce energy consumption?*	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	• Will it minimise flood risk from all sources of flooding?*	0	
	• Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?*	0	
8. To protect, enhance and create environments that encourage and support biodiversity	• Will it reduce combined sewer overflow events?	0	
	• Will it protect, enhance and increase biodiversity and protect habitats?	0	
	• Will it preserve SINCs?	0	
	• Will it improve access to and promote educational value of sites of biodiversity interest?	0	
9. To improve air quality	• Will it conserve and enhance species?	0	The supporting text to CS20 in paragraphs 5.30 makes the links between poor air quality and mortality and in paragraph 5.32 between poor air quality and road traffic.
	• Will it improve air quality? *	0	
10. To reduce noise and impact of noise	• Will it reduce emissions of key pollutants?	0	
	• Will it reduce noise levels*	0	
11. To reduce the need to travel; the use of private motorised	• Will it reduce noise concerns and complaints?	0	
	• Will it reduce traffic volumes?	0	

vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> Will it encourage walking and cycling?* 	0	
	<ul style="list-style-type: none"> Will it increase proportion of journeys using modes other than a car? 	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> Will lead to reduced consumption of materials and resources? 	0	
	<ul style="list-style-type: none"> Will reduce household waste? 	0	
	<ul style="list-style-type: none"> Will increase recovery recycling and re-use? 	0	
	<ul style="list-style-type: none"> Will reduce construction waste? 	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> Will it protect strategic views? 	0	
	<ul style="list-style-type: none"> Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> Will reduce litter? 	0	
	<ul style="list-style-type: none"> Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> Will improve access and mobility for all equality group strands?* 	0	

15. To protect, enhance and seek opportunities to increase open space throughout the borough	• Will it improve open space?*	0	
	• Will it improve landscape and character of open space?	0	
	• Will it minimise development in Greenfield sites?	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	• Will it improve qualifications and skills?***	0	
	• Will reduce unemployment?*	0	
	• Will provide jobs for most in need?***	0	
	• Will improve earnings?	0	
	• Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training?	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	0	
	• Will improve business resilience and economy?	0	
	• Will it encourage new business start ups and opportunities for local people?*	0	
	• Will it promote business in key sectors?	0	
	• Will it promote regeneration, reducing disparity?***	0	
	• Will it provide employment opportunities for out of work residents?	0	

For the **EIA** the following protected characteristics were considered:

Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation

Coloured asterisks **show SA sub-criteria also relevant to **EIA** and **HA** consideration

IIA Assessment

Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –

Overall Summary 0

Policy CS20 has not changed in the Core Strategy NPPF Revision. The supporting text to CS20 in paragraph 5.30 makes the links between poor air quality and mortality and in paragraph 5.32 between poor air quality and road traffic and although the additional text is to be welcomed this has not changed the overall direction and meaning of the policy and therefore the impact on IIA objectives is neutral.

Reasonable Alternatives

These changes do not alter the overall direction and meaning of the policy and just add additional textual evidence to the existing policy approach. Therefore an assessment of reasonable alternatives is not required.

<p>Long Term positive effect – N/A</p> <p>Short term – N/A</p> <p>Long term negative effects – N/A</p> <p>Mitigation/Change to plan – N/A</p> <p>Cumulative effects – N/A</p> <p>Uncertainties/risks – N/A</p> <p>Monitoring significant effects – N/A</p>

11. Integrated Impact Assessment: Community Infrastructure Levy Other Updates in Figure 1; paragraphs 1.6, 2.54, 5.42, 5.42, 5.43, 5.44, Policy CS32 and CS32 RJ.			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	The additional text to paragraphs 5.42-5.44 and in Policy CS32 and associated RJ in the Core Strategy
	• Shopping?	0	

	<ul style="list-style-type: none"> • Community facilities? 	0	NPPF Revision clarifies the detail of the local Community Infrastructure Levy (CIL), with information not available at the time of publication of the Core Strategy. The text does not contain details of CIL charges which will be contained in a separate document.
	<ul style="list-style-type: none"> • Will in increase ability to influence decision making (neighbourhoods)? 	0	
	<ul style="list-style-type: none"> • Will it promote positive relationships between communities and groups of people? 	0	
	<ul style="list-style-type: none"> • Does it provide equal opportunities for use, function and access to the built environment for all equality groups? • 	0	
	<ul style="list-style-type: none"> • Will it empower communities? 	0	
	<ul style="list-style-type: none"> • Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> • Will it reduce actual level of crime?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce fear of crime?* 	0	
	<ul style="list-style-type: none"> • Will it tackle hate crime? 	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	<ul style="list-style-type: none"> • Will it reduce homelessness?* 	0	
	<ul style="list-style-type: none"> • Will it increase a range of affordable housing?* 	0	
	<ul style="list-style-type: none"> • Will it reduce the number of unfit homes? 	0	
	<ul style="list-style-type: none"> • Will it result in high quality homes?*** 	0	
	<ul style="list-style-type: none"> • Will it improve life chances for all equality strand groups 	0	

4. To promote and improve health and well – being	• Will it help health and equalities?***	0	
	• Will it reduce death rates?	0	
	• Will it improve access/movement?	0	
	• Will it encourage healthy lifestyles?	0	
	• Will it increase participation in sport and leisure activities for all low participation groups?	0	
	• Will it provide access to a healthy diet and encourage healthy lifestyles?	0	
	• Will it encourage a physically active lifestyle (helping to reduce obesity)?	0	
	• Will it create healthy workplaces?	0	
5. To reduce greenhouse gas emissions and support climate change adaption	• Will energy need be met through renewable sources?	0	
	• Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*	0	
	• Will it reduce ozone depleting emissions?	0	
	• Will it reduce emissions through retrofitting new technology?	0	
	• Will it reduce heat island effects on people and property?	0	
6. To reduce the use of natural resources e.g. water, energy	• Will it reduce water consumption?	0	

	<ul style="list-style-type: none"> • Will it reduce energy consumption?* 	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> • Will it minimise flood risk from all sources of flooding?* • Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> • Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> • Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> • Will it preserve SINCs? 	0	
	<ul style="list-style-type: none"> • Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> • Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> • Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> • Will it reduce emissions of key pollutants? 	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> • Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> • Will it reduce noise concerns and complaints? 	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> • Will it reduce traffic volumes? 	0	
	<ul style="list-style-type: none"> • Will it encourage walking and cycling?* 	0	
	<ul style="list-style-type: none"> • Will it increase proportion of journeys using modes other than a car? 	0	

12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> • Will lead to reduced consumption of materials and resources? 	0	
	<ul style="list-style-type: none"> • Will reduce household waste? 	0	
	<ul style="list-style-type: none"> • Will increase recovery recycling and re-use? 	0	
	<ul style="list-style-type: none"> • Will reduce construction waste? 	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> • Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> • Will it protect strategic views? 	0	
	<ul style="list-style-type: none"> • Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> • Will it help preserve, enhance and record archaeological features and their settings? 	0	
	<ul style="list-style-type: none"> • Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> • Will reduce litter? 	0	
	<ul style="list-style-type: none"> • Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> • Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> • Will it improve open space?* 	0	
	<ul style="list-style-type: none"> • Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> • Will it minimise development in Greenfield sites? 	0	

16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	• Will it improve qualifications and skills?***	0
	• Will reduce unemployment?*	0
	• Will provide jobs for most in need?***	0
	• Will improve earnings?	0
	• Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training?	0
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	0
	• Will improve business resilience and economy?	0
	• Will it encourage new business start ups and opportunities for local people?*	0
	• Will it promote business in key sectors?	0
	• Will it promote regeneration, reducing disparity?***	0
	• Will it provide employment opportunities for out of work residents?	0

For the **EIA** the following protected characteristics were considered:

Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation

Coloured asterisks **show SA sub-criteria also relevant to **EIA** and **HA** consideration

IIA Assessment

Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –

Overall Summary 0 The overall summary is neutral. The changes to the Core Strategy NPPF Revision do not change the emphasis of Policy CS32 Delivering Infrastructure and Planning Obligations and therefore has no impact on the IIA objectives. The alterations to the text are explanatory and do not set out the charging tariff itself.

Reasonable Alternatives

The Community Infrastructure Levy (Amendment) Regulations (April 2011) requires local authorities to set up a local levy that will be chargeable in their area. There are no reasonable alternatives to this statutory requirement.

Long Term positive effect – N/A

Short term – N/A

Long term negative effects – N/A

Mitigation/Change to plan – N/A

Cumulative effects – N/A

Uncertainties/risks –N/A

Monitoring significant effects – N/A.

12. Integrated Impact Assessment: Major infrastructure projects Policy CS28

Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	<ul style="list-style-type: none"> • Will improve access to local services? 	0	
	<ul style="list-style-type: none"> • Shopping? 	0	
	<ul style="list-style-type: none"> • Community facilities? 	0	
	<ul style="list-style-type: none"> • Will in increase ability to influence decision making (neighbourhoods)? 	0	
	<ul style="list-style-type: none"> • Will it promote positive relationships between communities and groups of people? 	0	
	<ul style="list-style-type: none"> • Does it provide equal opportunities for use, function and access to the built environment for all equality groups? 	0	
	<ul style="list-style-type: none"> • Will it empower communities? 	0	

	<ul style="list-style-type: none"> • Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> • Will it reduce actual level of crime?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce fear of crime?* 	0	
	<ul style="list-style-type: none"> • Will it tackle hate crime? 	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	<ul style="list-style-type: none"> • Will it reduce homelessness?* 	0	
	<ul style="list-style-type: none"> • Will it increase a range of affordable housing?* 	0	
	<ul style="list-style-type: none"> • Will it reduce the number of unfit homes? 	0	
	<ul style="list-style-type: none"> • Will it result in high quality homes?*** 	0	
	<ul style="list-style-type: none"> • Will it improve life chances for all equality strand groups 	0	
4. To promote and improve health and well – being	<ul style="list-style-type: none"> • Will it help health and equalities?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce death rates? 	0	
	<ul style="list-style-type: none"> • Will it improve access/movement? 	0	
	<ul style="list-style-type: none"> • Will it encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it increase participation in sport and leisure activities for all low participation groups? 	0	
	<ul style="list-style-type: none"> • Will it provide access to a healthy diet and encourage healthy lifestyles? 	0	

	<ul style="list-style-type: none"> Will it encourage a physically active lifestyle (helping to reduce obesity)? 	0	
	<ul style="list-style-type: none"> Will it create healthy workplaces? 	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> Will energy need be met through renewable sources? 	0	
	<ul style="list-style-type: none"> Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?* 	0	
	<ul style="list-style-type: none"> Will it reduce ozone depleting emissions? 	0	
	<ul style="list-style-type: none"> Will it reduce emissions through retrofitting new technology? 	0	
	<ul style="list-style-type: none"> Will it reduce heat island effects on people and property? 	0	
6. To reduce the use of natural resources e.g. water, energy	<ul style="list-style-type: none"> Will it reduce water consumption? 	0	
	<ul style="list-style-type: none"> Will it reduce energy consumption?* 	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> Will it minimise flood risk from all sources of flooding?* 	0	
	<ul style="list-style-type: none"> Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> Will it preserve SINCS? 	0	

	<ul style="list-style-type: none"> Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> Will it conserve and enhance species? 	0	
9. To improve air quality	<ul style="list-style-type: none"> Will it improve air quality? * 	0	
	<ul style="list-style-type: none"> Will it reduce emissions of key pollutants? 	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> Will it reduce noise levels* 	0	
	<ul style="list-style-type: none"> Will it reduce noise concerns and complaints? 	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> Will it reduce traffic volumes? 	0	
	<ul style="list-style-type: none"> Will it encourage walking and cycling?* 	0	
	<ul style="list-style-type: none"> Will it increase proportion of journeys using modes other than a car? 	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> Will lead to reduced consumption of materials and resources? 	0	
	<ul style="list-style-type: none"> Will reduce household waste? 	0	
	<ul style="list-style-type: none"> Will increase recovery recycling and re-use? 	0	
	<ul style="list-style-type: none"> Will reduce construction waste? 	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> Will protect heritage sites and cultural value? 	0	
	<ul style="list-style-type: none"> Will it protect strategic views? 	0	

	<ul style="list-style-type: none"> • Will it protect listed buildings and their settings? 	0	
	<ul style="list-style-type: none"> • Will it help preserve, enhance and record archaeological features and their settings? 	0	
	<ul style="list-style-type: none"> • Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> • Will reduce litter? 	0	
	<ul style="list-style-type: none"> • Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> • Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> • Will it improve open space?* 	0	
	<ul style="list-style-type: none"> • Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> • Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> • Will it improve qualifications and skills?*** 	0	
	<ul style="list-style-type: none"> • Will reduce unemployment?* 	0	
	<ul style="list-style-type: none"> • Will provide jobs for most in need?*** 	0	
	<ul style="list-style-type: none"> • Will improve earnings? 	0	
	<ul style="list-style-type: none"> • Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training? 	0	

17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	0
	• Will improve business resilience and economy?	0
	• Will it encourage new business start ups and opportunities for local people?*	0
	• Will it promote business in key sectors?	0
	• Will it promote regeneration, reducing disparity?**	0
	• Will it provide employment opportunities for out of work residents?	0

For the **EIA** the following protected characteristics were considered:

Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation

Coloured asterisks **show SA sub-criteria also relevant to **EIA** and **HA** consideration

IIA Assessment

Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –

Overall Summary 0

The changes to the wording in CS28 will have a neutral impact. Although It could be argued that without the addition of the additional text to the policy as follows: *The development of major infrastructure projects will need to mitigate, avoid or remedy environmental and local impacts, both in construction and operation*, major infrastructure projects result in significant environmental and local impacts in essence it clarifies the details of Core Strategy Policy CS 28 and explicitly states that it will

apply to major infrastructure projects and therefore is unlikely to have any significant impact on the IIA objectives.

Reasonable Alternatives

The alterations are a point of clarification to an existing policy as such it is considered that an assessment of reasonable alternatives is not required.

Long Term positive effect – N/A

Short term – N/A

Long term negative effects – N/A

Mitigation/Change to plan – N/A

Cumulative effects – N/A

Uncertainties/risks –N/A

Monitoring significant effects – N/A.

13. Integrated Impact Assessment: Social and Community Infrastructure Reasoned Justification

Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	<ul style="list-style-type: none"> • Will improve access to local services? 	0	<p>The Reasoned Justification to Policy CS33 has been amended to include the following additional text: <i>..or is necessary to deliver a new or improved facility.. and or the planned re-provision of the new or improved facility would otherwise not be viable.</i></p> <p>It could be argued that this will provide a more positive approach to the provision of social and community facilities however as this just serves to clarify the policy and does not change the meaning of the policy it is considered to have a neutral impact on this objective.</p>
	<ul style="list-style-type: none"> • Shopping? 	0	
	<ul style="list-style-type: none"> • Community facilities? 	0	
	<ul style="list-style-type: none"> • Will in increase ability to influence decision making (neighbourhoods)? 	0	
	<ul style="list-style-type: none"> • Will it promote positive relationships between communities and groups of people? 	0	
	<ul style="list-style-type: none"> • Does it provide equal opportunities for use, function and access to the built environment for all equality groups? 	0	
	<ul style="list-style-type: none"> • Will it empower communities? 	0	
	<ul style="list-style-type: none"> • Will it encourage engagement in community activity 	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> • Will it reduce actual level of crime?* 	0	
	<ul style="list-style-type: none"> • Will it reduce fear of crime?* 	0	

	<ul style="list-style-type: none"> • Will it tackle hate crime? 	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	<ul style="list-style-type: none"> • Will it reduce homelessness?* 	0	
	<ul style="list-style-type: none"> • Will it increase a range of affordable housing?* 	0	
	<ul style="list-style-type: none"> • Will it reduce the number of unfit homes? 	0	
	<ul style="list-style-type: none"> • Will it result in high quality homes?*** 	0	
	<ul style="list-style-type: none"> • Will it improve life chances for all equality strand groups 	0	
4. To promote and improve health and well – being	<ul style="list-style-type: none"> • Will it help health and equalities?*** 	0	
	<ul style="list-style-type: none"> • Will it reduce death rates? 	0	
	<ul style="list-style-type: none"> • Will it improve access/movement? 	0	
	<ul style="list-style-type: none"> • Will it encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it increase participation in sport and leisure activities for all low participation groups? 	0	
	<ul style="list-style-type: none"> • Will it provide access to a healthy diet and encourage healthy lifestyles? 	0	
	<ul style="list-style-type: none"> • Will it encourage a physically active lifestyle (helping to reduce obesity)? 	0	

	<ul style="list-style-type: none"> • Will it create healthy workplaces? 	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> • Will energy need be met through renewable sources? 	0	
	<ul style="list-style-type: none"> • Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?* 	0	
	<ul style="list-style-type: none"> • Will it reduce ozone depleting emissions? 	0	
	<ul style="list-style-type: none"> • Will it reduce emissions through retrofitting new technology? 	0	
	<ul style="list-style-type: none"> • Will it reduce heat island effects on people and property? 	0	
6. To reduce the use of natural resources e.g. water, energy	<ul style="list-style-type: none"> • Will it reduce water consumption? 	0	
	<ul style="list-style-type: none"> • Will it reduce energy consumption?* 	0	
7. To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> • Will it minimise flood risk from all sources of flooding?* 	0	
	<ul style="list-style-type: none"> • Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?* 	0	
	<ul style="list-style-type: none"> • Will it reduce combined sewer overflow events? 	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> • Will it protect, enhance and increase biodiversity and protect habitats? 	0	
	<ul style="list-style-type: none"> • Will it preserve SINC's? 	0	
	<ul style="list-style-type: none"> • Will it improve access to and promote educational value of sites of biodiversity interest? 	0	
	<ul style="list-style-type: none"> • Will it conserve and enhance species? 	0	

9. To improve air quality	• Will it improve air quality? *	0	
	• Will it reduce emissions of key pollutants?	0	
10. To reduce noise and impact of noise	• Will it reduce noise levels*	0	
	• Will it reduce noise concerns and complaints?	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	• Will it reduce traffic volumes?	0	
	• Will it encourage walking and cycling?*	0	
	• Will it increase proportion of journeys using modes other than a car?	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	• Will lead to reduced consumption of materials and resources?	0	
	• Will reduce household waste?	0	
	• Will increase recovery recycling and re-use?	0	
	• Will reduce construction waste?	0	
13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	• Will protect heritage sites and cultural value?	0	
	• Will it protect strategic views?	0	
	• Will it protect listed buildings and their settings?	0	
	• Will it help preserve, enhance and record archaeological features and their settings?	0	

	<ul style="list-style-type: none"> Will it help preserve, enhance and record archaeological features and their settings? 	0	
14. To enhance public realm and street environment	<ul style="list-style-type: none"> Will reduce litter? 	0	
	<ul style="list-style-type: none"> Will it enhance the quality of public realm? 	0	
	<ul style="list-style-type: none"> Will improve access and mobility for all equality group strands?* 	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> Will it improve open space?* 	0	
	<ul style="list-style-type: none"> Will it improve landscape and character of open space? 	0	
	<ul style="list-style-type: none"> Will it minimise development in Greenfield sites? 	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> Will it improve qualifications and skills?*** 	0	
	<ul style="list-style-type: none"> Will reduce unemployment?* 	0	
	<ul style="list-style-type: none"> Will provide jobs for most in need?*** 	0	
	<ul style="list-style-type: none"> Will improve earnings? 	0	
	<ul style="list-style-type: none"> Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training? 	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> Will improve business development and environment? 	0	
	<ul style="list-style-type: none"> Will improve business resilience and economy? 	0	

	<ul style="list-style-type: none"> • Will it encourage new business start ups and opportunities for local people?* 	0	
	<ul style="list-style-type: none"> • Will it promote business in key sectors? 	0	
	<ul style="list-style-type: none"> • Will it promote regeneration, reducing disparity?*** 	0	
	<ul style="list-style-type: none"> • Will it provide employment opportunities for out of work residents? 	0	
<p>For the EIA the following protected characteristics were considered:</p> <p>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity), Race, Religion or Belief (including lack of) and Sexual Orientation</p> <p>Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration</p>			
<p>IIA Assessment</p> <p>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</p> <p>Overall Summary 0</p> <p>The changes to the wording in the reasoned justification to CS33 will have a neutral impact given the new wording merely seeks to clarify CS 33 and does not change the direction of this policy.</p> <p>Reasonable Alternatives</p> <p>The alterations are a point of clarification to an existing policy as such it is considered that an assessment of reasonable alternatives is not required.</p>			
<p>Long Term positive effect – N/A</p> <p>Short term – N/A</p> <p>Long term negative effects – N/A</p>			

Mitigation/Change to plan – N/A

Cumulative effects – N/A

Uncertainties/risks –N/A

Monitoring significant effects – N/A.

Appendix 4

List of key documents and strategies relevant to Core Strategy revisions published since 2009

National

Energy Efficiency and Historic Buildings (2011) English Heritage.

National Planning Policy Framework (2012) Department for Communities and Local Government.

Energy and Climate Change for all local authorities Dataset 6222 (2012) Department of Energy and Climate Change

London Borough Environmental Fact Sheet (2011) Environment Agency

Report on estimation of mortality impacts of particulate air pollution. Consulting report P951-001. (2010) Dr Brian G Miller Institute of Occupational Medicine.

(The) Setting of Heritage Assets (2011) English Heritage.

Technical Guidance to the National Planning Policy Framework (2012) Department for Communities and Local Government.

Understanding Place: Conservation Area Designation, Appraisal and Management (2011) English Heritage.

2011 Census

Regional

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

London Plan (2011) Mayor of London.

Mayor's Delivering London's Energy future: the Mayor's climate change mitigation and energy strategy (2011) Mayor of London.

Mayor's Economic Development Strategy for London (2010) Mayor of London.

Mayor's London Housing Strategy (2010) Mayor of London.

Mayor's Managing risks and increasing resilience: the Mayor's climate change adaptation strategy (2011) Mayor of London.

Local

Affordable Housing Viability Study (2010) DTZ Research. Published by Westminster City Council (jointly commissioned with London Borough of Camden).

Affordable Housing Viability Study, Payments in Lieu of Affordable Housing (2011) DTZ Research. Published by Westminster City Council (jointly commissioned with London Borough of Camden).

Core Strategy (Adopted January 2011).

Community Governance Review (2012) Westminster City Council.

Integrated Impact Assessment- Scoping Report for Westminster's City Plan (CMP Revision) (2012) Westminster City Council.

Appendix 5

Westminster Characteristics

Economic Conditions

Westminster functions as a national and international centre for business, shopping, arts, culture, and entertainment. It accommodates 590,000 jobs, 14% of all of London's jobs, and more than the City and Canary Wharf combinedⁱ.

Westminster's 46,000 businesses have a diverse and balanced employment offer, particularly when compared to other areas of the capital such as the City of Londonⁱⁱ. Seventy percent of these businesses are small businesses employing less than five people, and about 85% employ less than ten peopleⁱⁱⁱ.

Westminster is at the heart of the creative sector and contains the highest number of creative Industry jobs in London.

The London Plan projects Westminster to accommodate growth in employment of about 19,000 people between 2012/13 to 2026/27.

Westminster is highly developed with mostly high land values and development in Westminster is often about refurbishment and renewal of building stock rather than significant land use change. Economic development in Westminster is mainly directed to the three Opportunity Areas Paddington, Victoria and Tottenham Court Road (part Camden), and the North Westminster Economic Development Area (NWEDA).

NWEDA is the principle area of economic renewal containing a high proportion of social housing. Only 2% of jobs in Westminster are located in the in four main wards of NWEDA.

Westminster's residential population swells to over one million during the daytime, with the influx of workers, visitors and tourists. Such intense activity is part of what makes Westminster exciting and vibrant, but is also one of its greatest challenges. It places enormous pressure on transport systems and the public realm. The influx of visitors also extends into the evening and night-time, as people are drawn in for the entertainment offer, particularly concentrated around the West End. The high level of activity and 24 hour nature of some parts of the city strongly affects noise, air quality, crime and security, waste and the provision of local services. The functions of state and government, together with large events befitting Westminster's

Central London role, and high numbers of people make the threat of terrorism a particular issue.

Social Conditions

Westminster's Residents

Westminster has a resident population of 219,400. There is a relatively high number of young adults (20-44's) and working-age people make-up 70% of the population. The number of children and young people (0-19) is 41, 000 and old people (65+) is 24,500. Westminster is particularly unusual in being home to more males than females. The city contains 6,900 short-term migrants, which is highest number of any local authority in England.^{iv} It has the second highest proportion of residents born outside the UK - 54% for 2010, compared to 12% for England as a whole.^v

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 north-west and south of the city^{vi}. The City of Westminster Local Economic Baseline Study (2011) identifies that 42% of Westminster's deprived population live in the four Wards that make up most of NWEDA: Church Street, Westbourne, Queens Park and Harrow Road. Since 2004, the level of multiple deprivation in the worst affected wards has decreased, however Westminster still contains some of the most deprived areas in London^{vii}.

Health and Wellbeing

Whilst Westminster is generally viewed as a place of affluence, there are pockets of significant deprivation. Queens Park and Church Street are amongst the top 10% of deprived wards in the country, Harrow Road and Westbourne amongst the 10 – 20% most deprived, and Churchill ward amongst the 20 – 30% most deprived. At a sub-ward level, there are also smaller groupings of deprived residents, such as some communities in the West End. Health inequalities, including life expectancy, are closely linked to patterns of deprivation.

Although Westminster generally performs well on health indicators, patterns of health inequality mirror the patterns of social and economic deprivation and there are a number of key areas where the city performs less well or where there are specific issues that arise because of the characteristics of the city.

Westminster's Housing

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

Westminster has a significant, growing private rented sector, comprising an estimated 46% of households, compared to 20% for London and only 13% for England as a whole. It has a lower owner-occupier sector at only 32%, compared to London (57%) and England (70%)^{viii}. The housing sector reflects Westminster's role at the centre of a world city.

The average market rent per week in the cheapest part of Westminster is £310 for a 1 bed flat and £575 for a 3 bed flat^{ix}. The weekly figures for buying are £333 for a 1 bedroom unit and £627 for a three bed unit.^xThe provision of affordable housing is more important in Westminster than in some other areas due to the large mismatch between incomes and the cost of market housing in Westminster.

The London Plan seeks a minimum average of 770 new homes to be delivered annually in Westminster.

Many other parts of London have a ready supply of surplus industrial land with a relatively low existing use value that can be redeveloped for housing and mixed use with a significantly higher value. Such sites make a significant contribution to meeting borough housing targets. This is not typically the case within Westminster where many sites already contain offices, shops and housing with high existing values.

Environmental Conditions

Heritage

Westminster has in excess of 11,000 listed buildings (more than any other local authority in the country), and 75% of its land area is covered by a Conservation Area designation. Seventeen of the 27 views identified in the London Plan are either to or from Westminster, and the city is crossed by five designated viewing corridors, including ones to Westminster's World Heritage Site: the Palace of Westminster and Westminster Abbey, including St Margaret's Church.

Carbon and Green House Gas Emissions

London's total emissions from domestic, industry/commercial and transportation sectors have increased from 41,630.5 to 43,885.9 kilo tonnes of Co2 from 2009 to 2010. All authorities in London have increased emissions levels, following years of improved emission levels.

Westminster has the 5th historic carbon emissions in the UK from actions that can be addressed

through actions of the local authority. Historically, Westminster has always had the highest emissions in London, and over the last few years Westminster has not seen any major reduction in its emissions whereas most other authorities have reduced emissions. In 2010 Westminster's carbon emissions reached 3,213.0 kilo tonnes from 3,045.0 in 2009, with a figure of 3,314.8 in 2005^{xi}. Unlike other significant emitters, Westminster's carbon footprint is not linked to large scale industrial activity, which can be more easily reduced. Rather it is the cumulative impact of many small occupiers, with 74% of the emissions from the use of commercial occupiers, particularly electricity This is much higher than national average which puts emissions from buildings commercial and domestic at about 40%.^{xii}

Because of its central location Westminster suffers disproportionately from the effects of London's urban heat island and, in central areas, this is exacerbated by the 24 hour nature of this part of the city. Noise and poor air quality are also relevant to this issue as they increase reliance on air conditioning, which further contributes to localised heating effects, noise and energy consumption

The density, accessibility, heritage and complex mix of uses in Westminster, particularly in central areas, provide significant opportunities for sustainable development: reducing reliance on journeys by private vehicles; the efficient use of land; extending the lifetimes of existing buildings (by hundreds of years in some cases); and opportunities for local and neighbourhood solutions such as Combined (Cooling), Heat and Power networks, local in-vessel composting and other waste solutions, cycle hire, and freight consolidation schemes. However, the quality and extent of heritage assets means that flexible solutions are required to meet targets in carbon reduction.

Westminster's Key Issues and Challenges

- Accommodating Strategic Land Use Issues within a unique central London mix
- Strength of Westminster's Heritage Assets
- People Pressure
- Inequalities Including Health inequalities
- Adaption to and mitigating climate change

Westminster Community Governance Review: Equalities Impact Assessment

Equality Impact Assessment: Westminster Community Governance Review

1. Introduction

- 1.1 The new public sector Equality Duty (section 149 of the Equality Act 2010) came into force on 5 April 2011. The consideration of equalities issues has been an integral part of the Community Governance Review, both in terms of consultation, and during consideration of Review recommendations.

2. Proposal

- 2.1 The aim of the Westminster Community Governance Review is to assess potential for new forms of community governance, involvement and representation in Westminster. This includes whether or not to establish new parish councils, and the electoral arrangements of any new parish council. The review also investigates whether or not to introduce any other community governance arrangements, and explores options included in the Government's Localism Act, such as Neighbourhood Forums.

3. Current Situation

- 3.1 At present there are a number of existing differing mechanisms for the purpose of community governance:

Area Forums: Area Forums are a longstanding council initiative that provides local residents and businesses with regular opportunities to comment upon council services and issues that affect their neighbourhood, and to influence the allocation of Neighbourhood Funds.

Amenity Societies: There is a network of 18 officially recognised Amenity Societies in Westminster. These are non-profit, non-political voluntary organisations that promote the interests of residents, businesses and visitors. The Amenity Societies play an active role in shaping the special character of Westminster's neighbourhoods, through commenting on individual planning applications and making representations on planning policies.

Business Improvement Districts: There are currently five Business Improvement Districts (BIDs) in Westminster. These are distinct areas where businesses pay an additional business rate levy to fund improvements, such as additional street cleansing services and other initiatives in order to make their trading area safe, welcoming and attractive. They also undertake a promotional and marketing role to attract further investment and visitors to their areas.

Local Partnerships: There are a range of community-led neighbourhood groups that have operated across parts of Westminster. These include the Queens Park Forum amongst others. They aim to influence and improve local services, provide a voice for their local community, and support and celebrate social, community and cultural life within their neighbourhoods.

There are additional agencies and community groups who make a valuable contribution to the shaping and representation of neighbourhoods within Westminster. These include housing tenant associations, registered social landlords, landowners and voluntary organisations such as Voluntary Action Westminster.

4. What will happen as a result of the proposal?

4.1 The Recommendations set out Community Governance Review Cabinet Report in relation to Parish Councils are as follows:

- i) That Cabinet agrees to hold a special Cabinet meeting in June 2012 and to recommend the Council to hold an Extraordinary Council Meeting also in June 2012 to decide whether to establish the Queen's Park Community Council.
- ii) That Cabinet agrees that further consultation in the form of a referendum of local government electors should take place in May 2012 in Queen's Park Ward only to ensure that the application for parish council status is supported by the wider community in that area.
- iii) That Cabinet note all comments received as a result of the initial consultation exercise (from 14th November 2011 to 17th February 2012) relating to the creation of Parish Councils in other parts of Westminster.

4.2 As a result of these recommendations and the intention to make the final decision in relation to the Queen's Park Community Council at special Cabinet and Full Council meetings in June 2012, it is anticipated that a separate Equalities Impact Assessment will be also be published in June 2012.

- 4.3 The following sections of the Equalities Impact Assessment provide an assessment of the potential establishment of neighbourhood planning, and in particular, the establishment of Neighbourhood Forums in Westminster.
- 4.4 Neighbourhood Forums are a new form of local involvement introduced in the recently enacted Localism Act. They are primarily concerned with neighbourhood planning. The City Council can designate an organisation or body as a Neighbourhood Forum if the City Council is satisfied that it meets the following criteria:
- it has been established to promote the social, economic, and environmental well being of an area, and or to promote the trades, professions or other businesses of an area;
 - membership includes a minimum of 21 individuals and is open to those who live or work in the area; or are elected members of the borough council;
- 4.5 Through Neighbourhood Plans, Neighbourhood Forums will be able to set out a community's policies for the development and use of land in their area. It will provide communities with the freedom to bring forward more development than is set out in the local development plan for the area (although it has to be in conformity with strategic planning policies). Neighbourhood Plans will be subject to independent examination following validation by the local planning authority.
- 4.6 The Neighbourhood Forum can also produce Neighbourhood Development Orders relating to a specific site or properties across the neighbourhood area. Through the Order, full or outline planning permission will be granted, and a planning application for that site is not necessary.
- 4.7 The Recommendations set out Community Governance Review Cabinet Report in relation to Neighbourhood Planning are as follows:
- iv) That Cabinet agrees to acknowledge the opportunity for Neighbourhood Forums in Westminster, and acknowledges all expressions of interest in their formation received as a result of consultation.
 - v) That Cabinet recommend that applications for Neighbourhood Areas should accurately reflect whole neighbourhood areas that are clearly identifiable, established and recognised areas of Westminster.
 - vi) That Cabinet agrees that the attached map below provides a guide to the recognised and established neighbourhood areas of Westminster.



- 4.8 The establishment of neighbourhood areas and Neighbourhood Forums in Westminster will have an impact on the services provided by the City Council's Built Environment portfolio, and in particular, the planning services provided.

5. Baseline Information

- 5.1 Westminster has an estimated residential population of approximately 253,100 (Mid Year Estimate, 2010). This swells to over one million everyday as a result of the influx of workers, visitors and tourists that visit the area. The changes in community governance recommended by this review will potentially affect residents and businesses throughout Westminster, dependent upon the degree of interest in neighbourhood planning.

5.2 Westminster population demographics in terms of age and sex are as follows: (percentages shown)

Ages	Persons	Males	Females
		51	49
0-4	4	2	5
5 to 9	4	4	4
10 to 14	3	3	3
15-19	4	4	4
20-59	70	73	67
60-64	4	4	4
65-79	7	7	8
80+	3	3	4
Working age	78	81	76
Non-working age	22	19	24

Source: Mid Year Estimates 2010, Office for National Statistics (ONS)

- 5.3 Disability according to the Disability and Discrimination Act 2005 applies to someone who has a physical or mental impairment, which has a substantial and long-term effect on his or her ability to carry out normal day-to-day activities.
- 5.4 The census offers no breakdown diagnosis for residents with Long Term Limiting Illness, so it is impossible to ascertain whether problems are relate to visual, hearing, mobility, learning, mental health, disfigurement or other (such as epilepsy) disabilities, and therefore whether social conditions are appropriate.

	Number of people	% of population
Limiting long-term illness	25,835	10.36
Not Good Health - Total	14,980	6.01

Source: Census 2001, Office for National Statistics (ONS) Census data on Long Term Limiting Illness (LTLI) which is defined as an 'illness, health problem or disability which limits daily activities or the work' is used a proxy for disability. One of the major issues with the use of data from this source is that it is entirely down to self-assessment, and that perceptions may vary across cultures, ages and areas.

Total residents		% of population (estimated at 253,100)
Aged 18-64) predicated to have a physical, mental or learning disability	48,943	19%
Aged 65+ with a limiting long-term illness	12,176	5%
Total	61,119	24%

Source: POPPI, Projecting Older People Population Information System, Oxford Brookes University 2011.

- 5.5 The information collected in the census and the research by Oxford Brookes University on limiting long-term illness does not equate to the definition of disability in the Disability Discrimination Act 2005 or Disability and Equality Act 2010. However, together they are the best indicator of the number of disabled persons in Westminster.
- 5.6 25% of households contain at least one disabled person in Westminster. This is lower than London as a whole (30%) (Source: Census 2001)
- 5.7 Westminster's ethnicity data only partially shows how diverse the population really is, as there are a wider number of nationalities found within each ethnic group than anywhere else in the UK. This diversity also means that there is no secondary dominant group after White British.

Ethnicity	Total	Percentage of total
All	249.4	
WHITE		
British	136.6	55%
Irish	5.9	2%
Other	30.6	12%
BLACK		
Caribbean	6.4	3%
African	9.9	4%

Other	1.4	1%
ASIAN		
Indian	15.7	6%
Pakistani	5.9	2%
Bangladeshi	5.9	2%
Chinese	9.1	4%
Other	4.5	2%
MIXED		
White and Asian	3.2	1%
White and Black Caribbean	2	1%
White and Black African	1.6	1%
Other	3.2	1%
OTHER		
Other	7.6	3%

Source: Mid Year Estimates 2009, Office for National Statistics (ONS)

- 5.8 Westminster's prominence as a cultural and business venue attracts international migrants from all over the globe, and as an additional pull there are sizeable community groups such as Arab and Chinese which are more prevalent in the city than elsewhere, who attract more in-migration from their countries of origin.
- 5.9 Westminster is also home to the largest number of short-term international migrants, and is also likely to be a home for substantial numbers of irregular or illegal migrants.
- 5.10 The 2001 census was the first to try and capture information about people's religion, and the response was optional. There is, therefore, no previous information from which to make comparisons.
- 5.11 Over half of Westminster's residents are Christian, whilst the next largest group of residents stated that they had 'no religion'. Islam is the third largest religious group in the city. Westminster's population contains a high proportion of Jewish

people and followers of Islam compared to Greater London and England and Wales.

	Total	% of total Population	2011 Council Tax List
Christian	99,797	55	57%
Buddhist	2,392	1.3	4%
Hindu	3,497	1.9	2.9%
Jewish	7,732	4.3	1.1%
Muslim	21,346	12	17.1%
Sikh	400	0.2	0.3%
Any other religion	945	0.5	N/A
No religion	29,300	16	17.6%
Religion not stated	15,877	8.8	N/A

Source: Census 2001, Office for National Statistics (ONS)

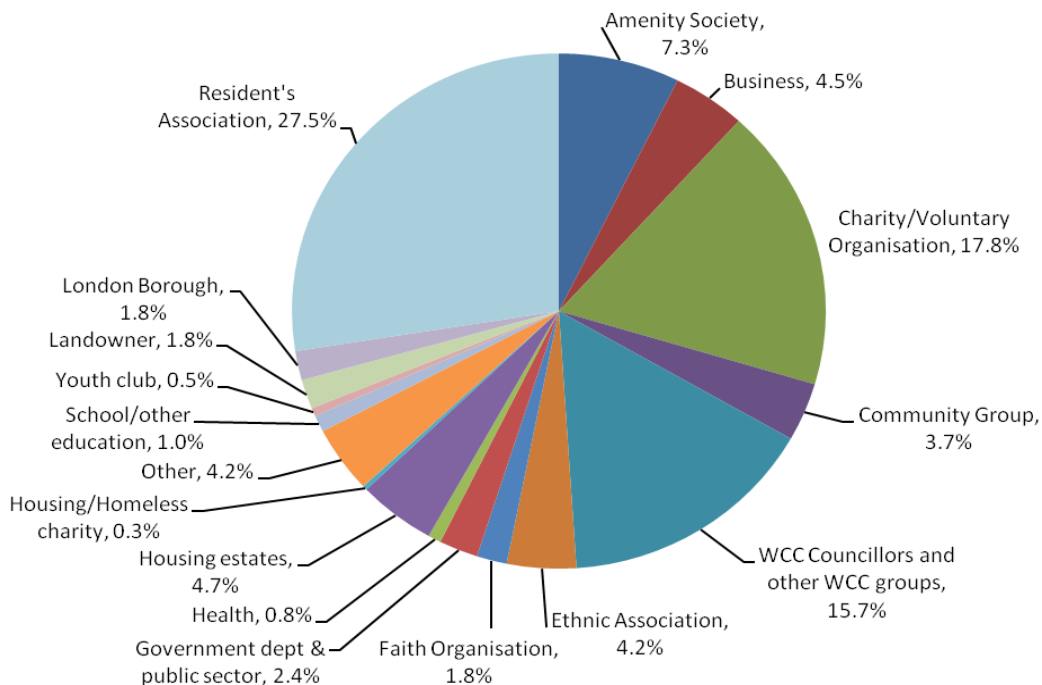
N.B. The Council Tax list estimate is based on payers and will therefore artificially lower the % of groups where children are disproportionately prevalent e.g. Muslims. It is suggested that these two figures act as a range and therefore together offer the most accurate portrayal of religion in Westminster.

- 5.12 It is difficult to estimate the size of the LGBT population. Sigma research carried out a needs assessment of LGBT people in Lambeth, and estimated the size of the population to be 5% (Keogh et al, 2006). This took into account a national survey which found that 3.9% of women and 5.5% of men aged 16-44 and living in London had had a same gender sex partner in the previous five years. Other studies have found that the population proportion in inner London is higher than that of London in general (estimated at 7% on the City Parochial Foundation Website) and a greater representation than the UK as a whole. This and the presence of the scene in Soho suggest that in Westminster the consideration of the needs of LGBT people should be greater than in the rest of the UK.
- 5.13 Using the 5% estimate and applying this to the population over 15 years old in Westminster, suggests that 10,165 LGBT people live in Westminster. This is a conservative estimate and does not consider the large LGBT population who work in or visit the city.

6. Consultation

6.1 The City Council undertook a widespread consultation in relation to the Community Governance Review to enable equal opportunity for all sections of the community to respond. Consultation took place over a twelve week period and was extended by two weeks to provide additional opportunity for response.

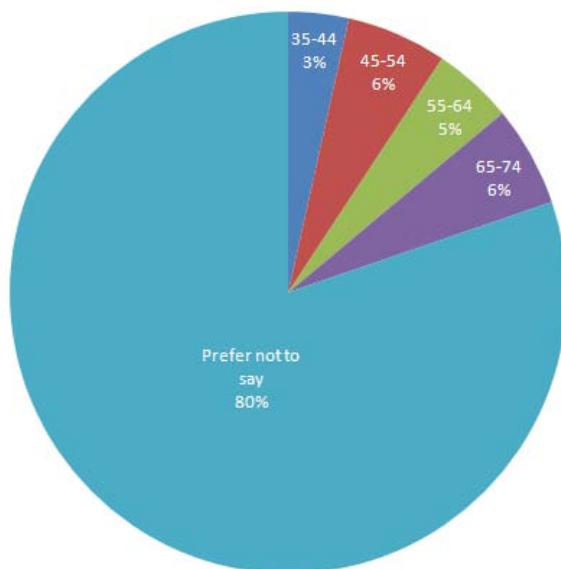
6.2 The City Council produced a consultation document that was initially sent to over 380 community and resident groups, amenity societies, business groups, landowners, voluntary and faith organisations, as shown on the pie chart below. Many of the groups that were sent the consultation document were ‘umbrella organisations’ representing an additional number of groups, organisations and individuals.



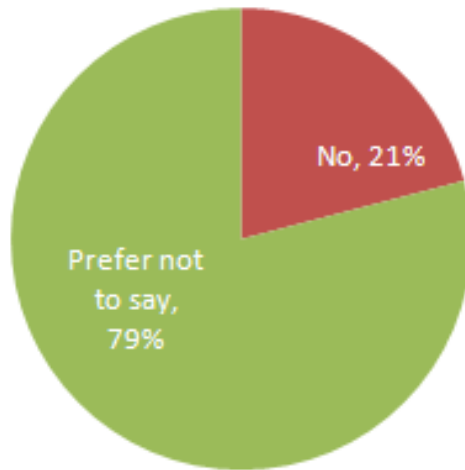
6.3 In total, over 1000 copies of the consultation document were distributed. It was also made available in all 13 Westminster libraries. The City Council's website contained pages dedicated to the Community Governance Review where the consultation document was made available for download.

6.4 Publicity was generated by two press releases produced on the 3rd November 2011 and 14th November 2011 to coincide with the start of consultation on 14th November 2011. Nine press articles that referenced the Westminster Community Governance Review were published in regional and national publications.

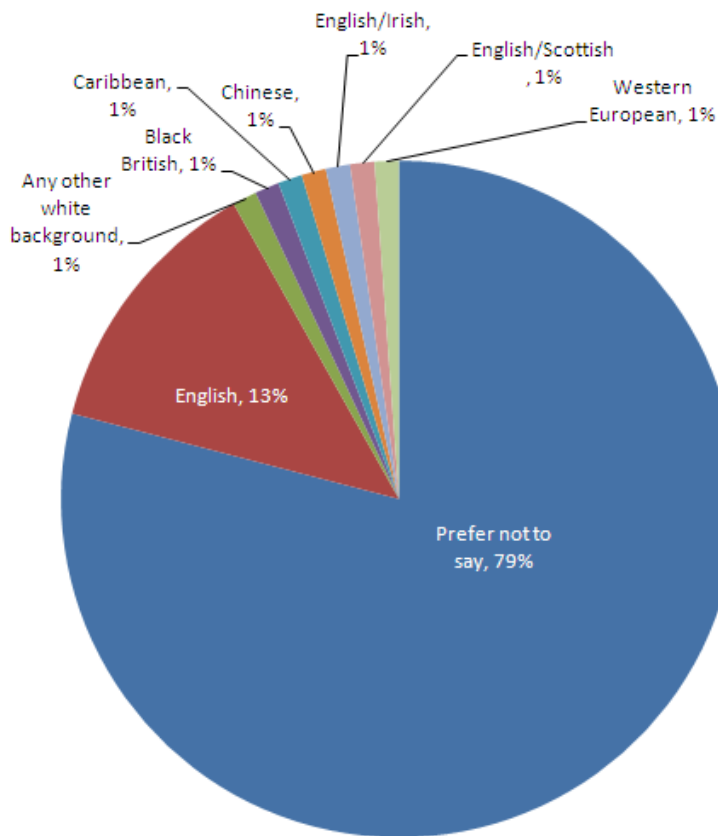
- 6.5 Articles in relation to the Community Governance Review were included in autumn and winter editions of the City Council's 'Westminster Reporter' magazine. This publication is circulated to 121,000 households in Westminster, whilst a further 4,000 are placed on deposit in libraries, leisure centres etc. Further details in relation to the consultation are set out in Appendix 2 to the main Community Governance Report.
- 6.6 To enable equalities impact monitoring, the consultation document contained questions in relation to consultee profile. Responses to these questions are set out below. This analysis takes into account the 86 individual responses. A further 113 responses were received from primary school children, and additional 209 responses originated from 'signed proformas'. Where the respondent did not specify their sex, age, disability or ethnicity, they were included in the 'Prefer not to say' category.
- 6.7 Fourteen percent of the responses did not give any indication of which equalities group they fall in to and in many instances only some of the equalities questions were answered. It should be noted that in many cases, responses were sent on behalf of whole organisations which are made up of many members from different equalities groups. To enable this statistical analysis however, the equalities information of the individual who sent in the response was recorded and is included in this analysis:
- 6.8 **Age:** The overwhelming majority of respondents did not answer this question. Of those that did, it is clear to see that they were mostly of the older age range – with only 3% being under 45 years old.



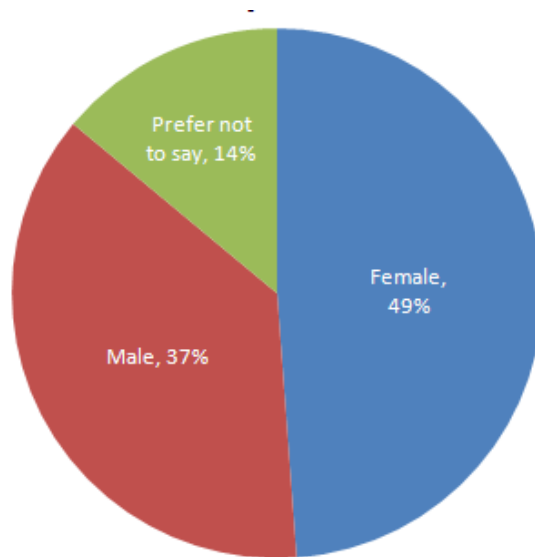
6.9 **Disability:** None of the respondents stipulated that they had a disability of any kind, although four fifths decided not to answer this question at all.



6.10 **Ethnicity:** Most respondents did not answer this question. Of those that did, the majority consider themselves to be English, with other ethnic backgrounds represented in small quantities.



6.11 **Sex:** Only twelve responses were received which did not indicate the sex of the respondent and nearly half of all respondents were female.



7. Assessment

7.1 The new Equality Duty extends the previous duties covering the following protected characteristics:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race – this includes ethnic or national origins, colour or nationality
- religion or belief – this includes lack of belief
- sex
- sexual orientation

7.2 The table below illustrates an assessment of the proposed Neighbourhood Planning recommendations in relation to the protected characteristics. In particular it assesses the impact each characteristic may have on:

A – Equality in respect of being able to form or be involved in a forum;

B – What impacts may stem from a forum being able to develop neighbourhood development plans;

C – Impact arising from the consultation on development orders

Characteristic	Positive/Negative Impact?	Impact on A	Impact on B	Impact on C	Mitigation
Age	Membership of Neighbourhood Forums is open to all ages above the age of eighteen. However this does not prevent those aged under 18 from responding to consultations and being involved in the production of a neighbourhood plan.	N/A	There may be impacts on age from plans that are unrepresentative. e.g. if plans do not include sufficient open space used by children, or parks do not cater for the needs of children (play areas) and older people (quieter spaces).	If consultation was only undertaken online, this could disadvantage the elderly who are unfamiliar with using computers	B – Plans must be in conformity with the Local Development Plan which will be fully representative and any neighbourhood Plan produced will be subject to independent examination C - a requirement to produce hard copies, and make them available in older people hubs or other areas accessed by older people e.g. public buildings. Offer assistance to the elderly to complete consultations online.
Disability	Disabilities may undermine the ability to attend neighbourhood planning consultation events or take part in consultation events	There may be barriers to people with some types of disabilities – learning disabilities, mental health	Plans will need to ensure that spaces are accessible to people with physical disabilities	Consultation will need ensure people with sensory impairments can participate.	A – Encourage informal community events to integrate people from all sectors of society B – Plans must be in conformity with the Local Development Plan

		issues, blind and hearing impaired.			which will fully take account of all types of disabilities C – Require neighbourhood forums to provide consultation materials in multiple formats to accommodate the needs of different disability groups
Gender reassignment	No significant impacts.	Higher degrees of discrimination exist, therefore maybe difficult for people undergoing a gender reassignment to be part of a forum.	N/A	N/A	A – Encourage informal community events to integrate people from all sectors of society
Pregnancy and maternity	No significant impacts	N/A	N/A	N/A	N/A
Race – this includes ethnic or national origins, colour or	There is evidence to suggest that members of minority ethnic communities are less likely to engage with the	N/A	N/A	N/A	The City Council will ensure that best practice is adopted in respect of the public availability of documents, the publicity

nationality	<p>planning system. Research published by the Office of the Deputy Prime Minister in 2005 cites previous research from 2003 in concluding that <i>“the very way the planning system operates can unwittingly exclude some persons and groups”</i>. It goes on to state that <i>“poverty and ethnicity are major barriers that need to be tackled if real inclusion is to be achieved.”</i></p>				<p>surrounding neighbourhood planning work and the availability of translations.</p>
Religion or belief – this includes lack of belief	No significant impacts	N/A		N/A	N/A
Sex	No significant impacts	N/A	There may be some issues ensuring public spaces meet the needs of each gender e.g. space for young children to	N/A	B - Plans must be in conformity with the Local Development Plan which will fully take account of the needs of different genders.

			play, which affects predominately mothers; sporting facilities which do not favour one gender (e.g. if all football grounds, and no netball courts)		
Sexual orientation	No significant impacts	Higher degrees of discrimination exist, therefore it may be difficult for some people of certain sexual orientations to be part of a forum.	N/A	N/A	A – Encourage informal community events to integrate people from all sectors of society

N.B. Further equalities impact assessments will be undertaken as policies and procedures are developed.

8. The Public Sector Duty

8.1 The Equality Duty has three aims. It requires public bodies to have due regard to the need to:

- **eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the Act;
- **advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
- **foster good relations** between people who share a protected characteristic and people who do not share it.

8.2 Having “due regard” for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

8.3 The Equality Act 2010 also provides rights for people not to be directly discriminated against or harassed because they have an association with someone who has a protected characteristic. This can therefore apply to a carer of a disabled or older person.

Aim	Commentary	Action/Mitigation (if required)
Eliminate unlawful discrimination	<p>The application process for Neighbourhood Forum status within a neighbourhood area may result in differing and self selected groups and organisations coming forward (for Neighbourhood Forum status).</p> <p>There is potential for policies within a Neighbourhood Plan to have differential impact on certain groups.</p>	<p>The City Council will ensure that the statutory consultation undertaken following the application for a Neighbourhood Forum is undertaken in a comprehensive and inclusive manner to enable all interested parties the opportunity to comment.</p> <p>The City Council will ensure that all Neighbourhood Plans are legally compliant.</p>
Advance equality of opportunity	<p>Membership of a Neighbourhood Forum is open to those who live or work in the neighbourhood area; or</p>	

	<p>are elected members of the City Council. Criteria for entry to and membership of a particular Neighbourhood Forum will be set out in the legally required written constitution.</p> <p>A minimum 21 members are required to form a Neighbourhood Forum. Whilst this ensures a minimum level of participation, there may be difficulties for those smaller groups who wish to form a Neighbourhood Forum but are restricted by their limited membership numbers.</p>	<p>The City Council will ensure that all parties have an equal opportunity to comment on applications for Neighbourhood Forum status.</p>
Foster good relations	<p>One of the principal objectives of neighbourhood planning is to increase civic and democratic participation. However there is potential for competing groups and types of groups to come forward for the Neighbourhood Forum status within the same Neighbourhood Area.</p>	<p>The City Council will ensure that all parties are aware of an application for Neighbourhood Forum status through widespread consultation, and will encourage 'competing groups' to informally enter into a dialogue.</p>

Name of person signing off the Equality Impact Assessment:

Rosemarie MacQueen

Role: Strategic Director Built Environment

Date: 4th April 2012

Appendix 7

Analysis of conflicts and synergies between Core Strategy NPPF Revision and IIA Objectives

IIA Objectives													
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
16													
17													
Identified areas of change	1	2	3	4	5	6	7	8	9	10	11	12	13

Key-

Positive	
Neutral	

Core Strategy NPPF Revision Identified areas of change

1. NPPF General and Sustainable development
2. Design
3. Communications
4. Housing (including Affordable Rent and Affordable Housing)
5. Heritage
6. Neighbourhood Planning
7. Duty to cooperate
8. Waste
9. Business and employment (including Training and Worklessness)
10. Air quality
11. Community Infrastructure Levy
12. Major infrastructure projects
13. Social and community Infrastructure

Footnotes for Appendix 5

ⁱ Business Register and Employment Survey 2010-11

ⁱⁱ Business Register and Employment Survey 2010-11

ⁱⁱⁱ Business Register and Employment Survey 2010-11

^{iv} 2011 Census

^v ONS, Annual Population Survey 2010

^{vi} Index of Deprivation 2007 Briefing Note Westminster City Council (accessible through Westminster City Council's COWSTAT system)

^{vii} Westminster City Plan 2006-2016

^{viii} Housing Needs Assessment, 2006

^{ix} GLA rent maps for NW8 (lower quartile)

^x Hometrack data for lowest quartile/area

^{xii} Local and Regional CO2 Emissions for 2005-2009 by local authority, 2011 and 2010 Local Authority Carbon Dioxide Figures-Department of Climate and Energy Change 2012.



City of Westminster

