

# Integrated Impact Assessment

## Submission Draft (Regulation 22) Mixed Use Revision



Revision to Westminster's City Plan

November 2015



City of Westminster



## **Non-Technical Summary**

This Integrated Impact Assessment (IIA) report documents the assessment of the predicted social, environmental, economic, health and wellbeing, crime and disorder and equalities effects of the Mixed Use Revision to Westminster's City Plan. It is intended to identify the nature and importance of these effects, and the need for any additional measures to mitigate them, to help ensure the City Council takes a properly informed decision on the proposed Revision.

The IIA fulfils the requirement for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). It also provides the basis for the council to demonstrate that it has considered the equalities impacts of its decisions as a step in meeting the Public Sector Equalities Duty imposed by section 149 of the Equality Act 2010. The IIA also considers crime and disorder matters in accordance with The Crime and Disorder Act 1998 (as amended by the Police and Justice Act 2006) and again will provide the basis for the council to demonstrate it has met its duties under this legislation. Although not a statutory requirement, a Health Impact Assessment has also been included in this IIA as a matter of good practice. This is intended to help ensure that so far as possible, policies actively promote health gain for the local population, reduce health inequalities and do not actively damage health. This is particularly important in light of the Health and Social Care Act 2012 which transferred statutory responsibility for public health to local authorities.

The 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 across the different cross-cutting issues assessed and a more comprehensive approach.

The IIA is part of a process intended to show how sustainability and other cross-cutting issues have been taken into account by the City Council in drawing the policy up and taking it through the legal process for formal adoption.

### **What is the Mixed Use Revision to Westminster's City Plan?**

There are seven separate revisions to Westminster's City Plan as follows:

1. Basement Revision to Westminster's City Plan
2. Vacant Building Credit Revision to Westminster's City Plan

3. Special Policy Areas and Policies Map Revision to Westminster's City Plan
4. Mixed Use Revision to Westminster's City Plan
5. Energy Revision to Westminster's City Plan
6. Revision to Westminster's City Plan (all remaining policies except waste)
7. Waste Revision to Westminster's City Plan

This IIA is in connection with Revision No. 4. - Mixed Use.

### **How was the Mixed Use Revision to Westminster's City Plan Assessed?**

The assessment of the Mixed Use Revision to Westminster's City Plan has been undertaken using an objectives-led approach. The IIA objectives (shown below) have been informed by the baseline evidence, the consideration of key sustainability issues for Westminster and the review of plans and programmes. It has built on objectives identified within previous IIAs. Each objective is supported by a series of guide questions (see Table 2 on P.23). All of this information was set out in the IIA Scoping Report prepared to support revision of Westminster's City Plan, which was consulted on between 17 June and 30 July 2014 and can be viewed [here](#).

#### **IIA Objectives**

1. To create cohesive, inclusive and safe communities
2. To reduce crime and the 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
4. To promote and improve health and wellbeing
5. To reduce greenhouse gas emissions and support climate change adaption
6. To reduce the use of limited natural resources e.g; water, fossil fuels, quarried materials, wood
7. To reduce flood risk, promote sustainable urban drainage, protect surface and groundwater quality

8. To protect, enhance and create environments that encourage and support biodiversity
9. To improve Air Quality
10. To reduce noise and the impact of noise
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
12. To reduce waste production and increase recycling, recovery and re-use of waste
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage
14. To enhance public realm and street improvements
15. To protect, enhance and seek opportunities to increase open space
16. To ensure equality of opportunities, and support sustainable economic growth throughout Westminster
17. To maintain economic diversity and support sustainable economic growth

In this report, the Mixed Use Revision to Westminster's City Plan has been assessed against these 17 objectives and given a positive, neutral or negative score with a commentary.

The IIA process has run alongside developing Westminster's City Plan. As well as assessing the policy itself, the legislation and associated guidance requires the assessment of reasonable alternatives to the policy being proposed by the City Council. These alternatives have been informed by previous informal, and formal, consultation exercises carried out as part of policy development as follows:

- [City Management Plan Policy Options January 2011](#)
- [City Management Plan Consultation Draft November 2011](#)
- [Mixed Use and Office to Residential Conversions December 2014](#)
- [Mixed Use Revision Publication Draft \(Regulation 19\) July 2015](#)

In addition, comments received in response to consultation which can themselves be considered to be reasonable alternatives have also been assessed.

Where policies have not been through this process reasonable alternatives have been derived using adopted policies in Westminster's City Plan: Strategic Policies and by setting out other scenarios.

## **The issue**

There is an insatiable demand for every type of floorspace within the central part of Westminster (known as the Central Activities Zone (CAZ)) from its internationally important agglomerations of commercial activities and functions to its residential communities.

Managing Westminster's CAZ is all about balance for both commercial and residential uses. The council wishes to maintain and enhance the preeminent role of Westminster's CAZ in terms of an internationally important business location to accommodate a broad mix of uses, but the balance between residential and commercial uses need to be carefully managed to ensure that the core strategic and commercial function can continue to thrive.

The Mixed Use Revision contains policies to try and achieve this balance and work to and achieve targets for new jobs. The council also has housing targets to meet and there will be separate policies for this matter to be included in the Revision to Westminster's City Plan (all remaining policies except waste), but for the purposes of this Revision residential use will grow alongside significant expansions in commercial floorspace as part of a mix of uses. Land use credits enable development to be brought forward early which can then meet policy requirements of a later scheme.

## **Mixed Use Revision to Westminster's City Plan**

### **The following have been assessed in this IIA Report:**

#### **Westminster's Strategic Objectives**

1. To accommodate sustainable growth and change that will contribute to **Westminster's** role as **the heart of a pre-eminent** world class city, **building on** its internationally **renowned** business, retail, cultural, **tourism** and entertainment functions within the Central Activities Zone; **to support the unique economic breadth and diversity of the West End and its fringe areas including the Opportunity Areas;** whilst maintaining its unique and historic character, mix, functions, and townscapes.

4. To increase the supply of good quality housing to meet Westminster's housing target, and to meet housing needs, including the provision of affordable housing and homes for those with special needs; **whilst ensuring that new housing in commercial areas coexists alongside the business activity and an appropriate balance of uses is maintained.**

5. To manage the pressures on the city from its national and international roles and functions, **supporting** business communities and tourism, and ensuring a safe and enjoyable visitor experience.

### **Policy S1 Mixed Use in the Central Activities Zone**

The council will encourage development which promotes Westminster's World City functions, manages its heritage and environment and supports its living, working and visiting populations.

Within the CAZ, a mix of uses consistent with supporting its vitality, function and character will be promoted.

A) Where proposals are outside;

- i. Core CAZ,
- ii. the Named Streets, or
- iii. Opportunity Areas,

no residential floorspace will be required.

Within these areas, where proposals increase the amount of floorspace by;

- i. less than 30% of the existing building, or
- ii. less than 400sqm; (whichever is the greater),

no residential floorspace will be required.

B) Where proposals are in;

- i. Core CAZ,
- ii. the Named Streets, or
- iii. Opportunity Areas, and

increase the amount of floorspace by between 30% and 50% of the existing building, and more than 400sqm, **residential floorspace or an equivalent payment in lieu will be provided.**

**The residential floorspace required is equivalent to the net gain in B1 office floorspace less 30% of the total net additional floorspace. Where the net gain in B1 office floorspace is less than 30% of the total net additional floorspace, no residential will be required. The residential floorspace can be provided:**

- i. on-site,
- ii. off-site, or
- iii. by mixed use credits (Policy CM47.2).

It is at the applicant's discretion **whether they wish to provide a payment in lieu or residential floorspace, and where residential floorspace is provided,** it is at the applicants discretion which of i, ii, or iii above the apply.<sup>1</sup>

C) Where proposals are in;

- i. Core CAZ,
- ii. the Named Streets, or
- iii. Opportunity Areas, and

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<sup>1</sup> The following text has been deleted from Policy S1(B) “ i. net increases in B1 office floorspace (up to a maximum of the net additional floorspace above the 30% development uplift threshold), will be accompanied by an equivalent amount of residential floorspace, either ... ; or ii. net increases in B1 office floorspace (up to a maximum of the net additional floorspace above the 30% development uplift threshold) will be accompanied by an affordable housing payment in lieu equivalent to the net gain in B1 office floorspace (subject to the 30% development uplift threshold as above).”



increase the amount of floorspace by more than 50% of the existing building and more than 400sqm, **residential floorspace will be provided.**

**The residential floorspace required is equivalent to the net gain in B1 office floorspace less 30% of the total net additional floorspace. Where the net gain in B1 office floorspace is less than 30% of the total net additional floorspace, no residential will be required. Where the net gain in B1 office floorspace is between 30% and 50% of the total net additional floorspace, B) above is applied.**

~~net increases in B1 office floorspace (up to a maximum of the net additional floorspace above the 30% development uplift threshold) will be accompanied by an equivalent amount of residential floorspace.~~

The residential floorspace will be provided in accordance with the following cascade. Applicants are required to demonstrate to the council's satisfaction that it is not appropriate or practicable to provide the floorspace (in whole or in part) at each step of the policy cascade before they can move to the next.

- i. The required floorspace will be provided on-site or in the immediate vicinity of the site.
- ii. The required floorspace will be provided off-site (including through a draw down of mixed use credits in accordance with Policy CM47.2) on a site in the vicinity of the development site, or in the case of Victoria and Paddington Opportunity Areas, within that Opportunity Area.
- iii. The required floorspace will be provided off-site (including through a draw down of mixed use credits in accordance with Policy CM47.2) elsewhere within the CAZ. This part of the cascade does not apply to Victoria and Paddington Opportunity Areas. The housing provided must be **greater and** of a higher quality than would be possible under i. or ii. above.

- iv. Payment of an appropriate Payment in Lieu to the Affordable Housing Fund equivalent to the net gain in B1 office floorspace (subject to the 30% development uplift threshold as above).

In demonstrating that a particular step is not practicable, site specific considerations will need to be taken into account. In demonstrating a particular step is not appropriate, considerations may include where a significantly better outcome can be achieved, in keeping with the council's mixed use objectives, by not providing the residential floorspace on site.

D) **Where proposals are in;**

- i. Core CAZ,
- ii. the Named Streets, or
- iii. Opportunity Areas,

and involve;

- i. changes of use from office to residential; and/or
- ii. replacement of office floorspace with residential floorspace

**which** are acceptable in principle under Policy S20, the net increase in residential floorspace will be accompanied by an *appropriate* amount of commercial floorspace and/or social and community floorspace, except where:

- i. the net increase in residential floorspace is less than 400sqm; or
- ii. in the case of changes of use from office to residential, the building was originally built as residential and the building is substantially retained.

Where these proposals increase the amount of floorspace by more than 50% of the original building and more than 400sqm, net increases in residential floorspace will be accompanied by an *equivalent* amount of commercial and/or social and community floorspace.

The commercial and/or social and community floorspace can be provided on-site, off-site or by the draw down of mixed use credits (Policy CM47.2) or by an appropriate payment in lieu to the City Council's Civic Enterprise Fund. These options will not apply where an active frontage is required at ground floor level, which must be provided on-site.

### **Policy S6 Core Central Activities Zone**

The Core Central Activities Zone (Core CAZ) is an appropriate location for a range of commercial and cultural uses and complimentary residential use, subject to the following priorities:

- Supporting strategically important clusters of uses consistent with enabling the growth and evolution of places to ensure **that the area retains its globally important function reputation of the area as a business location. is retained and enhanced.**
- Retail floorspace is encouraged throughout the area. Large scale retail development will be directed to the West End International Shopping Centre's Primary Shopping Frontages, the CAZ Frontages and the Opportunity Areas, with smaller-scale retail development also to its other shopping centres. Development within the Knightsbridge Primary Shopping Frontage will support the character, function and vitality of the wider International Shopping Centre within the Royal Borough of Kensington and Chelsea.
- Within the West End Stress Area, new entertainment uses will only be allowed where the council considers that they are small-scale, low-impact and they will not result in an increased concentration of late-night uses.
- Development sites within the Millbank Strategic Cultural Area between Lambeth and Vauxhall bridges will deliver a mix of uses including those that support culture and the creative industries - including arts and cultural uses, affordable business floorspace, workshops and studios; and

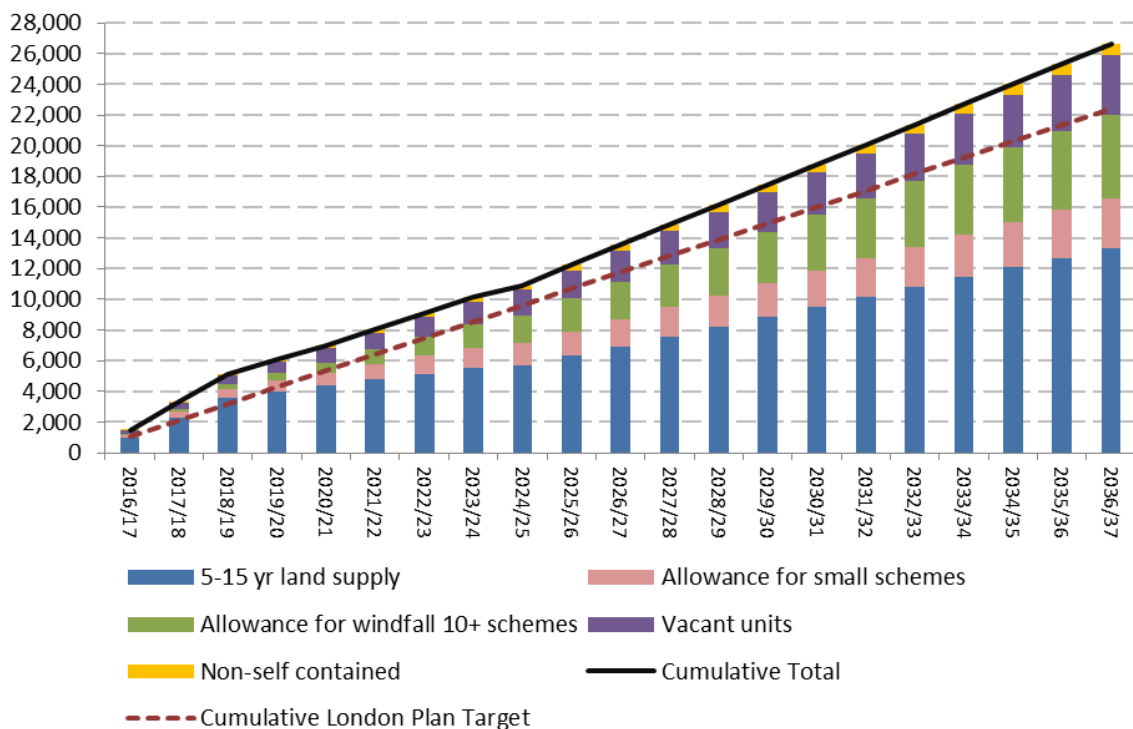
- Berwick Street market will be protected and the use of Rupert Street for specialist seasonal market trading will be supported.

Where retail developments fronting the Primary Shopping Frontages result in the requirement to provide residential floorspace, the residential floorspace may be provided off-site in the vicinity rather than on-site, where the council is satisfied that off-site provision would better contribute to the vitality of the West End Special Retail Policy Area or Knightsbridge International Shopping Centre.

### **Optimising Housing Delivery Reasoned Justification and Appendix 4: Housing Delivery**

#### Reasoned Justification

To achieve and exceed Westminster's housing targets it is necessary to protect existing housing and bring forward new housing as appropriate across the city. This means that schemes which retain or increase the overall housing floorspace should not reduce the number of residential units as this would reduce the number of homes in the city. Affordable housing is an exception as Westminster's own housing stock is dominated by one and two bedroom units; whilst need is focused on two and three bedroom units. Formerly converted houses which would provide family-sized homes will also be an exception because of the shortage of family homes with gardens in the city and the benefits such 'de-conversion' would bring to providing a range of accommodation. This also creates a flexibility and sustainability within the housing stock for different sizes and types of accommodation to be provided throughout a building's lifetime.



**FIGURE 37 WESTMINSTER'S HOUSING TRAJECTORY**

Westminster will be able to meet the London Plan target of **1,068 units from all sources**.

This graph is based on the 15 year Land Supply Assessment **2016/17-2036/37** included in the **Annual Authorities** Monitoring Report 2010/11, plus an allowance for windfall sites of 10 or more units and an allowance for sites yielding 1-9 units. **Figures beyond 2028/29 are based on estimates based on past delivery of non-conventional sources and development capacity.** It also includes sources of non-conventional housing: bringing vacant homes back into use and non-self contained housing. Westminster has local circumstances which justify including an allowance for windfalls and smaller sites, and that these can legitimately be included in the trajectory as set out in the spatial strategy. The justification is set out in Appendix 4, **(Note: This is set out as Appendix 7 to this IIA Report)** and is based on the following:

The 15 year Land Supply Assessments include sites which are expected to deliver 10 or more residential units. However, 93% of housing sites in the city yield less than 10 units, and these small sites have yielded about 25% of new homes in the city.

Historically, windfalls have accounted for 80% of housing delivered in the city. However, the 15 year Land Supply Assessments will now capture many of these sites **and there will be less 'windfalls' from the loss of offices** so a far lower figure needs to be projected into the future.

The inclusion of these windfall and small sites allowances reflects the advice in the National Planning Policy Framework as such sites have consistently come forward and will continue to provide a reliable source of housing. It is based on new development and conversions, and does not rely on development of residential gardens. The 5 year housing land supply includes an additional 5% buffer to ensure choice and competition, although as most sites in Westminster are available for housing, this will include an element of windfalls as set out above.

Policies relating to Special Policy Areas (Policy S2), the Opportunity Areas (Policies S3, S4 and S5), Core CAZ and the West End Special Retail Policy Area (Policies S6 and S7), **and North Westminster Economic Development Area (Policy S12) and Offices and other B1 Floorspace (S20)** have other priorities **instead of, or** in addition to housing.

#### **Policy S18 Commercial Development**

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

The council will work to achieve and exceed the target of additional floorspace capacity for 77,000 new jobs between 2016/17 and 2036/37, an average of 3,850 new jobs per annum. Commercial and other non-residential activity is the priority in the Core Central Activities Zone.

Proposals for new commercial uses must be appropriate in terms of scale and intensity of land uses, and character and function of the area. **Although the priority for Core CAZ, the Opportunity Areas and the Named Streets is commercial, there are residential streets and areas within CAZ where commercial encroachment is not appropriate.**

#### **Policy S20 Offices and other B1 Floorspace**

The council will work to achieve and exceed the target of additional **B1 Office** floorspace capacity for 58,000 new jobs between 2016/17 and 2036/37<sup>[1]</sup>, an average of 2,900 new jobs per annum.

New office development will be directed to Paddington, Victoria and Tottenham Court Road Opportunity Areas, the Core Central Activities Zone, the Named Streets, and the North Westminster Economic Development Area.

Inside the Core Central Activities Zone, Opportunity Areas and the Named Streets, changes of use from office to residential or replacement of office floorspace with residential floorspace will only be acceptable where the council considers that the benefits of the proposal outweigh the contribution made by the office floorspace, taking into account:

1. the employment and housing targets set out above, and as referred to in Policies S18 and S14, or in the case of the Victoria and Paddington Opportunity Areas, the targets set out in Policies S3 and S4;
2. the contribution of the office floorspace to meeting business and employment needs; and
3. the mix of type, size and tenure of housing proposed.

Where 3) above is not met due to site constraints and/or viability, the floorspace will be retained as B1 office.

Where appropriate, the council will request a range of business floorspace including workshops and studios.

#### **Policy CM47.1 Land Use Swaps and Packages**

Planning permission for the swapping of uses between sites and for land use packages (swaps between more than 2 sites) which are located in the Central Activities Zone will be appropriate where:

1. the sites are in the vicinity of each other;
2. the mixed use character of the immediate area is secured at a fine grain;

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<sup>[1]</sup> This target is based a) on the average office floorspace projections taking into account forecast employment and past stock growth, and assuming an occupation rate of 9sqm per employee and b) securing 49% of the employment growth target set out in Policy S18 in office-based employment. Both of these assessments are based on the London Office Policy Review 2012 Update, and both methods suggest a target of 58,000 jobs.

3. there is no net loss of floorspace which is protected by other policies in the plan **across the site taken as a whole;**
4. the uses are appropriate within each area and there is no loss of amenity resulting from the introduction or intensification of a use into an area;
5. any residential accommodation is of a higher quality than could have been achieved without the land use swap or package;
6. the applications for all sites are submitted at the same time and all elements of the scheme are completed within a time frame agreed by the City Council.

This policy does not prejudice the application of any other policies in the plan, and requirements for floorspace to be provided must be met in full.

If agreed, the sites subject to the land use swap or package will be treated as though the development is on a single site, including for consideration of viability.

Applications must be accompanied by a full schedule of the existing and proposed floorspace including the following:

1. the floorspace of each use (Gross Internal Area) proposed for each site, and for all of the sites taken as a whole;
2. in the case of residential floorspace, the breakdown of floorspace provided in accordance with 1. (immediately above) by the tenure, unit floorspace, and the number of bedrooms of each unit , and the total floorspace for all of the sites taken as a whole;
3. details of any draw downs of credits in accordance with Policy CM47.2
4. calculations of any floorspace shortfalls being met from Payment in Lieu.

### **Policy CM47.2 Credits**

#### **A) Registering Credits**

In addition to Policy S1 in the case of mixed use credits, credits must:

1. be agreed as a credit at application stage and registered as a credit at the time of permission being granted, or have been granted permission prior to [revision adoption date] and have not been implemented;



2. establish a nominal floorspace value for the affordable housing credit in agreement with the council, with each credit equating to 1 sqm;
3. fund the development and maintenance of a credit monitoring database which will be the definitive list of credit sites;
4. not be listed in Appendix 1 Proposals Sites with that use as a Preferred Use;
5. comply with the following policies;

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

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

#### B) Drawing Down Credits

In addition to Policy S1 in the case of mixed use credits, when drawing down credits:

1. They must be drawn down within 7 years of registration;
2. The floorspace registered by the credits must be completed, and the completion certificate provided to the council;
3. The nominal value referred to in A) 2. above must be used in any viability assessment for the host scheme;
4. Credits may be pooled from more than one credit scheme, or used in combination with on-site, off-site or payment in lieu provision;
5. The credits must be available for draw down, as follows;

- i. Credits are allocated to a host scheme at the time the planning application is submitted for the host scheme. After this, they will not be available for any other host scheme until they are released.
- ii. To release credits the council must be notified in writing that:
  - a) the host scheme planning application has been refused and the time for an appeal has expired, or an appeal dismissed;
  - b) the host scheme planning application has been withdrawn;
  - c) the host scheme has been superseded by an alternative host scheme and the credits are transferred to the latter scheme;
  - d) the host scheme has been superseded by an alternative scheme that does not use the credits; or
  - e) the host scheme planning permission has expired.
- iii. Credits can only be drawn down once, and the credit has been drawn down when the council is notified in writing that the host scheme is completed.

## **What were the key findings of the IIA?**

### **Mixed Use Revision to Westminster's City Plan**

Appendix 5 of this report contains the detailed assessments and associated considerations for the Mixed Use Revision to Westminster's City Plan for Strategic Objectives 1, 4 and 5, Policies S1, S6, S18, S20, CM47.1, CM47.2 and for additional wording to the text and reasoned justification for S14 and changes in Appendix 4: Housing Delivery (*Included as Appendix 7 to this IIA Report*). A summary of the assessments are as follows:

#### **Strategic Objective 1**

This strategic objective is mainly neutral but has positive scores for the sub-criteria in objectives 4, 11, 13, 16 and 17. All sub-criteria are positive for Objective 17 as the strategic objective primarily seeks to accommodate economic growth and change. The impact is considered to be both short term and long term and the cumulative impact is most likely to be for Objective 16 in terms of reducing unemployment.

#### **Strategic Objective 4**

This strategic objective is neutral overall. It has positive scores for objectives 1, 3, 4, 10, 11 and 17. It receives positive scores for all sub-criteria in objectives 3 and 17. However, it has negative scores for 3 because housing will no longer be the priority across Westminster and will be balanced against the commercial activity in Westminster's commercial core. This is balanced by gains in employment and workspace, and potential reduction in conflicts between residents and businesses e.g. noise.

#### **Strategic Objective 5**

This strategic objective is mainly neutral. It receives positive scores for all sub-criteria in objectives 2, 10 and 17 and three of the four sub-criteria in Objective 13 and one in objectives 4 and 16. The impact is considered to be both short term and long term and the cumulative impact is most likely to be a positive impact in the centre of Westminster spreading out the more deprived parts of Westminster in the north.

#### **Mixed Use in the CAZ (Policy S1)**

Policy S1 provides sustainable outcomes for economic, social and environmental objectives. The policy seeks to maintain and enhance the pre-eminent role of Westminster's CAZ in terms of an internationally important business agglomeration, and ensure a balance of homes mixed with commercial uses, which will help protect and enhance the unique character of Westminster and which underpins its sustainable economic growth. The policy is particularly positive for objectives 1, 11, 16 and 17.

The revision does have negative scores for objective 3 as it will result in an overall loss of housing, and a loss of receipts to the Affordable Housing Fund. This is balanced however, by the reversal of the negative impacts currently arising in relation to Objective 17, which receives very high positive scores. The small reduction in housing delivery is more than off-set by these gains. Research by Drivers Jonasi has shown that it is the diversity of commercial uses in Westminster and its mix of commercial and residential use that results in economic sustainability (IIA objective 17) in particular, in times of an economic down turn. Furthermore, there are significant agglomeration benefits in Westminster's core commercial areas that are being eroded by unbalanced growth in residential floorspace in these areas. The credits system is both beneficial to developers and the council and may provide more and higher quality new homes (IIA objective 3). Providing mixed commercial and residential communities has the potential to improve cultural wellbeing if theatres and cinemas are provided as part of the

mix(Objective 4) The potential for Payment in Lieu is positive for IIA objective 3 in particular the EQIA criteria for increasing the range of affordable housing.

### **Core Central Activities Zone (Policy S6)**

This is neutral overall but has significant positive impacts in Core CAZ encouraging economic growth including the retail and cultural offer and strategically important clusters of use and minimises the need to travel. There is a long term positive impact on the UK economy and Westminster's role in London's world city status. The recognition of diversity ensures an overall sustainable approach to development. The policy is particularly positive for objective 17, but also is positive for sub-criteria in objectives 1, 2, 3, 4 and 11. A growth in construction waste is likely and this gives a negative score to Objective 12. The economic impacts on other parts of the city are likely to be long term and cumulative.

### **Changes to supporting text and to the Reasoned Justification to Policy S14 - Optimising Housing Delivery and to Appendix 4: Housing Delivery**

Although there are no changes to the wording of Policy S14, there is significant alteration to the text and reasoned justification around this policy and to Appendix 4 – Housing Delivery that merit an IIA assessment. These mainly concern increased London Plan housing targets which result in a positive score for sub-criteria in Objective 3 and an associated improvement in health and well-being in Objective 5. The other change dovetails in to the mixed use balance of commercial and residential uses which is the overall theme of all changes in this phase of the City Plan and has removed the reference in the reasoned justification to not giving general protection to office use which is considered to potentially provide an improved business environment in particular for offices. There are long term positive effects for both housing and commercial uses with a cumulative impact on health and wellbeing.

### **Commercial Development (Policy S18)**

This policy is overall neutral but is most positive for Objective 17 seeking to protect and enhance Westminster's pre-eminent role for the economy. There may be a positive impact on Objective 13 by ensuring development is of an appropriate scale and for objectives 1 and 11 in terms of the provision of shops and services and reducing the need to travel by car. The changes made pre-submission clarify that even within the Central Activities Zone, there should be no commercial encroachment into wholly residential areas or streets and overall assessment remains neutral. As with other

similar policies this has a negative score for construction waste and is neutral for the reasons set out above in the strategic objectives all other environmental policies.

### **Offices and Other B1 Floorspace (Policy S20)**

This policy is very positive for Objective 17, in particular for businesses in key sectors, which is considered to include office floorspace. This has been given a neutral score for Objective 3 very much on balance. However, compared to the existing situation this may result in a reduced provision of housing. For office development which may have a wider impact on the UK and international economy.

### **Land Use Swaps and Packages (Policy CM7.1)**

This policy is positive on social and economic sustainability criteria in particular IIA objective 3 and Objective 17. The transfer of uses between buildings can facilitate a better arrangement of uses within buildings and therefore greater efficiency and sustainability of the building stock by ensuring long-term suitability and continued occupation. The overall effect is to enhance the quality of both commercial and residential accommodation. Applications for land use swaps are normally small scale involving change of use and therefore the policy is relatively neutral on environmental sustainability grounds. Larger scale applications where the swap of uses is in connection with the Mixed Use policy will be encouraged to provide an overall improvement for IIA sub-criteria in objectives 5 and 6.

### **Credits (Policy CM47.2)**

This policy provides the mechanism for the implementation of land use credits set out in Policy S1. These credits enable development to be bought forward early which can then meet policy requirements of a later scheme. It provides additional flexibility to support developers in delivering mixed use. This approach receives positive scores for both housing and economic objectives. In particular in the delivery of higher quality housing and affordable housing and for improving business development and environment. This policy is likely to result in the agglomeration of the residential requirement from several smaller mixed use schemes and therefore affordable housing will be provided where it may not have been possible in individual mixed use schemes.

### **Reasonable Alternatives**

The SEA Directive requires the assessment of reasonable alternatives and these have been informed by previous informal consultation stages in policy development as follows:

- [City Management Plan Consultation Draft November 2011](#)
- [Mixed Use and Office to Residential Conversion Consultation Booklet 18 December 2014](#)
- [Mixed Use Revision Publication Draft \(Regulation 19\) July 2015](#)

Where policies have not been through this process reasonable alternatives have been derived using adopted policies in Westminster's City Plan: Strategic Policies and by setting out other scenarios. The assessment tables including a full key to the reasonable alternatives are set out in Appendix 6 and a full description of the findings is contained in paragraphs 5.17 – 5.28 of this report. In summary the 'No policy approach' is the most negative for all policy areas and in general the more developed and detailed the approach the more positive scores the alternative receives.

### **Changes to the Plan as a result of the IIA**

There have been no changes to the Mixed Use Revision to Westminster's City Plan as a result of this IIA.

### **How will any effects be monitored?**

The effects of this policy will be included in our Authority's Monitoring Report.

### **What are the next steps?**

This IIA accompanies the Basement Revision to Westminster's City Plan submission draft. It is part of the supporting document submitted to the Secretary of State and will form part of the examination documents. Consultation responses are summarised in the consultation statement which also accompanies the basement revision as a support document.

The revision will be considered by an Inspector appointed by the Secretary of State. They will report to the council and ultimately the revision will be adopted. At this stage it will gain full weight for determination of planning applications as part of Westminster local plan.



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Appendix 3 - Consultation Comments and City Council Responses on the IIA Scoping Report June 2014

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Appendix 5 - IIA Detailed Appraisals for the Mixed Use Revision to Westminster’s City Plan

Appendix 6 - Reasonable Alternatives

Appendix 7 - Appendix 4: Housing Delivery of the Mixed Use Revision to Westminster’s City Plan



# 1. Introduction

## Integrated Impact Assessment

- 1.1 This IIA report presents the findings of the Integrated Impact Assessment (IIA) of the Mixed Use Revision to Westminster’s City Plan against the 17 objectives in the IIA Assessment Framework (set out in detail in Table 2 on page23) which has been prepared to assess the proposed revision to Westminster’s City Plan. The report also considers the potential effects of a number of reasonable alternatives to the Mixed Use Revision. Table 1 below shows the various stages in the preparation of this IIA (this is based on the five stages of the SA preparation process set out in A Practical Guide to the Strategic Environmental Assessment Directive (ODPM 2005). Appendix 1 of this report illustrates the development of the sustainability process in relation to the development plan process and Appendix 2 sets out the SEA Directive requirements checklist and how these have been covered in this report and in the [Scoping Report](#) June 2014.
- 1.2 Westminster’s City Plan will be revised in seven tranches, each taking the formal status of a separate revision to the Plan (this is explained in more detail in Chapter3). There will, therefore, be seven separate IIA reports dealing with the impacts of each of these sets of proposals (although they will inform each other and draw on a common evidence base) and one final IIA Report which will include a comprehensive overview and pick up policies that have been partly changed. The indices to be used for monitoring mixed use development (Stage E) will be included in this report and the relevant monitoring indices included in the subsequent IIA reports; however a comprehensive post adoption statement will only be published once all the IIA Reports have been finished and the process concluded.

**Table 1- Stages of the Integrated Impact Assessment (IIA)**

<b>Stage A</b> <b>Setting the context and objectives, establishing the baseline and deciding on the scope</b> Assemble the evidence base to inform the IIA and establish a framework for undertaking the appraisal (in the form of sustainability	Scoping Report – June 2014
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objectives).	
<p><b>Stage B</b></p> <p><b>Developing and refining alternatives and assessing effects</b></p> <p>Appraise the plan objectives and policies against the IIA Assessment Framework taking into account the evidence base. Propose mitigation measures for alleviating the plan’s adverse effects as well as indicators for monitoring the plan’s sustainability.</p>	Appraisal Framework Assessment
<p><b>Stage C</b></p> <p><b>Prepare the report</b></p> <p>Prepare an Integrated Impact Assessment Report documenting the appraisal process and findings.</p>	IIA Report
<p><b>Stage D</b></p> <p><b>Seek representations on the sustainability appraisal report from consultation bodies and the public</b></p> <p>This stage has been completed and this document will now be a supporting document for the basement revision to be submitted to the Secretary of State.</p>	IIA Report Consultation – Current Stage.
<p><b>Stage E</b></p> <p><b>Post adoption reporting and monitoring</b></p> <p>Prepare and publish post adoption statement and monitor the significant sustainability effects of implementing the plan.</p>	Authority’s Monitoring Report (AMR) and Post Adoption Statement.

## **The Requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)**

1.3 This IIA fulfils the requirement for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), which is the requirement of the Strategic Environmental Assessment Directive EC/2001/42 (SEA Directive). By taking an integrated approach it also enables the council to show how it has met a range of other statutory requirements:

- By considering equalities impacts for decisions it provides the council with the basis for, and evidence of, meeting the public sector equalities duty under section 149 of the Equality Act 2010).
- By considering crime and disorder matters, it provides the basis for, and evidence of, how the council has met the requirements of the Crime and Disorder Act 1998 (Amended by the Police and Justice Act 2006) to consider community safety implications of the policy.
- Although not the subject of a statutory requirement, a Health Impact Assessment has also been included in this IIA, as a matter of good practice. This is intended to ensure that so far as possible, policies actively promote health gain for the local population, reduce health inequalities and do not actively damage health. This is particularly important in light of the Health and Social Care Act 2012 which transferred statutory responsibility for public health to local authorities.

The integrated approach avoids the need to undertake and report on separate assessments, enables a comprehensive approach to cross-cutting issues and seeks to reduce any duplication of assessment work and benefits from a shared understanding of the policies.

### **Consultation on this IIA Report**

1.4 This IIA Report was issued for public consultation **10<sup>th</sup> July to 4<sup>th</sup> September 2015**. In addition to seeking views from statutory consultees this report was made available to all organisations/individuals on the planning policy database. No responses were received specific to the IIA.

## **2. Scoping Report Update**

- 2.1 The first stage of the IIA process (Stage A in Table 1 above) involved gathering evidence regarding the sustainability baseline and context for Westminster. This evidence was used to develop a set of sustainability objectives, which make up the sustainability framework to be used to assess the sustainability of the revisions to Westminster's City Plan. This information was set out in the IIA Scoping Report which was consulted on between 17 June and 30 July 2014 can be viewed [here](#).

### **Response to Consultation**

- 2.2 In response to this consultation three letters were received from Natural England, The Environment Agency and English Heritage. These comments and the City Council's response are set out in Appendix 3 of this report. The majority of the comments received concern matters that were already included in the Scoping Report. However, in response to comments from English Heritage, IIA Assessment Framework Objective 13 has been altered to better reflect the wording of national policy set out in the Government's National Planning Policy Framework (NPPF). In response to comments made by the Environment Agency's comments about the need to ensure that the IIA takes account of the European Union Water Framework Directive an additional sub-criterion question has been added to Objective 8 as follows: *Will it improve the water environment including quality?* Finally, additional documents have been included in the list of other relevant local plans/policies and strategies and information as a result of responses.

### **Updates to other relevant local plans/policies and strategies**

- 2.3 Appendix 4 of this report is an updated list of relevant local plans/policies and strategies, originally contained in Chapter 4 of the Scoping report June 2014, to include documents suggested by consultees and updates of those most relevant to mixed use.

### **Update of Corporate Vision**

- 2.4 Since writing the Scoping report the city council's corporate vision has been updated. *Better City, Better Lives Year 2*, March 2014 has been replaced with *A City for All* (April 2015). The ambitions in *A City for All* are as follows:

**City of Aspiration** – We are enabling all our communities to share in the economic prosperity of our City by being ambitious and enterprising in the way we work.

**City of Choice** – We are being collaborative in the way we work to create a City of Choice where residents, businesses and visitors can make responsible decisions for themselves, their families and their neighbourhoods

**City of Heritage** – We are being productive in protecting and enhancing Westminster’s unique heritage so that *every* neighbourhood is a great place to live, work and visit, both now and in the future.

2.5 As with *Better City, Better Lives, A City for All* ambitions cross cut the objectives in the IIA Framework. However it is possible to align the closest matches as follows:

- **City of Aspiration** – IIA Framework objectives 3, 16 and 17
- **City of Choice** – IIA Framework objectives 1 and 4
- **City of Heritage** – IIA Framework objectives 2, 4 11, 13 and 15

The City of Heritage ambition specifically refers to the Mixed Use Revision to Westminster’s City Plan.

### **Baseline Information**

2.6 The collection of baseline information is a key component of the SA process and a legal requirement under the SEA Directive. Baseline data and contextual information help to provide a basis for identifying relevant sustainability issues and for predicting, assessing and monitoring effects. The baseline information to inform assessment of the revision of the City Plan was set out in the Scoping Report. All of this information has been drawn on in preparation of this report, which should be read in conjunction with the Scoping Report. However, the following section provides an update with information particularly relevant to mixed use development.

### **Affordable Housing**

2.7 Overall the London average for buying is £513,519<sup>ii</sup>. In Westminster average market prices<sup>iii</sup> are as follows:

- 1 bedroom flat - £508,000
- 2 bedroom flat -£779,700

- 3 bedroom flat - £939,000
- 2.8 Overall the London average for renting (per week is) £530<sup>iv</sup>. In Westminster<sup>v</sup> this is as follows:
- 1 bedroom - £425
  - 2 bedrooms - £600
  - 3 bedrooms - £890
  - 4 bedrooms - £1,395
- 2.9 Westminster benefits for a very diverse economy including jobs with lower pay. These employees are unable to afford market properties in the area. Businesses benefit from a diverse employee base including people who live more locally. This is especially important for jobs with late/early shifts when public transport out of the city is less frequent.<sup>vi</sup>
- 2.10 The entry cost of a home is currently on average 27 times the average wage in Westminster.<sup>vii</sup>

#### **Office – Rents and affordability**

- 2.11 Figure 1 below shows consistently high demand for offices in Westminster over the last eight years and a growing demand for office base floorspace of under 300 sqm. At a strategic level, Westminster has the most employees in the UK, with about 693,000 employees, well ahead of the next largest number of employees in the City of London with some 392,000 and Camden with 328,000<sup>viii</sup>. Westminster generates by some estimates £55.7bn Gross Added Value, 18% of London's GVA and 4% of the UK's GVA.

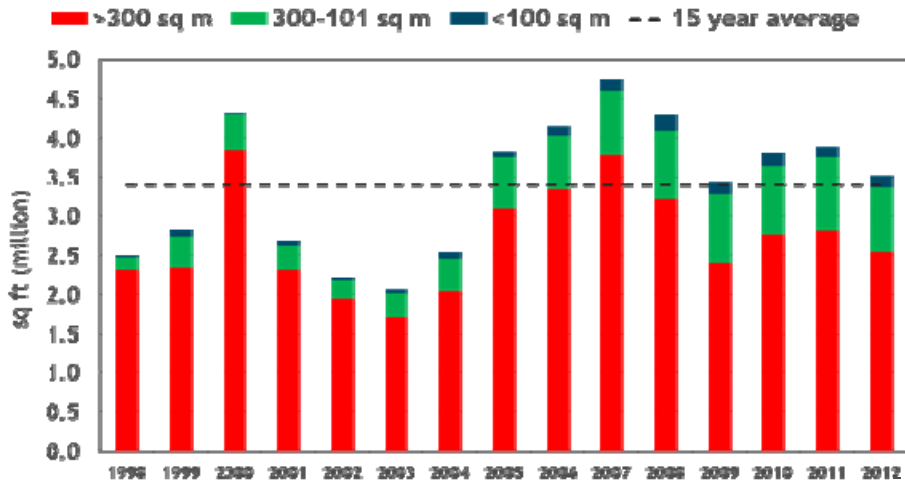
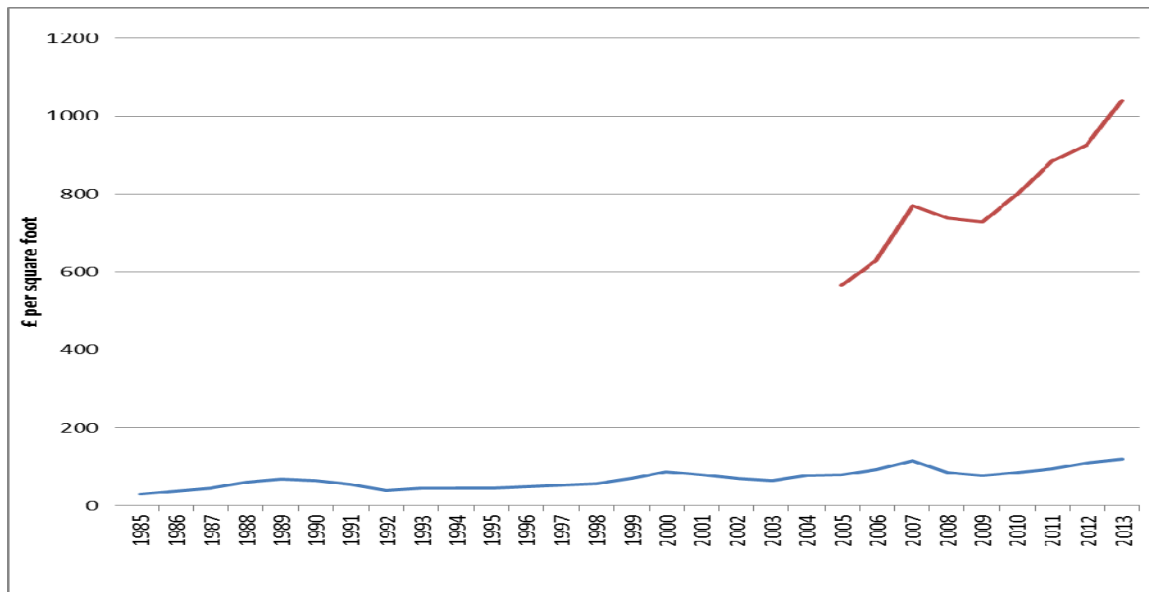


Figure 1 Westminster's Office Take-up 1998-2012<sup>ix</sup>

- 2.12 Westminster's office stock accommodates over 17,500 rateable business's with a rateable value of over £2.6 billion. This makes up 62% of Westminster's rateable businesses.
- 2.13 Average office rents have performed well and recovered to pre-recession levels. The higher returns on residential floorspace has now operated for over a decade. Figure 2 shows the price per square foot for both office and residential sales up to 2013.



**Figure 2 Average prime office (blue) 1985-2013 and average residential sales (red) 2005 - 2013**

### Likely Future Conditions

2.14 Westminster is home to thriving business clusters and a hub for commerce. It is also home to a significant residential population which is in places very different from that found in most other parts of London, with housing and commercial activity in very close proximity. It is this balance and mix of uses that help make Westminster a successful and sustainable location, and which in turn has a positive impact on London and the UK economy as a whole. Paragraph 3.9 of The [Scoping Report](#) June 2014 set out details of the consequences in Westminster from change in market conditions which has without a policy approach resulted in a loss of office accommodation to residential. Paragraph 3.28 of The [Scoping Report](#) June 2014 (*Likely Future Conditions*) sets out the need for a policy to ensure there is no future detrimental impact on the mixed use character of central Westminster and overall quantum of offices. This assessment still stands.

### Update final comment

2.15 The [Scoping Report](#) June 2014 is considered sufficiently recent and robust to use for this IIA report and the additional information set out above does not change the key considerations and 17 IIA objectives.<sup>2</sup>

<sup>2</sup> The wording of Objective 3 has been altered at the request of English Heritage to better reflect the wording of the NPPF. However, this change does not alter the meaning of the objective or outcome of any assessment.



### **3. The Local Plan – Westminster’s City Plan**

3.1 The Mixed Use Revision to Westminster’s City Plan is one of seven revisions to be carried out as follows:

1. Basement Revision to Westminster’s City Plan
2. Vacant Building Credit Revision to Westminster’s City Plan
3. Special Policy Areas and Policies Map Revision to Westminster’s City Plan
4. Mixed Use Revision to Westminster’s City Plan
5. Energy Revision to Westminster’s City Plan
6. Revision to Westminster’s City Plan (all remaining policies except waste)
7. Waste Revision to Westminster’s City Plan

This IIA Report is for 4. Mixed Use Revision to Westminster’s City Plan.<sup>3</sup>

3.2 Once all seven revisions are adopted Westminster’s City Plan will consist of both strategic and detailed city management policies and will provide a comprehensive source of planning policy for Westminster. [Westminster’s Local Development Scheme March 2015](#) sets out the timeline for all Revisions to Westminster’s City Plan, with adoption dates between 2015 and 2016.

#### **Strategic Policies**

3.3 [Westminster’s City Plan: Strategic Policies](#) was adopted on 13 November 2013 and sets out the vision for Westminster up to 2025 and beyond. It puts in place a strategic policy framework to deliver that vision. This document is based on a review of the Core Strategy adopted in January 2011 and has been fully reviewed and updated to ensure consistency with the National Planning Policy Framework (NPPF) published in 2012, and the London Plan - July 2011, with Further Alterations – March 2015.

3.4 Westminster’s City Plan: Strategic Policies was subject to an Integrated Impact Assessment and the report can be viewed [here](#). This built on The Core Strategy Sustainability Appraisal Report which included a Strategic Environmental Assessment (November 2009), which can be found [here](#) with associated appendices [here](#). The 2007 scoping report is available to view [here](#).

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<sup>3</sup> It should be noted that the first 5 revisions may emerge in a different order than set out above.

## City Management Policies

3.5 Work on developing the detailed city management policies began in 2008 and the steps taken to date are as follows:

- [Regulation 18 - Notification of the intent to prepare the plan October/ November 2008 \(Statutory Stage\)](#)
- [Consultation Workshops in the summer of 2009 \(Informal Stage\)](#)
- [City Management Plan Policy Options: January 2011 \(Informal Stage Consultation from January 2011 to March 2011\)](#)
- [City Management Plan Consultation Draft: November 2011 \(Informal Stage Consultation from November 2011 to March 2012\)](#)
- [Regulation 18-Notification of the intent to revise Westminster's Core Strategy to prepare a single local plan for Westminster May 2012 \(Statutory Stage\)](#)
- [Policy Topic based consultation booklets from October 2013 to 31 March 2014 \(including one dealing specifically with Mixed Use – see below\)](#)
- [Regulation 18 Notice of Revisions to Westminster's City Plan Development Document April 2015 \(Statutory Stage\)](#)

3.6 In 2012 the Council published an IIA Scoping Report for Westminster's City Plan and focusing on the detailed city management policies. This document can be viewed [here](#). However, following the enactment of the Localism Act 2011 and the publication of the NPPF in March 2012 it was decided to merge the strategic policies (Westminster's City Plan: Strategic Policies) with the detailed city management policies into one document to be called Westminster's City Plan. Any subsequent work using the 2012 IIA Scoping Report was halted and a new IIA Scoping Report was drafted in 2014. This forms the basis of this IIA Report and adequately reflects both strategic and detailed matters.

### Mixed Use

3.7 The [Mixed Use and Office to Residential Conversions December 2014](#) booklet was published in December 2014, with the consultation period between 15<sup>th</sup> December 2014 and 27<sup>th</sup> February 2015.

3.8 The policies and changes to text in the Mixed Use Revision to Westminster's City Plan which are the subject of this IIA report are as follows:

### 3.9 **Westminster's Strategic Objectives**

1. To accommodate sustainable growth and change that will contribute to Westminster's role as the heart of a pre-eminent world class city, building on its internationally renowned business, retail, cultural, tourism and entertainment functions within the Central Activities Zone; to support the unique economic breadth and diversity of the West End and its fringe areas including the Opportunity Areas; whilst maintaining its unique and historic character, mix, functions, and townscapes.
  
4. To increase the supply of good quality housing to meet Westminster's housing target, and to meet housing needs, including the provision of affordable housing and homes for those with special needs; whilst ensuring that new housing in commercial areas coexists alongside the business activity and an appropriate balance of uses is maintained.
  
5. To manage the pressures on the city from its national and international roles and functions, supporting business communities and tourism, and ensuring a safe and enjoyable visitor experience.

### 3.10 **Policy S1 Mixed Use in the Central Activities Zone**

The council will encourage development which promotes Westminster's World City functions, manages its heritage and environment and supports its living, working and visiting populations.

Within the CAZ, a mix of uses consistent with supporting its vitality, function and character will be promoted.

- A) Where proposals are outside;
- i. Core CAZ,
  - ii. the Named Streets, or
  - iii. Opportunity Areas,

no residential floorspace will be required.

Within these areas, where proposals increase the amount of floorspace by;

- i. less than 30% of the existing building, or
- ii. less than 400sqm; (whichever is the greater),

no residential floorspace will be required.

B) Where proposals are in;

- i. Core CAZ,
- ii. the Named Streets, or
- iii. Opportunity Areas, and

increase the amount of floorspace by between 30% and 50% of the existing building, and more than 400sqm, residential floorspace or an equivalent payment in lieu will be provided.

The residential floorspace required is equivalent to the net gain in B1 office floorspace less 30% of the total net additional floorspace. Where the net gain in B1 office floorspace is less than 30% of the total net additional floorspace, no residential will be required. The residential floorspace can be provided:

- i. on-site,
- ii. off-site, or
- iii. by mixed use credits (Policy CM47.2).

It is at the applicant's discretion whether they wish to provide a payment in lieu or residential floorspace, and where residential floorspace is provided, it is at the applicants discretion which of i, ii, or iii above the apply.<sup>4</sup>

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<sup>4</sup> The following text has been deleted from Policy S1(B) " i. net increases in B1 office floorspace (up to a maximum of the net additional floorspace above the 30% development uplift threshold), will be accompanied by an equivalent amount of residential floorspace, either ... ; or ii. net increases in B1 office

- C) Where proposals are in;
- i. Core CAZ,
  - ii. the Named Streets, or
  - iii. Opportunity Areas, and

increase the amount of floorspace by more than 50% of the existing building and more than 400sqm, residential floorspace will be provided.

The residential floorspace required is equivalent to the net gain in B1 office floorspace less 30% of the total net additional floorspace. Where the net gain in B1 office floorspace is less than 30% of the total net additional floorspace, no residential will be required. Where the net gain in B1 office floorspace is between 30% and 50% of the total net additional floorspace, B) above is applied.

The residential floorspace will be provided in accordance with the following cascade. Applicants are required to demonstrate to the council's satisfaction that it is not appropriate or practicable to provide the floorspace (in whole or in part) at each step of the policy cascade before they can move to the next.

- i. The required floorspace will be provided on-site or in the immediate vicinity of the site.
- ii. The required floorspace will be provided off-site (including through a draw down of mixed use credits in accordance with Policy CM47.2) on a site in the vicinity of the development site, or in the case of Victoria and Paddington Opportunity Areas, within that Opportunity Area.

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*floorspace (up to a maximum of the net additional floorspace above the 30% development uplift threshold) will be accompanied by an affordable housing payment in lieu equivalent to the net gain in B1 office floorspace (subject to the 30% development uplift threshold as above)."*

- iii. The required floorspace will be provided off-site (including through a draw down of mixed use credits in accordance with Policy CM47.2) elsewhere within the CAZ. This part of the cascade does not apply to Victoria and Paddington Opportunity Areas. The housing provided must be of a higher quality than would be possible under i. or ii. above.
- iv. Payment of an appropriate Payment in Lieu to the Affordable Housing Fund equivalent to the net gain in B1 office floorspace (subject to the 30% development uplift threshold as above).

In demonstrating that a particular step is not practicable, site specific considerations will need to be taken into account. In demonstrating a particular step is not appropriate, considerations may include where a significantly better outcome can be achieved, in keeping with the council's mixed use objectives, by not providing the residential floorspace on site.

- D) Where proposals are in;
  - i. Core CAZ,
  - ii. the Named Streets, or
  - iii. Opportunity Areas,

and involve;

- i. changes of use from office to residential; and/or
- ii. replacement of office floorspace with residential floorspace

which are acceptable in principle under Policy S20, the net increase in residential floorspace will be accompanied by an *appropriate* amount of commercial floorspace and/or social and community floorspace, except where:

- i. the net increase in residential floorspace is less than 400sqm; or
- ii. in the case of changes of use from office to residential, the building was originally built as residential and the building is substantially retained.

Where these proposals increase the amount of floorspace by more than 50% of the original building and more than 400sqm, net increases in residential floorspace will be accompanied by an *equivalent* amount of commercial and/or social and community floorspace.

The commercial and/or social and community floorspace can be provided on-site, off-site or by the draw down of mixed use credits (Policy CM47.2) or by an appropriate payment in lieu to the City Council's Civic Enterprise Fund. These options will not apply where an active frontage is required at ground floor level, which must be provided on-site.

### 3.12 **Policy S6 Core Central Activities Zone**

The Core Central Activities Zone (Core CAZ) is an appropriate location for a range of commercial and cultural uses and complimentary residential use, subject to the following priorities:

- Supporting strategically important clusters of uses consistent with enabling the growth and evolution of places to ensure that the area retains its globally important function as a business location.
- Retail floorspace is encouraged throughout the area. Large scale retail development will be directed to the West End International Shopping Centre's Primary Shopping Frontages, the CAZ Frontages and the Opportunity Areas, with smaller-scale retail development also to its other shopping centres. Development within the Knightsbridge Primary Shopping Frontage will support the character, function and vitality of the wider International Shopping Centre within the Royal Borough of Kensington and Chelsea.
- Within the West End Stress Area, new entertainment uses will only be allowed where the council considers that they are small-scale, low-impact and they will not result in an increased concentration of late-night uses.
- Development sites within the Millbank Strategic Cultural Area between Lambeth and Vauxhall bridges will deliver a mix of uses including those that support culture and the creative industries - including arts and cultural uses, affordable business floorspace, workshops and studios; and

- Berwick Street market will be protected and the use of Rupert Street for specialist seasonal market trading will be supported.

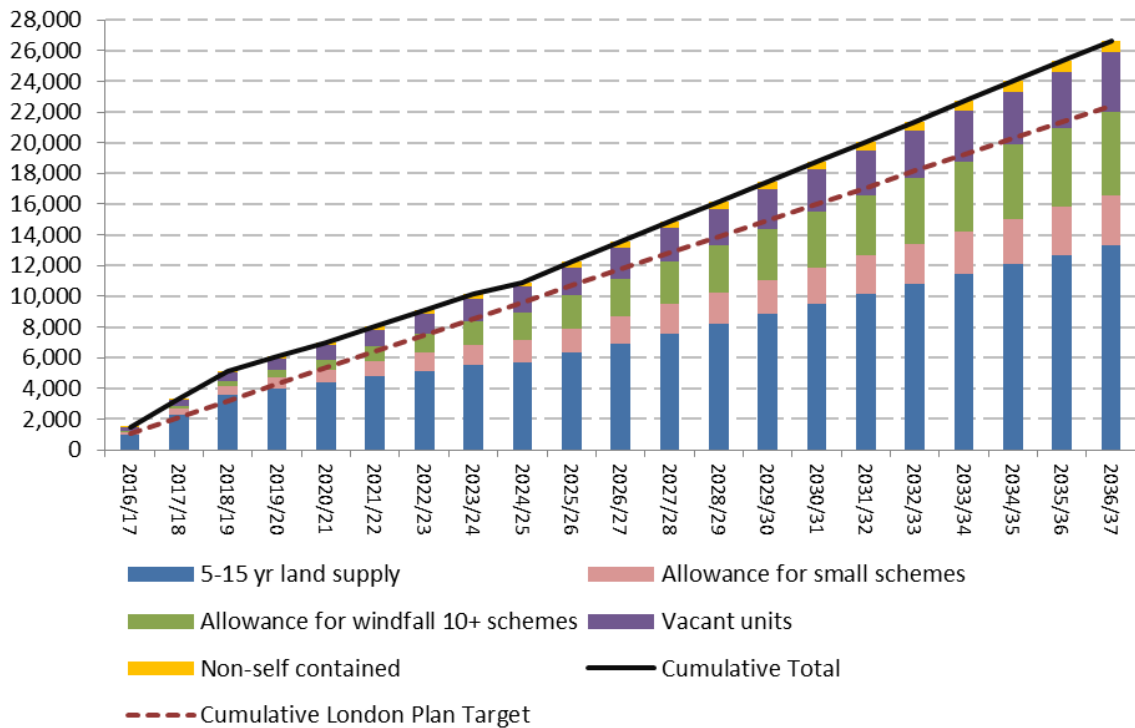
Where retail developments fronting the Primary Shopping Frontages result in the requirement to provide residential floorspace, the residential floorspace may be provided off-site in the vicinity rather than on-site, where the council is satisfied that off-site provision would better contribute to the vitality of the West End Special Retail Policy Area or Knightsbridge International Shopping Centre.

### 3.13 **Optimising Housing Delivery Reasoned Justification and Appendix 4**

#### Reasoned Justification

To achieve and exceed Westminster's housing targets it is necessary to protect existing housing and bring forward new housing as appropriate across the city. This means that schemes which retain or increase the overall housing floorspace should not reduce the number of residential units as this would reduce the number of homes in the city. Affordable housing is an exception as Westminster's own housing stock is dominated by one and two bedroom units; whilst need is focused on two and three bedroom units. Formerly converted houses which would provide family-sized homes will also be an exception because of the shortage of family homes with gardens in the city and the benefits such 'de-conversion' would bring to providing a range of accommodation. This also creates a flexibility and sustainability within the housing stock for different sizes and types of accommodation to be provided throughout a building's lifetime.





**FIGURE 37 WESTMINSTER'S HOUSING TRAJECTORY**

Westminster will be able to meet the London Plan target of **1,068 units from all sources**.

This graph is based on the 15 year Land Supply Assessment included in the Annual Monitoring Report 2010/11, plus an allowance for windfall sites of 10 or more units and an allowance for sites yielding 1-9 units. It also includes sources of non-conventional housing: bringing vacant homes back into use and non-self contained housing.

Westminster has local circumstances which justify including an allowance for windfalls and smaller sites, and that these can legitimately be included in the trajectory as set out in the spatial strategy. The justification is set out in Appendix 4, **(Note: This is set out as Appendix 7 to this IIA Report)** and is based on the following:

The 15 year Land Supply Assessments include sites which are expected to deliver 10 or more residential units. However, 93% of housing sites in the city yield less than 10 units, and these small sites have yielded about 25% of new homes in the city.

Historically, windfalls have accounted for 80% of housing delivered in the city. However, the 15 year Land Supply Assessments will now capture many of these sites **and there**

**will be less 'windfalls' from the loss of offices** so a far lower figure needs to be projected into the future.

The inclusion of these windfall and small sites allowances reflects the advice in the National Planning Policy Framework as such sites have consistently come forward and will continue to provide a reliable source of housing. It is based on new development and conversions, and does not rely on development of residential gardens. The 5 year housing land supply includes an additional 5% buffer to ensure choice and competition, although as most sites in Westminster are available for housing, this will include an element of windfalls as set out above.

Policies relating to Special Policy Areas (Policy S2), the Opportunity Areas (Policies S3, S4 and S5), Core CAZ and the West End Special Retail Policy Area (Policies S6 and S7), and North Westminster Economic Development Area (Policy S12) have other priorities **instead of, or** in addition to housing.

#### 3.14 **Policy S18 Commercial Development**

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

The council will work to achieve and exceed the target of additional floorspace capacity for 77,000 new jobs between 2016/17 and 2036/37, an average of 3,850 new jobs per annum. Commercial and other non-residential activity is the priority in the Core Central Activities Zone.

Proposals for new commercial uses must be appropriate in terms of scale and intensity of land uses, and character and function of the area. Although the priority for Core CAZ, the Opportunity Areas and the Named Streets is commercial, there are residential streets and areas within CAZ where commercial encroachment is not appropriate.

#### 3.15 **Policy S20 Offices and other B1 Floorspace**

The council will work to achieve and exceed the target of additional B1 office floorspace capacity for 58,000 new jobs between 2016/17 and 2036/37x, an average of 2,900 new jobs per annum.

New office development will be directed to Paddington, Victoria and Tottenham Court Road Opportunity Areas, the Core Central Activities Zone, the Named Streets, and the North Westminster Economic Development Area.

Inside the Core Central Activities Zone, Opportunity Areas and the Named Streets, changes of use from office to residential or replacement of office floorspace with residential floorspace will only be acceptable where the council considers that the benefits of the proposal outweigh the contribution made by the office floorspace, taking into account:

1. the employment and housing targets set out above, and as referred to in Policies S18 and S14, or in the case of the Victoria and Paddington Opportunity Areas, the targets set out in Policies S3 and S4;
2. the contribution of the office floorspace to meeting business and employment needs; and
3. the mix of type, size and tenure of housing proposed.

Where 3) above is not met due to site constraints and/or viability, the floorspace will be retained as B1 office floorspace.

Where appropriate, the council will request a range of business floorspace including workshops and studios.

### **3.16 Policy CM47.1 Land Use Swaps and Packages**

Planning permission for the swapping of uses between sites and for land use packages (swaps between more than 2 sites) which are located in the Central Activities Zone will be appropriate where:

1. the sites are in the vicinity of each other;
2. the mixed use character of the immediate area is secured at a fine grain;
3. there is no net loss of floorspace which is protected by other policies in the plan across the sites taken as a whole;
4. the uses are appropriate within each area and there is no loss of amenity resulting from the introduction or intensification of a use into an area;
5. any residential accommodation is of a higher quality than could have been achieved without the land use swap or package;

6. the applications for all sites are submitted at the same time and all elements of the scheme are completed within a time frame agreed by the City Council.

This policy does not prejudice the application of any other policies in the plan, and requirements for floorspace to be provided must be met in full.

If agreed, the sites subject to the land use swap or package will be treated as though the development is on a single site, including for consideration of viability.

Applications must be accompanied by a full schedule of the existing and proposed floorspace including the following:

1. the floorspace of each use (Gross Internal Area) proposed for each site, and for all of the sites taken as a whole;
2. in the case of residential floorspace, the breakdown of floorspace provided in accordance with 1. (immediately above) by the tenure, unit floorspace, and the number of bedrooms of each unit, and the total floorspace for all of the sites taken as a whole;
3. details of any draw downs of credits in accordance with Policy CM47.2; and
4. calculations of any floorspace shortfalls being met from Payment in Lieu.

### 3.17 **Policy CM47.2 Credits**

#### A) Registering Credits

In addition to Policy S1 in the case of mixed use credits, credits must:

1. be agreed as a credit at application stage and registered as a credit at the time of permission being granted, or have been granted permission prior to [revision adoption date] and have not been implemented;
2. establish a nominal floorspace value for the affordable housing credit in agreement with the council, with each credit equating to 1 sqm;
3. fund the development and maintenance of a credit monitoring database which will be the definitive list of credit sites;
4. not be listed in Appendix 1 Proposals Sites with that use as a Preferred Use;
5. comply with the following policies;

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

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

#### B) Drawing Down Credits

In addition to Policy S1 in the case of mixed use credits, when drawing down credits:

1. They must be drawn down within 7 years of registration;
2. The floorspace registered by the credits must be completed, and the completion certificate provided to the council;
3. The nominal value referred to in A) 2. above must be used in any viability assessment for the host scheme;
4. Credits may be pooled from more than one credit scheme, or used in combination with on-site, off-site or payment in lieu provision;
5. The credits must be available for draw down, as follows;
  - i. Credits are allocated to a host scheme at the time the planning application is submitted for the host scheme. After this, they will not be available for any other host scheme until they are released.
  - ii. To release credits the council must be notified in writing that:
    - a) the host scheme planning application has been refused and the time for an appeal has expired, or an appeal dismissed;
    - b) the host scheme planning application has been withdrawn;

- c) the host scheme has been superseded by an alternative host scheme and the credits are transferred to the latter scheme;
  - d) the host scheme has been superseded by an alternative scheme that does not use the credits; or
  - e) the host scheme planning permission has expired.
- iii. Credits can only be drawn down once, and the credit has been drawn down when the council is notified in writing that the host scheme is completed.

### **The London Plan**

- 3.18 The Mayor is responsible for London wide strategic planning, including the preparation of his spatial development strategy (known as 'the London Plan' – the latest version was published in July 2011). On 10 March 2015, the Mayor published (i.e. adopted) the Further Alterations to the London Plan (FALP). From this date, the FALP are operative as formal alterations to the London Plan (the Mayor's spatial development strategy) and form part of the development plan for Greater London. Planning policies in Westminster must be in general conformity with the London Plan.

## 4. Methodology

### Introduction

- 4.1 The IIA process carried out in Westminster is based on the five main stages of the SEA, as identified in guidance issued by the former Office of the Deputy Prime Minister (2005)<sup>5</sup> and set out in Table 1 (pages 8-9). It is also in accordance with the SEA Directive Requirements checklist which is attached as Appendix 2 of this Report. [The 2014 Scoping Report](#) set out the scope of the IIA, using the baseline information and a review of plans, programmes and strategies to help identify key sustainability and other cross-cutting policy issues. Using this evidence and with regard to previous pre IIA and SA/SEA assessments the Scoping Report established a framework, comprising 17 objectives and associated sub-criteria (the IIA Framework) to be used for the assessment of all policies in preparing Westminster's City Plan. The actual assessment of the policies including the 'reasonable alternatives' will be an on-going process for the seven separate revisions to Westminster's City Plan.
- 4.2 Table 2 shows the IIA Framework. The objectives have been used for the assessment of the reasonable alternatives (contained in Appendix 5) and for the detailed assessment Mixed Use Revision policy to Westminster's City Plan (contained in Appendix 6).
- 4.3 Although the equalities and health objectives are cross cutting, the IIA Framework includes key specific priority objectives from the Council's Equality Objectives 2012-2016. These are defined in red text in Table 2. The long term goals set out in Westminster's joint Health and Wellbeing Strategy - Healthier City Healthier Lives (2013) - which are most likely to be influenced by the built environment are set out in blue text. Crime and disorder matters in accordance with The Crime and Disorder Act 1998 (amended by the Police and Justice Act 2006) are also considered (particularly in Objective 2).

### Objective development through consultation

- 4.4 In response to consultation on the scoping report English Heritage (letter dated 31 July 2014) requested that the wording of Objective 13 be changed from '*protect and enhance the historic environment..*' to '**conserve** and enhance the historic environment..'. The objective has been amended as requested. In addition, The Environment Agency (email dated 22 July 2014) sent out a fact sheet (relevant to all local authority scoping reports and not specific to Westminster) setting out the requirements of the European

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<sup>5</sup> A Practical Guide to the Strategic Environmental Assessment Directive, ODPM 2005

Union Water Framework Directive. To ensure that this matter was re-enforced in the IIA Framework an additional sub-criterion was added to Objective 8 stating ‘will it improve the water environment?’ A table with all consultation comments and the council’s response is contained in Appendix 3.

**Table 2 Integrated Impact Assessment Framework**

SA (SEA)EQIA/HIA Objective	sub criteria for assessment Including EQIA/HIA considerations:
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 foster an inclusive Westminster community? Will it encourage engagement in community activity?
2) To reduce crime and fear of crime	Will it reduce crime, disorder and antisocial behaviour? ** Will it reduce fear of crime, disorder and antisocial behaviour? ** Will it reduce other behaviour adversely affecting the local environment? **
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 the range of affordable housing? ** Will it reduce the number of unfit homes? ** Will it create high quality homes? ** Will it provide housing that can help people stay independent for longer?
4 ) To promote and improve health and well being	Will it help improve health inequalities? ** Will it reduce death rates? * Will it improve access/movement? * Will it encourage healthy lifestyles? * Will it improve cultural wellbeing? Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities? 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	Will it reduce greenhouse gas emissions by reducing energy



emissions and support climate change adaptation	<p>consumption, generating low or zero carbon energy and reducing the need to travel? *</p> <p>Will it reduce ozone depleting emissions?*</p> <p>Will it reduce emissions through retrofitting new technology?</p> <p>Will it reduce heat island effects on people and property? *</p>
6) To reduce use of limited natural resources e.g. water, fossil fuels, quarried materials, wood	<p>Will it reduce water consumption and improve water efficiency?</p> <p>Will it reduce consumption of fossil fuels *</p> <p>Will use of other natural resources (e.g. quarried materials) be minimised?</p> <p>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</p>
7) To reduce flood risk , promote SUDs, protect surface and groundwater quality	<p>Will it minimise flood risk from all sources of flooding? *</p> <p>Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?*</p> <p>Will it reduce combined sewer overflow events?*</p>
8) To protect, enhance and create environments that encourage and support biodiversity	<p>Will it protect, enhance and increase biodiversity and protect habitats?</p> <p>Will it preserve Sites of Importance to Nature Conservation?</p> <p>Will it improve access to and promote educational value of sites of biodiversity interest?*</p> <p>Will it conserve and enhance species and habitats?</p> <p>Will it improve the water environment including quality?</p>
9) To improve Air Quality	<p>Will it improve air quality? *</p> <p>Will it reduce emissions of key pollutants?*</p>
10) To reduce noise and impact of noise	<p>Will it reduce noise concerns and noise complaints?</p> <p>Will it reduce noise levels? *</p>
11) To reduce need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport	<p>Will it reduce volumes of traffic?*</p> <p>Will it encourage walking and cycling?*</p> <p>Will it increase the proportion of journeys using modes other than the car?*</p>
12) To reduce waste production and increase recycling, recovery and re-use of waste	<p>Will it reduce consumption of materials and resources?</p> <p>Will it reduce household waste?</p> <p>Will it increase recycling, recovery and re-use?</p> <p>Will it reduce construction waste?</p>
13) To conserve and enhance the historic	<p>Will it conserve the significance of heritage sites and cultural value?</p>

environment and architectural, archaeological and cultural heritage	Will it protect strategic views? Will it conserve listed buildings and their settings? Will it help conserve, 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 groups? **
15) To protect, enhance and seek opportunities to increase open space	Will it improve open space? * Will it improve landscape character? Will it improve access to open space? **
16) To ensure equality of opportunities, improve local opportunities and support sustainable economic growth throughout Westminster.	Will it improve qualifications, skills or training? ** Will it reduce unemployment? * Will it provide jobs for those most in need? * Will it improve earnings? Will it support young people, adults and vulnerable parents into employment, education and training?
17) To maintain economic diversity 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? **

(\*\* asterisks show where sub-criteria other than that identified in coloured text is likely to impact on equalities outcomes (red) or health outcomes (blue))

## From Framework to Assessments

- 4.5 The anticipated effects of the basement policy and the associated reasonable alternatives have been assessed against the 17 objectives and sub-criteria in the IIA Framework using the following colour codes:

**Green = Positive**

**Amber = Neutral**

**Red = Negative**

Where appropriate this is supplemented with further annotations as follows:

**Major positive**                    ++  
**Minor positive**                    +

<b>Neutral</b>	<b>0</b>
<b>Minor negative</b>	<b>–</b>
<b>Major negative</b>	<b>--</b>

Commentary has been provided, which includes an overall summary and on long and short term positive and negative effects, mitigation/changes to plan and on uncertainty, risks and cumulative effects, as appropriate given the scope of the policy being assessed.

For the purpose of this assessment the timescales are as follows:

- Short term - This may be taken to refer to the effects that are likely to occur in the first 5-10 years of implementing the policy.
- Long term - This may be taken to refer to the effects that are likely to occur beyond 10 years of implementing the policy.

The assessment of the policies also considers (where relevant) the cumulative effects, uncertainties/risks and mitigation/changes to the policy.

### Completing the Assessments

- 4.6 The IIA has been undertaken by City Council officers and has progressed alongside the development of policies in the various stages of Westminster’s City Plan. The key stages are set out below in Table 3.

**Table 3 Relationship between IIA Process and development of Westminster’s City Plan**

IIA Stage	City Plan Stage	When	Strategic or City Management policies
	<a href="#">Consultation Workshops</a>	Summer 2009	City Management
<a href="#">Final SA Report</a>	Core Strategy Adopted July 2011	2010-2011	Strategic
Reasonable Alternatives for the City Plan IIA	<a href="#">CMP Policy Options</a>	January 2011	City Management

Reasonable Alternatives for the City Plan IIA	<a href="#">City Management Plan Consultation Draft</a>	November 2011	City Management
<a href="#">IIA Report August 2013</a>	<a href="#">Westminster's City Plan: Strategic Policies Adopted November 2013</a>	2012-2013	Strategic
<a href="#">IIA Scoping Report for Westminster's City Plan September 2012</a>	Development and background research for Topic Based booklets. CMP Revision	2012-2013	City Management
<a href="#">IIA Scoping Report for Westminster's City Plan July 2014</a>	<a href="#">Consultation of Topic based policy booklets</a>	2013-2014	Strategic and City Management
<a href="#">IIA Report for Mixed Use Revision to Westminster's City Plan.</a>	<a href="#">Mixed Use Revision to Westminster's City Plan.</a>	2015	Strategic and City Management
IIA Report for Mixed Use Revision to Westminster's City Plan – Submission Stage	Mixed Use Revision to Westminster's City Plan – Submission Stage	2015	Strategic and City Management

### **Assumptions and Technical Difficulties**

- 4.7 No technical difficulties have been encountered. However, the process of developing Westminster's City Plan, with various iterations using different names for documents and four of rounds of informal consultation, which began in 2009 is complex. Table 3 above clarifies this matter in relation to the IIA process.

- 4.8 The Scoping Report 2014 is considered sufficiently robust to support this IIA Report for the Mixed Use Revision to Westminster's City Plan, especially with the updates to relevant local plans/policies and strategies and to the baseline information as set out in Chapter 2.
- 4.9 It should be noted that any submission version policies will have been prepared in accordance with National Planning Policy Framework (NPPF) March 2012, which has sustainable development as a golden thread running through in terms of policy for plan making. Paragraph 8 of the NPPF advises that '*...to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.*'

### **Habitats Regulation Assessment**

- 4.10 A Habitats Regulations Assessment (HRA) Screening report has been produced as required by the European Habitats Directive (92/43/EEC), enacted by the *Conservation (Natural Habitats) Regulations 1994* (the Habitats Regulations) was sent to Natural England in June 2015 for their comment. The report concludes that Westminster is not situated close enough to any of the designated European Sites for there to be any direct and obvious detrimental effects on these sites as a result of the Mixed Use Revision to Westminster's City Plan and therefore a comprehensive Habitats Regulations Assessment is not required for this policy.
- 4.11 The response from Natural England has been resolved and a revised Habitats Regulation Assessment Screening Report produced. The updated version has been published on the website along with the HRA Screening Report. This confirms that Natural England have no further concerns.

### **Conservation of Wild Birds**

- 4.12 The Birds Directive (more formally known as European Council Directive 2009/147/EC on the conservation of wild birds) is an EU directed adopted in 2009. It replaces Council Directive 79/409/EEC of 2 April 1979 on the conservation of wild birds. The Directive recognises that habitat loss and degradation are the most serious threats to the conservation of wild birds. It therefore places great emphasis on the protection of habitats for endangered as well as migratory species, especially through the establishment of a coherent network of Special Protection Areas (SPAs) comprising all the most suitable territories for these species. Since 1994 all SPAs form an integral part of the NATURA 2000 ecological network. There are no SPAs of this kind in Westminster.

## **5 Assessment Findings**

- 5.1 This chapter sets out a summary of the assessment findings for the Mixed Use Revision to Westminster's City Plan and for the identified reasonable alternatives.

### **Mixed Use Revision to Westminster's City Plan IIA Detailed Assessments**

- 5.2 Appendix 5 of this report contains the detailed assessments and associated considerations for the Mixed Use Revision to Westminster's City Plan for Strategic Objectives 1, 4 and 5, Policies S1, S6, S18, S20, CM47.1, CM47.2 and for additional wording to the text and reasoned justification for S14 and changes in Appendix 4: Housing Delivery. A summary of the assessments are as follows:

#### **Strategic Objective 1**

- 5.3 This strategic objective is mainly neutral but has positive scores for the sub-criteria in objectives 4, 11, 13, 16 and 17. All sub-criteria are positive for Objective 17 as the strategic objective primarily seeks to accommodate economic growth and change. There are no negative objectives however it could be argued that any development may result in increased use of sustainable resources. However, given the NPPF requires that development is positive for environmental and as well as social and economic criteria then on balance objectives 5, 6, 7, 8 9 and 10 have been given a neutral assessment. The impact is considered to be both short term and long term and the cumulative impact is most likely to be for Objective 16 in terms of reducing unemployment.

#### **Strategic Objective 4**

- 5.4 This Strategic Objective is neutral overall. It has positive scores for objectives 1, 3, 4, 11 and 17. It receives positive scores for all sub-criteria in objectives 3 and 17. There are no negative objectives however it could be argued that any development may result in increased use of sustainable resources. However, as with other assessments given the NPPF requires that development is positive for environmental and as well as social and economic criteria then on balance objectives 5, 6, 7, 8 9 and 10 have been given a neutral assessment. Cumulatively access to good housing can help improve health inequalities and potentially improve death rates in the long term.

#### **Strategic Objective 5**

- 5.5 This strategic objective is mainly neutral. It receives positive scores for all sub-criteria in objectives 2, 10 and 17 and three of the four sub-criteria in Objective 13 and one in objectives 4 and 16. There are no negative objectives however it could be argued that

any development may result in increased use of sustainable resources. However, given the NPPF requires that development is positive for environmental and as well as social and economic criteria and that this strategic objective seeks to manage the pressures of the city from its national and international roles and functions, which includes any environmental concerns it has been given a neutral score for most environmental objectives. The impact is considered to be both short term and long term and the cumulative impact is most likely to be a positive impact in the center of Westminster spreading out the more deprived parts of Westminster in the north.

### **Mixed Use in the CAZ (Policy S1)**

- 5.6 Policy S1 provides sustainable outcomes for economic, social and environmental objectives. The policy seeks to maintain and enhance the pre-eminent role of Westminster's CAZ in terms of an internationally important business agglomeration. It ensures a balance of homes mixed with commercial uses, which will help protect and enhance the unique character of Westminster and which underpins its sustainable economic growth. The policy is particularly positive for objectives 3, 11, 16 and 17.
- 5.7 The policy approach, which includes the provision of the residential in the vicinity (where this is not appropriate and practical to provide on-site) ensures that truly mixed commercial and residential communities are maintained in the most central part of Westminster. Research by Drivers Jonas<sup>xi</sup> has shown that it is the diversity of commercial uses in Westminster and its mix of commercial and residential use that results in economic sustainability (IIA Objective17). The credits system is both beneficial to developers and the council and may provide more and higher quality new homes (IIA Objective 3). Providing mixed commercial and residential communities has the potential to improve cultural wellbeing if theatres and cinemas are provided as part of the mix (Objective 4) The potential for Payment in Lieu is positive for IIA Objective 3 in particular the EQIA criteria for increasing the range of affordable housing.
- 5.8 Any building adding to a net increase in any area is likely to result in an increased use of natural resources. However, as most development in Westminster is on previously developed land this impact is likely to be less than in other less developed areas in London and the UK as a whole. In addition other policies in the plan seek mitigation measures in connection with new development. The NPPF also seeks a high standard of development which was not evident when many of the existing buildings were given permission. It is unlikely this policy will result in a reduction in waste. However it may indirectly result in improved recycling as facilities in new buildings are improved. On balance however most of the sub-criteria are neutral except for that seeking to reduce

construction waste as it is difficult to see how this can be achieved with this policy and this therefore receives a negative score.

- 5.9 Although primarily for central Westminster this policy may have a cumulative positive impact on the more deprived parts of north Westminster. Improved housing is likely to have a cumulative impact on health and well-being. The positive objectives identified are considered to be both long and short term.

#### **Core Central Activities Zone (Policy S6)**

- 5.10 This is overall neutral but has significant positive impacts in Core CAZ encouraging economic growth including the retail and cultural offer and strategically important clusters of use and minimises the need to travel. There is a long term positive impact on the UK economy and Westminster's role in London's world city status. The recognition of diversity ensures an overall sustainable approach to development. The policy is particularly positive for objective 17, but also is positive for sub-criteria in objectives 1, 2, 3, 4 and 11. A growth in construction waste is likely and this gives a negative score to Objective 12. The economic impacts on other parts of the city are likely to be long term and cumulative.

#### **Changes to supporting text and to the Reasoned Justification to Policy S14 - Optimising Housing Delivery and to Appendix 4**

- 5.11 Although there are no changes to the wording of Policy S14, there is significant alteration to the text and reasoned justification around this policy and to Appendix 4 – Housing Delivery that merit an IIA assessment. These mainly concern increased London Plan housing targets which result in a positive score for sub-criteria in Objective 3 and an associated improvement in health and well-being in Objective 5. The other change dovetails in to the mixed use balance of commercial and residential uses which is the overall theme of all changes in this phase of the City Plan and has removed the reference in the reasoned justification to not giving general protection to office use which is considered to potentially provide an improved business environment in particular for offices. There are long term positive effects for both housing and commercial uses with a cumulative impact on health and well-being.

#### **Commercial Development (Policy S18)**

- 5.12 This policy is overall neutral but is most positive for Objective 17 seeking to protect and enhance Westminster's pre-eminent role for the economy. There may be a positive impact on Objective 13 by ensuring development is of an appropriate scale and for



objectives 1 and 11 in terms of the provision of shops and services and reducing the need to travel by car. As with other similar policies this has a negative score for construction waste and is neutral for the reasons set out above in the strategic objectives all other environmental policies.

### **Offices and Other B1 Floorspace (Policy S20)**

- 5.13 This policy is very positive for Objective 17, in particular for businesses in key sectors, which is considered to include office floorspace. This has been given a neutral score for Objective 3 very much on balance. However, compared to the existing situation this may result in a reduced provision of housing. For office development which may have a wider impact on the UK and international economy.

### **Land Use Swaps and Packages (Policy CM47.1)**

- 5.14 This policy is positive on social and economic sustainability criteria in particular IIA objective 3 and Objective 17. The transfer of uses between buildings can facilitate a better arrangement of uses within buildings and therefore greater efficiency and sustainability of the building stock by ensuring long-term suitability and continued occupation. The overall effect is to enhance the quality of both commercial and residential accommodation. Applications for land use swaps are normally small scale involving change of use and therefore the policy is relatively neutral on environmental sustainability grounds. Larger scale applications where the swap of uses is in connection with the Mixed Use policy will be encouraged to provide an overall improvement for IIA sub-criteria in objectives 5 and 6.

### **Credits (Policy CM47.2)**

- 5.15 This policy provides the mechanism for the implementation of land use credits set out in Policy S1. These credits enable development to be bought forward early which can then meet policy requirements of a later scheme. It provides additional flexibility to support developers in delivering mixed use. This approach receives positive scores for both housing and economic objectives. In particular in the delivery of higher quality housing and affordable housing and for improving business development and environment. This policy is likely to result in the agglomeration of the residential requirement from several smaller mixed use schemes and therefore affordable housing will be provided where it may not have been possible in individual mixed use schemes.

## Reasonable Alternatives

5.16 The IIA process has run alongside the development of the Mixed Use Revision to Westminster's City Plan and reasonable alternatives have been informed by previous informal consultation stages in policy development as follows:

- [City Management Plan Consultation Draft November 2011](#)
- [Mixed Use and Office to Residential Conversion Consultation Booklet 18 December 2014](#)

In addition, comments received in response to consultation which can themselves be considered to be reasonable alternatives have also been assessed. These are indicated in the table and below as CO. Where policies have not been through this process reasonable alternatives have been derived using adopted policies in Westminster's City Plan: Strategic Policies and by setting out other scenarios (indicated in the table and below by AO). The assessment tables and a full key to the reasonable alternatives are set out in Appendix 6.

## Reasonable Alternatives Assessment

### Westminster's Strategic Objective 1

5.17 The **AO1** 'No policy' approach receives negative scores for objectives 4,11,12,13 16 and 17, which is contrast to the positive scores for **WCP** and **MUR**. **MUR** has a positive + score for Objective 17 given the additional wording refers to supporting the unique economic breath and diversity of the Westminster and its fringe areas and therefore is marginally the most positive of all alternatives.

### Westminster's Strategic Objective 4

5.18 The **AO1** 'No policy' approach receives negative scores for objectives 1, 3, 11 and 17. **WCP** and **MUR** receive positive scores for these objectives. **WCP** has a positive + score for Objective because it refers to increasing the supply of housing across all parts of the city. This wording has been removed in **MUR** which indicates there are parts of Westminster where this will not be the case. For this reason **WCP** is considered to be the most positive of all alternatives

## Westminster's Strategic Objective 5

5.19 The **AO1** 'No policy' approach receives negative scores for objectives 2, 4, 10, 13 and 17. Both **WCP** and **MUR** are positive for these objectives with these alternatives receiving positive + scores for objectives 2 13 and 17. The wording is very positive and supportive in terms of safety and business and managing pressures on the city is considered to include pressures on the historic environment. **WCP** and **MUR** are jointly the most positive alternatives.

### Mixed Use Policy (S1)

5.20 The **AO1** 'No policy' approach is considered to be negative for objectives 3, 4 and 17 this is on the consideration that a policy is required which carefully manage a balance between residential commercial uses and without this the symbiotic relationship which is so evident in the central part of Westminster will be lost. Developers may argue this would have a positive impact on economic growth by removing viability constraints and given the lack of evidence to hand to dispute this matter this alternative has been given a negative score for Objective 17. Where there are positive scores or negative scores for both objectives 3 and 17 there are also reflected in Objective 4 given these matters can have an impact on health and wellbeing. **AO2** may result in the provision of additional housing in Westminster but fails to result in mixed use communities. Research has shown that it is this mixed use character which has helped make Westminster more resilient to recessionary pressures and for this reason this alternative receives a negative score for Objective 17.

5.21 **AO 3** recognises that the market is bringing forward housing in the CAZ but offices are being lost. It enables the delivery of commercial floorspace up to a point but without associated housing. This alternative is likely to have a positive impact on commercial development (Objective 17). However, it is likely to result in a loss of overall housing delivery, in particular affordable housing. **AO4** has an overall neutral score. It is difficult to assess the impact on affordable housing provision given its impact would depend on the size and location of the area that was subject to the exemption, however on balance this alternative is given a positive score for Objective 17 given it may be favorable to developers. **AO 5** This alternative provides a flexible approach in which commercial and residential floorspace would balance each other out and for this reason this alternative has positive scores for objectives 3, 4 and 17. The principle of benchmarking the mixed use policy in terms of market conditions (**AO 6**) appears to present an alternative which would be beneficial to both the provision of housing and for economic growth and therefore has positive scores for these objectives. **AO 7** receives a very positive score for

Objective 3 given it requires only affordable housing alongside commercial development. **CO1** was suggested by the Howard de Walden Estate. This has been included as a mixed use alternative although it could potentially be included along with the office policies or as a new policy topic. However, given the objective is to create a mixed use environment it is considered to be most appropriate in this section. This alternative is positive for objectives 1,3,4 and 17 as it is considered it provides a credible approach to providing a mixed use environment. However it is not positive + for objective 3 and 17 because the wording is not specific and it maybe difficult to easily quantify some of the aspects applied to individual applications (such as Gross Value Added).

- 5.22 **S1** is contained in the [Mixed Use and Office to Residential Conversion Consultation Booklet 18 December 2014](#) Given concerns about the loss of office to residential accommodation it provides a more refined approach by introducing a percentage up lift and also sets out a cascade approach to how the policy should be implemented. Part C of the policy in particular provides a mechanism for securing commercial floorspace where offices are being lost in favor of housing. In combination these matters are considered to result in a positive score for Objective 17 and overall the most positive of all alternatives. **Reg 19** includes the minor modification to remove the requirement for a greater amount of housing if it is provided off-site. This does not change the assessment.

#### **Core Central Activities Zone (S6)**

- 5.23 The **AO1** No policy approach is considered to be negative for objectives 1, 2, 3, 4, 11 and 17. This is counterbalanced by the positive scores received for these objectives in **WCP** and **MUR**. Both **WCP** and **MUR** encourage retail floorspace and a mixed uses including additional housing and those supporting culture, which may reduce the need to travel. This approach which encourages a range of commercial uses may have a ripple effect on other parts of Westminster and the London economy as a whole. There is no significant difference to the assessment with the additional wording in **MUR**.

#### **Optomising Housing Delivery (S14)**

- 5.24 There are no reasonable alternatives set out for the changes to the supporting text and the Reasoned Justification for S14 and to Appendix 4 as the targets are set out in the London Plan and accord with the London Strategic Housing and Land Availability Assessment 2013.

### **Commercial Development (S18)**

5.25 These alternatives direct commercial development in Westminster and advise that they must be appropriate in terms of scale and intensity of land uses and character and function of the area. In addition **MUR** states that commercial and non-residential activity will be a priority in Core CAZ and that the Council will work to achieve and exceed the London Plan jobs target. For this reason MUR receives very positive scores for Objective 17. As for **WCP**, **MUR** has positive scores for objectives 1, 11, 13, 16 and 17. The **AO1** No Policy alternative conversely receives negative scores for these objectives. **Reg 19** clarifies that the new policy approach does not justify encroachment of commercial floorspace into wholly residential areas and streets. Whilst this was the intention of the policy, the clarification will ensure it happens and therefore helps secure higher quality housing, albeit that the overall scores do not change.

### **Office and Other B1 Floorspace (S20)**

5.26 This is the council's key policy for office floorspace. Most objectives for all alternatives are neutral. It is considered that without a policy approach (**AO1**) which directs and encourages office development there could be a negative outcome for objectives 16 and 17, especially in the current economic climate where developers are favoring residential over offices. On balance **WCP** has been given neutral scores for these objectives given this policy alternative directs offices to the most commercial parts of Westminster. **S1** is the most positive for Objective 17 given it directly addresses applications which would result in the loss of office floorspace. Alternative **CO2** was suggested by the Grosvenor Estate and is considered to be the most positive alternative including additional wording to S20 by including job creation and uses other than offices. However, this approach would need to fit in with other policies in the plan. **CO4** includes further criteria that were suggested. While on the face of it, these additional references may appear to alter the assessment, in reality the inclusion of more detailed criteria would potentially 'shut down' other reasons why a decision may be made one way or another on the loss of offices and for this reason was considered to have a slightly negative overall impact compared to the policy as proposed.

### **Land Use Swaps and Packages (CM47.1)**

5.27 **AO1** does not provide any mechanism to allow the swap between office and residential properties and therefore is negative for objective 17. **AO2** allows land use swaps throughout Westminster. The swap of uses between buildings can facilitate a better arrangement of uses and therefore greater efficiency and sustainability of the building

stock by ensuring its long-term suitability and continued occupation. The land swaps take place between commercial and private residential premises and therefore are unlikely to have a direct positive impact in terms of ensuring the provision of affordable housing and reducing overcrowding, however **CMP 1.4** requires the new residential to be of a higher quality which is one of the sub criteria for Objective 3. **NP CM49.2** provides for a more defined and well drafted version of CMP 1.4 it includes advice for packages (two or more sites) as well as between individual properties. The aim is to ensure that mixed use is maintained at a very local level and it enables flexibility for developers and as such receives a very positive score for Objective 17. Allowing swaps throughout Westminster (AO2) rather than just within the Core CAZ may undermine council policies for mixed use buildings and mixed use areas. This is considered the most positive alternative with a positive plus score for Objective 17.

### **Credits (CM47.2)**

- 5.28 Where it is not practical or viable for the housing requirement to be provided on site; the use of Residential Mixed Use Credits can provide an alternative method for providing affordable housing off-site. **CMP 1.2** sets out the mechanism for this and specifies that this should deliver a substantially better planning outcome for the council by providing more homes, homes that are provided earlier and homes which have the highest standards of sustainable design and amenity provision, in comparison to what could have been provided on site. **CMP 1.2** has been assessed as providing a positive outcome for objectives 3 and 4 and 17, given the positive economic benefits of mixed use localities. As an addition to the cascade of approaches to the provision of Residential Mixed Use Credits are welcomed but it is considered there is overall likely to be only a neutral outcome if there were no detailed policy on this matter (**AO1**), given there may only be a limited application as they are only available to developers with a large property portfolio, however there may be a negative impact on objective 17 because in terms of providing for a mixed use in Central Westminster the credits approach is preferable to a payment in lieu, where the housing could be provided in any part of the city. **NP CM49.3** sets out an approach for credits that apply to both housing (including affordable housing) and for commercial development and for this reason this approach also receives a very positive score for Objective 17 and is the preferred alternative.

### **Changes to the Mixed Use Revision to Westminster's City Plan as a Result of the IIA**

- 5.29 No changes have been identified.

## 6. Mitigation and Monitoring

### Mitigation

- 6.1 No negative effects have been identified from the proposed Basement Revision to Westminster's City Plan and therefore no mitigation measures are necessary.

### Monitoring

- 6.2 Directive 2001/42/EC requires that significant sustainability effects of implementing the policy need to be monitored to identify unforeseen adverse effects to be able to undertake appropriate remedial action.
- 6.3 The following indices (set out in Table 4 below) will be collected and included in our Authorities Monitoring Report.

**Table 4 Proposed Monitoring data**

Indicators
Delivery of commercial floorspace against Policy S18 target and office floorspace against Policy S20 target (annual net completions)
Permissions for the loss of office floorspace to residential use pre- and post- 1 <sup>st</sup> -September 2015
Permissions for the loss of office floorspace to residential use to other uses
Delivery of commercial floorspace from office to residential conversions and/or redevelopment
Delivery of residential floorspace as part of a mixed use development
Use of land use swaps to deliver against Policy S1 Mixed Use requirements

Use of the credits mechanism for delivery against Policy S1 Mixed Use requirements, including whether these were instigated by the developer (less than 50% development uplift) or through the policy cascade (greater than 50% development uplift)

Payments in lieu taken to meet requirements of Policy S1 Mixed Use requirements, including whether these were instigated by the developer (less than 50% development uplift) or through the policy cascade (greater than 50% development uplift)

Number of appeals to the Secretary of State from planning decisions by the Council concerning office losses and, where these are upheld, the reason why.



## **7. Next Steps**

- 7.1 This IIA accompanies the Basement Revision to Westminster's City Plan submission draft. It is part of the supporting document submitted to the Secretary of State and will form part of the examination documents. Consultation responses are summarised in the consultation statement which also accompanies the basement revision as a support document.
- 7.2 The revision will be considered by an Inspector appointed by the Secretary of State. They will report to the council and ultimately the revision will be adopted. At this stage it will gain full weight for determination of planning applications as part of Westminster local plan.
- 7.3 A comprehensive post adoption statement will be published once all the IIA Reports have been finished and the process concluded.

## 8. End Notes

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<sup>i</sup> Westminster Office Study Impact of the Recession (2009)

<sup>ii</sup> London Property Watch April 2014

<sup>iii</sup> Hometrack. Three months to March 2014

<sup>iv</sup> London Property Watch April 2014

<sup>v</sup> Hometrack. Three months to March 2014

<sup>vi</sup> Affordable Housing Developing Westminster's Local Plan Booklet No. 17 (P.11) January 2015

<sup>vii</sup> Affordable Housing Developing Westminster's Local Plan Booklet No. 17 January 2015

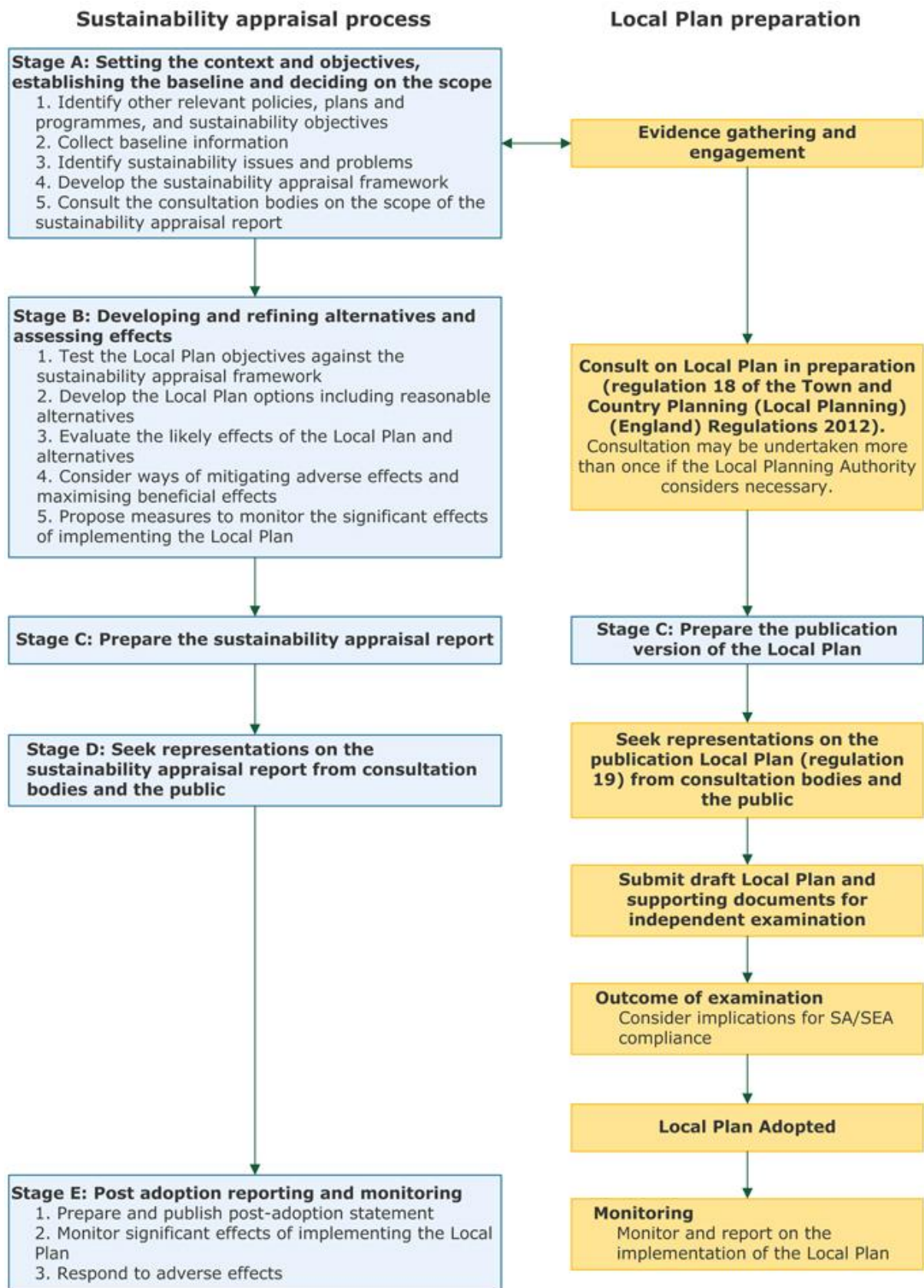
<sup>viii</sup> Provisional 2013 BRES figures

<sup>ix</sup> Colliers International

<sup>x</sup> **This target is based a) on the average office floorspace projections taking into account forecast employment and past stock growth, and assuming an occupation rate of 9sqm per employee for B1 uses and b) securing 49% of the employment growth target set out in Policy S18 in office-based employment. Both of these assessments are based on the London Office Policy Review 2012 Update, and both methods suggest a target of 58,000 jobs.**

<sup>xi</sup> Westminster Office Study Impact of the Recession (2009)

**Appendix 1 Sustainability Process in relation to Local Plan Preparation from NPPF PPG March 2014**



## Appendix 2 - SEA Directive Requirements and how these have been addressed

The SEA Directive Requirements	IIA Report Sections
a) An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	IIA Scoping Report 2014 and chapters 2 and 3 in this IIA Report.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;	IIA Scoping Report 2014 and Chapter 2 in this IIA Report.
c) The environmental characteristics of the areas likely to be significantly affected;	IIA Scoping Report 2014 and Chapter 2 in this IIA Report.
d) Any existing environmental problems which are relevant to the plan, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	IIA Scoping Report 2014 and Chapter 4 in this IIA report. A separate Habitats Directive Screening Report has been to Natural England.
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives have been taken into account during preparation;	IIA Scoping Report 2014 and chapters 2 and 3 in this IIA Report.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative effects);	IIA Assessment Framework in the Scoping Report 2014 and Chapter 5 and Appendix 6 of this IIA Report.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Chapter 7 of this IIA Report.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including and difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information);	Chapters 4 and 5 of this IIA Report.
i) a description of measures envisaged concerning monitoring in accordance with article 10;	Chapter 7 of this IIA Report.
j) a non-technical- summary of the information provided under the above headings	A non-technical summary is contained at the front of this IIA

	Report.
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The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2).

## APPENDIX 3 - Consultation Comments on the City Plan IIA Scoping Report - June 2014

How comments received in response to consultation on the IIA Scoping Report for Westminster's City Plan – June 2014 have been taken into account.

Summary of Comments	How comments have been taken on board
<b>Natural England</b>	
There should be a priority for the creation of SUDs within any redevelopment which takes place in Westminster. This can have health benefits as identified in the scoping report and objective 7 mentions that the provision is most likely to happen as part of creation within built structures where green roofs and walls or rain gardens can be implemented.	Not relevant to Mixed Use Revision
The protection of the 30 Sites of Importance for Nature Conservation (SINCS) should be a key consideration throughout the City Plan process as given the amount of open space deficiency identified within the borough and the benefits both for human health and that of biodiversity loss of any sites would be detrimental and almost impossible to replace.	Not relevant to Mixed Use Revision
Objectives 13 and 14 should both be used to help ensure that the plan overall has policies in it that will bring forward improvements in the open spaces in Westminster and also to improve the public realm through some potential greening measures to create a better environment for the public to want to walk through.	Objective 15 is the primary policy for open space. It seeks <i>to protect, enhance and seek opportunities to increase open space</i> . This objective in combination with objectives 11, 13 and 14 will be used to assess draft policies in terms of creating a better environment for the public to walk through.
<b>Environment Agency</b>	
No specific comments on the IIA but provided a factsheet containing suggested guidance on the scope and level of information to be included in the SA report.	Noted – See below.
Climate change should be considered as part of the evidence base for the SA, as a key sustainability issue and as SA objective against which your plan will be appraised.	Climate change is considered in paragraphs 3.114 to 3.119 in the baseline information and as a key sustainability issue (paragraph 5.6). It is also set out as Objective 5 in the Sustainability Framework.
Flood Risk should be included in the baseline	Flood risk is considered in the baseline

<p>information as a key sustainability issue and as an objective.</p> <p>The Strategic Flood Risk Assessment should be included as part of the evidence base.</p> <p>As should Westminster’s Surface Water Management Plan and the Environment Agency Thames Estuary 2100 plan.</p>	<p>information (paragraphs 2.129 to 3.131) and as a key sustainability issue (paragraph 5.8). It is also set out as Objective 7 in the Sustainability Framework.</p> <p>The Strategic Flood Risk Assessment and the Environment Agency Thames Estuary 2100 plan are included in Appendix 4 of this Report Updated Relevant Plans, Programmes and Strategies</p> <p>Westminster’s Surface Water Management Plan. Likely adoption June/July 2015.</p>
<p>The Water Framework Directive should be considered and recommendations from the Thames River Basin Management Plan as an objective and as part of the baseline.</p>	<p>There is one watercourse in Westminster (The Grand Union Canal) designated under the Water Framework Directive (WFD). This is included in the baseline information paragraph 3.105 in the IIA Scoping Report June 2014.</p> <p>An additional sub-criteria has also been added to Objective 8 as follows: <i>Will it improve the water environment including Quality?</i></p> <p>The Thames River Basin Management Plan is included in Appendix 4 of this Report Updated Relevant Plans, Programmes and Strategies.</p>
<p>Comment on the importance of green infrastructure and suggest that the protection and enhancement of biodiversity is considered as a key sustainability issue, protected habitats and species are mapped as part of the evidence base and biodiversity issues are addressed as an SA objective.</p>	<p>Biodiversity is considered in the baseline information (paragraphs 3.105 to 3.113) and as a key sustainability issue in Paragraph 5.9. It is also set out in Objective 8 in the Sustainability Framework.</p> <p>Map 4 (page 17) of this IIA Report and Map 5 (page 18) of this IIA Report show <i>Biodiversity Action Plan Habitats and Sites of Importance for Nature Conservation</i> and <i>Records of Protected and Priority Species</i> respectively.</p>
<p>Suggest that water quantity and water resource efficiency should be considered as part of the evidence base for the SA, as a key sustainability issue and as SA objective.</p>	<p>Water quantity and water resource efficiency are considered in the baseline information in paragraphs 3.133 to 3.135 Objectives 6 and 8 in the Sustainability Framework set out these</p>

	matters for assessment.
Comment that part of Westminster are defined as being sensitive locations for groundwater because they are located within source protection zones 1,2 or 3 and/or are located over principle or secondary aquifers. We suggest you include this information and information on land contamination in Westminster as part of the baseline for your SA to ensure that the potential impacts of the local plan policies and site allocations on groundwater can be identified and addressed.	Noted. Ground water has been mapped and shown in Map 1 of this IIA Report.  In terms of contaminated land there are no Special Sites registered under the Environmental Protection Act 1990 78R-T, and none where notices have been served under Part IIA of Section 78.
Emphasise the importance of the 'waste hierarchy' and London Plan Policies 5.16 and 5.17 which encourage greater self sufficiency for waste management in London and sustainable transportation of waste. Therefore suggest that waste issues are considered as part of the SA and objectives addressing waste management and resource efficiency are included.	Waste is considered in paragraphs 3.149 to 3.159 in the baseline information and as a key sustainability issue (paragraph 5.13). It is also set out as Objective 12 in the Sustainability Framework.
Suggest that air quality issues are considered as part of the SA and objectives addressing air quality are included. Your Borough Air Quality Action Plan and the Mayor's Air Quality and Transport Strategies should form the evidence base for this.	Air Quality is considered in paragraphs 3.120 to 3.128 in the baseline information and as a key sustainability issue (paragraph 5.10). It is also set out as Objective 9 in the Sustainability Framework.
English Heritage (now Historic England)	
Generally content with the treatment of the historic environment in the Scoping Report subject to the following comments:	Noted
Request that a further issue is added to Scoping Report Page 31 concerning <i>the pressure for residential development and employment uses being exponentially greater and the implications this might have for Westminster's town centre conservation areas and their settings in particular. Whilst Further Alterations to the London Plan (FALP) are yet to be examined and must not be given undue weight, English Heritage considers that the pressures they convey could present real challenges for Westminster's historic</i>	Noted



<p><i>environment in the mid to long term future.</i></p>	
<p>Request the following documents are included in Relevant Plans, Programmes:</p> <p><i>English Heritage Good Practice Notes on</i></p> <ul style="list-style-type: none"> <li>• <i>The Historic Environment in Local Plans</i></li> <li>• <i>Decision-taking in the Historic Environment</i></li> <li>• <i>The Setting of Heritage Assets</i></li> </ul> <p><i>Improving Historic Soho’s Environmental Performance</i></p> <p><i>Retrofitting Historic Buildings for Sustainability</i></p>	<p>These documents have been added to Appendix 4 of this Report Updated Relevant Plans, Programmes and Strategies</p>
<p>Request changes to the wording of the IIA Objective for cultural heritage to better reflect the requirements of the NPPF by reading as follows: <i>To conserve and enhance the significance of heritage assets and their settings.</i></p>	<p>The wording of Objective 13 has been changed as follows:</p> <p>To <u>conserve</u> and enhance the historic environment and architectural, archaeological and cultural heritage</p> <p>With the sub-criteria also changed to reflect NPPF wording as follows:</p> <p>Will it <u>conserve the significance</u> of heritage sites and cultural value?</p> <p>Will it protect strategic views?</p> <p>Will it <u>conserve</u> listed buildings and their settings?</p> <p>Will it help <u>conserve</u>, enhance and record archaeological features and their settings?</p>

## **Appendix 4 - Relevant Plans, Programmes and Strategies updated Scoping Report Version**

### **International**

EU Directives 79/409/EEC; 92/43/EEC; 2000/60/EC; 96/62/EC; 75/442/EEC; 99/31/WC

EU Directive 2008/50/EC

EU Water Directive Framework 2000

Kyoto protocol to the United Nations framework convention on climate change (2005)

The World Summit on Sustainable Development – Commitments arising from Johannesburg Summit United Nations (2002)

### **National**

Air pollution: Action in a Changing Climate 2010 *DEFRA*

Air Quality Regulations 2010

Climate Change Act 2008

Conservation Principles, Policies and Guidance (2008) *English Heritage*

Crowded Places: The Planning System and Counter-Terrorism (2012) *Home Office*

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

Energy Efficiency and Historic Buildings (2012) *English Heritage*

Environment Act 1995

Equality Act 2010

Groundwater Protection: Policy and Practice (GP3) (2013) *Environment Agency*

Guidance on Tall Buildings (2007) *English Heritage/CABE*

Historic Environment Good Practice Advice in Planning Consultation Draft (2014) Notes 1-3 *English Heritage*

London Borough Environmental Fact Sheet (2011) *Environment Agency*

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

National Heritage Protection Plan (2011 –ongoing) *English Heritage*

Obesity and the environment: Increasing physical activity and active travel (November 2013) *Public Health England and LGA*

Planning Act 2008

Planning and Compulsory Purchase Act (2004)

Planning Policy for Traveler Sites (2012) *Communities and Local Government*

Planning Policy Statement 10: Planning for Sustainable Waste Management (2005) *Communities and Local Government*

Planning Practice Guidance (2014)

Safer Places: The Planning System and Crime Prevention (2004) *ODPM*

Seeing the History in the View: A method for assessing Heritage Significance within Views (2011) *English Heritage*

Thames Estuary 2100 Flood Risk Management Plan (2002) *Environment Agency*

Thames River Basin Management Plan (2009) *Environment Agency*

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

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

UK Air Quality Strategy (2007) *Department for Environment, Food and Rural Affairs, Scottish Executive, Welsh Assembly Government and Department of the Environment Northern Ireland. Published by DEFRA*

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

Updated National Waste Planning Policy: Planning for Sustainable Waste Management (2013) *Department for Communities and Local Government*

2010 Local Authority Carbon Dioxide Figures (2012) *Department of Climate and Energy Change*

## **Regional**

Affordable Capital? Housing in London (2012) *Institute for Public Policy Research*

Better Environment, Better Health: A GLA guide for London Boroughs. London Borough of Westminster (2013) *Mayor of London*

Building London, Building Britain: The economic impact of Central London construction (2013) *London First*

Energy Planning: GLA Guidance on preparing energy assessments (2011) *Greater London Authority*

Draft Housing Strategy (2013) *Mayor of London*

Health Issues in Planning - Best Practice Guidance, (2007) *Mayor of London*

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

London Office Policy Review (2012) *Ramidus*

London Plan (2011) *Mayor of London*

The London Plan – The Spatial Development Strategy for London Consolidated with Alterations since 2011 (March 2015) *Mayor of London*

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

London View Management Framework (2012) *Mayor of London*

Air Quality Strategy: Cleaning London's Air (2010) *Mayor of London*

All London Green Grid Supplementary Planning Guidance (2012) *Mayor of London*

Climate Change Mitigation and Energy Strategy (2011) *Mayor of London*

Cultural Metropolis: Mayor's Cultural Strategy (2010) *Mayor of London*

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

Economic Development Strategy for London (2010) *Mayor of London*

London Development Report (2012) *Knight Frank*

London's Foundations Supplementary Planning Guidance (2012) *Mayor of London*

London's World Heritage Sites – Guidance on Settings Supplementary Planning Guidance (2011) *Mayor of London*

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

Securing London's water future: the Mayor's Water Strategy (2011) *Mayor of London*

The London Review Autumn 2012 (2012) *Knight Frank*

Transport Strategy (2010) *Mayor of London*

Tree and Woodlands Supplementary Planning Guidance (2012) *Mayor of London*

Waste Management Strategies (2011) *Mayor of London*

### **Neighbouring Authorities**

City of London – Core Strategy (adopted 8 September 2011)

London Borough of Brent – Core Strategy (adopted 12 July 2010) and Site Specific Allocations (2011)

London Borough of Camden – Core Strategy and Development Polices (adopted 8 November 2010)

Royal Borough of Kensington and Chelsea –Core Strategy (adopted 8.December 2010) and partial review of the Core Strategy (adopted January 2015)

### **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)*

Basement Development in Westminster SPD (October 2014) *Westminster City Council*

Air Quality Action Plan 2013-2018 (2013) *Westminster City Council*

Better City Better Lives Year 2 (2014) *Westminster City Council*

Biodiversity Action Plan (2007) *Westminster City Council*

Church Street Master Plan Health Profile refresh 2013 (2013) *JSNA*

Core Strategy Sustainability Appraisal Scoping Report (2007) *Westminster City Council*

Core Strategy Sustainability Appraisal - Publication Draft (2009) *Westminster City Council*

Core Strategy NPPF Revision (Draft) IIA 2012 *Westminster City Council*

Creative Industries Report and Statistical Update (2007 and 2011) *GVA Grimley; Burns and Owens*

Cycling Strategy (Consultation Draft) December 2013 *Westminster City Council*

Decentralised Energy Masterplan for the City of Westminster (2014) *Published by Westminster City Council*

Economic Development Strategy 2008-2011 (2007) *Westminster City Council*

Equalities Impact Analysis Guidance For assistance with Tri-and Bi-Borough and single Borough decisions

Estates Strategy 2008- 2013 (2008) *Westminster NHS Primary Care Trust*

Every Older Person Matters (2010 – 2013) *Westminster City Council*

From offices to oligarchs: A new role for Mayfair (2011) *Ramidus Consulting Ltd*

Healthier City, Healthier Lives –Westminster’s Joint Health and Wellbeing Strategy (2013) *NHS, LINK and Westminster City Council*

Health profile 2012- City of Westminster (2012) *NHS*

Housing Renewal Strategy (2010) *Westminster City Council*

Housing Strategy 2007-2012 (2007) *Westminster City Council*

(The) Importance of the Historic Environment to the Office Market in Westminster (2007) *Drivers Jonas*

Improving Historic Soho’s Environmental Performance (2013) *Sturgis Carbon Profiling LLP, Ramboll, Sampson Associates and Donald Insall Associates for Westminster City Council, English Heritage and the Soho Community Environment Fund*

Local Development Scheme (2012) *Westminster City Council*

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

Local Implementation Plan: a Transport Delivery Plan up to 2031(2011) *Westminster City Council*

Mapping LGBT Westminster (2009) *Deborah Gold and Katherine Cowan Published by Westminster City Council*

(Draft )Municipal Waste Management Strategy 2016-2031 (August 2013) *Westminster City Council*

Noise Attitudes Survey (2008) *GfK NOP Social Research. Published by Westminster City Council*

Noise Survey (2008) *Scott Wilson. Published by Westminster City Council*

North London Sub-Region Strategic Housing Market Assessment (2009) *Opinion Research Services. Published by City of Westminster and the London Boroughs of Barnet, Enfield, Haringay, Islington and Camden*

Our Strategy for Tackling Health Inequalities in Westminster 2009-2016 (2009) *NHS Westminster*

Preliminary Flood Risk Assessment (2011) *Drain London Westminster City Council*

The Prime Residential Market in Westminster (2014) *Ramidus Consulting*

Retrofitting Historic Buildings for Sustainability (2013) *Westminster City Council*

Retrofitting Soho (2008) *The Max Lock Centre, University of Westminster. Published by MLC Press, University of Westminster in partnership with Westminster City Council*

Safer Westminster Partnership Strategy (2011- 2014) *Westminster City Council*

Strategic Plan 2008-2013 (2008) *Westminster NHS*

Strategic Service Development Plan 2008-2013 (2008) *Westminster NHS Primary Care Trust*

Statement of Community Involvement (2014) *Westminster City Council*

Statement of Licensing Policy (2011) *Westminster City Council.*

Strategic Flood Risk Assessment (2009) *Westminster City Council*

(A) Study of Small Offices in Westminster 2008 (2009) *DTZ Research. Published by Westminster City Council*

Trees and the Public Realm (2011) *Westminster City Council*

Westminster Housing Market Analysis (2014) Wessex Economics

Waste Sites Assessment (2009) *Westminster City Council*

West End in the Market (2014) *Deloitte Real Estate*

Westminster Biodiversity Action Plan (2007) *Westminster City Council*

Westminster City Plan 2006 - 2016 Sustainable Community Strategy (2006) *Westminster City Partnership*

Westminster City Council Residential Basements Report (2013) *Alan Baxter Associates*

Westminster City Council Equality Objectives 2012-2016

Westminster Infrastructure Plan: Technical Assessment 2006-2026 (2009) *URS Consultants. Published by Westminster City Council*

Westminster (City of) Local Economic Assessment Baseline Study (2011) *Westminster City Council*

Westminster Noise Strategy (2010) *Westminster City Council*

Westminster Office Study – Impact of the Recession (2009) *Drivers Jonas. Published by Westminster City Council*

Westminster Open Spaces Strategy (2007) *Westminster City Council*

Westminster Profile (2013) *Westminster City Council*

Westminster Way (2011) *Westminster City Council*

Westminster's City Plan: Strategic Policies (2013) *Westminster City Council*





## Appendix 5 – The IIA Assessments

For the following: Strategic Objectives 1, 4 and 5, Policies S1 (Mixed Use in the CAZ), S6 (Core CAZ), S14 Housing, S18 (Commercial Development), S20 (Offices and other B1 floorspace), CM47.1 (Land Use Swaps and Packages), CM47.2 (Credits)

Integrated Impact Assessment: For Westminster's Strategic Objectives No.1			
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"> <li>Will improve access to local services including shops and community facilities?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will in increase ability to influence decision making (neighbourhoods)? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage engagement in community activity</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community?</li> </ul>	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>Will it reduce the levels of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce fear of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce other behaviour adversely affecting the local environment? **</li> </ul>		
3. To ensure the provision of appropriate	<ul style="list-style-type: none"> <li>Will it reduce homelessness? **</li> </ul>	0	

housing types to 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 provide housing than can help people stay independent for longer?	0	
4. To promote and improve health and wellbeing	• Will it help health inequalities?***	0	This strategic objective has the potential to increase cultural wellbeing given it supports cultural, tourism and entertainment functions
	• Will it reduce death rates?*	0	
	• Will it improve access/movement?*	0	
	• Will it encourage healthy lifestyles?*	0	
	• Will it improve cultural wellbeing?	+	
	• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?	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"> <li>Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing the need to travel?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce ozone depleting emissions? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce heat island effects on people and property? *</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood.	<ul style="list-style-type: none"> <li>Will it reduce water consumption and improve water efficiency?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce consumption of fossil fuels?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>		
	<ul style="list-style-type: none"> <li>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	
7. To reduce flood risk, promote sustainable urban drainage (SUDs) and	<ul style="list-style-type: none"> <li>Will it minimise flood risk from all sources of flooding?*</li> </ul>	0	

protect, surface and ground water quality			
	<ul style="list-style-type: none"> <li>Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience? *</li> </ul>		
	<ul style="list-style-type: none"> <li>Will it reduce combined sewer overflow events?*</li> </ul>	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to and promote educational value of sites of biodiversity interest?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve and enhance species and habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve water environment?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions of key pollutants?*</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>Will it reduce noise levels*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce noise concerns and complaints?</li> </ul>	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"> <li>Will it reduce traffic volumes?*</li> </ul>	0	Providing economic functions alongside residential uses potentially has the impact of increasing walking and the use of public transport.
	<ul style="list-style-type: none"> <li>Will it encourage walking and cycling?*</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using modes other than a car?*</li> </ul>	+	

12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> <li>Will lead to reduced consumption of materials and resources?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce household waste?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will increase recovery recycling and re-use?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>Will it conserve the significance of heritage sites and cultural value?</li> </ul>	++	This objective specifically refers to the importance of cultural, tourism and entertainment functions and Westminster's unique and historic character and for this reason has positive scores for the sub-criteria.
	<ul style="list-style-type: none"> <li>Will it protect strategic views?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it conserve listed buildings and their settings?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it help conserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands?* *</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space	<ul style="list-style-type: none"> <li>Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities and support sustainable growth throughout	<ul style="list-style-type: none"> <li>Will it improve qualifications, skills and training? **</li> </ul>	0	This has been given a neutral score overall but this is very much on balance and it is considered that there may be a secondary impact on these
	<ul style="list-style-type: none"> <li>Will it reduce unemployment? *</li> </ul>	+	

Westminster.	<ul style="list-style-type: none"> <li>• Will provide jobs for most in need?*</li> </ul>	0	matters. It is likely that Objective 1 will contribute to increased employment and therefore this sub criteria has been given a positive score.
	<ul style="list-style-type: none"> <li>• Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>• Will improve business development and environment?</li> </ul>	++	This strategic objective is positive for all sub criteria in Objective 17 as it primarily seeks to accommodate sustainable economic growth and change.
	<ul style="list-style-type: none"> <li>• Will improve business resilience and economy?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>• Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it promote business in key sectors?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>• Will it promote regeneration, reducing disparity?*</li> </ul>	+	
<p>(* asterisks show where the sub-criteria other than that identified in coloured text (blue text = health considerations and red text = equalities considerations) is likely to impact on health and equalities).</p> <p><b>For the EIA the following protected characteristics were considered:</b></p> <p><b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p>			

**IIA Assessment****Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –****Overall Summary**

This strategic objective is mainly neutral but has positive scores for the sub-criteria in objectives 4, 11, 13, 16 and 17. All sub-criteria are positive for Objective 17 as the strategic objective primarily seeks to accommodate economic growth and change. There are no negative objectives however it could be argued that any development may result in increased use of sustainable resources. However, given the NPPF requires that development is positive for environmental and as well as social and economic criteria then on balance objectives 5, 6, 7, 8 9 and 10 have been given a neutral assessment.

**Long Term positive effect** – All the objectives identified as positive are likely to be for the short and long term**Short term** – All the objectives identified as positive are likely to be for the short and long term**Long term negative effects** – None identified**Mitigation/Change to plan** – None identified**Cumulative effects** – The cumulative impact is most likely to be for Objective 16 in terms of reducing unemployment**Uncertainties/risks** – All potential positive effects related to economic growth are dependent on the health of the economy as a whole and related to a number of national and international factors.**Monitoring significant effects** – AMR**Integrated Impact Assessment: For Westminster’s Strategic Objectives No.4****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"> <li>Will improve access to local services including shops and community facilities?*</li> </ul>	0	The mix of residential and commercial uses in a locality has the potential to encourage community activity in particular if these are 'active uses' such as public houses and retail.
	<ul style="list-style-type: none"> <li>Will in increase ability to influence decision making (neighbourhoods)? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage engagement in community activity</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community?</li> </ul>	+	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>Will it reduce the levels of crime, disorder and anti-social behaviour? **</li> </ul>	0	Balanced mixed residential and commercial communities have the potential to reduce crime and anti-social behaviour and the fear of this given this provides activity on the street but this may also increase so under the circumstances this objective is neutral.
	<ul style="list-style-type: none"> <li>Will it reduce fear of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce other behaviour adversely affecting the local environment? **</li> </ul>	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"> <li>Will it reduce homelessness? **</li> </ul>	+	This has the potential to result in positive outcomes for all sub-criteria given the emphasis on increasing the supply of good quality housing to meet Westminster's housing targets and housing needs
	<ul style="list-style-type: none"> <li>Will it increase a range of affordable housing? **</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it reduce the number of unfit homes? **</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it result in high quality homes? **</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it provide housing than can help people stay independent for longer?</li> </ul>	+	
4. To promote and improve health and wellbeing	<ul style="list-style-type: none"> <li>Will it help health inequalities? **</li> </ul>	+	Access to good quality housing can help improve health inequalities and potentially improve death rates
	<ul style="list-style-type: none"> <li>Will it reduce death rates? *</li> </ul>	+	

	<ul style="list-style-type: none"> <li>• Will it improve access/movement?*</li> </ul>	0	although the impact is likely to be indirect and long term.
	<ul style="list-style-type: none"> <li>• Will it encourage healthy lifestyles?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve cultural wellbeing?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it create healthy workplaces?</li> </ul>	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>• Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing the need to travel?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce ozone depleting emissions? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce heat island effects on people and property? *</li> </ul>	0	

6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood.	<ul style="list-style-type: none"> <li>• Will it reduce water consumption and improve water efficiency?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce consumption of fossil fuels?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>		
	<ul style="list-style-type: none"> <li>• Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	
7. To reduce flood risk, promote sustainable urban drainage (SUDs) and protect, surface and ground water quality	<ul style="list-style-type: none"> <li>• Will it minimise flood risk from all sources of flooding?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience? *</li> </ul>		
	<ul style="list-style-type: none"> <li>• Will it reduce combined sewer overflow events?*</li> </ul>	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>• Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve access to and promote educational value of sites of biodiversity interest?*</li> </ul>	0	

	<ul style="list-style-type: none"> <li>Will it conserve and enhance species and habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve water environment?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions of key pollutants?*</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>Will it reduce noise levels*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce noise concerns and complaints?</li> </ul>	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"> <li>Will it reduce traffic volumes?*</li> </ul>	+	Encouraging commercial and residential in the same location may have a positive impact on this objective. Residents can walk or cycle to work and shops. Entertainment facilities and local services rather than use a car.
	<ul style="list-style-type: none"> <li>Will it encourage walking and cycling?*</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using modes other than a car?*</li> </ul>	+	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> <li>Will lead to reduced consumption of materials and resources?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce household waste?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will increase recovery recycling and re-use?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>Will it conserve the significance of heritage sites and cultural value?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it protect strategic views?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve listed buildings and their settings?</li> </ul>	0	

	<ul style="list-style-type: none"> <li>Will it help conserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands?* *</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space	<ul style="list-style-type: none"> <li>Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities and support sustainable growth throughout Westminster.	<ul style="list-style-type: none"> <li>Will it improve qualifications, skills and training?**</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce unemployment? *</li> </ul>		
	<ul style="list-style-type: none"> <li>Will provide jobs for most in need?**</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>Will improve business development and environment?</li> </ul>	0	Research by Drivers Jonas showed that during the recession, Westminster was more resilient due to its mixed use economy ( residential and commercial uses).
	<ul style="list-style-type: none"> <li>Will improve business resilience and economy?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it promote business in key sectors?</li> </ul>	0	

	<ul style="list-style-type: none"> <li>• Will it promote regeneration, reducing disparity?*</li> </ul>	0	
<p>(* asterisks show where the sub-criteria other than that identified in coloured text (blue text = health considerations and red text = equalities considerations) is likely to impact on health and equalities).</p> <p><b>For the EIA the following protected characteristics were considered:</b></p> <p><b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b></p> <p>This Strategic Objective is neutral overall. It has positive scores for objectives 1, 3, 4, 11 and 17. It receives positive scores for all sub-criteria in objectives 3 and 17. There are no negative objectives however it could be argued that any development may result in increased use of sustainable resources. However, given the NPPF requires that development is positive for environmental and as well as social and economic criteria then on balance objectives 5, 6, 7, 8 9 and 10 have been given a neutral assessment.</p>			
<p><b>Long Term positive effect</b> – Access to good quality housing can help improve health inequalities and potentially improve death rates although the impact is likely to be indirect and long term.</p> <p><b>Short term</b> – Most likely to be on the supply of housing.</p> <p><b>Long term negative effects</b> – None</p> <p><b>Mitigation/Change to plan</b> – None</p> <p><b>Cumulative effects</b> – Most likely to impact on Objective 11</p> <p><b>Uncertainties/risks</b> – The economy</p> <p><b>Monitoring significant effects</b> – AMR</p>			

Integrated Impact Assessment: For Westminster's Strategic Objectives No.5			
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"> <li>Will improve access to local services including shops and community facilities?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will in increase ability to influence decision making (neighbourhoods)? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage engagement in community activity</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community?</li> </ul>	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>Will it reduce the levels of crime, disorder and anti-social behaviour? **</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it reduce fear of crime, disorder and anti-social behaviour? **</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it reduce other behaviour adversely affecting the local environment? **</li> </ul>	+	
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"> <li>Will it reduce homelessness? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it increase a range of affordable housing? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce the number of unfit homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it result in high quality homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide housing than can help people stay independent for longer?</li> </ul>	0	

4. To promote and improve health and wellbeing	<ul style="list-style-type: none"> <li>Will it help health inequalities? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce death rates? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access/movement? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage healthy lifestyles? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve cultural wellbeing?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> <li>Will it create healthy workplaces?</li> </ul>	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing the need to travel? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce ozone depleting emissions? *</li> </ul>	0	



	<ul style="list-style-type: none"> <li>• Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce heat island effects on people and property? *</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood.	<ul style="list-style-type: none"> <li>• Will it reduce water consumption and improve water efficiency?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce consumption of fossil fuels?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>		
	<ul style="list-style-type: none"> <li>• Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	
7. To reduce flood risk, promote sustainable urban drainage (SUDs) and protect, surface and ground water quality	<ul style="list-style-type: none"> <li>• Will it minimise flood risk from all sources of flooding?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience? *</li> </ul>		

	<ul style="list-style-type: none"> <li>• Will it reduce combined sewer overflow events?*</li> </ul>	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>• Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve access to and promote educational value of sites of biodiversity interest?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it conserve and enhance species and habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve water environment?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>• Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce emissions of key pollutants?*</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>• Will it reduce noise levels*</li> </ul>	+	Residential amenity including noise is likely to be a key consideration in this strategic objective
	<ul style="list-style-type: none"> <li>• Will it reduce noise concerns and complaints?</li> </ul>	+	
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"> <li>• Will it reduce traffic volumes?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it encourage walking and cycling?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it increase proportion of journeys using modes other than a car?*</li> </ul>	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> <li>• Will lead to reduced consumption of materials and resources?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will reduce household waste?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will increase recovery recycling and re-use?</li> </ul>	0	

	<ul style="list-style-type: none"> <li>• Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>• Will it conserve the significance of heritage sites and cultural value?</li> </ul>	+	Although the historic environment is key in its prominent national and international role it is also at risk from the pressures this brings. This strategic objective predicates the more detailed policies to ensure the architectural and historic environment is conserved and enhanced.
	<ul style="list-style-type: none"> <li>• Will it protect strategic views?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it conserve listed buildings and their settings?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it help conserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>• Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will improve access and mobility for all equality group strands?* *</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space	<ul style="list-style-type: none"> <li>• Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve access to open space? **</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities and support sustainable growth throughout Westminster.	<ul style="list-style-type: none"> <li>• Will it improve qualifications, skills and training? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce unemployment? *</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will provide jobs for most in need? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	

17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>Will improve business development and environment?</li> </ul>	+	This strategic objective seeks to support business communities and tourism and is therefore positive for Objective 17. It has been given a positive score for the sub-criteria 'will it promote regeneration, reducing disparity because although business activity is mainly located in the CAZ this may have a ripple effect on other parts of Westminster in particular NWEDA.
	<ul style="list-style-type: none"> <li>Will improve business resilience and economy?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it promote business in key sectors?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it promote regeneration, reducing disparity?***</li> </ul>	+	

(\* asterisks show where the sub-criteria other than that identified in coloured text (blue text = health considerations and red text = equalities considerations) is likely to impact on health and equalities).

**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**

**IIA Assessment**

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

**Overall Summary**

This strategic objective is overall neutral. It receives positive scores for all sub-criteria in Objective 2, 10 and 17 and three of the four sub-criteria in Objective 13 and one in objectives 4 and 16.

There are no negative objectives however it could be argued that any development may result in increased use of sustainable resources. However, given the NPPF requires that development is positive for environmental and as well as social and economic criteria and that this strategic objective seeks to manage the pressures of the city from its national and international roles and functions, which includes any environmental concerns it has been given a neutral score for most environmental objectives.

**Long Term positive effect** – The sub-criteria identified as positive are for both the long and short terms

**Short term** – The sub-criteria identified as positive are for both the long and short terms

**Long term negative effects** – None identified

**Mitigation/Change to plan** – None identified

**Cumulative effects** – The positive effects in Central Westminster may have a cumulative positive impact on the more deprived parts of the city resulting in regeneration.

**Uncertainties/risks** – Depends on the national and international economy

**Monitoring significant effects** – AMR

Integrated Impact Assessment: For Policy No. S1 Mixed Use in the CAZ			
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?	+	The SA for the Core Strategy identified the social and economic benefits that can lead to improved quality of life and reduced inequality and poverty some of the deprived parts of the CAZ resulting from the Mixed Use Policy as set out in CS1. Policy S1 provides further detailed criteria for the policy.
	• Shopping?	+	
	• Community facilities?	+	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it foster an inclusive Westminster community?	0	
	• Will it encourage engagement in community activity	0	

2. To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>Will it reduce the levels of crime, disorder and anti-social behaviour? **</li> </ul>	+	Natural surveillance in mixed use areas can reduce crime.
	<ul style="list-style-type: none"> <li>Will it reduce the fear of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce other behaviour adversely affecting the local environment? **</li> </ul>	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"> <li>Will it reduce homelessness? *</li> </ul>	++	This policy has a direct impact on the provision of housing.
	<ul style="list-style-type: none"> <li>Will it increase a range of affordable housing? *</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it reduce the number of unfit homes?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it result in high quality homes? **</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it provide housing that can help people stay independent for longer?</li> </ul>	+	
4. To promote and improve health and wellbeing	<ul style="list-style-type: none"> <li>Will it help health and equalities? **</li> </ul>	0	A shift from using private vehicles to public transport. Walking and cycling will improve access/movement and can encourage a healthier lifestyle.
	<ul style="list-style-type: none"> <li>Will it reduce death rates?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access/movement?</li> </ul>	+	Providing mixed commercial and residential communities has the potential to improve cultural wellbeing if theatres and cinemas are provided as part of the mix in any locality.
	<ul style="list-style-type: none"> <li>Will it encourage healthy lifestyles?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it improve cultural wellbeing?</li> </ul>		
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	+	
<ul style="list-style-type: none"> <li>Will it create healthy workplaces?</li> </ul>	0		
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel? *</li> </ul>	0	Homes provided in conjunction with commercial activity in the CAZ reduces the need for residents to travel for work, shopping and leisure .However this is off-set by any

	<ul style="list-style-type: none"> <li>• Will it reduce ozone depleting emissions?</li> </ul>	0	increase in greenhouse gas generated by development. On balance this has been given a neutral score.
	<ul style="list-style-type: none"> <li>• Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce heat island effects on people and property?</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood.	<ul style="list-style-type: none"> <li>• Will it reduce water consumption?</li> </ul>	0	Any building adding to a net increase in any area is likely to result in an increased use of natural resources. However, as most development in Westminster is on previously developed land this impact is likely to be less than in other less developed areas. In addition other policies in the plan seek mitigation measures in connection with new development. The NPPF also seeks a high standard of development which was not evident when many of the existing buildings were given permission.
	<ul style="list-style-type: none"> <li>• Will it reduce consumption of fossil fuels?*</li> <li>• Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	
7. To a) reduce flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> <li>• Will it minimise flood risk from all sources of flooding?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?*</li> </ul>		
	<ul style="list-style-type: none"> <li>• Will it reduce combined sewer overflow events?</li> </ul>	0	
8.To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>• Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve access to and promote educational value of sites of biodiversity interest?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it conserve and enhance species and habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve water quality?</li> </ul>		

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?	++	
	• Will it encourage walking and cycling?*	++	
	• 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	• Will lead to reduced consumption of materials and resources?	0	It is unlikely this policy will result in a reduction in waste. However it may indirectly result in improved recycling as facilities in new buildings are improved. On balance however most of the sub-criteria are neutral except for that seeking to reduce construction waste as it is difficult to see how this can be achieved with this policy.
	• Will reduce household waste?	0	
	• Will increase recovery recycling and re-use?	0	
	• Will reduce construction waste?	-	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	• Will it conserve the significance of heritage sites and cultural value?	0	.
	• Will it protect strategic views?	0	
	• Will it conserve listed buildings and their settings?	0	
	• Will it help conserve, enhance and record archaeological features and their settings?	0	
14.To enhance public realm and street improvements	• Will reduce litter?	0	
	• Will it enhance the quality of public realm?	0	
	• Will improve access and mobility for all equality group strands?*	0	
15.To protect, enhance and seek	• Will it improve open space?*	0	



opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	This policy may improve both qualifications and skills and reduce unemployment given it refers to an appropriate payment into the Civic Enterprise fund as part of the cascade.
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	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"> <li>Will it improve qualifications skills and training? **</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will reduce unemployment?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will provide jobs for most in need? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>Will improve business development and environment?</li> </ul>	+	comment
	<ul style="list-style-type: none"> <li>Will improve business resilience and economy?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it promote business in key sectors?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it promote regeneration, reducing disparity? **</li> </ul>	++	
<p><b>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</b></p> <p><b>Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration</b></p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b></p> <p>Policy S1 provides sustainable outcomes for economic, social and environmental objectives. The policy seeks to maintain and enhance the pre-eminent role of Westminster’s CAZ in terms of an internationally important business agglomeration. And ensure a balance of homes mixed with commercial uses, which will help protect and enhance the unique character of Westminster and which underpins its sustainable economic growth. The policy is particularly positive for objectives 3, 11, 16 and 17.</p>			

The policy approach, which includes the provision of the residential in the vicinity (where this is not appropriate and practical to provide on-site) ensures that truly mixed commercial and residential communities are maintained in the most central part of Westminster. Research by Drivers Jonas<sup>1</sup> has shown that it is the diversity of commercial uses in Westminster and its mix of commercial and residential use that results in economic sustainability (IIA objective 17) in particular, in times of an economic down turn. The credits system is both beneficial to developers and the council and may provide more and higher quality new homes (IIA objective 3). Providing mixed commercial and residential communities has the potential to improve cultural wellbeing if theatres and cinemas are provided as part of the mix (Objective 4) The potential for Payment in Lieu is positive for IIA objective 3 in particular the EQIA criteria for increasing the range of affordable housing.

Any building adding to a net increase in any area is likely to result in an increased use of natural resources. However, as most development in Westminster is on previously developed land this impact is likely to be less than in other less developed areas. In addition other policies in the plan seek mitigation measures in connection with new development. The NPPF also seeks a high standard of development which was not evident when many of the existing buildings were given permission. It is unlikely this policy will result in a reduction in waste. However it may indirectly result in improved recycling as facilities in new buildings are improved. On balance however most of the sub-criteria are neutral except for that seeking to reduce construction waste as it is difficult to see how this can be achieved with this policy and this is negative.

**Long Term positive effect** – The positive objectives identified are considered to be both short and long term. The policy seeks sustainable development which is a long term objective. The positive impact on health and well-being is likely to be long term.

**Short term** – See above

**Short term negative effects** – increased construction waste

**Mitigation/Change to plan** – None

**Cumulative effects** – Although primarily for central Westminster this policy may have a cumulative positive impact on the more deprived parts of north Westminster. Improved housing is likely to have a cumulative impact on health and well-being.

**Uncertainties/risks** – This policy is very much linked to the ups and downs of the international and national economy.

**Monitoring** - AMR

Integrated Impact Assessment: For Policy No. S6 Core Central Activities Zone			
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"> <li>Will improve access to local services including shops and community facilities?*</li> </ul>	+	Retail floorspace is encouraged throughout the area.
	<ul style="list-style-type: none"> <li>Will it increase ability to influence decision making (neighbourhoods)? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage engagement in community activity</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community?</li> </ul>	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>Will it reduce the levels of crime, disorder and anti-social behaviour? **</li> </ul>	+	Vibrant space for the community and visitors alike may result in a reduction in levels of crime, disorder and anti-social behaviour and the fear of these matters.
	<ul style="list-style-type: none"> <li>Will it reduce fear of crime, disorder and anti-social behaviour? **</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it reduce other behaviour adversely affecting the local environment? **</li> </ul>	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"> <li>Will it reduce homelessness? **</li> </ul>	+	Any additional housing theoretically has the potential to reduce homelessness. New commercial development as part of mixed use schemes can increase the provision of housing including affordable housing.
	<ul style="list-style-type: none"> <li>Will it increase a range of affordable housing? **</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it reduce the number of unfit homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it result in high quality homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide housing that can help people stay independent for longer?</li> </ul>	0	

4. To promote and improve health and wellbeing	<ul style="list-style-type: none"> <li>• Will it help health inequalities?***</li> </ul>	+	Access to fresh food in Berwick Street Market can help provide access to a healthy diet.
	<ul style="list-style-type: none"> <li>• Will it reduce death rates?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve access/movement?*</li> </ul>	0	This policy encourages the development of uses that support culture and the creative industries in the Millbank Strategic Cultural Area.
	<ul style="list-style-type: none"> <li>• Will it encourage healthy lifestyles?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve cultural wellbeing?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	0	
<ul style="list-style-type: none"> <li>• Will it create healthy workplaces?</li> </ul>	0		
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>• Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing the need to travel?*</li> </ul>	0	Homes provided in conjunction with commercial activity in the Core CAZ reduces the need for residents to travel for work, shopping and leisure. However this is off-set by any increase in greenhouse gas generated by development. On
	<ul style="list-style-type: none"> <li>• Will it reduce ozone depleting emissions? *</li> </ul>	0	

	<ul style="list-style-type: none"> <li>• Will it reduce emissions through retrofitting new technology?</li> </ul>	0	balance this has been given a neutral score.
	<ul style="list-style-type: none"> <li>• Will it reduce heat island effects on people and property? *</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood.	<ul style="list-style-type: none"> <li>• Will it reduce water consumption and improve water efficiency?</li> </ul>	0	Any building adding to a net increase in any area is likely to result in an increased use of natural resources. However, as most development in Westminster is on previously developed land this impact is likely to be less than in other less developed areas. In addition other policies in the plan seek mitigation measures in connection with new development. The NPPF also seeks a high standard of development which was not evident when many of the existing buildings were given permission.
	<ul style="list-style-type: none"> <li>• Will it reduce consumption of fossil fuels?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	

7. To reduce flood risk, promote sustainable urban drainage (SUDs) and protect, surface and ground water quality	<ul style="list-style-type: none"> <li>Will it minimise flood risk from all sources of flooding?*</li> </ul>	0	The Millbank Strategic Cultural Area is in Flood Zone 3.
	<ul style="list-style-type: none"> <li>Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience? *</li> </ul>		
	<ul style="list-style-type: none"> <li>Will it reduce combined sewer overflow events?*</li> </ul>	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to and promote educational value of sites of biodiversity interest?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve and enhance species and habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve water environment?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions of key pollutants?*</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>Will it reduce noise levels*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce noise concerns and complaints?</li> </ul>	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"> <li>Will it reduce traffic volumes?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage walking and cycling?*</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using modes other than a car?*</li> </ul>	+	

12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> <li>Will lead to reduced consumption of materials and resources?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce household waste?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will increase recovery recycling and re-use?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce construction waste?</li> </ul>	-	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>Will it conserve the significance of heritage sites and cultural value?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it protect strategic views?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve listed buildings and their settings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it help conserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands? * *</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space	<ul style="list-style-type: none"> <li>Will it improve open space? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? * *</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities and support sustainable growth throughout	<ul style="list-style-type: none"> <li>Will it improve qualifications, skills and training? * *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce unemployment? *</li> </ul>	0	

Westminster.	<ul style="list-style-type: none"> <li>• Will provide jobs for most in need? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>• Will improve business development and environment?</li> </ul>	+	This policy encourages a range of commercial uses and recognises that Core CAZ is the centre of commercial life and the heart of business in London but may also have a ripple effect to the more deprived parts of the city. A diverse range of commercial uses means that any local economy is more likely to be more buoyant in a downturn. This policy encourages key businesses sectors and important clusters and recognises the significant contribution these make to Westminster and its key position in the national and international world economy.
	<ul style="list-style-type: none"> <li>• Will improve business resilience and economy?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it encourage new business start ups, small businesses and opportunities for local people? *</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it promote business in key sectors?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>• Will it promote regeneration, reducing disparity? **</li> </ul>	+	

(\* asterisks show where the sub-criteria other than that identified in coloured text (blue text = health considerations and red text = equalities considerations) is likely to impact on health and equalities).

**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**



## **IIA Assessment**

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

### **Overall Summary**

This is overall neutral but has significant positive impacts in Core CAZ encouraging economic growth including the retail and cultural offer and strategically important clusters of use and minimises the need to travel. There is a long term positive impact on the UK economy and Westminster's role in London's world city status. The recognition of diversity ensures an overall sustainable approach to development. A growth in construction waste is likely and this gives a negative score to Objective 12.

**Long Term positive effect** – This policy has both long term and short term positive impacts. The impact on health and well-being is likely to be seen in the long term as will any positive impact on the north of Westminster.

**Short term** – See above

**Short term negative effects** – Increase in construction waste however this is likely to be mitigated by forthcoming policies for waste

**Mitigation/Change to plan** – None

**Cumulative effects** – The economic impacts on other parts of the city are likely to be long term and cumulative.

**Uncertainties/risks** – The wider economy

**Monitoring significant effects** – AMR

Integrated Impact Assessment: For changes to supporting text and to the Reasoned Justification to Policy No. 14 Optimising Housing Delivery and to Appendix 4.			
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"> <li>Will improve access to local services including shops and community facilities?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will in increase ability to influence decision making (neighbourhoods)? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage engagement in community activity</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community?</li> </ul>	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>Will it reduce the levels of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce fear of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce other behaviour adversely affecting the local environment? **</li> </ul>		
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"> <li>Will it reduce homelessness? **</li> </ul>	+	This additional text sets out updated figures from the London Plan equating to 21,360 units between 2016/17 and 2036/37.(previously 7,700 units between 2011 and 2021).
	<ul style="list-style-type: none"> <li>Will it increase a range of affordable housing? **</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it reduce the number of unfit homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it result in high quality homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide housing than can help people stay independent for longer?</li> </ul>	0	

<p>4. To promote and improve health and wellbeing</p>	<ul style="list-style-type: none"> <li>• Will it help health inequalities? **</li> </ul>	+	<p>Additional housing may have a long term positive impact on health inequalities and a reduction in death rates.</p>
<ul style="list-style-type: none"> <li>• Will it reduce death rates?*</li> </ul>	+		
<ul style="list-style-type: none"> <li>• Will it improve access/movement?*</li> </ul>	0		
<ul style="list-style-type: none"> <li>• Will it encourage healthy lifestyles?*</li> </ul>	0		
<ul style="list-style-type: none"> <li>• Will it improve cultural wellbeing?</li> </ul>	0		
<ul style="list-style-type: none"> <li>• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> </ul>	0		
<ul style="list-style-type: none"> <li>• Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0		
<ul style="list-style-type: none"> <li>• Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	0		
<ul style="list-style-type: none"> <li>• Will it create healthy workplaces?</li> </ul>	0		
<p>5. To reduce greenhouse gas emissions and support climate change adaption</p>	<ul style="list-style-type: none"> <li>• Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing the need to travel?*</li> </ul>	0	.
<ul style="list-style-type: none"> <li>• Will it reduce ozone depleting emissions? *</li> </ul>	0		
<ul style="list-style-type: none"> <li>• Will it reduce emissions through retrofitting new technology?</li> </ul>	0		
<ul style="list-style-type: none"> <li>• Will it reduce heat island effects on people and property? *</li> </ul>	0		
<p>6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood.</p>	<ul style="list-style-type: none"> <li>• Will it reduce water consumption and improve water efficiency?</li> </ul>	0	.
<ul style="list-style-type: none"> <li>• Will it reduce consumption of fossil fuels?*</li> </ul>	0		

	<ul style="list-style-type: none"> <li>Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>		
	<ul style="list-style-type: none"> <li>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	
7. To reduce flood risk, promote sustainable urban drainage (SUDs) and protect, surface and ground water quality	<ul style="list-style-type: none"> <li>Will it minimise flood risk from all sources of flooding?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience? *</li> </ul>		
	<ul style="list-style-type: none"> <li>Will it reduce combined sewer overflow events?*</li> </ul>	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to and promote educational value of sites of biodiversity interest?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve and enhance species and habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve water environment?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions of key pollutants?*</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>Will it reduce noise levels*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce noise concerns and complaints?</li> </ul>	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"> <li>Will it reduce traffic volumes?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage walking and cycling?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using</li> </ul>	0	

	modes other than a car?*		
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 conserve and enhance the historic environment and architectural, archaeological and cultural heritage	• Will it conserve the significance of heritage sites and cultural value?	0	
	• Will it protect strategic views?	0	
	• Will it conserve listed buildings and their settings?	0	
	• Will it help conserve, enhance and record archaeological features and their settings?	0	
14. To enhance public realm and street improvements	• Will reduce litter?	0	
	• Will it enhance the quality of public realm?	0	
	• Will improve access and mobility for all equality group strands?* *	0	
15. To protect, enhance and seek opportunities to increase open space	• Will it improve open space?*	0	
	• Will it improve landscape and character of open space?	0	
	• Will it improve access to open space? **	0	
16. To ensure equality of opportunity and improve local opportunities and support sustainable growth throughout Westminster.	• Will it improve qualifications, skills and training? **	0	
	• Will it reduce unemployment? *		
	• Will provide jobs for most in need? **	0	
	• Will improve earnings?	0	

	<ul style="list-style-type: none"> <li>• Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>• Will improve business development and environment?</li> </ul>	+	The changes to the wording of the policy has removed the reference in the RJ to not giving general protection to office use which is considered to potentially provide an improved business environment in particular for offices.
	<ul style="list-style-type: none"> <li>• Will improve business resilience and economy?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it promote business in key sectors?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it promote regeneration, reducing disparity?***</li> </ul>	0	
<p>(** asterisks show where the sub-criteria other than that identified in coloured text (blue text = health considerations and red text = equalities considerations) is likely to impact on health and equalities).</p> <p><b>For the EIA the following protected characteristics were considered:</b>  <b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b>  Although there are no changes to the wording of Policy S14, there is significant alteration to the text and reasoned justification around this policy and to Appendix 4 – Housing Delivery that merit an IIA assessment. These mainly concern increased London Plan housing targets which result in a positive score for sub-criteria in Objective 3 and an associated improvement in health and well-being in Objective 5. The other change dovetails in to the mixed use balance of commercial and residential uses which is the overall theme of all changes in this phase of the City Plan and has removed the reference in the reasoned justification to not giving general protection to office use which is considered to potentially provide an improved business environment in particular for offices</p>			
<p><b>Long Term positive effect –</b> For both housing and commercial uses with a cumulative impact on health and well-being  <b>Short term –</b> For both housing and commercial uses  <b>Long term negative effects –</b> None identified  <b>Mitigation/Change to plan –</b> None  <b>Cumulative effects –</b> See above- Health and well-being  <b>Uncertainties/risks –</b> The wider economy  <b>Monitoring significant effects –</b> AMR</p>			

Integrated Impact Assessment: For Policy No. S18 Commercial development			
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"> <li>Will improve access to local services including shops and community facilities?*</li> </ul>	+	This policy approach encourages the growth of commercial uses and should therefore improve access to all local shops and community facilities where required.
	<ul style="list-style-type: none"> <li>Will in increase ability to influence decision making (neighbourhoods)? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage engagement in community activity</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community?</li> </ul>	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>Will it reduce the levels of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce fear of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce other behaviour adversely affecting the local environment? **</li> </ul>		
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"> <li>Will it reduce homelessness? **</li> </ul>	0	The changes made pre-submission clarify that even within the Central Activities Zone, there should be no commercial encroachment into wholly residential areas or streets.
	<ul style="list-style-type: none"> <li>Will it increase a range of affordable housing? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce the number of unfit homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it result in high quality homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide housing than can help people stay independent for longer?</li> </ul>	0	

4. To promote and improve health and wellbeing	• Will it help health inequalities?*	0	
	• Will it reduce death rates?*	0	
	• Will it improve access/movement?*	0	
	• Will it encourage healthy lifestyles?*	0	
	• Will it improve cultural wellbeing?	0	
	• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?	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 it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing 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, fossil fuels, quarried materials, wood.	• Will it reduce water consumption and improve water efficiency?	0	.
	• Will it reduce consumption of fossil fuels?*	0	



	<ul style="list-style-type: none"> <li>Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>		
	<ul style="list-style-type: none"> <li>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	
7. To reduce flood risk, promote sustainable urban drainage (SUDs) and protect, surface and ground water quality	<ul style="list-style-type: none"> <li>Will it minimise flood risk from all sources of flooding?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience? *</li> </ul>		
	<ul style="list-style-type: none"> <li>Will it reduce combined sewer overflow events?*</li> </ul>	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to and promote educational value of sites of biodiversity interest?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve and enhance species and habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve water environment?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions of key pollutants?*</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>Will it reduce noise levels*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce noise concerns and complaints?</li> </ul>	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"> <li>Will it reduce traffic volumes?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage walking and cycling?*</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using</li> </ul>	+	

	modes other than a car?*		
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?	-	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	• Will it conserve the significance of heritage sites and cultural value?	0	The policy seeks appropriate development in terms of scale..... which may protect strategic views
	• Will it protect strategic views?	+	
	• Will it conserve listed buildings and their settings?	0	
	• Will it help conserve, enhance and record archaeological features and their settings?	0	
14. To enhance public realm and street improvements	• Will reduce litter?	0	
	• Will it enhance the quality of public realm?	0	
	• Will improve access and mobility for all equality group strands?* *	0	
15. To protect, enhance and seek opportunities to increase open space	• Will it improve open space?*	0	
	• Will it improve landscape and character of open space?	0	
	• Will it improve access to open space? **	0	
16. To ensure equality of opportunity and improve local opportunities and support sustainable growth throughout Westminster.	• Will it improve qualifications, skills and training? **	0	
	• Will it reduce unemployment? *	++	
	• Will provide jobs for most in need? **	0	
	• Will improve earnings?	0	

	<ul style="list-style-type: none"> <li>• Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>• Will improve business development and environment?</li> </ul>	++	This policy specifically encourages development and directs to certain parts of Westminster including NWEDA and the designated shopping centres. It states that commercial and other non-residential activity is the priority in the Core CAZ and also that the council will work to achieve and exceed London plan targets for jobs.
	<ul style="list-style-type: none"> <li>• Will improve business resilience and economy?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>• Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	++	
	<ul style="list-style-type: none"> <li>• Will it promote business in key sectors?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>• Will it promote regeneration, reducing disparity?***</li> </ul>	++	
<p>(* asterisks show where the sub-criteria other than that identified in coloured text (blue text = health considerations and red text = equalities considerations) is likely to impact on health and equalities).</p> <p><b>For the EIA the following protected characteristics were considered:</b>  <b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b>  This policy is overall neutral but is most positive for Objective 17 seeking to protect and enhance Westminster’s pre-eminent role for the economy. There may be a positive impact on Objective 13 by ensuring development is of an appropriate scale and for objectives 1 and 11 in terms of the provision of shops and services and reducing the need to travel by car. As with other similar policies this has a negative score for construction waste and is neutral for all other environmental policies.</p>			
<p><b>Long Term positive effect</b> – This is considered to be most positive for Objective 17.  <b>Short term</b> – This is considered to be most positive for Objective 17.  <b>Short term negative effects</b> – Construction waste  <b>Mitigation/Change to plan</b> – None  <b>Cumulative effects</b> – Without this policy in place potentially there could be a detrimental impact to the economy of London and UK more widely  <b>Uncertainties/risks</b> – Economy  <b>Monitoring significant effects</b> – AMR</p>			

Integrated Impact Assessment: For Policy No. S20 Offices and other B1 Floorspace			
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"> <li>Will improve access to local services including shops and community facilities?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will in increase ability to influence decision making (neighbourhoods)? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage engagement in community activity</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community?</li> </ul>	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>Will it reduce the levels of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce fear of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce other behaviour adversely affecting the local environment? **</li> </ul>		
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"> <li>Will it reduce homelessness? **</li> </ul>	0	This has been given a neutral score very much on balance. However compared to the exiting situation this may result in a reduced provision of housing.
	<ul style="list-style-type: none"> <li>Will it increase a range of affordable housing? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce the number of unfit homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it result in high quality homes? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide housing than can help people stay independent for longer?</li> </ul>	0	

4. To promote and improve health and wellbeing	• Will it help health inequalities?*	0	
	• Will it reduce death rates?*	0	
	• Will it improve access/movement?*	0	
	• Will it encourage healthy lifestyles?*	0	
	• Will it improve cultural wellbeing?	0	
	• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?	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 it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing 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, fossil fuels, quarried materials, wood.	• Will it reduce water consumption and improve water efficiency?	0	.
	• Will it reduce consumption of fossil fuels?*	0	

	<ul style="list-style-type: none"> <li>Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>		
	<ul style="list-style-type: none"> <li>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	
7. To reduce flood risk, promote sustainable urban drainage (SUDs) and protect, surface and ground water quality	<ul style="list-style-type: none"> <li>Will it minimise flood risk from all sources of flooding?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience? *</li> </ul>		
	<ul style="list-style-type: none"> <li>Will it reduce combined sewer overflow events?*</li> </ul>	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to and promote educational value of sites of biodiversity interest?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve and enhance species and habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve water environment?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions of key pollutants?*</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>Will it reduce noise levels*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce noise concerns and complaints?</li> </ul>	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"> <li>Will it reduce traffic volumes?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage walking and cycling?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using</li> </ul>	0	

	modes other than a car?*		
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?	-	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	• Will it conserve the significance of heritage sites and cultural value?	0	
	• Will it protect strategic views?	0	
	• Will it conserve listed buildings and their settings?	0	
	• Will it help conserve, enhance and record archaeological features and their settings?	0	
14. To enhance public realm and street improvements	• Will reduce litter?	0	
	• Will it enhance the quality of public realm?	0	
	• Will improve access and mobility for all equality group strands?* *	0	
15. To protect, enhance and seek opportunities to increase open space	• Will it improve open space?*	0	
	• Will it improve landscape and character of open space?	0	
	• Will it improve access to open space? **	0	
16. To ensure equality of opportunity and improve local opportunities and support sustainable growth throughout Westminster.	• Will it improve qualifications, skills and training? **	0	
	• Will it reduce unemployment? *	+	
	• Will provide jobs for most in need? **	0	
	• Will improve earnings?	0	

	<ul style="list-style-type: none"> <li>• Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>• Will improve business development and environment?</li> </ul>	+	This policy is very positive for this objective in particular for businesses in key sectors, which is considered to include office floorspace.
	<ul style="list-style-type: none"> <li>• Will improve business resilience and economy?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will it promote business in key sectors?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>• Will it promote regeneration, reducing disparity?***</li> </ul>	+	
<p>(* asterisks show where the sub-criteria other than that identified in coloured text (blue text = health considerations and red text = equalities considerations) is likely to impact on health and equalities).</p> <p><b>For the EIA the following protected characteristics were considered:</b>  <b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b>  This policy is very positive for Objective 17, in particular for businesses in key sectors, which is considered to include office floorspace. This has been given a neutral score for Objective 3 very much on balance. However compared to the existing situation this may result in a reduced provision of housing.</p>			
<p><b>Long Term positive effect</b> – For office development which may have a wider impact on the UK and international economy  <b>Short term</b> – For office development  <b>Short term negative effects</b> – Construction waste  <b>Mitigation/Change to plan</b> – None  <b>Cumulative effects</b> – See long term positive effect  <b>Uncertainties/risks</b> – The economy  <b>Monitoring significant effects</b> – AMR</p>			



Integrated Impact Assessment: For Policy No.CM47.1 Land Use Swaps and Packages			
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 foster an inclusive Westminster community?	0	
	• Will it encourage engagement in community activity	0	
2. To reduce crime and fear of crime	• Will it reduce the levels of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce fear of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce other behaviour adversely affecting the local environment? **	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?	+	
	• Will it result in high quality homes? **	+	
	• Will it provide housing that can help people stay independent for longer?	0	
4. To promote and improve	• Will it help health and equalities? **	0	

health and wellbeing	<ul style="list-style-type: none"> <li>• Will it reduce death rates?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve access/movement?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve cultural wellbeing?</li> </ul>		
	<ul style="list-style-type: none"> <li>• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it create healthy workplaces?</li> </ul>	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>• Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*</li> </ul>	+	The principle of allowing the re-location of uses between buildings can facilitate a better arrangement of uses within buildings and therefore greater efficiency and sustainability of building stock by ensuring long term suitability and continued occupation. Larger scale applications where the swap of uses is in connection with the Mixed Use policy will be encouraged to provide an overall improvement in environmental sustainability, in accordance with IIA criteria 5 and 6.
	<ul style="list-style-type: none"> <li>• Will it reduce ozone depleting emissions?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce heat island effects on people and property?</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood	<ul style="list-style-type: none"> <li>• Will it reduce water consumption and improve water efficiency?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce consumption of fossil fuels?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>	+	

	<ul style="list-style-type: none"> <li>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>		
7. To a) reduce flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> <li>Will it minimise flood risk from all sources of flooding?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?*</li> </ul>		
	<ul style="list-style-type: none"> <li>Will it reduce combined sewer overflow events?</li> </ul>	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it preserve SINC's?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to and promote educational value of sites of biodiversity interest?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve and enhance species and habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve water quality?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions of key pollutants?</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>Will it reduce noise levels*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce noise concerns and complaints?</li> </ul>	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"> <li>Will it reduce traffic volumes?</li> </ul>	+	Any policy which encourages the provision of housing and employment uses/local services in close proximity will reduce the need to travel.
	<ul style="list-style-type: none"> <li>Will it encourage walking and cycling?*</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using modes other than a car?</li> </ul>	+	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> <li>Will lead to reduced consumption of materials and resources?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce household waste?</li> </ul>	0	

	<ul style="list-style-type: none"> <li>Will increase recovery recycling and re-use?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>Will it conserve the significance of heritage sites and cultural value?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it protect strategic views?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve listed buildings and their settings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it help conserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands?*</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> <li>Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	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"> <li>Will it improve qualifications, skills and training? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce unemployment?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will provide jobs for most in need? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>Will improve business development and environment?</li> </ul>	+	This policy maximises the potential of sites within the commercial parts of Westminster. It ensures a mix of uses is retaining locally and has the potential to improve business
	<ul style="list-style-type: none"> <li>Will improve business resilience and economy?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it encourage new business start ups, small</li> </ul>	0	

	businesses and opportunities for local people?*		development and environment.
	• Will it promote business in key sectors?	0	
	• Will it promote regeneration, reducing disparity?***	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**

This policy is positive on social and economic sustainability criteria in particular IIA objective 3 and IIA objective 17. The transfer of uses between buildings can facilitate a better arrangement of uses within buildings and therefore greater efficiency and sustainability of the building stock by ensuring long-term suitability and continued occupation. The overall effect is to enhance the quality of both commercial and residential accommodation. Applications for land use swaps are normally small scale involving change of use and therefore the policy is relatively neutral on environmental sustainability grounds. Larger scale applications where the swap of uses is in connection with the Mixed Use policy will be encouraged to provide an overall improvement for IIA sub-criteria in objectives 5 and 6.

**Short and Long Term positive effect –** The principle of allowing the relocation of uses between buildings can facilitate a better arrangement of uses within buildings and therefore greater efficiency and sustainability of building stock by ensuring long term suitability and continued occupation rather than redevelopment.

**Long term negative effects –** No significant effects

**Cumulative effects** Spatial Sustainability

**Uncertainties/risks –** Development in Westminster will depend on wider economic impacts.

**Monitoring significant effects –** AMR

**Integrated Impact Assessment: For Policy No. CM47.2 Credits**

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"> <li>Will improve access to local services?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Shopping?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Community facilities?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it increase ability to influence decision making (neighbourhoods)?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage engagement in community activity</li> </ul>	0	
2. To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>Will it reduce the levels of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce fear of crime, disorder and anti-social behaviour? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce other behaviour adversely affecting the local environment? **</li> </ul>	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"> <li>Will it reduce homelessness? *</li> </ul>	+	The policy requires better quality housing than would have been possible on site.
	<ul style="list-style-type: none"> <li>Will it increase a range of affordable housing? *</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it reduce the number of unfit homes?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it result in high quality homes? **</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it provide housing that can help people stay independent for longer?</li> </ul>	0	
4. To promote and improve	<ul style="list-style-type: none"> <li>Will it help health and equalities? **</li> </ul>	0	

health and wellbeing	<ul style="list-style-type: none"> <li>• Will it reduce death rates?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve access/movement?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve cultural wellbeing?</li> </ul>		
	<ul style="list-style-type: none"> <li>• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it create healthy workplaces?</li> </ul>	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>• Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce ozone depleting emissions?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it reduce heat island effects on people and property?</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood	Will it reduce water consumption and improve water efficiency?	0	
	<ul style="list-style-type: none"> <li>• Will it reduce consumption of fossil fuels?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will use of other natural resources (e.g. quarried materials) be minimised?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	

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



	<ul style="list-style-type: none"> <li>• Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>• Will it conserve the significance of heritage sites and cultural value?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it protect strategic views?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it conserve listed buildings and their settings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it help conserve enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>• Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will improve access and mobility for all equality group strands?*</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> <li>• Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it improve access to open space? **</li> </ul>	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"> <li>• Will it improve qualifications, skills and training? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will reduce unemployment?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will provide jobs for most in need? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>• Will improve business development and environment?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>• Will improve business resilience and economy?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>• Will it promote business in key sectors?</li> </ul>	0	

	<ul style="list-style-type: none"> <li>• Will it promote regeneration, reducing disparity? **</li> </ul>	0	
<p>For the <b>EIA</b> the following protected characteristics were considered:  <b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p> <p>Coloured asterisks **show SA sub-criteria also relevant to <b>EIA</b> and <b>HA</b> consideration</p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b>  This policy provides the mechanism for the implementation of land use credits set out in Policy S1. These credits enable development to be bought forward early which can then meet policy requirements of a later scheme. This provides additional flexibility to support developers in delivering mixed use. This policy approach receives positive scores for both housing and economic objectives. In particular in the delivery of higher quality housing and affordable housing and for improving business development and environment.</p>			
<p><b>Long Term positive effect</b> – This policy is likely to result in the agglomeration of the residential requirement from several smaller mixed use schemes and therefore affordable housing will be provided where it may not have been possible in individual mixed use schemes.  <b>Short term</b> – More certainty on the land use outcome of schemes  <b>Long term negative effects</b> – No significant effects  <b>Cumulative effects</b> – Supports other policies in the plan  <b>Uncertainties/risks</b> – All potential positive effects depend on economic growth.  <b>Monitoring significant effects</b> – AMR</p>			

<sup>i</sup> Westminster Office Study Impact of the Recession (2009)

## Appendix 6 Reasonable Alternatives

For the following: Strategic Objectives 1, 4 and 5, Policies S1 (Mixed Use in the CAZ), S6 (Core CAZ), S18 (Commercial Development), S20 (Offices and other B1 floorspace), CM47.1 (Land Use Swaps and Packages), CM47.2 (Credits)

(Key to alternatives set out below the tables)

### Strategic Objective 1

IIA Objectives	AO1	WCP	MUR
1.To create cohesive, inclusive and safe communities			
2. To reduce crime and fear of crime			
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units			
4.To promote and improve health and well being			
5.To reduce greenhouse emissions and support climate change adaption			
6.To reduce use of natural resources e.g. water, energy			

7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality			
8.To protect, enhance and create environments that encourage and support biodiversity			
9.To improve Air Quality			
10.To reduce noise and the impact of noise			
11.To reduce the need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport			
12.To reduce waste production and increase recycling, recovery and re-use of waste			
13.To protect and enhance the historic environment and architectural, archeological and cultural heritage			
14.To enhance public realm and street improvements			
15.To protect, enhance and seek opportunities to increase open space			
16.To ensure equal opportunities to improve local opportunities and support sustainable			

economic growth			
17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.			+

AO1 – No Policy

**WCP (Westminster City Plan: Strategic Policies. Westminster’s Strategic Objectives 1.)** To accommodate sustainable growth and change that will contribute to enhancing London’s role as a sustainable world class city, including its international business, retail, cultural and entertainment functions within the Central Activities Zone; whilst maintaining its unique and historic character, mix, functions, and townscapes.

**MUR (Mixed Use Revision to Westminster’s City Plan Strategic Objective 1.)** To accommodate sustainable growth and change that will contribute to enhancing London’s Westminster’s role as the heart of a pre-eminent a sustainable world class city, including building on its internationally renowned business, retail, cultural, tourism and entertainment functions within the Central Activities Zone; to support the unique economic breadth and diversity of the West End and its fringe areas including the Opportunity Areas; whilst maintaining its unique and historic character, mix, functions, and townscapes.

**Strategic Objective 4**

IJA Objectives	AO1	WCP	MUR
1.To create cohesive, inclusive and safe communities			
2. To reduce crime and fear of crime			
3.To ensure provision of appropriate housing		+	

types to reduce overcrowded households and meet the demand for affordable housing and family sized units	Red	Green	Green
4.To promote and improve health and well being	Yellow	Yellow	Yellow
5.To reduce greenhouse emissions and support climate change adaption	Yellow	Yellow	Yellow
6.To reduce use of natural resources e.g. water, energy	Yellow	Yellow	Yellow
7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality	Yellow	Yellow	Yellow
8.To protect, enhance and create environments that encourage and support biodiversity	Yellow	Yellow	Yellow
9.To improve Air Quality	Yellow	Yellow	Yellow
10.To reduce noise and the impact of noise	Yellow	Yellow	Yellow
11.To reduce the need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport	Red	Green	Green
12.To reduce waste production and increase recycling, recovery and re-use of waste	Yellow	Yellow	Yellow

13.To protect and enhance the historic environment and architectural, archeological and cultural heritage			
14.To enhance public realm and street improvements			
15.To protect, enhance and seek opportunities to increase open space			
16.To ensure equal opportunities to improve local opportunities and support sustainable economic growth			
17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.			

AO1 – No Policy

**WCP (Westminster City Plan: Strategic Policies. Westminster’s Strategic Objective 4.)** To increase the supply of good quality housing across all parts of the city to meet Westminster’s housing target, and to meet housing needs, including the provision of affordable housing and homes for those with special needs.

**MUR (Mixed Use Revision to Westminster’s City Plan Strategic Objective 4.)** ~~To increase the supply of good quality housing across all parts of the city~~ to meet Westminster’s housing target, and to meet housing needs, including the provision of affordable housing and homes for those with special needs; whilst ensuring that new housing in commercial areas coexists alongside the business activity and an appropriate balance of uses is maintained.

## Strategic Objective 5

IIA Objectives	AO1	WCP	MUR
1.To create cohesive, inclusive and safe communities			
2. To reduce crime and fear of crime		+	+
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units			
4.To promote and improve health and well being			
5.To reduce greenhouse emissions and support climate change adaption			
6.To reduce use of natural resources e.g. water, energy			
7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality			
8.To protect, enhance and create environments that encourage and support biodiversity			



9.To improve Air Quality			
10.To reduce noise and the impact of noise			
11.To reduce the need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport			
12.To reduce waste production and increase recycling, recovery and re-use of waste			
13.To protect and enhance the historic environment and architectural, archeological and cultural heritage		+	+
14.To enhance public realm and street improvements			
15.To protect, enhance and seek opportunities to increase open space			
16.To ensure equal opportunities to improve local opportunities and support sustainable economic growth			
17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.		+	+





improvements										
15.To protect, enhance and seek opportunities to increase open space										
16.To ensure equal opportunities to improve local opportunities and support sustainable economic growth										
17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.								+		

A01 – No Policy

A02 – Do not pursue a cascade approach as part of mixed use but require a payment in lieu of residential provision

A03 – Allow a percentage uplift in development before the mixed use policy applies

A04 – Area-based exemption from mixed use policy

A05 - Require a mix of uses from office to residential conversions

A06 – Benchmark triggered policy for mixed use

A07- Require only affordable housing alongside commercial development

S1 [Mixed Use and Office to Residential Conversion Consultation Booklet 18 December 2014](#)

POLICY S1 MIXED USE IN THE CENTRAL ACTIVITIES ZONE

The council will encourage development which promotes Westminster's World City functions, manages its heritage and environment and supports its living, working and visiting populations.

Within the CAZ, a mix of uses consistent with supporting its vitality, function and character will be promoted.

A) Where proposals increase the amount of floorspace by more than 50% of the original building, net increases in commercial floorspace will be accompanied by an equivalent amount of residential floorspace, except where the net increase in commercial floorspace is less than 200sqm in the case of B Use Classes, or less than 400sqm in the case of A Use Classes or private D Use Classes. The residential floorspace will be provided in accordance with the following cascade. Applicants are required to demonstrate to the council's satisfaction that it is not appropriate or practicable to provide the floorspace (in whole or in part) at each step of the policy cascade before they can move to the next.

- i. The required floorspace will be provided on-site or in the immediate vicinity of the site.
- ii. The required floorspace will be provided off-site (including through a draw down of Mixed Use Credits Policy CM49.3) on a site in the vicinity of the development site, or in the case of an Opportunity Area, within that Opportunity Area.
- iii. The required floorspace will be provided off-site (including through a draw down of Mixed Use Credits Policy CM49.3) elsewhere within the Core CAZ or the Named Streets. This part of the cascade does not apply to sites in Opportunity Areas. The housing provided must be greater and of a higher quality than would be possible under i. or ii. above.
- iv. Payment of an appropriate Payment in Lieu to the Affordable Housing Fund in accordance with Appendix 1.1 In demonstrating that a particular step is not practicable, site specific considerations will need to be taken into account. In demonstrating a particular step is not appropriate, considerations may include where a significantly better outcome can be achieved, in keeping with the council's mixed use objectives, by not providing the residential floorspace on site.

B) Where proposals increase the amount of floorspace by between 30% and 50% of the original building, except where the commercial floorspace is less than 200sqm in the case of B Use Classes, or less than 400sqm in the case of A Use Classes or private D Use Classes:

- i. all commercial floorspace will be accompanied by an equivalent amount of residential floorspace, either on-site, elsewhere in the CAZ or by mixed use credit (Policy CM49.3); or

ii. all commercial floorspace will be accompanied by an affordable housing payment in lieu equivalent to the amount of commercial floorspace, calculated in accordance with Appendix 1.1;

It is at the applicant's discretion whether they wish to apply i. or ii. above.

#### POLICY S1 MIXED USE IN THE CENTRAL ACTIVITIES ZONE – Additional Alternative Requirement

C) Where proposals increase the amount of floorspace by more than 30% of the original building, changes of use from office to residential and replacement of office floorspace with residential floorspace will be accompanied by an equivalent amount of commercial floorspace and/or social and community floorspace, except where:

- i. the net increase in residential floorspace is less than 400sqm; or
- ii. in the case of changes of use from office to residential, the building was originally built as residential.

The floorspace can be provided on-site, off-site, through the draw down of a mixed use credit (Policy CM49.3) or by an appropriate payment in lieu to the Civic Enterprise Fund in accordance with Appendix 1.1.

#### CO1 suggested by Howard de Walden Estate

“...inside the Central Activities Zone change of use from office to residential, or replacement of office floorspace with residential, should demonstrate that the benefits to Westminster, in terms of one, or more, of the following factors, or other material considerations, outweigh the contribution made by the office floorspace, particularly to meeting business and employment needs:

- a) Economic contribution, in terms of Gross Value Added, and/or comparable measurement; or
- b) Quality of existing office accommodation and the likelihood of outdated or obsolete office floorspace being successfully redeveloped or refurbished for continuing office use; or
- c) Townscape benefits of redeveloping an existing poor quality building that is visually detrimental to its surrounding area; or
- d) Contribution to meeting Westminster's housing needs.”

REG 19 MIXED USE REVISION TO WESTMINSTER'S CITY PLAN SUBMISSION DRAFT. POLICY S18 COMMERCIAL DEVELOPMENT

POLICY S1 MIXED USE IN THE CENTRAL ACTIVITIES ZONE

... C) Where proposals in Core CAZ, the Named Streets or Opportunity Areas increase the amount of floorspace by more than 50% of the existing building and more than 400sqm, net increases in B1 office floorspace (up to a maximum of the net additional floorspace above the 30% development uplift threshold) will be accompanied by an equivalent amount of residential floorspace. The residential floorspace will be provided in accordance with the following cascade. Applicants are required to demonstrate to the council's satisfaction that it is not appropriate or practicable to provide the floorspace (in whole or in part) at each step of the policy cascade before they can move to the next.

... iii. The required floorspace will be provided off-site (including through a draw down of mixed use credits in accordance with Policy CM47.2) elsewhere within the CAZ. This part of the cascade does not apply to Victoria and Paddington Opportunity Areas. The housing provided must be ~~greater and~~ of a higher quality than would be possible under i. or ii. above.

**Core Central Activities Zone (S6)**

IIA Objectives	AO1	WCP	MUR
1.To create cohesive, inclusive and safe communities			
2. To reduce crime and fear of crime			
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and			

family sized units			
4.To promote and improve health and well being			
5.To reduce greenhouse emissions and support climate change adaption			
6.To reduce use of natural resources e.g. water, energy			
7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality			
8.To protect, enhance and create environments that encourage and support biodiversity			
9.To improve Air Quality			
10.To reduce noise and the impact of noise			
11.To reduce the need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport		+	+
12.To reduce waste production and increase recycling, recovery and re-use of waste			
13.To protect and enhance the historic environment and architectural, archeological			



and cultural heritage			
14.To enhance public realm and street improvements			
15.To protect, enhance and seek opportunities to increase open space			
16.To ensure equal opportunities to improve local opportunities and support sustainable economic growth			
17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.		++	++

AO1 – No Policy

**WCP Westminster City Plan: Strategic Policies. Policy S6 Core Central Activities Zone**

**POLICY S6 CORE CENTRAL ACTIVITIES ZONE**

The Core Central Activities Zone (Core CAZ) is an appropriate location for residential use and a range of commercial and cultural uses, subject to the following priorities:

- Retail floorspace is encouraged throughout the area. Large scale retail development will be directed to the West End International Shopping Centre’s Primary Shopping Frontages, the CAZ Frontages and the Opportunity Areas, with smaller-scale retail development

also to its other shopping centres. Development within the Knightsbridge Primary Shopping Frontage will support the character, function and vitality of the wider International Shopping Centre within the Royal Borough of Kensington and Chelsea.

- Within the West End Stress Area, new entertainment uses will only be allowed where the council considers that they are small-scale, low-impact and they will not result in an increased concentration of late-night uses.
- Development sites within the Millbank Strategic Cultural Area between Lambeth and Vauxhall bridges will deliver a mix of uses including those that support culture and the creative industries - including arts and cultural uses, affordable business floorspace, workshops and studios; and
- Berwick Street market will be protected and the use of Rupert Street for specialist seasonal market trading will be supported.

Where retail developments fronting the Primary Shopping Frontages result in the requirement to provide residential floorspace, the residential floorspace may be provided off-site in the vicinity rather than on-site, where the council is satisfied that off-site provision would better contribute to the vitality of the West End Special Retail Policy Area or Knightsbridge International Shopping Centre.

### MUR Mixed Use Revision to Westminster's City Plan. Policy S6 Core Central Activities Zone

#### POLICY S6 CORE CENTRAL ACTIVITIES ZONE

The Core Central Activities Zone (Core CAZ) is an appropriate location for ~~residential use and~~ a range of commercial and cultural uses and complimentary residential use, subject to the following priorities:

- Supporting strategically important clusters of uses consistent with enabling the growth and evolution of places to ensure the global reputation of the area is retained and enhanced.
- Retail floorspace is encouraged throughout the area. Large scale retail development will be directed to the West End International Shopping Centre's Primary Shopping Frontages, the CAZ Frontages and the Opportunity Areas, with smaller-scale retail development also to its other shopping centres. Development within the Knightsbridge Primary Shopping Frontage will

support the character, function and vitality of the wider International Shopping Centre within the Royal Borough of Kensington and Chelsea.

- Within the West End Stress Area, new entertainment uses will only be allowed where the council considers that they are small-scale, low-impact and they will not result in an increased concentration of late-night uses.
- Development sites within the Millbank Strategic Cultural Area between Lambeth and Vauxhall bridges will deliver a mix of uses including those that support culture and the creative industries - including arts and cultural uses, affordable business floorspace, workshops and studios; and
- Berwick Street market will be protected and the use of Rupert Street for specialist seasonal market trading will be supported.

Where retail developments fronting the Primary Shopping Frontages result in the requirement to provide residential floorspace, the residential floorspace may be provided off-site in the vicinity rather than on-site, where the council is satisfied that off-site provision would better contribute to the vitality of the West End Special Retail Policy Area or Knightsbridge International Shopping Centre.

Where retail developments fronting the Primary Shopping Frontages result in the requirement to provide residential floorspace, the residential floorspace may be provided off-site in the vicinity rather than on-site, where the council is satisfied that off-site provision would better contribute to the vitality of the West End Special Retail Policy Area or Knightsbridge International Shopping Centre.

### Commercial Development (S18)

IJA Objectives	AO1	WCP	MUR	Reg 19
1.To create cohesive, inclusive and safe communities				
2. To reduce crime and fear of crime				

3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units				
4.To promote and improve health and well being				
5.To reduce greenhouse emissions and support climate change adaption				
6.To reduce use of natural resources e.g. water, energy				
7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality				
8.To protect, enhance and create environments that encourage and support biodiversity				
9.To improve Air Quality				
10.To reduce noise and the impact of noise				
11.To reduce the need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport				
12.To reduce waste production and increase				

recycling, recovery and re-use of waste				
13.To protect and enhance the historic environment and architectural, archeological and cultural heritage				
14.To enhance public realm and street improvements				
15.To protect, enhance and seek opportunities to increase open space				
16.To ensure equal opportunities to improve local opportunities and support sustainable economic growth			+	
17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.		+	++	

AO1 – No Policy

### WCP Westminster City Plan: Strategic Policies. Policy S18 Commercial Development

#### POLICY S18 COMMERCIAL DEVELOPMENT

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

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

## MUR Mixed Use Revision to Westminster's City Plan. Policy S18 Commercial Development

### POLICY S18 COMMERCIAL DEVELOPMENT

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

The council will work to achieve and exceed the target of additional floorspace capacity for 77,000 new jobs between 2016/17 and 2036/37, an average of 3,850 new jobs per annum. Commercial and other non-residential activity is the priority in the Core Central Activities Zone.

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

### REG 19 MIXED USE REVISION TO WESTMINSTER'S CITY PLAN SUBMISSION DRAFT. POLICY S18 COMMERCIAL DEVELOPMENT

### POLICY S18 COMMERCIAL DEVELOPMENT

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

The council will work to achieve and exceed the target of additional floorspace capacity for 77,000 new jobs between 2016/17 and 2036/37, an average of 3,850 new jobs per annum. Commercial and other non-residential activity is the priority in the Core Central Activities Zone.

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

Although the priority for Core CAZ, the Opportunity Areas and the Named Streets is commercial, there are residential streets and areas within CAZ where commercial encroachment is not appropriate.

### Offices and other B use business floorspace

IJA Objectives	AO1	WCP	S20	CO2	CO4
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1.To create cohesive, inclusive and safe communities					
2. To reduce crime and fear of crime					
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units					
4.To promote and improve health and well being					
5.To reduce green house emissions and support climate change adaption					
6.To reduce use of natural resources e.g. water, energy					
7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality					
8.To protect, enhance and create environments that encourage and support biodiversity					
9.To improve Air Quality					
10.To reduce noise and the impact of noise					
11.To reduce the need to travel, the use of private motorised vehicular transport as well as					

encourage walking, cycling and use of public transport					
12.To reduce waste production and increase recycling, recovery and re-use of waste					
13.To protect and enhance the historic environment and architectural, archeological and cultural heritage					
14.To enhance public realm and street improvements					
15.To protect, enhance and seek opportunities to increase open space					
16.To ensure equal opportunities to improve local opportunities and support sustainable economic growth				+	
17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.			++	++	

AO1 – No Policy

**WCP Westminster City Plan: Strategic Policies. Policy S20 Offices and Other B1 Floorspace**

**POLICY S20 OFFICES AND OTHER B1 FLOORSPLACE**



New office development will be directed to Paddington, Victoria and Tottenham Court Road Opportunity Areas, the Core Central Activities Zone, the Named Streets, and the North Westminster Economic Development Area.

Where appropriate, the council will request a range of business floorspace including workshops and studios.

### S20 Mixed Use and Office to Residential Conversion Consultation Booklet 18 December 2014

#### POLICY S20 OFFICES AND OTHER B USE BUSINESS FLOORSPACE

New office development will be directed to the Paddington, Victoria and Tottenham Court Road Opportunity Areas, the Core Central Activities Zone, the Named Streets, and the North Westminster Economic Development Area.

Inside the Core Central Activities Zone, Opportunity Areas and the Named Streets:

A) Changes of use from office to residential will be appropriate where the building:

- i) was originally built as residential; and
- ii) is substantially retained.

B) Any other changes of use from office to residential or replacement of office floorspace with residential floorspace must provide a mix of type, size and tenure of housing that the council considers contributes to meeting Westminster's housing needs to the extent that this outweighs the contribution made by the office floorspace, particularly to meeting business and employment needs. Where either A) or B) above are not met, or can not be met due to site constraints and/or viability, the floorspace will be retained as B1 office.

Where appropriate, the council will request a range of business floorspace including workshops and studios.

CO2 Suggestion by Grosvenor Estate

Additional criteria for S20:

- i the respective contributions of the existing and proposed uses to job creation;
- ii the quality of existing office accommodation and the likelihood of outdated or obsolete office floorspace being successfully redeveloped or refurbished for continuing office use; and
- iii the contribution of an existing office building to the character and appearance of an area. Buildings that detract from the surrounding area to be redeveloped for alternative uses where this would lead to a material improvement. Uses other than offices, such as hotels and retail, can make a very significant contribution to the vitality and architectural distinctiveness of Central Westminster.

Policy S20: Add the following criteria:

- *the quality of the existing stock, the length of vacancy and other relevant specific reasons for redevelopment<sup>1</sup> the likelihood of the existing building being successfully refurbished and redeveloped for office use* (Westminster Property Association)
- *The townscape benefits of redeveloping the existing building, especially where the existing building is unsightly or visually intrusive.* (Westminster Property Association)
- *where an alternative use would secure a long term, viable future for listed buildings.* (GVA)

### Land Use Swaps and Packages

IIA Objectives	AO1	AO2	CMP 1.4	NP CM49.2
1.To create cohesive, inclusive and safe communities				

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<sup>1</sup> GVA

2. To reduce crime and fear of crime				
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units				
4.To promote and improve health and well being				
5.To reduce green house emissions and support climate change adaption				
6.To reduce use of natural resources e.g. water, energy				
7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality				
8.To protect, enhance and create environments that encourage and support biodiversity				
9.To improve Air Quality				
10.To reduce noise and the impact of noise				
11.To reduce the need to travel, the use of privet motorised vehicular transport as well as encourage walking, cycling and use of public transport				
12.To reduce waste production and increase recycling, recovery and re-use of waste				

13.To protect and enhance the historic environment and architectural, archeological and cultural heritage				
14.To enhance public realm and street improvements				
15.To protect, enhance and seek opportunities to increase open space				
16.To ensure equal opportunities to improve local opportunities and support sustainable economic growth				
17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.				+

A01 – No Policy for Land Use Swaps

A02 – Policy to Apply to the whole of Westminster

CMP 1.4 Policy in [City Management Plan Consultation Draft November 2011](#)

Planning permission for the swapping of uses between sites which are located in the Core Central Activities Zone

or in the Named Streets will be granted where:

1. the swap is of lawful commercial and residential accommodation;

2. the swap is between sites which are in the vicinity of each other;
3. the mixed use character of buildings and the area around the commercial site is maintained;
4. at least the equivalent amount of residential floorspace is provided;
5. the new residential accommodation is of a higher standards in terms of quality and amenity;
6. the commercial site is not protected by other Core Strategy or CMP polices;
7. the commercial site does not have a previous permission for residential purposes;
8. the commercial property is not on the 5-15 year list of identified sites for housing delivery; and
9. the lawful commercial site and the residential site are in the same ownership.

NP CM49.2 in [Mixed Use and Office to Residential Conversion Consultation Booklet 18 December 2014](#)

#### NEW POLICY CM49.2 LAND USE SWAPS AND PACKAGES

Planning permission for the swapping of uses between sites and for land use packages (swaps between more than 2 sites) which are located in the Core Central Activities Zone or in the Named Streets will be appropriate where:

1. the sites are in the vicinity of each other;
2. the mixed use character of the immediate area is secured at a fine grain;
3. there is no net loss of floorspace which is protected by other policies in the plan;
4. the uses are appropriate within each area and there is no loss of amenity resulting from the introduction or intensification of a use into an area;

5. any residential accommodation is of a higher quality than could have been achieved without the land use swap or package;
6. the applications for all sites are submitted at the same time and all elements of the scheme are completed within a time frame agreed by the City Council.

This policy does not prejudice the application of any other policies in the plan, and requirements for floorspace to be provided must be met in full.

If agreed, the sites subject to the land use swap or package will be treated as though the development is on a single site, including for consideration of viability.

Applications must be accompanied by a full schedule of the existing and proposed floorspace including the following:

1. the floorspace of each use (Gross Internal Area) proposed for each site, and for all of the sites taken as a whole;
2. in the case of residential floorspace, the breakdown of floorspace provided in accordance with 1. (immediately above) by the tenure, unit floorspace, and the number of bedrooms of each unit , and the total floorspace for all of the sites taken as a whole;
3. details of any draw downs of Mixed Use Credits or Affordable Housing Credits; and
4. calculations of any floorspace shortfalls being met from Payment in Lieu.

### Mixed Use Credits

IJA Objectives	AO1	CMP 1.2	NP CM49.3
1.To create cohesive, inclusive and safe communities			

2. To reduce crime and fear of crime			
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units			
4.To promote and improve health and well being			
5.To reduce green house emissions and support climate change adaption			
6.To reduce use of natural resources e.g. water, energy			
7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality			
8.To protect, enhance and create environments that encourage and support biodiversity			
9.To improve Air Quality			
10.To reduce noise and the impact of noise			
11.To reduce the need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport			
12.To reduce waste production and increase recycling, recovery and re-use of waste			

13.To protect and enhance the historic environment and architectural, archeological and cultural heritage			
14.To enhance public realm and street improvements			
15.To protect, enhance and seek opportunities to increase open space			
16.To ensure equal opportunities to improve local opportunities and support sustainable economic growth			
17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.			+

AO1 – No Policy

CMP 1.2 in [City Management Plan Consultation Draft November 2011](#)

Policy CMP 1.2: Residential Mixed Use Credits

A) Proposals for residential development intended for use as a residential mixed use credit site must:

1. be agreed as a residential mixed use credit site at application stage;
2. be a commercial building/site which has no previous applications for change of use to residential and is not on a site included in the council’s 5 – 15 yr list of housing sites;



3. be in the Core CAZ or Named Streets;
  4. achieve the highest standards of sustainable design and amenity provision;
  5. provide affordable housing on sites of 10 additional units or 1000sqm of additional residential floorspace;
  6. accord with housing mix and sustainable living policies and be within the appropriate housing density range, and
  7. fund the development and maintenance of a monitoring database for each mixed use credit site.
- B) When it is agreed that a land use credit is an acceptable way of complying with Policies CS1 and CMP1.1, more homes and residential floorspace should result than would have been possible on-site. This will be achieved by:
1. applying an 'uplift' to the amount of residential floorspace to reflect that the host commercial site will be able to provide more commercial floorspace (as set out in CMP1.1 Mixed Use Cascade); and
  2. applying the multipliers set out in Table 1.1 where the credit site is in a lower value area than the host mixed use site.

NP CM49.3 in [Mixed Use and Office to Residential Conversion Consultation Booklet 18 December 2014](#)

NEW POLICY CM49.3 CREDITS

## A) Registering Credits

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

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

5. comply with the following policies;

Residential Mixed Use Credits -

S14 Optimising Housing Delivery; Policy S16 Affordable Housing excluding Payments in Lieu; CM16.1 Meeting the Range of Affordable Housing Needs; and CM14.1 Housing Quality

Commercial Mixed Use Credits -

S18 Commercial Development; S19 Inclusive Local Economy and Employment; and where relevant S21 Retail

## Affordable Housing Credits -

S14 Optimising Housing Delivery; CM16.1 Meeting the Range of Affordable Housing Needs; and CM14.1 Housing Quality

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

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

### B) Drawing Down Credits

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

- a) the host scheme planning application has been refused and the time for an appeal has expired, or an appeal lost;
  - b) the host scheme planning application has been withdrawn;
  - c) the host scheme has been superseded by an alternative host scheme and the credits are transferred to the latter scheme;
  - c) the host scheme has been superseded by an alternative scheme that does not use the credits; or
  - d) the host scheme planning permission has expired.
- iii. Credits can only be drawn down once, and the credit has been drawn down when the council is notified in writing that the host scheme is completed.

## Appendix 7 in connection with Housing Policy S14

# APPENDIX 4: HOUSING DELIVERY

## HOUSING DELIVERY

The table below sets out the projected delivery of housing for the ~~15~~ 20 year period ~~2012/13 – 2026/27~~ 2016/17 -2036/37. The council anticipates a net increase in conventional housing of ~~9,320~~ 22,041, and a further ~~2,640~~ 4,578 from non-conventional sources. This is based on annual estimates of ~~81~~183 vacant units bought back into use, ~~95~~ 35 non-self contained units, an average of ~~130~~ 260 windfalls over 10 units per year, and ~~200~~ 150 units per year from schemes of <10 units.

These allowances accord with the London Strategic Housing and Land Availability Assessment ~~2009~~ 2013. However it is noted that delivery of units, particularly non-self contained units is, in reality, very ‘lumpy’. The annual allowance from all sources of housing includes a 5% buffer, although as most sites in Westminster are appropriate for housing, there is already a significant degree of choice and competition.

These are the raw figures shown in Figure 37 Westminster’s Housing Trajectory, to deliver against a ~~15~~ 20 year target of ~~11,550~~ 21,360.

	Year	Conventional homes from 5-15 year land supply	Allowance for schemes under 10 units	Allowance for windfalls sites of 10+ units	Total conventional units	Bringing vacant homes back into use	Non-self contained units	Cumulative TOTAL
<u>1</u>	<del>2012/13</del>	<del>725</del>	<del>200</del>	<del>0</del>	<del>925</del>	<del>81</del>	<del>95</del>	<del>886</del>
<u>2</u>	<del>2013/14</del>	<del>977</del>	<del>200</del>	<del>50</del>	<del>1,227</del>	<del>81</del>	<del>95</del>	<del>1,987</del>
<u>3</u>	<del>2014/15</del>	<del>546</del>	<del>200</del>	<del>50</del>	<del>796</del>	<del>81</del>	<del>95</del>	<del>3,390</del>
<u>4</u>	<del>2015/16</del>	<del>477</del>	<del>200</del>	<del>75</del>	<del>752</del>	<del>81</del>	<del>95</del>	<del>4,362</del>
<u>5</u>	<del>2016/17</del>	<del>780-948</del>	<del>150-200</del>	<del>75-100</del>	<del>1,005-1248</del>	<del>81-183</del>	<del>95-35</del>	<del>5,290-1,466</del>
<u>6</u>	<del>2017/18</del>	<del>147-1324</del>	<del>150-200</del>	<del>100</del>	<del>397-1624</del>	<del>81-183</del>	<del>95-35</del>	<del>-6,471-3,308</del>
<u>7</u>	<del>2018/19</del>	<del>147-1324</del>	<del>150</del>	<del>100-150</del>	<del>397-1624</del>	<del>81-183</del>	<del>95-35</del>	<del>7,044-5,150</del>
<u>8</u>	<del>2019/20</del>	<del>147-389</del>	<del>150</del>	<del>150</del>	<del>447-689</del>	<del>81-183</del>	<del>95-35</del>	<del>7,617-6,057</del>
<u>9</u>	<del>2020/21</del>	<del>147-389</del>	<del>150</del>	<del>150</del>	<del>447-689</del>	<del>81-183</del>	<del>95-35</del>	<del>8,240-6,964</del>
<u>10</u>	<del>2021/22</del>	<del>147-389</del>	<del>150</del>	<del>200-300</del>	<del>497-839</del>	<del>81-183</del>	<del>95-35</del>	<del>-8,863-8,021</del>

<del>11</del> 7	2022/23	<del>60</del> <u>389</u>	<u>150</u>	<u>200-300</u>	<u>410-839</u>	<u>81183</u>	<u>9535</u>	<u>9536 9,078</u>
<del>12</del> 8	2023/24	<del>60</del> <u>389</u>	<u>150</u>	<u>250-300</u>	<u>460-839</u>	<u>81183</u>	<u>9535</u>	<u>10,122-10,135</u>
<del>13</del> 9	2024/25	<del>0</del> <u>120</u>	<u>150</u>	<u>250-300</u>	<u>400-570</u>	<u>81183</u>	<u>9535</u>	<u>10,758-10,923</u>
<del>14</del> 10	2025/26	<del>0</del> <u>640</u>	<u>150</u>	<u>250-300</u>	<u>4501,090</u>	<u>81183</u>	<u>9535</u>	<u>11,334 12,231</u>
<del>15</del> 11	2026/27	<del>0</del> <u>640</u>	<u>150</u>	<u>300</u>	<u>4501,090</u>	<u>81183</u>	<u>9535</u>	<u>11,960-13,539</u>
<del>12</del>	<u>2027/28</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>13539-14,848</u>
<del>13</del>	<u>2028/29</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>14847-16,155</u>
<del>14</del>	<u>2029/30</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>16155-17,463</u>
<del>15</del>	<u>2030/31</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>17463-18,771</u>
<del>16</del>	<u>2031/32</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>20,079</u>
<del>17</del>	<u>2032/33</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>21,387</u>
<del>18</del>	<u>2033/34</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>22,695</u>
<del>19</del>	<u>2034/35</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>24,003</u>
<del>20</del>	<u>2035/36</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>25,311</u>
<del>21</del>	<u>2036/37</u>	<u>640</u>	<u>150</u>	<u>300</u>	<u>1,090</u>	<u>183</u>	<u>35</u>	<u>26,619</u>
	TOTAL	<u>4,870</u> <u>13,341</u>	<u>2,550</u> <u>3,250</u>	<u>1,950</u> <u>5,450</u>	<u>9,320-22,041</u>	<u>1,215</u> <u>3,843</u>	<u>1,425</u> <u>735</u>	<u>26,619</u>

FIGURE 57 PROJECTED HOUSING SUPPLY FROM ALL SOURCES ~~2011/12 – 2026/27~~ 2016/17 – 2036/37

## WINDFALL DEVELOPMENTS

There are a number of unique local circumstances in Westminster which justify the inclusion of windfalls and smaller schemes (which are nearly always windfalls) when demonstrating deliverability in terms of housing land supply, and producing the housing trajectory for Westminster's City Plan.

- Westminster, being at the heart of Central London, is already densely built up, and has only has brownfield sites, and very few large sites. Any large sites coming forward will be expected to provide either solely housing (with supporting community facilities), e.g. Chelsea Barracks; or mixed uses to include housing, e.g. the three Opportunity Areas designated for mixed use to provide significant employment uses and housing.
- Because Westminster is intensively built up, over 90% of housing schemes completed in the city have less than 10 additional residential units. Small schemes of less than 10 units produced ~~2,179~~ 3,283 units in the ~~nine~~ twelve years 2002 to 2013/14 2010/11, and make up about ~~27%~~ 44% 33% of additional residential units completed. This equated to an average figure of 242 274 units per annum from these small sites. An allowance of 200 units per year for small schemes is therefore considered to represent a realistic estimate of likely units arising.

~~3. — There are no general policies in Westminster’s City Plan protecting employment uses (i.e. B1 office). Housing is given the highest priority in the plan. Therefore, any office building can, in principle, change use to housing, and many do. However, it would be inappropriate to include all B1 buildings in the housing land supply as it is not known if, or when, any specific site will be developed for housing. Hence, whilst some such schemes, particularly those in the investment strategies of the major landowners, can be included in the 5-15 year land supply assessment, many applications for change of use from B1 use to housing are ‘windfalls’ and depend on the vagaries of the market and cannot be anticipated.~~

Period	No of < 10 unit schemes	Net units from < 10 unit schemes	Total net units from conventional housing	Percentage of conventional housing from < 10 unit schemes
2002	27	109	703	16%
2003	89	192	1,318	15%
2004	103	234	596	39%
2005/06	169	360	1,809	20%
2006/07	124	252	665	38%
2007/08	92	206	671	31%
2008/09	118	274	850	32%
2009/10	110	243	653	37%
2010/11	134	309	831	37%
<u>2011/12</u>	<u>198</u>	<u>458</u>	<u>837</u>	<u>24%</u>
<u>2012/13</u>	<u>127</u>	<u>286</u>	<u>591</u>	<u>21%</u>
<u>2013/14</u>	<u>163</u>	<u>360</u>	<u>527</u>	<u>31%</u>
<b>Total/</b>	<b>966</b>	<b><del>2,179</del> <u>3,283</u></b>	<b><del>8,096</del> <u>10,051</u></b>	<b><del>27%</del> <u>44%</u></b>
<b>Average</b>	<b><u>1,454</u></b>			

**FIGURE 58** RESIDENTIAL SCHEMES WITH 1 TO 9 ADDITIONAL RESIDENTIAL UNITS

~~4. 3.~~ The market will also dictate when it is viable to redevelop existing housing sites to a higher density. Most of these applications will be ‘windfalls’; though an exception will be existing Registered Provider/CityWest Homes sites, but the majority of these estates are already high density.

~~5.4.~~ Westminster's mixed use policy requires an equivalent amount of residential floorspace be provided in proposals for increases in commercial office floorspace of over 30% of the original building (or less than 400sqm, whichever is greater) 200 sqm (or 400 sqm in the case of A1 or private health, education and leisure facilities). This policy also therefore leads to new housing units in the city, but as with change of use schemes, mixed use developments cannot always be anticipated.

~~6.5.~~ Between 2002 and 2009/10, 'windfalls' i.e. developments on sites not included in the UDP schedules of Major Development Sites or Opportunity Sites have accounted for 80% of housing units delivered in Westminster. However, the ~~new~~ system of preparing 5-15 year Land Supply Assessments will capture many sites that were previously considered to be 'windfalls'. So a reduced allowance for windfalls sites with the capacity for 10 plus residential units needs to be made. In the nine year period 2002 – 2010/11, 5,917 completed units were the result of windfall sites of 10 or more units. It is therefore reasonable to make an allowance of 130 units per annum, which represents about 20% of this figure, reflecting the fact that windfalls will be significantly reduced in the future due to the improved site capture afforded by the preparation of the 5 - 15yr supply list. However, at the time of preparation of this Plan most sites which will deliver housing in the city beyond 2016/17 2021/22 are unknown to the council and therefore must be treated as windfalls, hence the 'windfall' allowance increases over time in the assessment.

## MEETING HOUSING TARGETS

The housing targets for Westminster are updated over time, including though changes to the London Plan. This has made it difficult to assess performance against the London Plan targets because the overall time period has never been completed before the target has been changed. Whenever a new target is introduced, any surplus housing that may have been built in previous years does not count against the new target, and the borough essentially starts from zero again.

The housing trajectory set out at Figure 37 assumes an annual target of 770-1,068 units. It applies these targets cumulatively over the 15-20 year time period of the plan. However, the London Plan targets are actually as follows:

<u>1999-2003</u>	<u>No London Plan target</u>
<u>2004-2006/07</u>	<u>970p.a. 1997-2016 or 2,910 for the three year period</u>
<u>2007/08 -2010/11</u>	<u>680p.a. 2007/08-2016/17 or 2,720 for the four year period</u>



2011/12-2014/15 current 770p.a. 2011/12-2021/22 or 7,700 for the ten year period

2015/16-2036 1,068 p.a., or 21,360 for the twenty year period

The figure above shows past and projected performance against these targets. It also rolls out the target of ~~770~~ 1,068 units per year p.a. beyond the ~~2021/22~~ 2034/35 time period of the London Plan to cover the entire Core Strategy City Plan time period. This figure shows that, although the target may not be reached in any one year, cumulatively sufficient surplus is built up in other years to cover the target over the longer term. When the new 680 p.a. target was introduced in 2007/08, the surplus that had been built up previously was essentially deleted, although in that year the target was exceeded (1,011 homes were delivered) and therefore a surplus was still recorded for that year.

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



# City of Westminster

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