

# Core Strategy

## Submission Draft Sustainability Appraisal Report





### **Sustainability Appraisal of the Submission Draft Core Strategy**

The Core Strategy DPD has been subject to an SA incorporating SEA and significant effects have been identified. The assessment findings conclude that the Core Strategy will positively contribute to sustainable development in Westminster and has taken account of the recommendations set out above.

Westminster City Council intends to submit the plan to the Secretary of State in Spring 2010, having taken account of consultation responses and made any necessary changes. Following examination in public of the Core Strategy and the Submission of the inspectors report, the Core Strategy is scheduled for adoption in 2011.



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# SECTION 1

## INTRODUCTION

### WESTMINSTER'S LOCAL DEVELOPMENT FRAMEWORK

1.1 This is the Sustainability Appraisal Report (SAR) of the City of Westminster's Submission Draft Core Strategy, which is a key element of Westminster's Local Development Framework (LDF). Westminster's Local Development Framework (LDF) is a 'portfolio' of documents which, together, provide a comprehensive local policy framework for the spatial development of the city. The Core Strategy is the most important of the LDF documents. It sets out the strategic vision for the City of Westminster up to and beyond 2025, and it puts in place a policy framework to deliver that vision.

1.2 The LDF, and the Submission draft Core Strategy take account of the council's own strategies as well as other agencies' plans and proposals, and will ultimately replace the Unitary Development Plan (UDP). This more holistic approach to planning was introduced by the Planning and Compulsory Purchase Act 2004 and is known as 'spatial planning'.

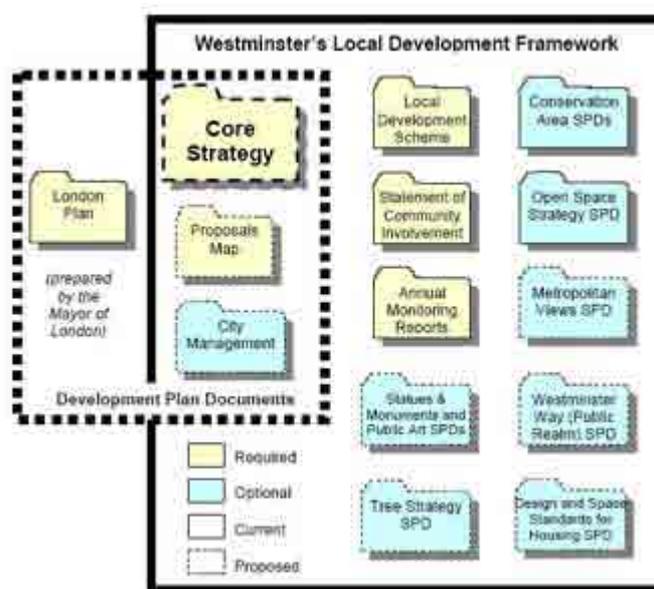


FIGURE 1 LDF STRUCTURE DIAGRAM

### THE SUSTAINABILITY APPRAISAL REPORT (SAR)

1.3 This Sustainability Appraisal Report for Westminster's submission draft Core Strategy. It identifies the potential significant effects of implementing the Core Strategy on the social, economic and environmental characteristics of Westminster and beyond. It also documents the changes to policy resulting from consultation on,

- issues and options,
- preferred and alternative options for the Core Strategy,
- Publication Draft Core Strategy

- sustainability appraisal scoping report
  - and draft Core Strategy sustainability appraisal reports,
- 1.4 This SAR sets out the proposed measures to mitigate for any negative effects from implementation of the Submission draft core strategy, along with proposed monitoring framework against which changes ( as a consequence of implementing the Core Strategy) can be assessed and remedial action taken, if necessary.
- 1.5 The SA process undertaken has addressed the legislative requirements for sustainability appraisal and strategic environmental assessments.

#### PURPOSE AND REQUIREMENT FOR SA (INCORPORATING SEA)

1.6 Under the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) is required for all Development Plan Documents. The purpose of the SA is to promote Sustainable Development and to integrate the principles of sustainability into the preparation and adoption of plans.

1.7 Taking the regulations and principles for sustainable development into account PPS12 advises that:

*"4.39 The 'sustainability appraisal' required by S19 (5) of the planning and Compulsory Purchase Act 2004 should be an appraisal of the economic, social and environmental sustainability of the plan", and that*

*"4.40 Sustainability Appraisal fully incorporates the requirements of the European Directive on Strategic Environmental Assessment (SEA). Provided the sustainability appraisal is carried out following the guidelines in the 'A practical guide to the Strategic Environmental Assessment Directive' and the 'Plan Making Manual' there will be no need to carry out a separate SEA".*

1.8 Where authorities are required by law or encouraged by government policy to undertake assessments of their plans, such assessments should feed into and be summarised in the sustainability appraisal.

1.9 Sustainability Appraisal must be proportionate to the plan in question. It should not repeat the appraisal of higher level policy. (PPS12)

1.10 Sustainable Development, as set out in the UK Government's Sustainable Development Strategy – securing the future, (DETR, March 2008), contains five key principles. These are:

- *Living within environmental limits,*
- *Ensuring a healthy and just society,*
- *Achieving a sustainable economy,*
- *Using sound science responsibly and*
- *Promoting good governance.*

These principles underpin Sustainability Appraisal, which aims to

- Promote sustainable development
- Provide a way to ensure sustainability objectives are an integral part of the planning process and policy
- Incorporate the needs of SEA and provide a high level of environmental protection
- Look at the long term social, economic and environmental effects of the plan
- Reflect global, regional and local issues
- Provide a means for tracking how plans are revised in light of the findings of SA.

1.11 Sustainability Appraisal is an integral part of the plan making process and details of how it is incorporated into the Development Plan making process is set out in Table A below.

**TABLE A** INCORPORATING SA WITHIN THE DPD PROCESS

DPD Stage 1 – Pre production- Evidence gathering

- **SA stage A and tasks**
- A1 – identifying other relevant policies, plans and programmes, and sustainability objectives.
- A2 Collecting baseline information
- A3 Identifying sustainability issues
- A4 Developing and SA Framework
- A5 Consulting on the scope of the SA
- DPD Stage 2 – Production
- SA Stages and Tasks

**Stage B – Developing and refining options and assessing effects**

- B1 Testing DPD objectives against the SA Framework
- B2 Developing DPD options
- B3 Predicting the effects of DPD
- B4 Evaluating effects of the DPD
- B5 Considering ways of mitigating adverse effects and maximising beneficial effects
- B6 Proposing measures to monitor significant effects of implementing DPD's

**Stage C – Preparing SAR**

- C1 – preparing sustainability report

**Stage D Consulting on preferred options and the DPD and SA Report**

- D1 – Public participation on the preferred options of the DPD and SA Report
- D2(i) Appraising significant changes
- DPD Stage 3 Examination
- D2(ii) Appraising significant changes resulting from representations
- Stage 4 Adoption and monitoring
- D3 Making decisions and providing information

**Stage E monitoring significant effects of implementing the DPD**

1.12 The Strategic Environmental Assessment, incorporated in this SAR, has been undertaken in accordance with the relevant European Directive<sup>1</sup> and the DCLG guidance entitled “A Practical Guide to the Strategic Environmental Assessment Directive” (September 2005). The specific requirements of the SEA

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<sup>1</sup> Town and Country Planning (Local Development) (England) Regulations 2004. The Regulations came into force on September 28 2004. <sup>2</sup> European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment

Directive are set out in Table B below. This report has also been prepared in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004, (Statutory Instruments 2004, No. 1633).

**TABLE B**

The SEA Directive Requirements
<p>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art.5 and Annex 1) :</p> <p>Outline of the contents, main objectives of the plan or programme, and relationship with other plans and programmes</p> <p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;</p> <p>The environmental characteristics of areas likely to be significantly affected.</p> <p>Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</p> <p>The environmental protection objectives established at international, Community or national level; which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.</p> <p>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 archaeological heritage, landscape and interrelationship between the above factors(Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary positive and negative effects):</p> <p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme</p> <p>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p> <p>A description of the measures envisaged concerning monitoring in accordance with Article 10:</p>

<p>A non-technical summary of the information provided for the above headings</p> <p>The report shall 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 or programme, 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. (Art 5.2)</p>
<p>Consultation</p> <p>Authorities with environmental responsibility, when decided on the scope and level of detail of the information included in the environmental report (Art5.4)</p> <p>Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme (Art 6.1,6.2)</p> <p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.</p>
<p>Taking the environmental report and the results of the consultation into account in decision making (Art 8)</p>
<p>Provision of information on decision</p> <p>When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed:</p> <p>The plan or programme is adopted</p> <p>A statement summarising how environmental consideration have been integrated into the plan or programme and how the environmental report pursuant to Art.5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>The measures decided concerning monitoring (Art 9. and 10).</p>
<p>Monitoring of the significant environmental effects of the plan's programme's implementation (Art. 10)</p>
<p>Quality Assurance; Environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive.</p>

1.13 The Council undertook the Sustainability Appraisal of Core Strategy in-house. The Sustainability Appraisal has been considered and validated by independent environment consultants and the consultants concluded that the methodology is sound and that the assessments are broadly satisfactory and scoring appropriate. This validation process helped maintain standards and consistency of approach.

## OTHER DETAILED ASSESSMENTS UNDERTAKEN

### EUROPEAN HABITATS DIRECTIVE

- 1.14 In October 2005, the European Court of Justice (ECJ) ruled that Appropriate Assessments (AA) must be carried out on all land use planning documents in the UK. Article 6 (3) of the Habitats Directive 92/43/EEC states:

*“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives.”*

- 1.15 In line with the regulations an Appropriate Assessment a screening report for the emerging core strategy was undertaken in July 2007 which concluded that Westminster is not situated close enough to any designated European Sites for there to be direct and obvious detrimental effects on these sites as a result of the policies and proposals put forward for implementation in the Core Strategy. A comprehensive Appropriate Assessment is therefore not considered necessary. This conclusion was validated by Natural England. The screening can be downloaded from the council’s website

<http://www.westminster.gov.uk/services/environment/planning/ldf/sustainability-appraisal-report/>

## WESTMINSTER CORE STRATEGY

### PLAN OBJECTIVES AND OUTLINE OF CONTENTS

- 1.16 Westminster’s Local Development Framework will be made up of a suite of documents including two main Development Plan Documents and Supplementary Planning Documents. The Core Strategy is the key document in the Local Development Framework. It sets out the long term vision and strategy for the type and location of development in Westminster. The purpose of the Sustainability Appraisal is to assess the potential effects of proposed planning policies on the social, economic and environmental character of the city and to propose policy changes or mitigation for any conflicting effects.

### WESTMINSTER’S SPATIAL VISION

- 1.17 Westminster Core Strategy sets out a vision for the city which is:

To make Westminster the foremost world class sustainable city; A city which values its unique heritage and accommodates growth and change to ensure the city’s

continued economic success while providing opportunities and a high quality of life for all its communities and a high quality environment for residents, workers and visitors alike.

1.18 To achieve this Westminster City Council has prepared its Core Strategy and set out the objectives that will need to be met to achieve the vision. These objectives are set out in Table C below.

**TABLE C WESTMINSTER CORE STRATEGY OBJECTIVES**

	Objective
1	To accommodate growth and change that will contribute to enhancing London's role as a world class city, including its international business, retail, cultural and entertainment functions within the Central Activity Zone; whilst maintaining its unique and historic character, mix, functions, and townscapes.
2	To sensitively upgrade Westminster's building stock to secure sustainable and inclusive exemplary design which minimises energy and resource consumption and the production of waste, reduces the impacts of local environmental pollution and meets both today's needs and those of the future, including the effects of a changing climate; creating attractive places that function will whilst ensuring that the historic character and integrity of Westminster's built fabric and places is enhanced.
3	To maintain and enhance the quality of life, health and wellbeing of Westminster's residential communities; Ensuring that Westminster's residents can benefit from growth and change, providing more employment and housing opportunities, safety and security, and better public transport and local services; to work with partners to foster economic vitality and diversity, improved learning skills, and improved life chances in areas of deprivation.
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.
5	To manage pressures on the city from its national and international roles and functions, business communities and tourism, including the 2012 Olympics and Paralympic Games and their legacy, and to ensure a safe and enjoyable visitor experience.
6	To accommodate the safe and efficient movement of growing numbers of people entering and moving around Westminster by facilitating major improvements to the public transport system, improving public realm and pedestrian environment, managing vehicular traffic, and making walking and cycling safer and more enjoyable.
7	To protect and enhance Westminster's open spaces, civic spaces and Blue Ribbon Network, and Westminster's biodiversity; including protecting the unique character and openness of the Royal Parks and other open spaces; and to manage these spaces to ensure areas of relative tranquility in a city with a daytime population increased every day by over 1 million workers and visitors.

The Core Strategy is made up of 6 parts as set out in the table D below

**TABLE D: STRUCTURE AND CONTENTS OF WESTMINSTER CORE STRATEGY**

Part	What in includes
1 Introduction	What the Core Strategy is and how to use it
2 A unique city	Westminster's profile and its issues and challenges. A vision, objectives and spatial strategy to address these challenges over the next 15 – 20 years
3 Local Spatial Policies	Building on the spatial strategy, these policies set out the approach and priorities for Westminster's varied local areas
4 City Wide Spatial policies	Land use policies to direct activities to appropriate locations, and advise how these should be delivered to meet Westminster's needs.
5 Creating Places	Westminster wide policies to deliver sustainable development, including infrastructure needed to support development.
6 Implementation	Mechanisms for achieving the spatial strategy and minimising risk to its achievement.

The development of this Core Strategy has been informed by national and regional policy, the sustainability appraisal, consultation responses at Issues and Options, and Preferred Options, and publication draft stages, discussions with neighbouring boroughs, the Government Office for London, Greater London Authority and the Planning Inspectorate, and the council's evidence base. It is considered that Core Strategy represents the most appropriate strategic vision for Westminster having considered reasonable alternatives.

## SECTION 2

### APPRAISAL METHODOLOGY

#### OVERALL APPROACH

2.1 The SA was carried out 'in house' at Westminster City Council between 2006 and 2009. This allowed greater understanding of the sustainability issues in Westminster and made it easier to feed recommendations from the SA of the preferred options and publication draft into the submission draft Core Strategy. The work was primarily carried out by planning officers and specialists within and beyond the LDF team in Westminster, to ensure the full range of sustainability issues in the city was identified.

The key stages and timeline for the SA and Core Strategy is presented in Table E below.

**TABLE E** CARRYING OUT THE SUSTAINABILITY APPRAISAL

SA/SEA Stage	Core Strategy Stage	When	Who
Identifying relevant programmes, policies and plans, baseline, and SA objectives	Development of Core Strategy Issues and Options	Jan – April 07	Planning Policy
Consultation on SA Scoping Report		23rd April 2007	Planning Policy
Consultation on Initial Appraisal of Issues and Options	Consultation on Issues and Options	14th May to 29th June 2007	Planning Policy
Appraising emerging Core Strategy Options	Developing and refining the Core Strategy Options	Sept – July 2008	LDF Team and DPS
Detailed Appraisal of Preferred and Alternative Options Reasons for Discounted options	Developing and refining the Core Strategy Options	July 2008	Planning Officers
Consultation on SA of Preferred Options	Consultation on Preferred Options	24th July to 30th September 2008	
Independent review of SA of Preferred Options		24th July to 30th September 2008	Environmental Consultants
Amend SA from results of consultation	Amend Core Strategy policy options from results of consultation and	Sept 08– Sept 2009	Planning Policy

SA/SEA Stage	Core Strategy Stage	When	Who
	other evidence		
Write final SA report for Publication draft		November 2009	Planning Policy
Independent review of Publication draft Core Strategy SAR		October 2009	Environmental Consultants
Consultation on publication draft of the Core Strategy Sustainability Appraisal	Consultation on Submission draft of Core Strategy	November 9th 2009 to December 18th 2009	Planning policy
Preparation of submission draft SA in line taking account of consultation responses.	Minor amendments to policy wording, no significant changes	January - February 2010	Planning policy team

2.2 Consultation on the Sustainability Appraisal was carried out at Issues and Options, and Preferred Options and publication draft stage of the Development Plan Process for Westminster's Core Strategy. Consultees included, the statutory consultees, identified in the both the SEA and planning regulations and was in each case for a minimum of 5 weeks (extending to 12 weeks in the case of the Core Strategy Preferred Options, and 9 weeks for the publication draft). This directly addressed the relevant consultation requirements established in the SEA directive, which stated that:

2.3 Authorities with environmental responsibility [be consulted], when deciding on the scope and level of detail of the information included in the environmental report (Art5.4)

2.4 Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme (Art 6.1,6.2)

2.5 Comments received in relation to each of the consultation documents identified in Table E above have informed the production of this SAR. The consultation comments received for the Sustainability Scoping Report and Preferred Options Sustainability Appraisal have been considered and taken into account in this Submission draft Core Strategy Sustainability Appraisal. A schedule of responses can be found in Appendix 1.

#### COMPLIANCE WITH SEA DIRECTIVE

2.6 In addition to requirements for a Sustainability Appraisal set out in the Planning Act, EU Directive 2001/42/EC (SEA Directive) requires that

Development Plan Documents should be subject to a Strategic Environmental Assessment (SEA), and this has been carried out in line with SEA Regulations (The Environmental Assessment of Plans and Programmes Regulations 2004(Statutory Instrument 2004 No 1633) which implement the SEA Directive. The purpose of SEA is to consider the likely significant effects of a plan or programme on the environment. In line with Government guidance, this SAR integrates the requirements for a Sustainability Appraisal and a Strategic Environmental Assessment into a single appraisal process. This includes both the requirements for consultation on SA and SEA and the required contents for an Environmental Report. Table F below sets out the requirements for an Environmental Report and highlights where these are addressed in this SAR.

**TABLE F** REQUIREMENTS OF THE ENVIRONMENTAL REPORT SEA AND WHERE THEY ARE COVERED IN THE SUSTAINABILITY APPRAISAL OF THE CORE STRATEGY

The SEA Directive Requirements	Sustainability Appraisal Report Sections
1. Outline of contents, main objectives of the plan or programme and the relationship with other relevant plans.	Introduction (see Section 1)
2 Relevant current state of the environment and likely trends without implementation of the plan	Westminster Characteristics and Baseline Information (see Section 4)
3. Likely significant effects of plan on environmental characteristics	Appraisal of Core Strategy Options (see Section 5)
4 Existing environmental issues relevant to plan, including, in particular, those relating to any areas of particular environmental importance	Westminster Characteristics and Baseline Information (see Section 4)
5 Environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account	Review of relevant PPPs (see Section 2)
6. The likely significant effects on environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, landscape and interrelationship between the above factors. These effects should include secondary cumulative, synergistic, short, medium and long term effects on the environment of implementing the plan	Section Appraisal of Core Strategy (see Section 5)
7 an outlines of the reasons for selecting the alternatives dealt with, and description of how the assessment was undertaken including any difficulties encountered in compiling required	Section Appraisal of Core Strategy (see Section 5)

The SEA Directive Requirements	Sustainability Appraisal Report Sections
information.	
8 Description of measures envisages concerning monitoring	Monitoring Framework (see Section 6)
9 A non-technical summary of the information provided under the above heading.	NTS (see separate document)

## LIMITATIONS AND PROBLEMS

2.7 A number of problems and/or limitations were encountered throughout the Sustainability Appraisal Process. These are summarised in Table G below.

**TABLE G** LIMITATIONS / PROBLEMS ENCOUNTERED DURING SA PROCESS

Limitations/ Problem	How they were overcome.
Staff had to be trained on how to effectively carry out SA	<p>Planning policy officers undertook 3 day SEA/SA training course.</p> <p>Although all staff in the LDF team were given SA/SEA training, the time between training and application of knowledge in the planning process was longer than anticipated and staff were uncertain and needed to review requirements.</p>
Limited number of strategic alternatives coming out of process due to constraints in Westminster. Explained in section on defining and refining policy.	<p>Alternatives were developed within constraints to ensure all viable alternatives were appraised and most sustainable option recommended. Officers draft options in keeping line with national and regional policy guidance, evidence base and consultation responses. Informed reasoned justification for preferred options and publication draft Core Strategy. .</p>
Lack of evidence base can make appraisal difficult	<p>Where necessary, further study or mitigation was recommended, along with policy assessment and review through AMR process and Sustainability appraisal monitoring Policy to be amended to achieve the most sustainable outcome.</p>
Extensive revision of the structure and policy content following preferred options required full re-assessment of revised, merged and new policies.	<p>The Core Strategy evolved through issues and options, and preferred and alternative options to Submission draft. Given the extensive nature of the consultation comments and the subsequent changes to policy options it was decided to undertake a revised assessment of all draft Submission policy options.</p>

Limitations/ Problem	How they were overcome.
Further study and monitoring may be difficult to resource	Opportunities to inform baseline information will be sought as necessary, and all future studies will be used to revise baseline data and key issues and challenges.
Objectivity of in-house SA	This was overcome through independent validation by environmental consultants, and by consultation across the council functions to ensure a rounded approach.
There are significant sustainability issues in Westminster and expert knowledge is required to ensure the range of issues is adequately covered to focus future sustainable development	Internal interviews with Principal Planning Officers to identify key sustainability issues, problems and relevant information for the SA/SEA
There are a vast number of PPP's to assess and appraise which could be relevant to the emerging Core Strategy.	PPP's that have been identified and assessed by dedicated SA/SEA officer
Some key data is relatively old e.g. Census information. Some not available and needs enhancing, such as carbon emissions data	Baseline data collected and information that links to issues identified at the initial interviews with Principle Planning Officers. Gaps in data will be taken into account throughout the process and recommendations for future data collection made as and when required.
Internal consultation carried out to identify the most appropriate set of objectives for the SA framework. Specific topics were always given priority depending on the consultee's area of expertise. This had to be taken into account so as not to get a biased set of objectives.	Develop SA framework through internal meetings of planning officers and local experts.

# SECTION 3

## CONTEXT AND ASSESSMENT FRAMEWORK

### RELEVANT POLICIES, PLANS AND PROGRAMMES AND SUSTAINABILITY OBJECTIVES

- 3.1 The SEA Directive requires information to be provided on the “environmental protection objectives established at International, Community or Member State level, which are relevant to the plan or programme, and the way those objectives and any environmental considerations have been taken into consideration during its preparation.
- 3.2 Other relevant policies, plans, programmes, and sustainability objectives were identified and considered in the development of the Core Strategy. A summary of relevant policies, plans, programmes and sustainability issues and objectives are set out in Table H and Box 1 , respectively. A full listing of all relevant plans, policies, programmes and sustainability objectives are set out in Appendix 2.

**TABLE H** RELEVANT POLICIES, PLANS AND PROGRAMMES

<b>International</b>
Kyoto protocol to the United Nations framework convention on climate change (1997)
The Johannesburg Declaration on Sustainable Development
European
Council Directive 79/409/EEC on the conservation of wild birds
Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora
EU Water Framework Directive (2000/60/EC)
Air Quality Framework Directive 96/62/EC and daughter directives (99/30EC), (2000/69/EC), (2002/3/EC)
Waste Framework Directive 75/442/EEC Landfill Directive (99/31/WC)
<b>National</b>
UK Sustainable Development Strategy – Securing the Future
UK Climate Change Programme and draft PPS on Climate Change
UK Biodiversity Action Plan
DETR (2002) Working Together for Clean Air

ODPM (2004) Sustainable Communities Plan
ODPM (2002) Living Places: Cleaner, Safer, Greener
PPS 1 Delivering Sustainable Development (2005)
PPS1 Planning and Climate Change – Supplement to Planning Policy Statement 1 (2007)
PPS 3 Housing (2006)
PPG 4 Industrial, Commercial Development and Small Firms(1992)
PPS 6 Planning for Town Centres (2005)
PPG 8 Telecommunications
PPS 9 Biodiversity and Geographical Conservation (2005)
PPS 10 Planning for Sustainable Waste Management (2005)
PPS 12 Local Spatial Planning 2008
PPG 13 Transport (2001)
PPG 15 Planning and Historical Environment (1994)
PPG 13; Transport (2001)
PPG 15; Planning and Historic Environment
PPG 16 Archaeology and Planning (1990)
PPG17 Open Space, Sports and Recreation (2002)
PPS 22 Renewable Energy (2004)
PPS23 Planning and Pollution Control; plus Model Procedures for the management of contaminated land CLR11 (2004)
PPG 24 Planning and Noise (1994)
PPS 25 Development and Flood Risk; plus The draft Thames Corridor Abstraction Management Strategy (2007)
Thames Region Catchment Flood Management Plan ( consultation Jan 2007)
Sustainable Drainage Systems – an introduction, booklet ( Environment Agency)
Good Practice Guide on Planning for Tourism
Guidance on Tall Buildings (EH/CABE joint publ) draft revision 2007
Guidance on Appraisals of Conservation Areas, 2005
Guidance for the Management of Conservation Areas, 2006
Transport and the historic environment (English Heritage)
Streets for All/London Streets for All (English Heritage)
Local Strategic Partnerships and the Historic Environment (English Heritage)
Guidance notes for the reduction of obtrusive light, GN01(ILE, 2005)
The Planning system and crime prevention (ODPM, 2004)

National Community Safety Plan 2006-2009
Circular 01/06 Planning of Gypsy and Traveller Caravan Sites (2006) ODPM
Regional
The London Plan (including draft alterations 2005 and 2006)
Mayor's Transport Strategy (2001)
Mayor's Biodiversity Action Plan (2002)
Mayor's Municipal Waste Management Strategy (2003)
Mayor's Ambient Noise Strategy (2004)
Mayors Air Quality Strategy (2002)
Mayor's Economic Development Strategy (2001)
Mayor's Energy Strategy (2004)
GLA (2002) Green Light to Clean Power
London Sustainable Development Commission (2003) Sustainable Development Framework for London
London Development Agency and Partners (2004) Design for Biodiversity: A Guidance Document for Development in London
Greenspace Information for London (GIGL) GIGL@wildlondon.org.uk
Planning Policies for sustainable building-a guidance to Local Development Frameworks(LGA, Oct 2006)
<b>Local</b>
Westminster City Council UDP, adopted January 2007
RB Kensington and Chelsea UDP, adopted May 2002
LB Brent UDP, adopted January 2004
LB Camden, adopted June 2006
The City of London UDP, adopted April 2002
LB Southwark UDP, adopted July 1995
LB Lambeth UDP, adopted August 1998
LB Wandsworth UDP, adopted August 2003
Congestion Charge Plan 2004
Westminster City Plan (2006-2016)
One City (November 2005)
'Air Quality Strategy & Action Plan' (2001) and 'Air Quality Strategy & Action Plan: Progress Report' (2005)
Open Space Strategy (February 2007)
Local Implementation Plan 2005/06- 2010/11

Sustainable Buildings SPG, 2003
Tourism Charter
Nature Conservation Strategy (1997)
South Westminster Renewal Plan
Draft Entertainments SPG, 2006-07
Crime and Disorder Reduction Strategy 2005 – 2008
2012 London Olympics and Paralympic Games – Strategy and Action Plan (2008)
Active Westminster ; Sport and Physical Activity Strategy 2008- 2013 (2008)
Addressing Health Inequalities in Westminster CMB (2008)
Air Quality Progress Report 2008
Annual Monitoring Report 2007/8
Asset Management and Property Strategy (2008)
Bespoke Tailoring in London’s West End ( 2006)
Biodiversity Action Plan 2007
Chinatown Night time Pedestrian Flow Count (2008)
Conservation Area Audits
Creative Industries Report (2007)
Crime and Disorder Reduction Strategy 2005 – 2008
Economic Development Strategy 2008 – 2011
Housing Density Study (2008)
Housing needs assessment 2006 (2007)
Housing Space Standards ( 2006) Mayor of London
Infrastructure needs in Westminster (2009)
Libraries, Archives, Arts, Culture Business Plan 2008/9
London Office Policy Review (2007) Mayor of London
London Plan consolidated with alterations since 2004 (2008) Mayor of London
London Strategic Housing Market Assessment 2008 (2009) Mayor of London
London Waste Apportionment Study 2006) and London Waste Apportionment Study update and Further sensitivity Testing (2007) GLA
London’s Safety Plan 2008 – 2011 (2008) London Fire Brigade
Long term Land Use Trends in Core Central Activity Zone ( 2009)
Municipal Waste Management Strategy 2007 Mayor of London
Noise Survey (2008)
North London sub regional strategic housing market assessment (2009)

North Westminster Planning Study (2000)
North Westminster Community Space Audit (2009) Harrow Road Neighbourhood Partnership
Shopping Area Healthchecks (various) December 2008
Rolling Land Supply for Housing 2007/08 ( 2009)
Strategic Plan 2008 – 2013 (2008) Westminster NHS
Theatreland Strategy (2008)
Travel in London ; key trends and Development Report No 1 (2007) Transport for London
Walking Strategy for Westminster 2004
Waste Sites Assessment 2009
Westminster Affordable Housing Viability Study (2009)
Westminster City Plan 2006 – 2016 9 Sustainable Community Strategy 2006 Westminster City Partnership.
Westminster Play Strategy 2005- 2009 (2005)
Wholesale Showrooms uses in Westminster 2009

3.3 The Assessment of the policies, plans and programmes identified some key considerations and synergies, which are listed in Box 1 below.

<b>Box 1</b> KEY SUSTAINABILITY ISSUES AND OBJECTIVES IDENTIFIED THROUGH REVIEW OF PLANS, POLICIES AND PROGRAMMES
<p>The provision of improved access and availability of social and community facilities</p> <p>The provision of developments supporting and contributing to the creation of safe, accessible and sustainable communities, reducing fear of crime and actual crime.</p> <p>Provision of housing needs, with wider choice, mix, size, type, location and support to mixed communities</p> <p>Improved health</p> <p>Reduction in greenhouse gas emissions and effective climate change adaptations to built environment.</p> <p>To encourage and seek renewable energy generation for energy provision in the city.</p> <p>To protection of the environment and reduction in levels of environmental pollution</p> <p>To provide good quality buildings through sustainable design and construction for new and old building stock.</p> <p>To reduce flood risk to people and property and improved water quality</p> <p>Sustain, maintain, restore and enhance biodiversity and natural habitats by accommodating in new developments and recognising links between nature conservation and well being.</p>

Improved Air Quality

Improved Noise Environment

Provision of cycling facilities, paths, improved pedestrian movement through good design ( no. of cycling facilities)

Reduce the need to travel, especially by car.

Provision of multimodal transport interchanges

Reduce waste production and increase in recycling rates (Waste figures AMR)

Promoting and facilitate sustainable patterns of urban development and land use through quality design taking account of historic character of Westminster

Protection of historic built and natural environment and cultural heritage

Improved provision of open space and connectivity for pedestrian movement

Improved opportunities for local worker and education

Enhanced viability of Westminster as the Economic hub for central London without detrimental effect on environment.

3.4 The review of international, national, regional and local plans, programmes and policies informed the development of the Core Strategy and the synergies and considerations outlined above informed policy development. All of the considerations and synergies are reflected in the Core Strategy.

# SECTION 4

## WESTMINSTER CHARACTERISTICS AND BASELINE INFORMATION

- 4.1 This section sets out the Characteristics of Westminster and identifies the key sustainability issues and challenges in the city and how these are likely to change in the future. Before the collection and analysis of data of the baseline started an internal and external consultation took place to identify and focus on the main issues and challenges that Westminster faced and the likely sources of information relevant to meeting these challenges. This ensured that the baseline information collected was relevant and appropriate to the assessment of the emerging LDF Core Strategy.
- 4.2 Consultation highlighted a number of key challenges faced in Westminster. These are:
- it's role as a world/capital City
  - balancing growth and residential communities
  - inequalities, and
  - climate change.
- 4.3 Data was collated from a large number of sources including national government and agency websites, 2001 census and Westminster City Council surveys and data. The collated information has been presented in a detailed table presented in Appendix 3. It gives details of:
- key sustainability issues and concerns
  - information, data and indicators for the City of Westminster
  - source of information
  - quantifiable information with comparators, targets and trends
  - comment and observations and identifiable issues.
- 4.4 The baseline data is essential, to assess, predict and monitor the effects of implementing the Core Strategy on how it is meeting the challenges and issues identified above. It is the benchmark against which change can be measured and the effectiveness of the policies tracked. Sufficient information on the current and likely future state of Westminster is necessary for the effects of the Core Strategy policies to be predicted.

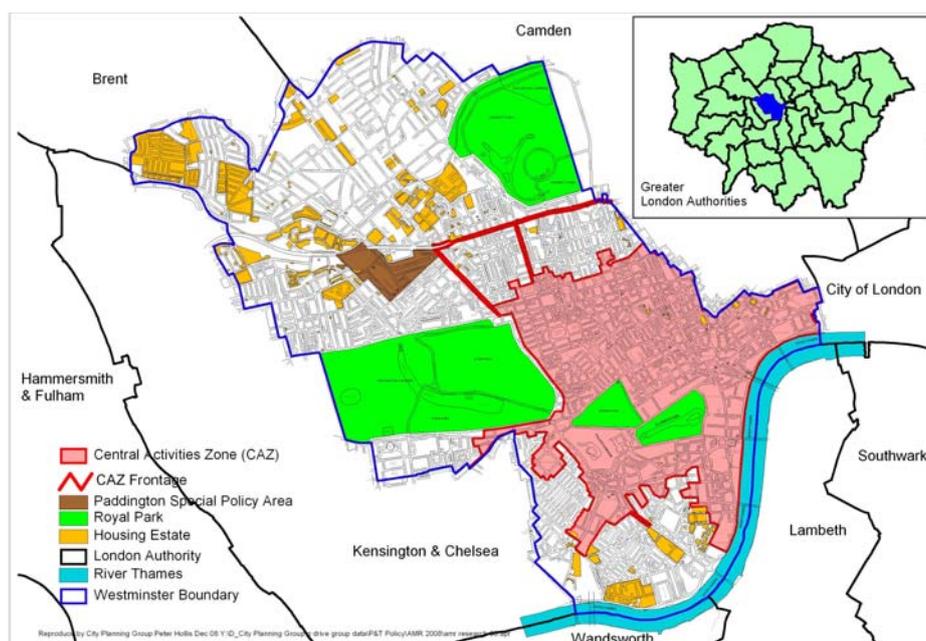
- 4.5 Some gaps in data were identified and noted. Consideration will be given to filling data gaps in the future, dependant on financial or monitoring constraints. These are considered in more detailed in the Monitoring Section.
- 4.6 This information in turn has provided the evidence base to determine the Sustainability Objectives, which will be used to test the policies as they evolve.
- 4.7 The data collection was completed in accordance with ODPM Guidance (November 2004). Data was collected from a wide range of sources including Government (and its agencies) websites, 2001 Census and Westminster City Council surveys and data.

**Collation and analysis of baseline data identified key sustainability issues.**

- 4.8 Westminster is one of the most recognised places in the world. It is at the heart of London, which is one of the leading world cities. Westminster is the seat of government and monarchy, and is home to many government departments, law courts, many places of worship of international importance, embassies and diplomatic institutions and other functions of the state. Many of Westminster's attractions and functions are emblematic of London itself.
- 4.9 The residential population of approximately 230.000 swells to over 1 million every day, due to the influx of workers, visitors and tourists. This pressure is intense, at times overwhelming, and is central to both the city's character and many of its challenges. This level of movement and activity means that Westminster's more tranquil places; its parks, squares and residential enclaves are particularly valued.
- 4.10 Westminster is also characterised by areas of a very different nature. There are largely residential areas in the north and south of the borough which do not have significant commercial activity outside the designated town centres, and whose town centres provide more local offer. Even within more central commercial parts of the city , there are significant areas of quieter residential streets, and other areas of relative quiet that provide respite from the activity.
- 4.11 Westminster functions as a national and international centre for business, shopping , arts, culture, and entertainment. It accommodates 577,000 jobs, 14% of all of London's jobs. Westminster's economy generates 2.2% of the GDP for the UK, about £16 billion.

4.12 Westminster's 47,000 businesses have a diverse and balanced employment offer, this reflects the mixed character and contributes to its economic resilience. Seventy per cent of these businesses are small businesses employing less than 5 people, and about 85% employ less than 10 people. This is similar to averages for London, as a whole.

Westminster is a unique city, which plays a key role at the heart of London.



MAP 1 WESTMINSTER IN HEART OF LONDON

## OPEN SPACE

4.13 Westminster has a unique open space network which makes an important contribution to the heritage, townscape, economy and enjoyment of Westminster and London as a whole. The borough contains 182 open spaces, including 85 London Squares and 10 civic spaces, together totalling an area of 4,853,620 m<sup>2</sup>, which is significantly more than that of the Royal Borough of Kensington and Chelsea (1,871,930 m<sup>2</sup>), although less than that of the London Borough of Camden (5,319,390 m<sup>2</sup>). The five Royal Parks in the central area of the city comprise the majority of the parkland, but there are also 90ha of small parks and squares, and a number of hard civic spaces. Seventy percent of the land area is built up and the buildings form a total vertical surface area that far exceeds the 438 hectares of parkland.

4.14 Open Space deficiency is a particular problem in the north and south of Westminster; 32% of built up areas of the city are considered to be deficient in open space and 52% of the City is deficient in outdoor children's play space. The amount of open space per 1,000 of the residential population per hectare

in Westminster is 1.86ha, which exceeds the national standard of 1.6ha. However, this calculation is of little use in Westminster due to the daily influx of over 1 million non-residents into the borough, which substantially reduces open space provision to 0.45ha per 1,000 of the population.



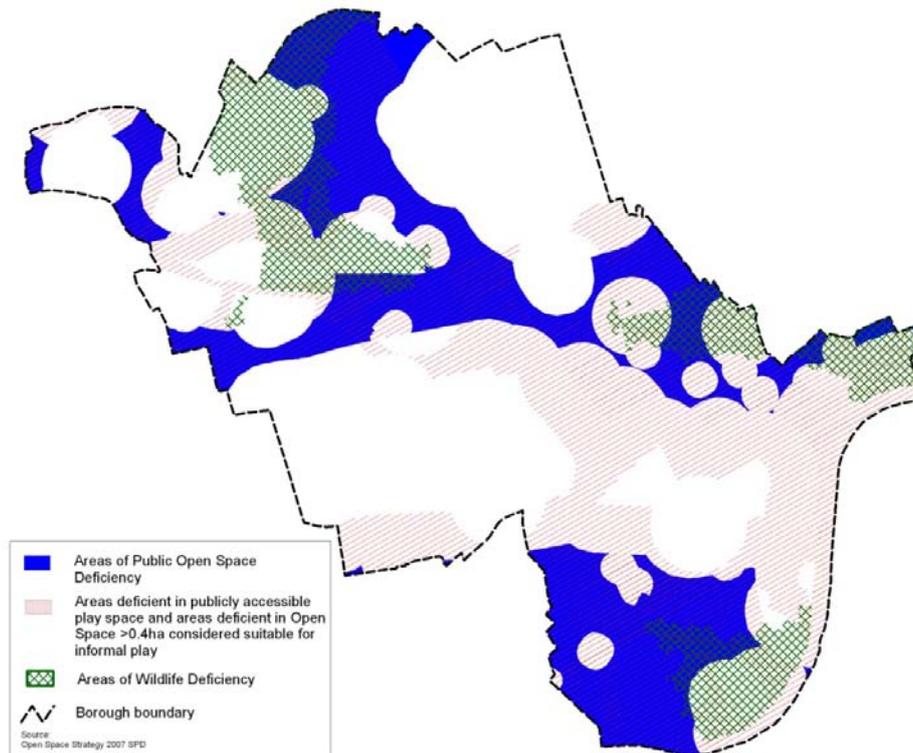
MAP 2 OPEN SPACE

## BIODIVERSITY

4.15 Westminster has a diverse ecology. Priority species and habitats include:

- Birds: house sparrow [Breeding], tawny owl [Breeding]
- Invertebrates: buttoned snout moth
- Mammals: bats [Present] [all species]; hedgehogs
- Habitats: parks and open spaces, churchyards and cemeteries, tidal Thames, standing open water, veteran trees and decaying wood, built environment and private gardens.

4.16 Parks and green spaces and waters edge habitats provide valuable functions in terms of accommodating wildlife and have a role in ameliorating pollution.



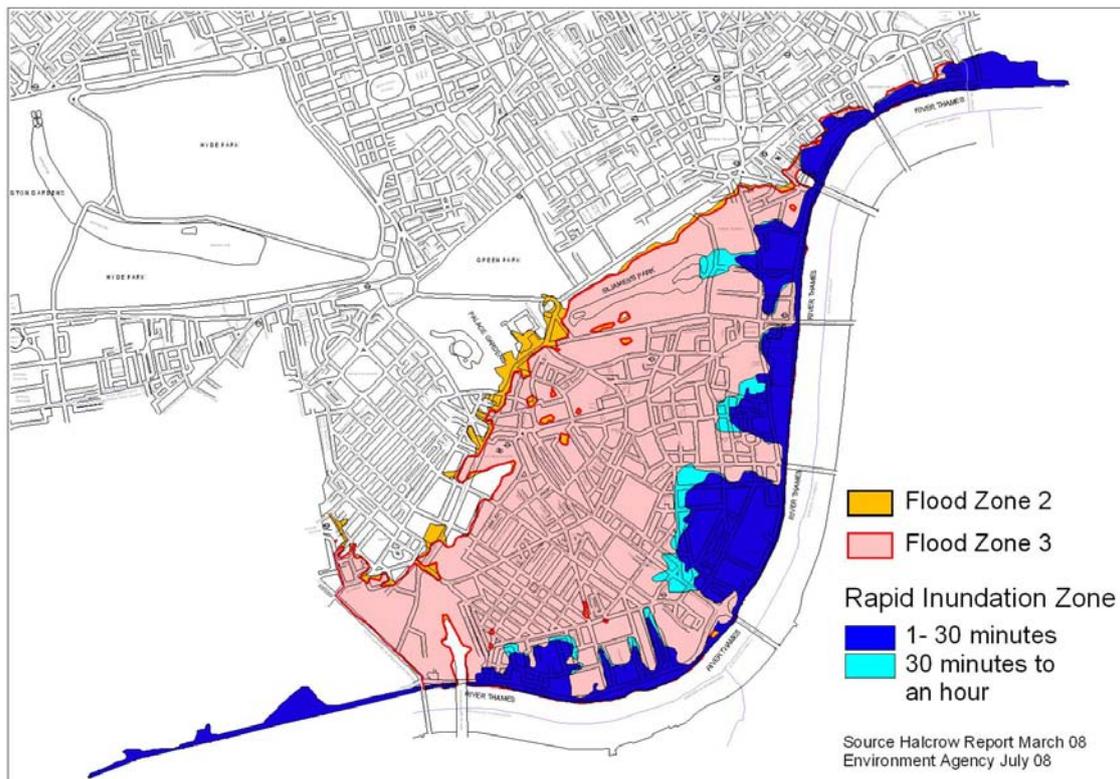
**MAP 3** BIODIVERSITY AND WILDLIFE DEFICIENCY

4.17 Despite its intensely urban aspect, Westminster has a diverse ecology. There are 438ha of Parkland in the borough and 3ha of water's edge habitats, which accommodate wildlife and have a role in ameliorating pollution. There are 33 Sites of Importance for Nature Conservation (SINCs), which cover 44 open spaces and account for 86% of open space within Westminster. Species of European or National biodiversity importance include Bats, Black Red Start, Peregrine Falcon and all wild birds. However, 17.1% of the city is considered deficient in access to biodiversity.

#### WATER QUALITY AND FLOOD RISK

4.18 Combined Sewer Overflow (CSO) discharges into the Thames are a direct result of high volumes of rainfall. In 2007 CSOs accounted for approximately 42 million litres of storm sewage being discharged into the Thames. CSO are a significant factor in water quality problems in the Thames Tideway, with 57 CSO discharging into the Thames between Hammersmith and Woolwich. There are 8 combined sewer overflows discharging directly into the River Thames in Westminster, contributing to poor river water quality. Westminster will need to consider the management of surface water and the future of the Thames Tideway Sewer.

4.19 In 2006 the Thames Bubbler was employed 22 times and there were approximately 35 days when Dissolved Oxygen Saturation was below 30% at the middle tideway. River Water Quality is also vital to improving amenity and biodiversity in the city and will be considered throughout the planning process. The need for measures to reduce the amount of pollution entering water courses will be taken into account.



**MAP 4 FLOOD ZONE 3 AND AREAS MOST AT RISK OF RAPID INUNDATION**

4.20 In terms of flooding from the River Thames, a large part of south Westminster is designated as within Flood Zone 3. Westminster does however have a high level of flood protection. There are lowlying areas, close to the river Thames that would be more susceptible to flooding should the flood defences be breached, as shown in Map 4.

#### CULTURAL HERITAGE

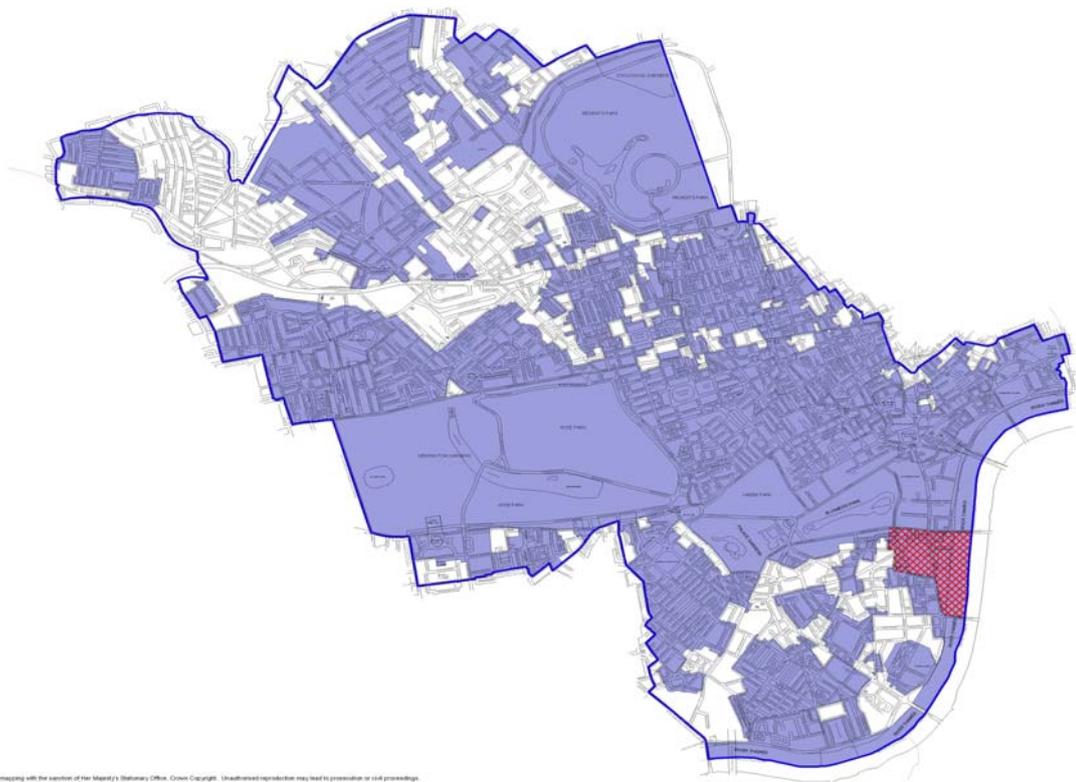
4.21 Westminster contains a wide range of cultural facilities, including 39 theatres, 17 cinemas with 60 screens, 18 casinos, 19 museums and major art galleries, the National Ballet, the Royal Opera House, and 430 hotels, which make up 40% of London’s available bed spaces. . Furthermore, Westminster has the highest density of licensed premises of any local authority, with 1.28 licensed premises per hectare, which comprise approximately 1,000 restaurants licensed to serve alcohol, 500 pubs, bars and wine bars, and 136 night clubs and dance venues. These cultural facilities, along with the major shopping centres and other such facilities, help to foster local distinctiveness and play a

significant role in Westminster's contribution to the London Economy. In addition, throughout the year Westminster is host to a wide range of special events, with approximately 30 such events taking place each month, which can be of local, regional, national or even global significance.

## HISTORIC ENVIRONMENT

4.22 Westminster has a unique historic environment, which represents an important environmental conservation issue. Over 75% of the borough is covered by its 55 Conservation Areas, and Westminster has more listed buildings than any other Local Planning Authority, with over 11,000 listed buildings and structures, all of which are of special architectural or historic merit and as such there is a strong presumption against unauthorised demolition, alteration, or extension. Historic and listed buildings are significantly important to the city's local character and distinctiveness. The implications on planning and design in and around listed buildings is key to the fabric of Westminster's urban landscape and affects land use and sustainable development in the city.

**MAP 5** CONSERVATION AREAS AND WORLD HERITAGE SITE



- 4.23 Westminster has 85 London Squares and 21 English Heritage listed parks and gardens, including five Royal Parks. The borough also contains five areas of archaeological interest, four scheduled monuments, and a World Heritage site comprising Westminster Palace, Westminster Abbey and Saint Margaret's Church. Of the 26 strategic views identified in the London Plan, 16 are relevant to Westminster, of which 5 are subject to Directions by the Secretary of State. Strategic Views are protected in Westminster and have an impact on large parts of London. This influences spatial land use and design in areas where the views may be affected.
- 4.24 Westminster has exciting new architecture and wealth of historic buildings of particular architectural interest. The city has retained many of its original 18th and 19th century buildings. As the principal cultural and administrative centre of the country for many centuries a number of the city's buildings are of particular historic importance.
- 4.25 Over 75% of Westminster is covered by Conservation Areas, with 55 Conservation Areas in total. These are areas of special architectural and historic interest, the character and appearance of which it is desirable to preserve or enhance. Westminster Abbey and Houses of Parliament World Heritage sites are located in the city (see Map 5 ). Much of Westminster's archaeological heritage is also of national importance including the area around the Houses of Parliament and Westminster Abbey and the site of Lundenwic, probably the single most important Lower Thames Valley settlement of the middle-Saxon era.

#### NOISE AND THE IMPACT OF NOISE ON HEALTH

- 4.26 Like most urban areas, average night time noise levels (as measured outside residential properties) frequently exceed World Health Organisation Guidelines. In Westminster noise levels only drop below the World Health Organisation's day time recommended values between 02:00–04:00, which demonstrates the significance of the noise issue in the city.
- 4.27 The Westminster Noise Attitude Survey (2008) cites Road Traffic Noise as the most significant issue in Westminster, which was also the case in the National Survey. Construction activities also have significant impacts and to a much greater degree than nationally. Therefore the increased growth and development anticipated by the plan could contribute to worsening the impacts of construction noise.

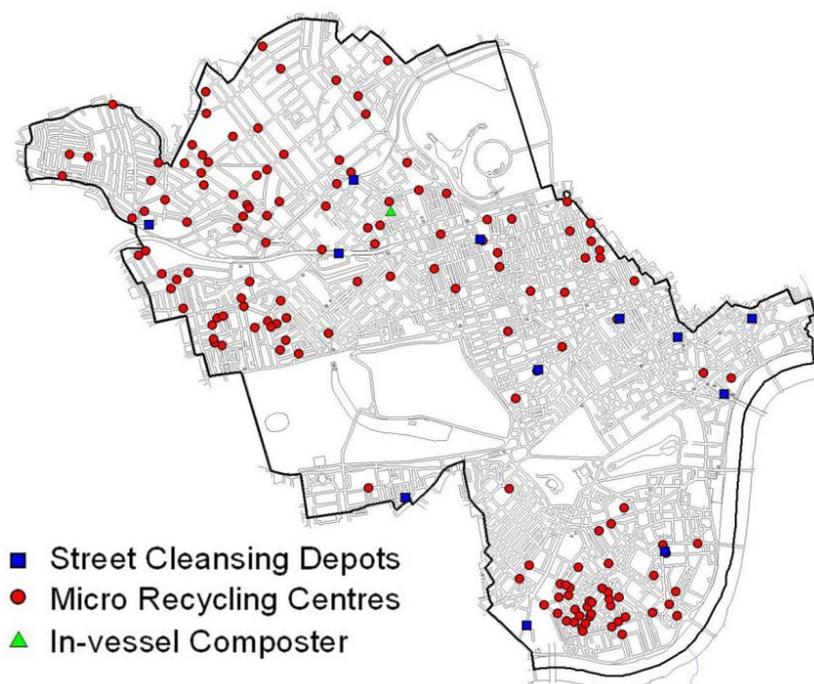
4.28 Residents bothered by entertainment noise were generally in the centre of the city, where these uses are most concentrated. Air traffic noise were dispersed throughout the city but tends to be concentrated in the south as these properties were most affected by major flight paths. Continuous ambient noise levels may lead to more serious long term ill health effects including cardiovascular illness. However, individual noise incidents can also be disturbing and adversely affect wellbeing.

4.29 Westminster has the greatest number of licensed premises per hectare of any local authority. The entertainment sector has a significant role in the terms of London's cultural offer to the economy. The number of licensed premises and their proximity to other land uses can have social, land use and environmental implications, particularly with regard to noise, smells and rubbish. Late night activities and their impacts need to be considered.

#### WASTE AND RECYCLING

4.30 During 2009/10, 190,000 tonnes of municipal waste was collected in Westminster. Whilst there are no waste disposal sites in the city due to the immense pressure on land, there are 145 mini recycling sites and 11 street cleaning depots located within the borough. Unlike other boroughs, whose household waste usually accounts for 80% of all waste collected; 60% of waste in Westminster is collected from commercial sources; 10% of waste is from street cleansing; 30% is from household waste; and recycling levels of municipal waste are improving but could be higher, currently at 13%. The city has very little light industrial land and high land costs so the need to prevent waste production in the first instance is vital, followed by re-use and recycling of waste materials and recovery of energy

MAP 6 WASTE FACILITIES IN WESTMINSTER

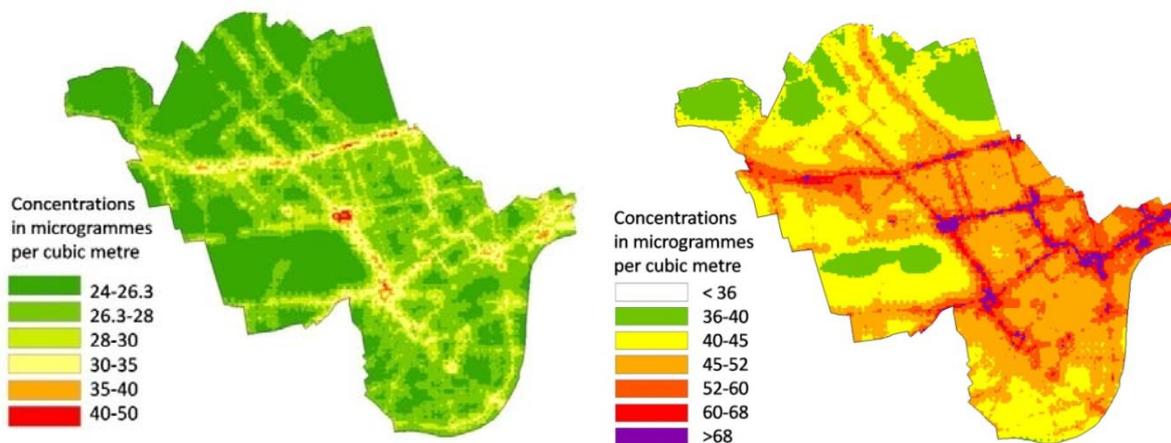


from waste.

## AIR QUALITY

4.31 Concentrations of two of the regulated pollutants, nitrogen dioxide and particulates, regularly exceed the Air Quality Standards. In 1999 the whole of Westminster was declared an Air Quality Management Area for NO<sub>2</sub> and PM<sub>10</sub>. In 2010 the annual average NO<sub>2</sub> concentrations are predicted to exceed the air quality objective of 40µg/m<sup>3</sup> over most of the city, with concentrations of over 60µg/m<sup>3</sup> predicted along several of the busiest roads. Also in 2010, the annual average PM<sub>10</sub> concentration is predicted to exceed the air quality objective of 40µg/m<sup>3</sup> at several of the busiest junctions in the city. It is therefore an issue that needs to be addressed in the SA and Core Strategy. Source apportionment has been carried out to determine the contribution of different sources of emissions at typical receptors in and around Westminster. For NO<sub>x</sub>, the main contributors to ground level concentrations are road vehicles, commercial gas and rail emissions. Of the traffic contribution, cars, rigid HGVs and taxis contribute significantly while buses have a major impact at some locations, particularly Oxford Street. For PM<sub>10</sub>, the major contributors are background sources, i.e. sources outside London, and road traffic. Vehicle exhaust emissions and brake and tyre wear contribute significantly to the contribution from the roads. Of the vehicle exhaust contribution, cars, motorcycles and taxis make up more than half.

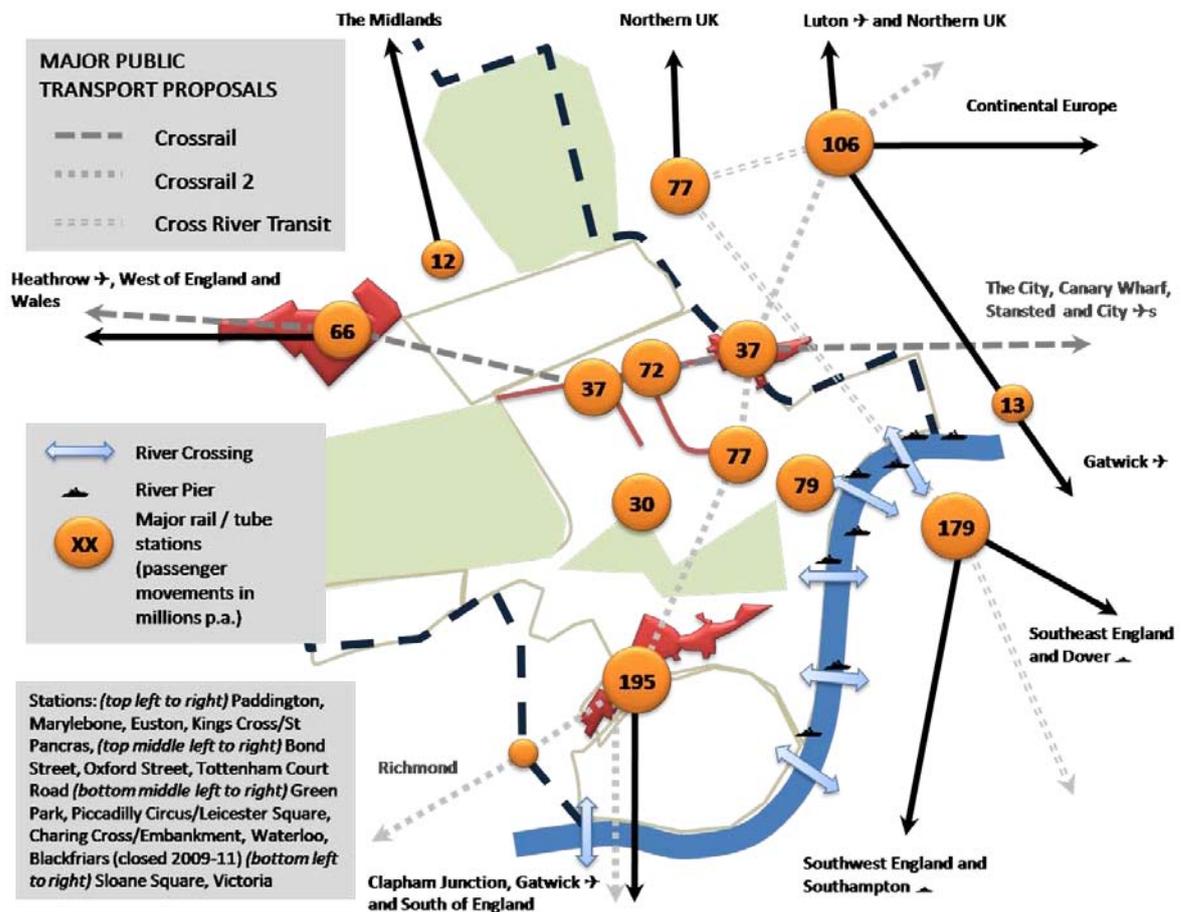
**MAP 7** 2010 MODELLED ANNUAL AVERAGE POLLUTION EXCEEDANCES FOR NITROGEN DIOXIDE (LEFT) AND PARTICULATES (RIGHT)



## TRANSPORT INFRASTRUCTURE

4.32 Access to public transport is exceptionally high, although areas in the north of the city are less well served than elsewhere. Westminster has four mainline rail termini, 32 Underground stations and all tube lines run through Westminster, with the exception of the Waterloo & City Line and the East London Line (see Map 8). Additionally, some 79 bus services pass through

Westminster's streets. While access to transport is good there remain problems of capacity. Victoria Station alone deals with 76.4 million passengers a year. The intensity of activity and large day time population puts considerable pressure on public transport infrastructure, footpaths and pavement space, sometimes leading to slower travel and overcrowded conditions.

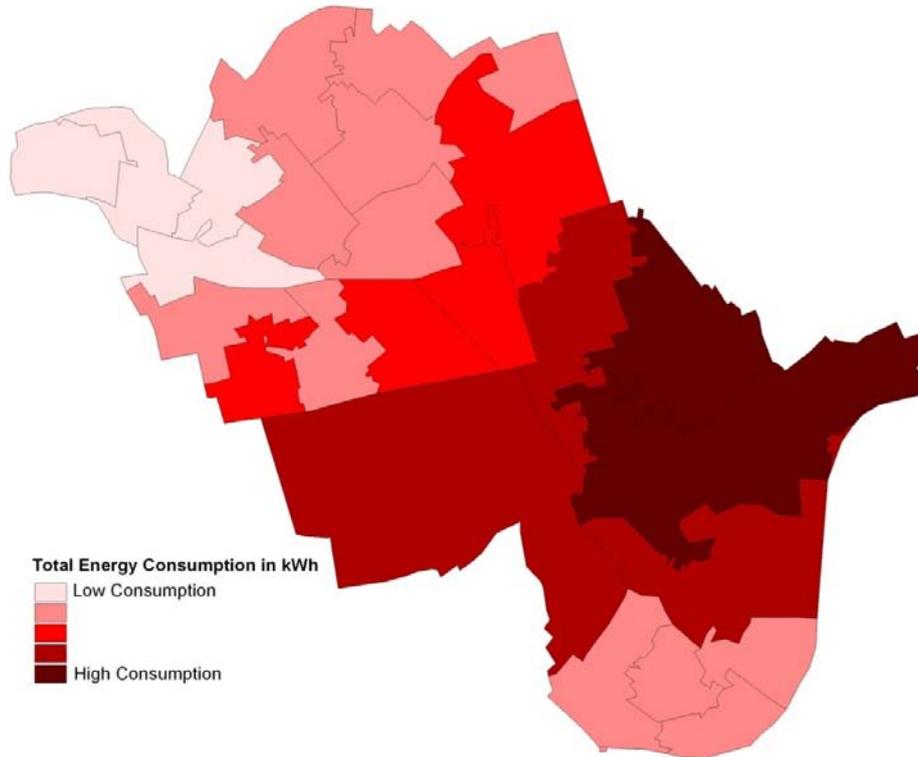


MAP 8 TRANSPORT INFRASTRUCTURE EXISTING AND PROPOSED IN WESTMINSTER

- 4.33 Crossrail 1 is a planned transport scheme that will increase rail services to three existing stations within Westminster and link Paddington to Liverpool Street. A further line, Crossrail Line 2, is safeguarded but the plans are less well defined and no date for implementation has been set.
- 4.34 Car ownership in Westminster has been rising for a number of years. In 1991 42% of households had a car or van available; by 2001 this had increased to 44%. In absolute terms, the number of households with cars has risen from 43,625 households in 1991 to 49,316 in 2001. Westminster also has very high levels of through traffic and traffic congestion which contributes to problems of poor local air quality, noise pollution and climate change.

## CLIMATE CHANGE

4.35 Westminster's emissions make up 6.8% of the total carbon emissions for London, and 0.6% of the UK total. The proportion of carbon emissions from commercial activity is very high; Westminster accounts for 11.8% of the sector total in the UK. Westminster is particularly vulnerable to some of the impacts of climate change, particularly higher temperatures and increased precipitation.



**MAP 9** ENERGY CONSUMPTION 2007

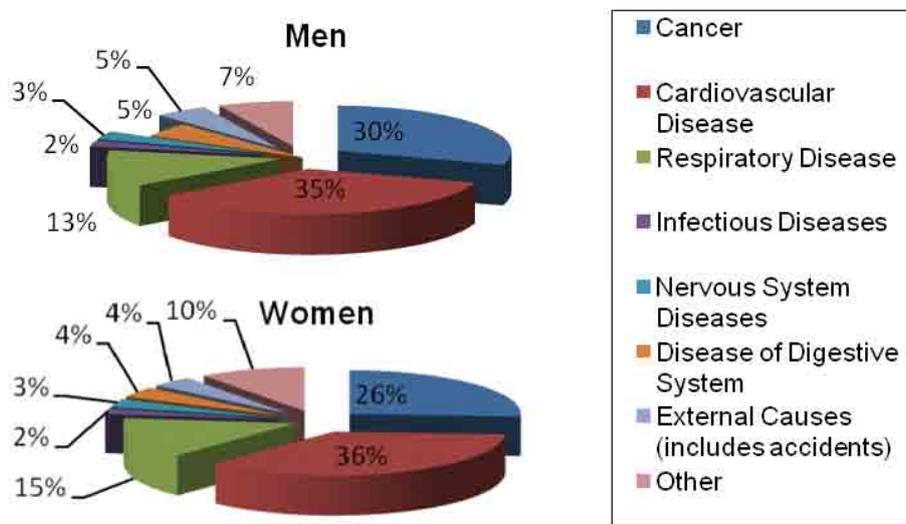
4.36 London's Urban Heat Island effect is now well documented, adding up to 5-6°C to summer night-time temperatures. Westminster, with a dense urban environment in the heart of London, is one of the worst-affected boroughs. The green expanses of the Royal Parks reduce this effect, but only in the immediate vicinity. Prolonged periods of high temperatures also result in shrinkage of clay soils, leading to increased subsidence of buildings and structures. As with much of the south-east, hotter and drier summer conditions will put a considerable strain on water resources. Conversely, an increase in heavy precipitation events is also likely and the density of development and prevalence of non-porous surfaces makes Westminster particularly vulnerable to heavy rainfall events and resulting surface flooding.

## HEALTH

4.37 Life expectancy in Westminster is 78.9 years, which is the 53rd highest life expectancy in the country. This is compared to 76.5 years for London and 76.9

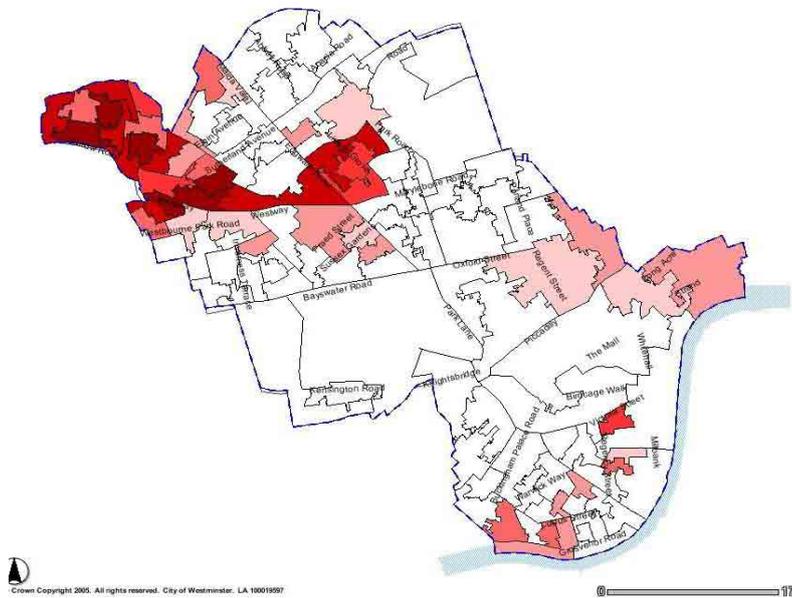
years for England. The main causes of death in Westminster are through circulatory diseases, followed by cancers and respiratory diseases. The infant mortality ratio for Westminster is 5.6 deaths per 1,000 live births. The breakdown of emergency hospital admissions revealed the following causes: 9.6% were due to respiratory diseases; 8.7% were due to circulatory diseases; and 8.5% were due to digestive system diseases. In addition, there are high levels of mental illness in Westminster – 60% higher than England as a whole. Social and economic factors are major determinants of life expectancy and nationally there is a marked social class gradient in life expectancy. Furthermore, crime and fear of crime also have significant health impacts; for example, through increased levels of stress, fear of going out alone, levels of activity undertaken and loss of confidence. Westminster generally performs well on health indicators. However, patterns of health inequality mirror the patterns of social and economic deprivation and there are a number of key areas where the city performs less well or where there are specific issues that arise because of the characteristics of the city.

**FIGURE 2** MAIN CAUSES OF DEATH FOR WESTMINSTER’S RESIDENTS



4.38 The Indices of Deprivation includes a measure for the outdoor living environment, and measures air quality and road traffic accidents<sup>2</sup>. All of Westminster falls within the worst 20% of areas across the UK for this measure. Although Westminster employs 14% of London’s total workforce, in some of wards almost half of the residents are unemployed (Westminster Economic Development Strategy 2008 – 2011).

<sup>2</sup> ONS Vital Statistics 2006 cited in Public Health Annual Report 2006/2007

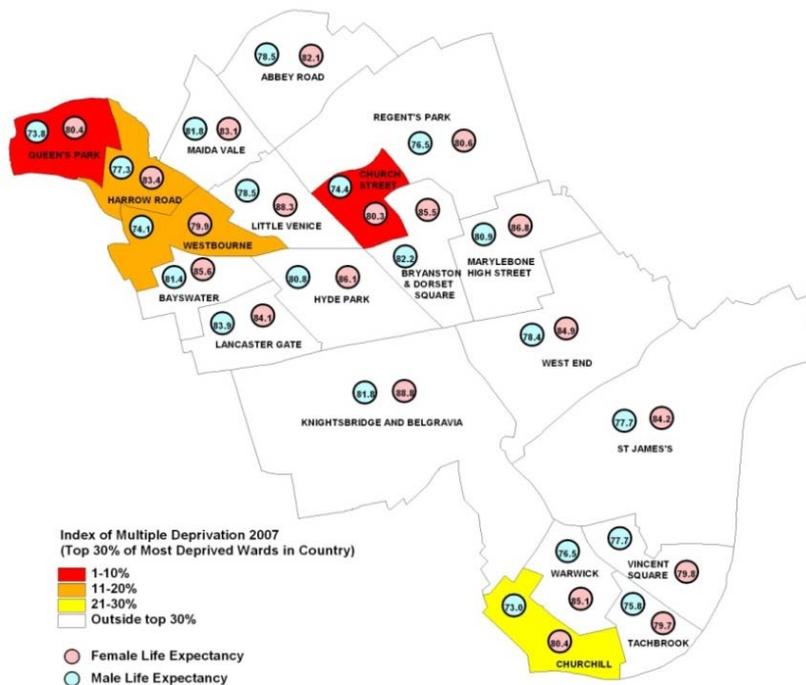


MAP 10 INDICES OF MULTIPLE DEPRIVATION

4.39 The latest Index of Multiple Deprivation (2004) revealed Westminster as a whole is:

- 39th most deprived district out of England's 354 districts
- 9th most deprived district out of London's 33 boroughs.

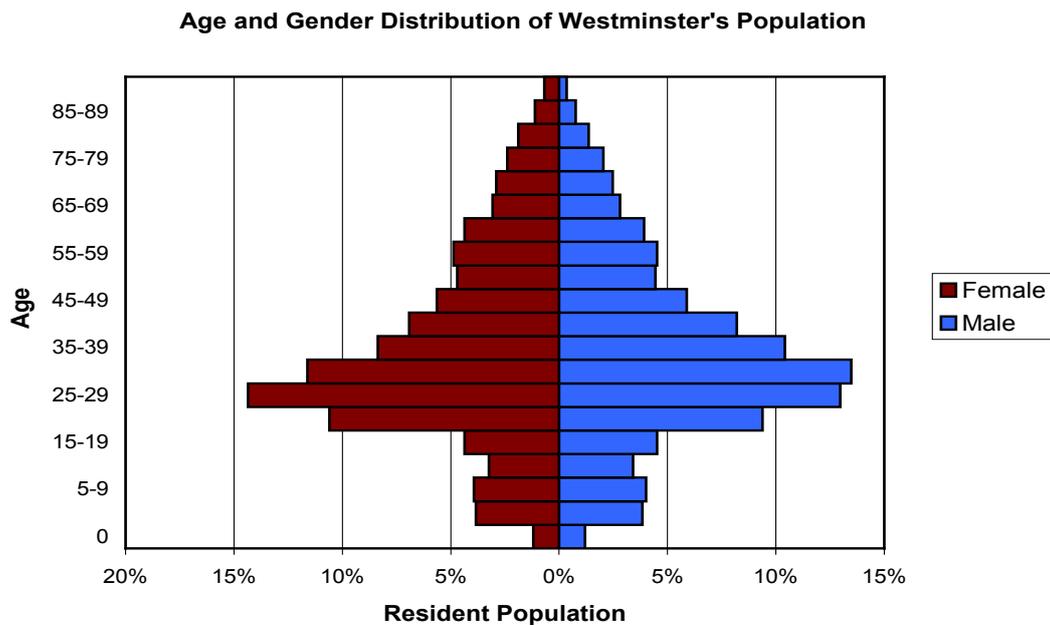
4.40 Levels of deprivation are highest in the north of the City and most concentrated in Church Street ward. There are also significant pockets of deprivation elsewhere, particularly near the southern boundary (see Map 10).



MAP 11 DEPRIVATION AND LIFE EXPECTANCY FOR WESTMINSTER, 2007<sup>i</sup>

4.41 While life expectancy at birth is 4 years higher than for England as a whole, there are significant variations within the city. There is a difference in life expectancy of approximately 15 years for men and 12 years for women in Knightsbridge and Belgravia ward, which has the highest life expectancy, and Queen’s Park ward which has the lowest<sup>3</sup>.

## POPULATION



**FIGURE 3** AGE AND GENDER DISTRIBUTION OF WESTMINSTER’S POPULATION

4.42 Westminster’s residential population is estimated to be 234,100. The day time population, expanded by workers and visitors, is approximately 1 million. Westminster’s residential population is concentrated in the north west and south of the city where housing is the dominant land use, but there is a significant residential population in central areas. The mixture of residential and commercial uses adds to the vitality of the city’s centre.

4.43 Some 72% of Westminster’s residents are aged between 20 and 64 years. Westminster has a far smaller proportion of residents aged below 20 (17%) and people over the age of 65 (11%) compared with the England average of 22% and 16% respectively<sup>4</sup>.

<sup>3</sup> ONS, Life expectancy at birth for all persons, by ward in England and Wales, 1999 to 2003 and Results for Persons, Males and Females, released June 2008

<sup>4</sup> ONS, Mid-2006 to Mid-2007 Population Estimates, 2008, and Results for Persons, Males and Females, 2008

4.44 Westminster’s residential population is ethnically diverse (see figure 5)<sup>5</sup>:

- 60% of secondary school pupils come from ethnic minorities
- 40% of working age residents come from ethnic minorities
- over 150 languages are spoken within Westminster’s boundaries

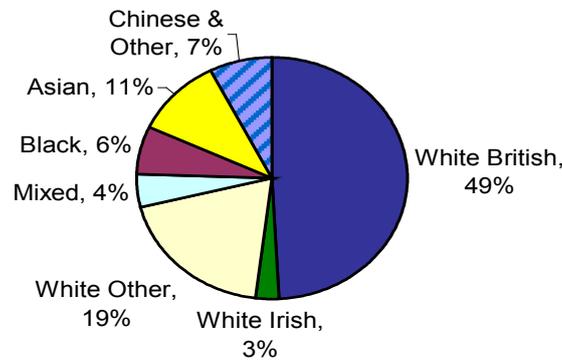


FIGURE 4 POPULATION DISTRIBUTION (GENDER AND ETHNICITY)

SOURCE: ONS: RESULTS FOR PERSONS, MALES AND FEMALES – RELEASED JUNE 2008

4.45 Compared to other local authorities in the country, Westminster has the highest proportion of residents born outside the UK (52% for 2004-2006, compared to 9% for England as a whole). Approximately 29% of Westminster’s residents are from a Black, Asian, Arabic or other minority ethnic groups. The overall proportion is not expected to change in the future, although increases are expected from Chinese, Indian, Other Asian and ‘other’ groups, and decreases in Black African, Bangladeshi and Black Caribbean groups.

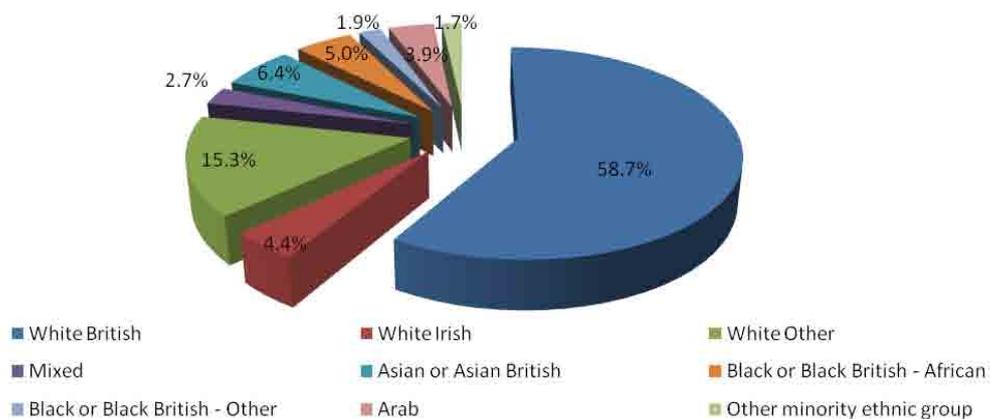


FIGURE 5 PERCENTAGE OF WESTMINSTER’S HOUSEHOLDS IN DIFFERENT ETHNIC GROUPS, 2006<sup>III</sup>

<sup>5</sup> Westminster Economic Development Strategy, 2008 – 2011.

- 4.46 During the period 2001-2006, Westminster also had the highest level of international migration per 1,000 population for England and Wales. In particular, Victoria Coach Station is one of the main points of arrival into the UK from Europe, and at its peak had an estimated 2,000 migrants arriving from the continent every week<sup>ii</sup>.
- 4.47 Westminster is a place of contrast, with the poorest residents often living cheek by jowl with its richest. There are significant differences in life expectancy and mortality between and within electoral wards in Westminster. Deprivation is much more concentrated in the north-west and south of the city<sup>iii</sup>. However, significant progress has been made, particularly through local area renewal partnerships: Since 2004, Index of Deprivation affected wards have improved their national ranking<sup>iii</sup>.
- 4.48 Westminster's housing sector also differs markedly from other areas. Average house prices in Westminster are the second highest in the country. The city has a significant private rented sector, comprising over one-third of households, compared to 20% for London and only 13% for England as a whole. It has a lower owner-occupier sector at only 44%, compared to London (57%) and England (70%)<sup>iii</sup>.

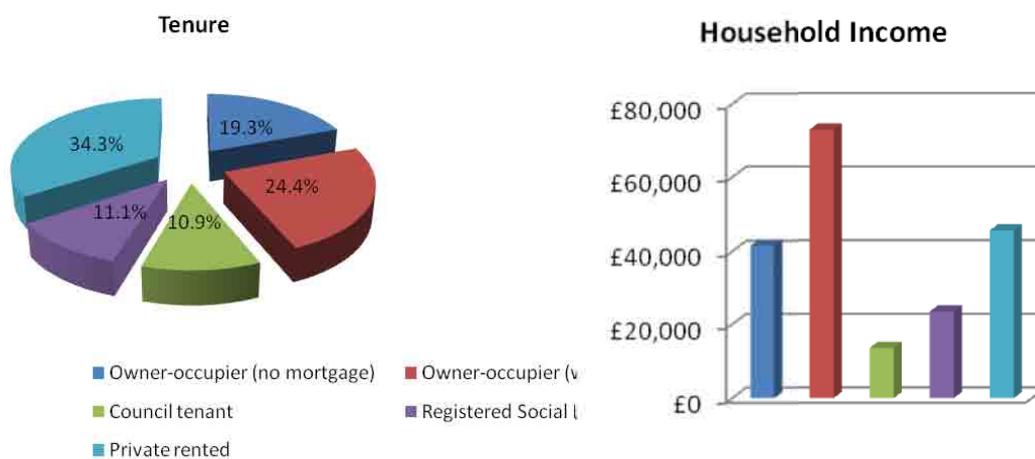


FIGURE 6 HOUSEHOLD TENURE AND INCOME 2006<sup>viii</sup>

## LANDSCAPE

- 4.49 Westminster is a highly developed urban environment. Many parts of London have a ready supply of surplus industrial land; however, such sites do not typically exist in Westminster where many sites already contain offices, shops and housing with high existing values. Development in Westminster is often about refurbishment and renewal of building stock rather than significant land use change.

- 4.50 Westminster's local economy relating to the Central Activities Zone also creates challenges for the borough. A lack of available industrial land is also a considerable constraint for Westminster, if it is to meet its housing targets.
- 4.51 Levels of deprivation are highest in the north of the city and most concentrated in Church Street ward. There are also significant pockets of deprivation elsewhere, particularly on the southern boundary.

#### SOIL

- 4.52 Some parts of Westminster have a legacy of contaminated land as a result of previous use.

#### ECONOMIC DATA

- 4.53 In 2004 Westminster ranked 39th out of 354 local authorities in England in terms of average deprivation (where 1 is most deprived), from a ranking of 136th in 2000. Over half of London boroughs (18 out of 33) are in the top 30% most deprived in England on the average deprivation score measure and, relative to other local authorities, most London boroughs appear to have got worse. Whilst Westminster has some of the wealthiest and economically affluent parts of London and the country, it also has pockets of extreme deprivation.

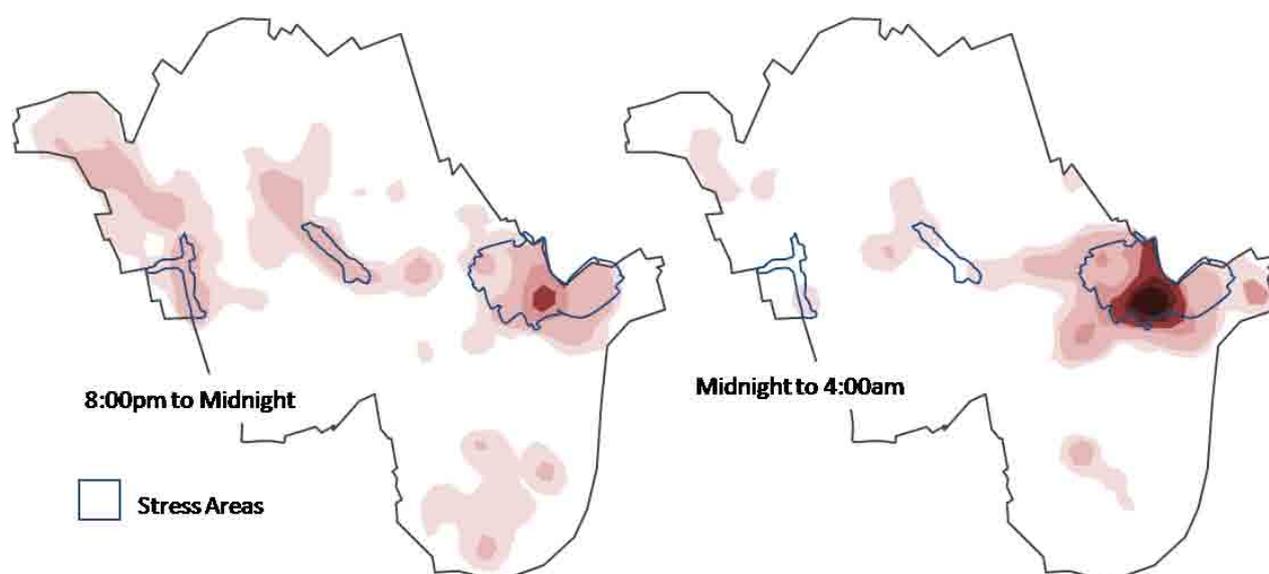
The average house price in Westminster is £662,400.

- 4.54 There were 568,900 jobs in Westminster in 2005, 14% of London's total. Of which, 76% were full time. Up to 96% of jobs in Westminster are service sector jobs. Westminster contributes 2.2% of total UK GDP, and 69% of firms employ less than 5 people and 92% of firms employ less than 25 people. There are 2,800 entertainment uses including bars, restaurants, pubs, nightclubs, cinemas and casinos. It contains 39% of London's bedspaces and plays host to approximately 28.5 million visitors per year.

Westminster receives an average of 10,000 planning applications per year.

## CRIME DATA

4.55 Westminster has seen crime decrease steadily between 2001/02 and 2005/06, dropping 18%.



MAP 12 DENSITY OF INCIDENTS OF VIOLENCE AGAINST THE PERSON 2007/08

## PROSPERITY, SOCIAL INCLUSION AND EMPLOYMENT

4.56 Although Westminster employs 14% of London's total workforce, in some wards almost half of the residents are unemployed. The latest Index of Multiple Deprivation shows Westminster as a whole is the 39th most deprived district out of England's 354 districts and 9th most deprived district out of London's 33 boroughs.

## EDUCATION AND SKILLS

4.57 When compared to the rest of London education results are similar. Except that NVQ1 level which shows Westminster average is less. Westminster has better than regional and national average percentage of people aged between 16 – 74 with higher qualifications.

## HOUSING

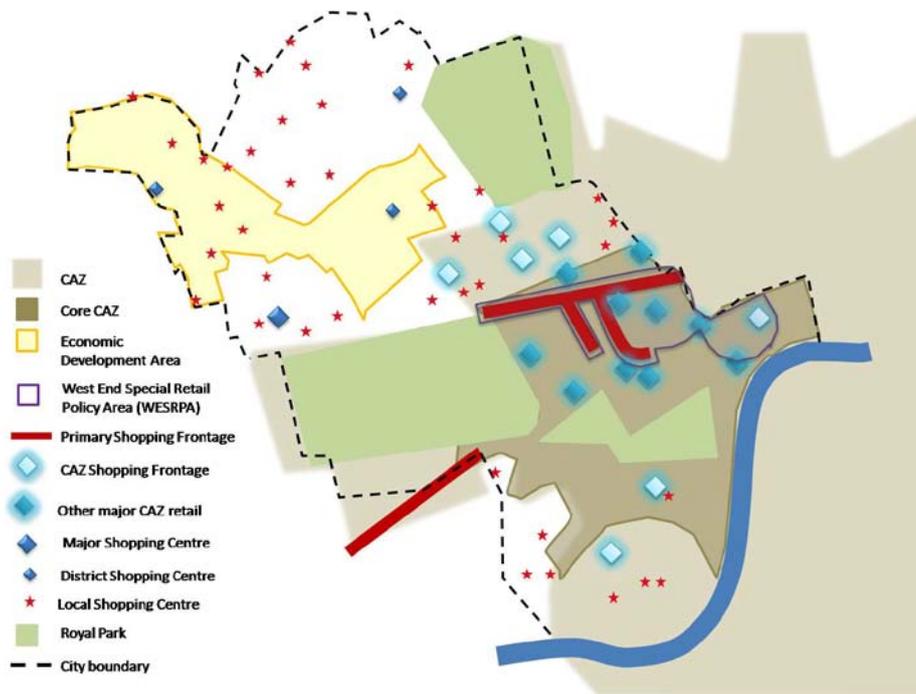
4.58 Homelessness in Westminster is static. Rough sleepers are a major issue. Westminster is third in the list of local authorities with the most crowded homes and the number of council properties has consistently decreased over the past 15 years. The nature of housing in Westminster is polarised with the very wealthy living alongside most deprived. One third of the city's homes are over occupied, one third are privately rented and one third are social housing.

## GROWTH IN WESTMINSTER

4.59 Westminster continues to have housing as a central driver for development. It still however, has significant commercial, retail, tourism, arts and cultural areas that need protecting and enhancing.

## RETAIL IN WESTMINSTER

4.60 Westminster's designated hierarchy of shopping centres ranges from the International Centres of the West End and part of Knightsbridge, through the CAZ Frontages and other Shopping Centres within the CAZ, and the Major, District and Local Shopping Centres spread throughout the city. The high number of specialist shops and retail clusters within Westminster contribute to the local character and identity of particular areas (Map 13).



MAP 13 ECONOMIC AND COMMERCIAL ZONES IN WESTMINSTER

## KEY SUSTAINABILITY ISSUES AND CHALLENGES

4.61 Based on the reviews of policies, programmes and projects, and analysis of the baseline information, a number of sustainability issues were identified.

These are:

- The need for a high quality natural and built environment to improve quality of life
- The need for Improved air quality
- The need to reduce noise pollution and the provision of tranquil zones to reduce impacts on health and wellbeing.
- The need to protect and improve open space provision
- To protect and enhance biodiversity
- To protect and maintain historic buildings and conservation areas
- To reduce waste production and increase recycling rates
- To reduce road traffic and improve the street environment,
- To encourage the use of public transport, and walking and to provide cycling facilities
- To reduce greenhouse gas emission and adapt and mitigate for climate change,
- To encourage sustainable design, construction, and building management
- To provide appropriate housing types and tenures
- To create sustainable, cohesive and inclusive communities, and
- To maintain economic diversity and improve local education and employment opportunities

4.62 Having identified the significant sustainability issues in the city, an assessment of how these issues may change in the future if the Core Strategy was not implemented was undertaken. In Table I below the sustainability issues are identified and presented along with characteristics and supporting data and the likely future trends if the core strategy is not implemented.

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<sup>i</sup> Public Health Annual Report 2006/2007

<sup>ii</sup> Estimate based on Office of National Statistics 2006 data, in liaison with Victoria bus station management and core coach station companies

<sup>iii</sup> Housing Needs Assessment, 2006

**TABLE 1** SUSTAINABILITY ISSUES, CHARACTERISTICS AND SUPPORTING DATA LIKELY FUTURE TRENDS

Significant sustainability issues	Characteristics and Supporting data	Likely future trends if core strategy not implemented.
<p>Increasing pressure on built and natural environment.</p> <ul style="list-style-type: none"> <li>● <i>Immense pressure on open space</i></li> <li>● <i>Lack of open space in residential areas in north-west and south of the City</i></li> <li>● <i>Need to protect, enhance and increase biodiversity and protect habitats</i></li> <li>● <i>Density and numbers of late night activities – noise, smells, anti-social behaviour and waste</i></li> <li>● <i>Need to protect and enhance the cultural experience including archaeological and architectural heritage.</i></li> <li>● <i>High number of listed buildings and conservation areas</i></li> <li>● <i>Air pollution.</i></li> </ul>	<p>There are 1.86 ha of public accessible space/ 1,000 resident population (common standard is 1.6ha). This, at first glance would appear acceptable, but with the vast influx of daily workers, visitors and tourists the daytime population swells to more than 1million and reduces the amount of public accessible space to 0.5ha.</p> <p>76% of the residential population in Westminster are within 1.2km of a District Park. This is not the case in residential areas north-west or south of the City.</p> <p>Westminster covers an area of 2,204 hectares and 17.1% is deemed deficient in access to biodiversity. The pressure on wildlife is compounded by the sheer number of daily visitors entering the City. River water quality is poor in London as a whole. Combined Sewer Overflows discharges into the River Thames have a significant impact on biodiversity in the river.</p> <p>Westminster has 38 Theatres, 20 Cinemas, 18 Casino's, &gt;3000 eating, drinking and nightlife establishments, 430 hotels (40% of London's hotel bed spaces), the national ballet, the Royal Opera House, Museums and Art Galleries. With only a marginally lower population density than Kensington and Chelsea, Westminster has 66% more licensed premises and the City's premises density is &gt;60% that of Kensington and Chelsea. This has clear social and environmental implications as well as economic benefits for the City and London as a whole. Strategic views are vital to large parts of Westminster. This will therefore impact and influence and shape spatial visions for the City. These strategic views are an important economic consideration for the City. There are &gt;11,000 listed buildings and 55 conservation areas, covering 78% of the City. There's 1 World Heritage Site, 5 Royal Parks, 21 Historic Parks and Gardens and 85 London Squares. All historic assets contribute to Westminster's heritage and contribute to</p>	<p>With population growth predicted to continue, and continuous redevelopment within Westminster, with over 10,000 planning applications a year, it is likely that even without the development proposed in the Core Strategy that pressure on the built and natural environment will increase, thereby adding to the pressures on open space. Additionally there are 'hidden' migrant populations in Westminster that are impossible to quantify. Such significant growth in the population of Westminster will increase pressure on social and community facilities, public realm and open space, transport and utilities and the local environment. Increasing population can lead to greater nuisance complaints, degradation of the quality of the natural and built environment and increased air and noise pollution.</p>

	<p>interest and value as they are equally important for creating a sense of place and identity and will impact development along administrative boundaries. Westminster has the worst Air Quality in the UK. The City was been declared an Air Quality Management Area in 1999 for NO<sub>2</sub> and PM<sub>10</sub>. In 2004 PM<sub>10</sub> and NOx were at levels exceeding European Standards. Air pollution affects all the residents and daily commuters, visitors to the borough.</p>	
<p>Noise and the impact of noise upon human health and quality of life</p> <ul style="list-style-type: none"> <li>• <i>Ambient Noise Levels</i></li> <li>• <i>Noise impact from commercial activities</i></li> <li>• <i>Transport Noise</i></li> <li>• <i>Cooling and Heating Plant Noise from buildings.</i></li> </ul>	<p>World Health Organisation states that to prevent serious annoyance during the day that noise outside the facades of living space should not exceed 55dB LAeq for a steady continuous noise. At night noise levels outside the facades of living space should not exceed 45LAeq. The average hourly night time noise levels only drop below WHO day time recommended values between 0200-0400hrs. Noise sources most bothering residents in Westminster include recycling or waste collection, outdoor events, pubs, clubs and restaurants, schools, health and community buildings, building and construction and road works (Westminster Noise Attitude survey 2008). Noise from inside entertainment venues from loudspeakers or voices is a problem and outside noise from people in eating, drinking, smoking areas is an issue. Traffic noise is main source of noise nuisance in Westminster. Other noise sources most bothering residents in Westminster include railways and aircraft, including helicopters. Breaches of planning conditions can result in a large number of noise problems. Westminster has stringent planning policies setting out maximum noise emissions standards for buildings, plant and other equipment.</p>	<p>Noise pollution in Westminster may increase with increased population and transport use, if development and protection of tranquil areas are not encouraged and new technologies or sustainable design are not considered as the city grows. Noise from heating and cooling plant machinery may increase as a result of impacts of climate change and if not considered may result in a much noisier soundscape in the borough.</p>
<p>Waste and Recycling</p> <ul style="list-style-type: none"> <li>• <i>Waste handling facilities</i></li> <li>• <i>Recycling rates need to improve as population grows</i></li> <li>• <i>Street cleansing vitally</i></li> </ul>	<p>There are no waste handling facilities in Westminster, primarily due to the immense pressure for land, and therefore, land value. All of Westminster's Waste is disposed of outside the City. MSW to landfill: 14.2% 07/08 (was 13% 2009/10)</p> <p>Recycling is an integral part of a sustainable lifestyle and rates must improve. Large amounts of building waste from construction and demolition requires high rates of recycling. Household waste reused, recycled and composted:24% 2009/10. PPS10 and Government targets for</p>	<p>Waste produced in the borough is increasing, with increased commercial activity, greater residential and working population. If this trend continues the production of waste and its disposal will need to be managed sustainably. Recycling facilities are limited, and will continue to be so if not required as part of development in the future. Increased commercial activity will increase pressure on</p>

<p><i>important</i></p>	<p>reducing waste to land fill require alternative disposal methods. Energy from waste incineration is an option, but solutions need to be considered London wide. Incineration is supported in the Mayor’s Waste Strategy. Residual household waste per household: 264 07/08 kilograms (was 267 in 06/07)</p> <p>Best practical environmental option for waste disposal should be taken into account when making waste management decisions.</p>	<p>council services and may result in dirtier streets.</p>
<p>Road transport and congestion, the provision for pedestrians and cycling needs to be improved</p> <ul style="list-style-type: none"> <li>• <i>Pedestrianisation</i></li> <li>• <i>Alternative transport modes, cycling, walking</i></li> <li>• <i>Quality of public realm</i></li> </ul>	<p>Over 1 million people travel to and around Westminster each day. The underground is the predominant mode of transport. 13.2% of residents drive to work. Most of the City has an ‘excellent’ PTAL rating, level 6b (40.01+). North West Westminster has a slightly lower PTAL rating and is one of the most deprived parts of the City.</p> <p>Walking in Westminster is important. The City has intense pedestrian activity. Leicester Square has &gt; 250,000 pedestrian movements per day. Pedestrians killed or seriously injured (KSI) in Westminster has progressively dropped since 1990. Good transport links are reflected in the high proportion of school journeys being made on these modal transport groups.</p>	<p>The City is ever changing. Transport infrastructure projects such as Crossrail (Lines 1 and 2), the ongoing redevelopment of Paddington and the emerging proposals for the Victoria Transport Interchange, Tottenham Court Road and Oxford Street- Regent Street-Bond Street (ORB) Action Plan. Other Actions Plans, for example, the China Town Action Plan are also expected to have an impact on the future shape and role of the City. Pedestrian movement in the city will become more difficult with increased daily population and the pressure on open space greater. Sustainable transport modes will be limited in the Westminster if there is no provision for cycle routes and improved pedestrian movement and public realm, to improve access and mobility around the borough</p>
<p>Climate change, climate change adaptation and air quality</p> <ul style="list-style-type: none"> <li>• <i>greenhouse gas emissions and contribution to global</i></li> </ul>	<p>Westminster’s emissions are 6.8% of the total carbon emissions for London, 0.6% of the UK total. Energy use in the commercial sector is the primary reason for this.</p> <p>Westminster is particularly vulnerable to the following impacts of climate change: Higher temperatures: London’s Urban Heat Island effect is now</p>	<p>Predicted climate change scenarios suggest wetter, warmer winters, more intense downpours, hotter drier summers and more frequent extreme high temperatures. Reducing the impact of climate change and adapting to predicted changes are vital to the</p>

<p>issue</p> <ul style="list-style-type: none"> <li>• <i>Changing weather patterns</i></li> <li>• <i>Increase flood risk</i></li> <li>• <i>Flash flooding and drainage issues.</i></li> </ul>	<p>well documented, adding up to 5-6°C to summer night-time temperatures. Westminster, with a dense urban environment in the heart of London, is one of the worst-affected boroughs. The green expanses of the Royal Parks reduce this effect, but only in the immediate vicinity. Prolonged periods of high temperatures also result in shrinkage of clay soils, leading to increased subsidence of buildings and structures. Increase in heavy rainfall events is likely and the density of development and prevalence of non-porous surfaces makes Westminster particularly vulnerable to surface water flooding. As with much of the south-east, hotter and drier summer conditions will put a considerable strain on water resources.</p> <p>Much of South Westminster is within the Environment Agency's high risk Flood Zone 3. With predicted climate change scenarios there is an increased risk of tidal flooding. Westminster has good flood defences but in the event of a breach the consequences could be severe and therefore need to be taken into account. Westminster's SFRA sets out details of flood risk in the borough and presents our policy approach for managing the risk. There is a low risk of fluvial flooding in Westminster, but needs to be taken into account.</p> <p>In the preparation of Westminster Strategic Flood Risk Assessment Surface Water flooding was identified as the likely key cause of flooding in the future. The risk of surface water flooding needs to be taken into account when developing planning policies in the future.</p>	<p>future health of the city and the health of those people that live, work and visit. If the impacts and causes of climate change are not addressed we are likely to see an increase in greenhouse gas emissions, which will continue to affect climate in the future and increase likelihood of flooding. Increased flood risk will lead to greater risk to health and safety in the city from flooding and from pollution incidents. Flash flooding will become a greater problem and may result in restricting development if not mitigated for. The city of Westminster is particularly vulnerable to the following impacts of climate change:</p> <p>Higher temperatures, London's heat island effect is likely to add up to 5-6 °C to summer night time temperatures. The implications of this are considerable in terms of health and safety and prolonged periods of high temperatures also result in shrinkage of clay soils, leading to increased subsidence of buildings and structures.</p>
<p>Sustainable Building policies needed to</p> <ul style="list-style-type: none"> <li>• <i>Increase energy efficiency measures</i></li> <li>• <i>Application of SUDs</i></li> <li>• <i>Sustainable design of old and new building stock</i></li> </ul>	<p>The UK is looking to increase the amount of energy generated from renewable sources, which will greatly reduce its reliance on fossil fuels and reduce Carbon emissions.</p> <p>With the increased risk of flooding from surface water, drainage is a key issue in a city with high density development and vast areas of hardstanding. The use of Sustainable Urban Drainage systems allows engineering solutions to be applied to surface water drainage which mimic natural water systems while potentially adding value in terms of</p>	<p>If sustainable design measures are not implemented as the city grows, development may have significant impacts on the quality of life (noise from plant, overheating) environment( increased greenhouse gas emissions leading to climate change impacts) economy ( increased costs of building, operation and maintenance with reduced lifespan of building stock in the city. Continued inefficient uses of natural</p>

<ul style="list-style-type: none"> <li>• <i>Better use of water resources</i></li> </ul>	<p>biodiversity and amenity, for example.</p> <p>There are high numbers old buildings in Westminster that need to address reducing energy and water consumption as well as new build.</p> <p>Water consumption in London and the Thames region is increasing. Westminster needs to consider water use efficiency measures to ensure better use is made of water as a resource.</p>	<p>resources resulting increased costs. If we don't design, build, operate and maintain sustainable buildings our ecological and carbon footprint will continue to grow and we will not meet targets for reducing emissions in the future. Surface water flooding is likely to increase with current climate change predictions and if sustainable urban drainage methods are not employed the risk to personal safety and businesses is likely to increase.</p>
<p>Supply of appropriate housing for</p> <ul style="list-style-type: none"> <li>• <i>Homeless</i></li> <li>• <i>Supply of affordable and intermediary homes</i></li> <li>• <i>Over crowding and lack of family units</i></li> </ul>	<p>To ensure that housing needs are met by setting out the size and tenure of units required, how the needs of those with specialist housing needs will be met, and protecting specialist housing such as affordable housing, hostels and Houses of Multiple Occupations (HMOs).</p> <p>Homeless figures for Westminster have remained constant for the last four years. At the end of March 2008, 2,865 households were living in temporary accommodation, including 245 bed &amp; breakfast hotels. Approximately 1,800 rough sleepers are on the streets of Westminster each year, with about 65 new rough sleepers each month. On any given night the number of people on the streets varies between 100 and 150.</p> <p>Two thirds of housing needs for Westminster is for social rented homes, while the remainder is for intermediate housing. The need for affordable housing has more than doubled since 2001. To meet the housing need over the next five years, it is estimated that an additional 5,600 affordable homes will be needed per annum.</p> <p>The 3 main reasons for housing need are overcrowding, disrepair and unaffordability</p>	<p>If need for homeless shelters and housing of multiple occupation, affordable and intermediary homes and family sized units, is likely to increase as population in the borough grows. there is likely to be an increase in the number of homeless through migrant population in the borough and increased risk to personal safety for those living on the street. Failing to meet these likely future trends were considered when assessing the impacts of the Core Strategy on sustainable development in Westminster.</p>

<p>Creation of cohesive and inclusive communities; appropriate level of social and community facilities</p> <ul style="list-style-type: none"> <li>• <i>Mixed use pattern of land use creates conflict priorities</i></li> <li>• <i>Remedy areas recognised as deprived</i></li> <li>• <i>Health and well being of community</i></li> </ul>	<p>Westminster has a population of approximately 244,400. 90% of population growth in Westminster is due to net in-migration. 72% of the population is young adults. Westminster is home to many ethnic groups with 150 languages spoken by residents.</p> <p>Westminster is the 9th most densely populated local authority in the UK. Westminster is ranked 39th out of 354 local authorities in England in terms of average deprivation (where 1 is most deprived).</p> <p>Life expectancy in Westminster is above the London average as well as the average for England and Wales. Total number of patients waiting for hospital admissions is 1,329.</p>	<p>Westminster's residential population is expected to grow to up 320,000 residents by 2025. clearly taking the availability of housing into account this is likely to be a constraint on population growth.</p> <p>Westminster has few large sites and those there are will be expected to deliver housing as well as a mix of other commercial uses.</p> <p>Housing provision will be a priority for Westminster for the duration of the plan, as will new job opportunities and social and community facilities and infrastructure.</p>
<p>Maintain Economic diversity and increase local opportunity</p> <ul style="list-style-type: none"> <li>• <i>Support world city functions whilst at same time securing equal opportunities across all areas and social spectrum</i></li> <li>• <i>Education and job creation and distribution of wealth to local communities across the city.</i></li> </ul>	<p>The City of Westminster contributes 2.2% to national GDP. It provides 14.1% of all employment in London. There are more service sector jobs than in any other part of London.</p> <p>Westminster is a borough of extremes with some of wealthiest areas in the country alongside some of the poorest. Church St and Queens park are the two most deprived SOAs in London.</p> <p>Educational standards in Westminster are comparable to the rest of London. Except NVQ Level 1 which shows Westminster averages less than 5 GCSE's, which is below the figures for the rest of London and GB</p>	<p>Economic growth in Westminster is important nationally, regionally and locally, with more than 500,000 employed and nearly 50,000 businesses located in the City. It is expected that the financial and service sectors will provide the greatest number of jobs. With business tourism predicted to increase there will be a need to improve services and facilities.</p> <p>The 2012 Olympics and Paralympics are expected to have a major impact on the City, with increased numbers of visitors adding demand for entertainment, shopping and hotels; safety and security will be paramount.</p>

## DEVELOPING THE SUSTAINABILITY APPRAISAL FRAMEWORK

4.63 The sustainability appraisal framework is a methodology which enables the sustainability effects of the Core Strategy policies to be analysed, compared and critically assessed. It consists of sustainability objectives, which are described “as a methodological yardstick against which social, environmental and economic effects of a plan can be tested”.

3.2.15, page 46, Sustainability Appraisal of Regional Spatial Strategies and Local Development Document, ODPM, November 2005.

4.64 The framework consists of 17 Sustainability Objectives which define the long term social, economic and environmental goals for the City. The achievement of which will be measured using identifiable indicators. The sustainability objectives were developed by researching specific issues affecting Westminster, through detailed desk top analysis and internal discussions. The objectives have also been formulated with regard to the City Council’s adopted Unitary Development Plan and the London Plan (as the higher tier Regional Spatial Strategy ). These sustainability objectives have been used throughout the sustainability appraisal process and are presented below in Table K. The Table also shows the detailed decision making criteria used to undertake the assessment for each objective.

**TABLE J THE 17 SUSTAINABILITY OBJECTIVES**

Sustainability Objective	Detailed decision making criteria
1) To create cohesive, inclusive and safe communities with appropriate levels of social and community facilities	<ul style="list-style-type: none"> <li>• Will it improve access to                             <ul style="list-style-type: none"> <li>○ local services?</li> <li>○ Shopping?</li> <li>○ community facilities?</li> </ul> </li> </ul>
	<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 increase ability to influence decision making (neighbourhoods)?</li> </ul>
2) To reduce crime and fear of crime	<ul style="list-style-type: none"> <li>• Will it reduce actual level of crime?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it reduce fear of crime?</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>
	<ul style="list-style-type: none"> <li>• Will it increase range of affordable housing ?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it reduce no. of unfit homes?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it high quality homes?</li> </ul>

4)To promote and improve health and well – being	• Will it help improve health and equalities?
	• Will it reduce death rates?
	• Will it improve access/movement?
	• Will it encourage healthy lifestyles?
5)To reduce greenhouse gas emissions and support climate change	• Will it reduce Greenhouse Gas emissions by reducing energy consumption and the need to travel?
	• Will energy needs be met through renewable sources?
	• Will it reduce ozone depleting emissions?
	• Will it reduce emissions through retrofitting new technology?
6)To require the application of sustainable design and construction in all new developments and refurbishment of existing buildings	• Will it reduce water consumption?
	• Will it reduce energy consumption?
7)To a) minimise flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	• Will it minimise flood risk from all sources of flooding?
	• Will it reduce property damage due to storm events/ heavy rainfall?
	• Will it reduce Combined Sewer Overflow events?
8)To protect, enhance and create environments that encourage and support biodiversity	• Will it reduce water consumption and improve water efficiency?
	• Will it protect, enhance and increase biodiversity and protect habitats?
	• Will it preserve Sites of Importance for Nature Conservation?
	• Will it improve access to and promote educational value of sites of biodiversity interest?
9)To improve air quality	• Will it conserve and enhance species?
	• Will it improve air quality?
	• Will it help achieve objectives of Air Quality Strategy and Action Plan?
10)To reduce noise and impact of noise	• Will it reduce emissions of key pollutants?
	• Will it reduce noise levels
11)To reduce the need to travel; the use of private motorised vehicular	• Will it reduce noise concerns?
	• Will it reduce traffic volumes?
	• Will it encourage walking and cycling?

transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> <li>• Will it increase proportion of journeys using modes other than 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 it lead to reduced consumption of materials and resources?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it reduce household waste?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it increase recovery and recycling?</li> </ul>
13)To protect and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>• Will it reduce construction waste?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it protect heritage sites and cultural value?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it protect strategic views?</li> </ul>
14)To enhance public realm and street environment	<ul style="list-style-type: none"> <li>• Will it protect listed buildings and their settings?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it help preserve, enhance and record archaeological features and their settings?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it reduce litter?</li> </ul>
15)To enhance public realm and street environment	<ul style="list-style-type: none"> <li>• Will it enhance the quality of public realm ?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it improve access and mobility?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it reduce pressure on open space?</li> </ul>
16)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 in residential areas in north-west and south of the City?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it improve landscape and character of open space?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it minimise development in Greenfield sites?</li> </ul>
17)To ensure equality of opportunity and improve local opportunities for education, training and employment	<ul style="list-style-type: none"> <li>• Will it improve qualifications and skills</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it reduce unemployment</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it provide jobs for most in need</li> </ul>
18)To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>• Will it improve earnings</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it improve business development and environment?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it improve business resilience and economy?</li> </ul>
	<ul style="list-style-type: none"> <li>• Will it encourage new business start ups and opportunities for local people?</li> </ul>
19)To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<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 with surrounding areas?</li> </ul>

4.65 The objectives have also been formulated so that they meet the environmental protection objectives set out in the SEA Directive. This is demonstrated in Table K, which establishes the link between the objectives relating to the specific environmental and sustainability issues experienced in the City of Westminster and the SEA Directive’s over-arching objective to protect the environment and promote sustainable development.

**TABLE K ENVIRONMENTAL ISSUES HIGHLIGHTED IN SEA REGULATIONS AND RELATIONSHIP WITH WESTMINSTER'S SA OBJECTIVES**

Environmental Issues highlighted in SEA Regulations	Westminster’s Strategic Environmental Objectives
Population Human Health	This is covered in objective 1 of the assessment framework.
Fauna, Flora Biodiversity	This is covered in objective 3 of the assessment framework.
Soil	This is covered in objective 13 of the assessment framework.
Water	This is covered in Objective 7 of the assessment framework
Air	This is covered in objective 4 of the assessment framework,
Climatic Factors	This is covered by objective 2 of the assessment framework
Material Assets	This is covered by objectives 3 and 14 of the assessment framework
Cultural Heritage– architectural, archaeological	This is covered by objective 8 of the assessment framework.
Landscape	This is covered by objectives 8 and 9 of the assessment framework.

4.66 SA guidance requires the interrelationships between the Sustainability Objectives used for the appraisal to be considered and any conflicts between objectives identified. Figure 7 summarises the interactions and uncertainties between the sustainability objectives.

4.67 The matrix shows that for most part, the objectives are either compatible or there are no clear links. However, there are a small number of exceptions where possible conflict between sustainability objectives may exist. For example, Objective 3 (to ensure the provision of appropriate housing types) and Objective 17 (maintaining economic diversity and sustaining economic growth) are arguably in conflict with other Sustainability Objectives. This is

because they both have the potential to increase activity, which will add, inevitably, to the pressures already placed on the local environment. Increased activity may lead to increased carbon emissions which will contribute to local air pollution, and more activity generates more waste and more people place greater pressure upon social and community facilities, transport, green space and the historic environment.

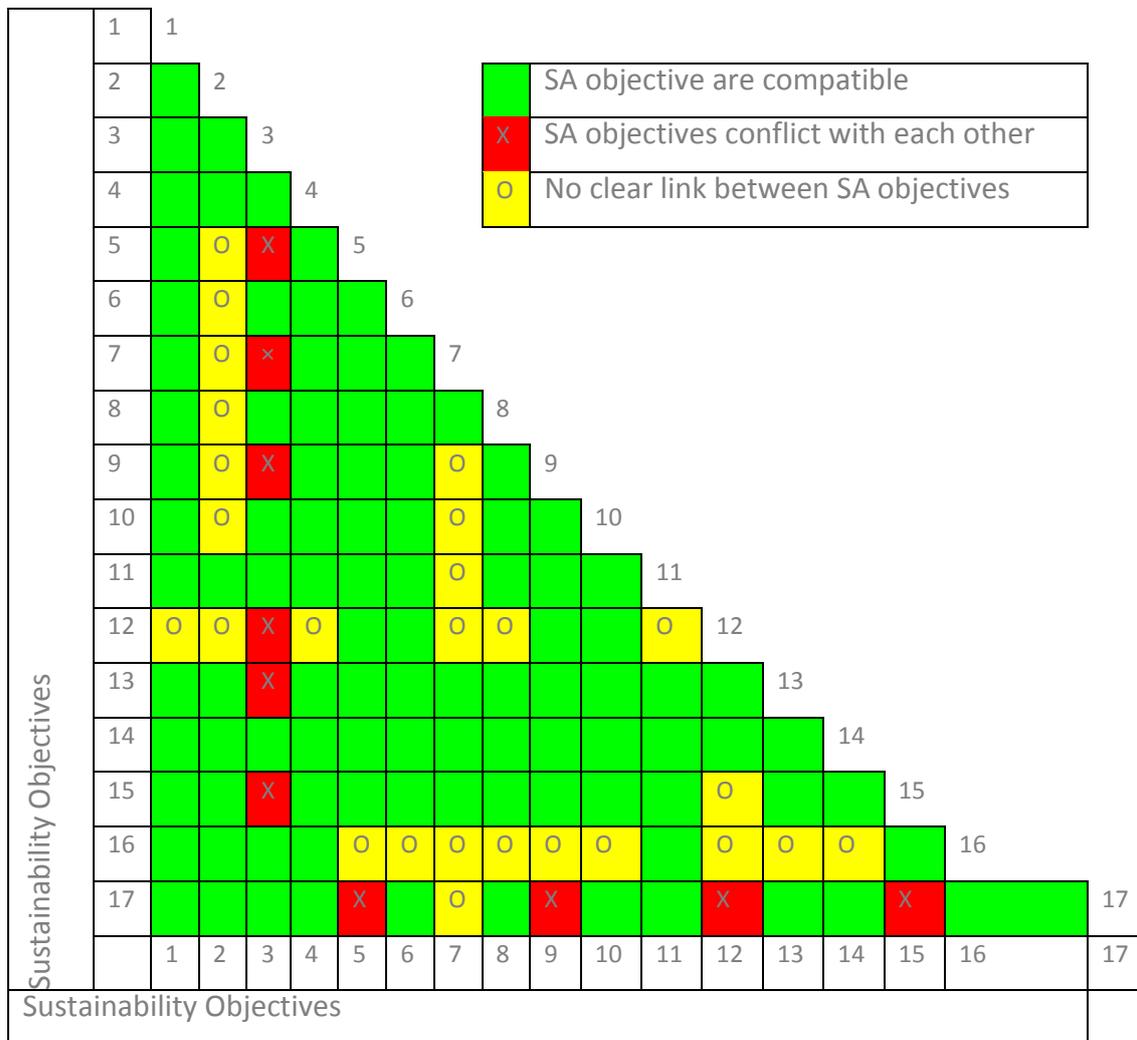


FIGURE 7 COMPATIBILITY BETWEEN THE SUSTAINABILITY OBJECTIVES

4.68 The assumptions or justification for the potentially conflicting Sustainability Objectives are presented below in Table L and are accompanied by an assessment of how such conflicts could be mitigated or, at the very least, how the predicted conflict should be considered.

TABLE L IDENTIFICATION OF SOME CONFLICTING OBJECTIVES

Conflicting objectives	Comments / Justification / Assumption	Mitigation / Resolution / Consideration
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Conflicting objectives	Comments / Justification / Assumption	Mitigation / Resolution / Consideration
3 and 5	With an increase in the number of residential units there will be an increase in space heating / cooling which, along with associated transport demands, is likely to contribute to increased greenhouse gas emissions.	Climate change considerations and the need for effective building adaptation will need to be taken into account when forming policies relating to residential construction, conversion and/or refurbishment
3 and 9	With an increase in the number of residential units there will be an increase in space heating from boilers and increasing demands on transport usage, including private road vehicles, all of which will impact upon air quality	Air quality will need to be taken into account when formulating policies. Will also need to reflect other plan objectives such as local, regional and national Air Quality Action Plans.
3 and 12	With an increase in the number of residential units there will be an increase in the amount of municipal waste that will have to be collected and recycled or disposed of.	Sufficient waste / recycling storage space will need to be supplied in residential developments and waste handling services must be able to cope with increases in waste and recyclables.
3 and 7	Increasing residential units in the southern part of Westminster which is in designated Flood Zone 3 is in conflict with the objective to minimise flood risk to both human life and property	Policies should require effective mitigation measures to minimise risk of flooding and ensuing damage to property and human life.
3 and 15	More residential units are likely to increase the pressure on existing open space by actual land take and an increase in numbers of people using the open spaces.	Policies are essential for protecting existing open spaces and for seeking more when appropriate. Green spaces are vital for social well-being and community cohesion. The Westminster Open Space Strategy will need to be taken into consideration.
17 and 5	Any increase in economic activity is likely to also increase greenhouse gas emissions because of the increase in buildings, activities in them and subsequent energy/water/heating/cooling demands and transport demands.	Climate change needs to be taken into account when formulating policies relating to commercial development - whether through construction, conversion or refurbishment.
17 and 9	Increasing economic activity will mean more commercial buildings requiring space heating / cooling which could raise levels of air pollution. Also, more people travelling to work in the City will increase demands on transport, contributing to air pollution.	Air quality will need to be taken into account when formulating policies. Will also reflect other plan objectives such as local, regional and national Air Quality Action Plans.
17 and 12	An increase in economic activity is likely to increase waste production	Important to require recycling within commercial developments as well as

Conflicting objectives	Comments / Justification / Assumption	Mitigation / Resolution / Consideration
	directly and indirectly.	other “green” practices. Services need to be able to cope with potential increases in waste and recycled material.
17 and 15	Increase in economic activity may increase pressure on open space as more and more people use them for recreational purposes	The increase in pressure upon open space is inevitable if more people work in Westminster. Policies need to protect existing open spaces and seek more when appropriate. Green spaces are vital for social well-being and community cohesion. The Open Space Strategy will need to be taken into consideration.

# SECTION 5

## MAIN STAGES OF CORE STRATEGY DEVELOPMENT AND THE ROLE OF THE SA

This section of the Sustainability Appraisal Report sets out how the Core Strategy Policies were defined and refined and the how the sustainability appraisal informed the development of these policies.

### Core Strategy Defining and Refining Options

#### CONTEXT

- 5.1 The starting point for developing a vision and spatial strategy for Westminster was the Westminster City Plan (our Sustainable Community Strategy) and the context of Westminster's unique character and function. While there are identified opportunities for large scale redevelopment in parts of the city, such opportunities are likely to decrease over time. In this context, managing the existing city and delivering incremental change is a key component of the Core Strategy. The constraints on development and site availability have meant that only a limited range of spatial strategic options were able to be identified; and in some cases there were few realistic alternatives.
- 5.2 The first stage in the preparation of the Core Strategy involved a review of relevant policy documents, including the London Plan, as detailed in Appendix 2. Following this review, the Council, published the Core Strategy Issues and Options document for consultation, alongside the Sustainability Appraisal Scoping Report, in May 2007. This was essentially a discussion document whereby the City Council sought views on the main planning issues that the Core Strategy would need to address, including a range of alternative policy options to deal with them. The Issues and Options discussion paper contained a questionnaire seeking views on the alternative policy options.
- 5.3 The Issues and Options paper identified 7 key drivers of change and challenges affecting the city in the next 15 -20 years. These were:
- The city's environment
  - The changing economy
  - The heart of London
  - Building communities and strengthening neighbourhoods
  - Life chances
  - Quality of services and
  - Safety in the City of Westminster

- 5.4 Taking these drivers and challenges into account, 6 key strategic issues were identified for the Core Strategy to address:
1. How to mitigate against climate change and ensure that the city plays its part in delivering sustainable development
  2. How and where to accommodate growth and change and how to maintain economic diversity and vitality
  3. How to strike the balance between growth in housing and employment
  4. How to support Westminster's role as a world class city while maintaining local distinctiveness
  5. How to build, cohesive, tolerant and neighbourly communities, and
  6. How to balance the needs of the night time economy with a large and growing residential population and the needs of the day time economy.

From these, seventeen broad spatial options to address the drivers and challenges were presented, and a sustainability appraisal undertaken of these options.

- 5.5 Of the 6 key strategic issues', the most significant in defining the spatial strategy set was Key Strategic Issue (2) Growth, Change and Economic Activity - How and where to accommodate growth and change and how to maintain economic diversity and vitality. The options presented were strongly influenced by the London Plan which sets a target for housing growth in the city and also encourages further residential and commercial growth in the central areas of Westminster (Central Activities Zone) and in Opportunity Areas identified in the London Plan (Paddington, Victoria and Tottenham Court) that lie within the Westminster area. The council's own research also informed the issues, not least the identification of persistent levels of deprivation and poor quality of the built environment in some parts of north Westminster.
- 5.6 The Issues and Options report therefore raised initial questions on where to accommodate growth and change and how to maintain economic diversity and vitality, by presenting different options related to the Central Activities Zone, Opportunity Areas, West End Special Retail Policy Area, and north Westminster.

## ISSUES AND OPTIONS SUSTAINABILITY APPRAISAL

- 5.7 The sustainability appraisal incorporated the requirements of Planning Policy Statement 12 (PPS 12) and the SEA Directive, and is based on the methodology set out in the ODPM document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (November 2005).

- 5.8 The first stage in the Sustainability Appraisal process was the production of a Scoping Report. The Scoping Report set out the context and baseline information in order to provide a starting point from which to appraise the effects of implementing the Local Development Framework. To provide a sound base for analysis, the report identifies relevant plans and strategies, programmes, key sustainability issues and problems, and sets out a detailed Sustainability Framework through which the appraisal can take place. Westminster's Draft Sustainability Appraisal Scoping Report was made available for consultation in April 2007. It can be downloaded from the City Council's website.
- 5.9 The City Council assessed each of the 17 policy options for potential economic, environmental and social effects and their consequential impact on the achievement of sustainable development. This helped to ensure that the options that went forward to be included in the Core Strategy help to achieve the aim of sustainable development.
- 5.10 An evaluation of the 17 options (1A-D, 2A-C, 3A-C, 4A-B, 5A-B and 6A-C) identified in the Core Strategy Issues and Options document, May 2007, has been carried out against the draft SA framework .

Following the consultation on the Core Strategy issues and options document and on this associated Initial Sustainability Appraisal, a set of preferred options and other alternative options for the Core Strategy has been prepared. A few of the issues and options raised in the Issues and Options paper were set aside at this stage for consideration later, in the preparation of the City Management Plan DPD, which will contain more detailed development management policies.

#### RECOMMENDATIONS MADE AS A RESULT OF SUSTAINABILITY APPRAISAL

- 5.11 The sustainability appraisal shows that there are unavoidable tensions between policy objectives and sustainability objectives.
- 5.12 It is impossible to avoid negative environmental impacts under conditions of growth and development. However, measures were recommended to reduce the impacts by ensuring that development is more environmentally sustainable than that being replaced; that new development achieves an excellent BREEAM standard; incorporates renewable energy wherever practicable and minimises carbon emissions.
- 5.13 Air pollution, particularly PM<sub>10</sub> and NO<sub>x</sub>, remains a very serious environmental issue in Westminster, where the highest levels of air pollutants are recorded

anywhere in the UK. Any net increase in private motor vehicles as a result of additional growth in development will exacerbate the situation. It is recommended that the need for private motorised vehicles be minimised and green transport options be promoted.

- 5.14 Residential densities are amongst the highest in the country, and open spaces are needed locally, especially for children and the elderly, and are essential for respite from the bustle of the city. Additional development at higher densities will exacerbate this situation as well as affect the City Council's ability to achieve its targets in the City Plan. The initial sustainability appraisal demonstrates that for options that involve more development, higher densities and increased activities, whether relating to housing, workplaces, retail or hotels, they are assessed negatively, not only against the environmental baseline but also against the social baseline, because, for example, lack of adequate social and community infrastructure and additional pressures on existing public services and facilities.
- 5.15 Policies to take account of the need for improved waste management and the provision of recycling facilities will help manage increased waste production as a consequence of economic and population growth.
- 5.16 The Core Strategy should seek to ensure adequate infrastructure and public services and facilities are provided to deal with increased population (including daytime population) and residential growth.
- 5.17 Regeneration areas, such as Westminster's Opportunity Areas in Victoria, Paddington and Tottenham Court Road, as identified in the London plan, should consider environmental improvement is an important element of successful regeneration, and that this can lead to an improved economy and social well being and ultimately a better quality of life.
- 5.18 Development should be concentrated in the Victoria, Tottenham Court Road and Paddington Opportunities areas and if new development opportunities present themselves, these should be in areas with integrated transport links and adequate public services and facilities, unless provision is made to deliver these services.
- 5.19 Growth and regeneration policies will need to be coupled by policies to protect areas, such as conservation areas, strategic views, SINC's, heritage, open spaces and tranquil areas and to promote sustainable development, construction and operational policies, to make better use of resources and to reduce greenhouse gas emissions from new and old building stock.

## DEVELOPMENT OF PREFERRED OPTIONS AND CONSIDERATION OF ALTERNATIVES

5.20 The initial options presented in the Issues and Options Report were developed into more detailed spatial options presented in the Core Strategy Preferred Options document. The Preferred Options, published in July 2008 presented a more refined policy framework made up of 'preferred options' and 'alternative options' where realistic options exist. The Preferred Options document detailed how the council wished to move forward in preparing the Core Strategy. It set out 6 spatial objectives to deliver objectives of Westminster's Sustainable Community Strategy. It covered cross cutting strategic policy approaches such as Health and Design but also the key strategic spatial options for accommodating growth and change in the city highlighted at Issues and Options Stage. These key strategic spatial options related to:

- Central Activities Zone
- Paddington Opportunity Area
- Victoria Opportunity Area
- Tottenham Court Road Opportunity Area
- West End Special Retail Policy Area
- North Westminster Economic Development Area
- the priority for Housing

5.21 Alternative options for the above were presented, including the Council's preferred options. Because of the particular constraints in Westminster (heritage designations and lack of large development areas), the alternatives presented are often not radically different, and in some cases a seemingly marginal variation is presented. Each option presented in the Preferred Options report is supported by relevant references to the evidence base, consultation responses, the Sustainability Appraisal, and where an option is not supported, the reasons for this clearly given. The key strategic spatial options have evolved in the course of development of the Core Strategy, and are presented in summary in Appendix 5.

5.22 The process is described in more detail below. The reasoning for selection of a key spatial strategic option, over another, is briefly outlined below, and includes, where relevant, how consideration of the sustainability assessment influenced the choice of preferred option or its final form. Reference is also made to the development of strategic crosscutting or thematic policies.

5.23 Following on from the Issues and Options, Preferred Options and alternatives were drawn up, taking account of the recommendations made and feedback

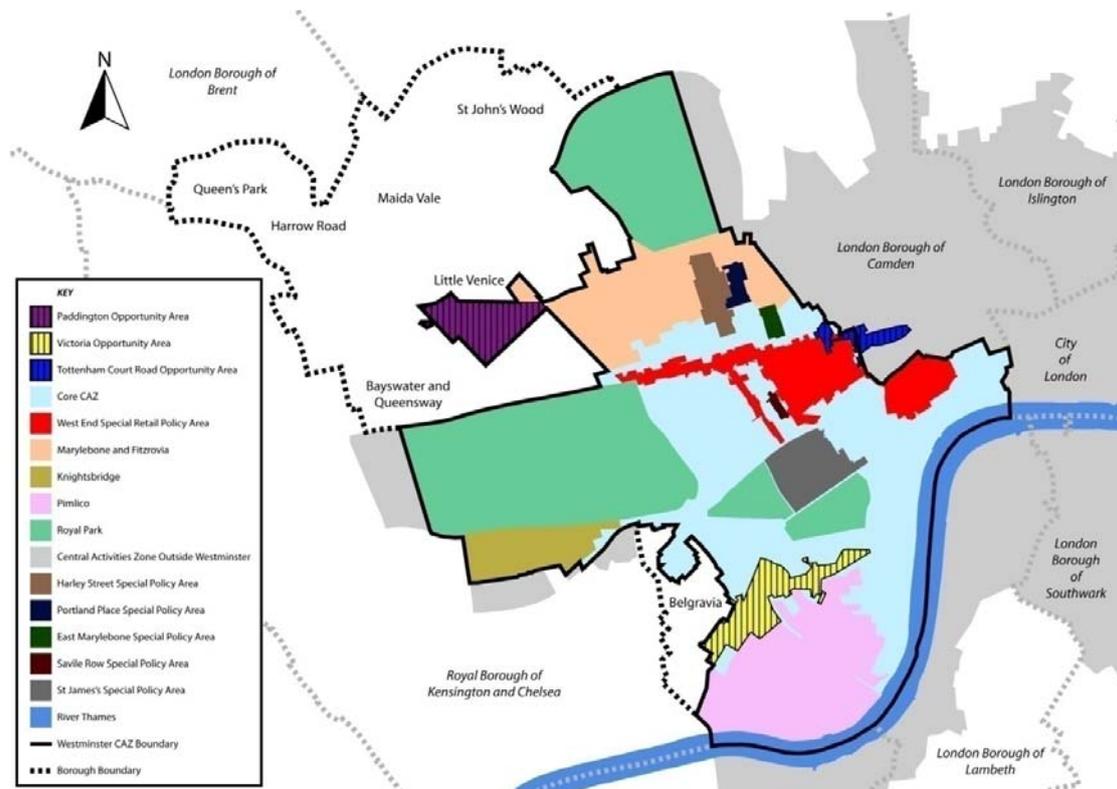
given on the SA of commentary and recommendations and representations on the Core Strategy Issues and Options.

- 5.24 The potential sustainability effects of the preferred options and alternatives were considered as part of the SA during the development of the preferred options. This was done using SA proformas. Regular meetings were held with Policy officers in the LDF and planning teams to discuss the implications of policies on sustainable development of the emerging policy options and alternatives.
- 5.25 All options were considered and appraised at this stage, and a set of 'preferred' options began to emerge. In many cases the 'preferred' options were dictated by higher level policies or targets. For example, the Core Strategy has limited options in relation to provision on new homes, due to the constraints on development in Conservation areas. Other options were then either treated as 'alternative' options or 'rejected' options in the 'Preferred Options' document. The categorisation of options as preferred, alternative, or rejected was made by appraising the different options in terms of:
- contribution to achieving the Core Strategy vision and strategic objectives
  - the evidence to support the option
  - general conformity with the London Plan
  - views of stakeholders and community, and level of support
  - contribution to sustainable development (using the results of the SA)
- 5.26 The preferred options were those which most clearly 'scored' well on all the above. Those options which were not considered to make such a high contribution to achieving the Core Strategy vision and strategic objectives and/or sustainable development became the 'alternative' options. Those options termed 'rejected' were most commonly those which were not considered to be in general conformity with the London Plan, or those which were considered to be beyond the scope of the planning system.
- 5.27 Due to Westminster's particular constraints, many of the different alternatives were fairly marginal in terms of the 'choices' offered, and therefore did not constitute 'alternative spatial strategies'. For example, Westminster's Opportunity Areas in Victoria, Tottenham Court Road and Paddington are set out in the London Plan, therefore alternatives really relate to the refining of the broad locations of the opportunity areas, set out in the London Plan. Where the 'preferred' and 'alternative' options involved different alternative boundaries for specific policy areas, for example the Central Activities Zone, the Opportunity Areas, WESRPA, and North Westminster Economic

Development Area, all the preferred options and alternative options where separately mapped in the consultation document.

- 5.28 Some of the policies proposed, and the alternatives, that were possible, were limited, making significant differences in terms of sustainability objectives, negligible
- 5.29 The tables set out in SA of preferred options and Core Strategy Preferred Options show the alternative options considered as part of developing the Core Strategy and the reasons given by the Council why they were not selected as a 'preferred' option.
- 5.30 An SA commentary on how each of preferred and alternative options contributed to sustainable development is given in the Core Strategy Preferred Options.
- 5.31 To fully appreciate the context of the comments it is necessary to read them alongside the Preferred Options document and sustainability appraisal.

## CENTRAL ACTIVITIES ZONE



MAP 14 CENTRAL ACTIVITY ZONE

5.32 The City Council first designated the central area of Westminster as the Central Activities Zone (CAZ) in the City of Westminster District Plan (adopted 1982), in recognition of the unique and diverse mix of uses in the area including those fulfilling a variety of interrelated regional, national and international functions: it also encompassed long-established residential communities that sit alongside these commercial uses. This designation had evolved over previous generations of plans and in response to wider changes taking place in the economy and in national and regional policy and practice. Since this designation the CAZ has been used as a key policy instrument to direct mainly non-residential uses to the CAZ, where such activities better relate to the existing character, infrastructure, transport facilities and environment and to ensure the continuation of its mixed use character. The boundary of the CAZ has generally marked the point where residential became the principle land use. Over the years the CAZ boundary has been regularly reviewed and updated as new development plans were prepared. The City of Westminster UDP (adopted January 2007) sets out the current CAZ boundary. The CAZ Frontages are individual major roads outside the CAZ which have a similar character to the CAZ, however the streets behind the CAZ frontages are largely residential and comprise of buildings on a smaller scale. CAZ Frontages are mainly located in the north part of Westminster.

5.33 The term Central Activities Zone was adopted at a regional level in The London Plan, February 2004 extended the concept of the CAZ to other London boroughs, however within Westminster the boundary was broadly consistent with the existing CAZ boundary as set out in the adopted UDP.

5.34 At the time of the preparation of the Issues and Options document (May 2007) a new London Plan was emerging (the Draft Further Alterations to the London Plan, September 2006). This showed an indicative CAZ boundary as extending across 10 London boroughs and included a wider area of Westminster (as shown in Map 1 in the Issues and Options document). In light of the emerging London Plan the Issues and Options documents posed the following questions regarding the CAZ boundary:

- Option 2A - Should we extend the CAZ boundary as proposed in the draft Alterations to the London Plan?

With regard to the CAZ Frontages the following question was asked:

- Option 2C (ii) - In order to encourage economic activity in the north of Westminster should we extend the Edgware Road and Marylebone Road CAZ Frontage designations.

5.35 In order to come up with the preferred and alternative options, as set out in the Preferred Options Document (July 2008), a detailed assessment was undertaken of stakeholder and community views, evidence, the contribution to sustainable development, and regional and national policy and guidance. The views of stakeholders were fairly evenly split between those generally in favour of extending Westminster's CAZ boundary to reflect that of the London Plan (PO7) (17 respondents, three with reservations) and those who considered that the existing CAZ boundary and approach as set out in the adopted UDP should remain (AO 7-A) (19 respondents). An additional option was suggested by three local amenity groups that the Royal Parks should be excluded from any wider CAZ boundary in Westminster. A detailed analysis, the 1990 Land Use survey, updated with data from the Decisions Analyse System (DAS) annual 'pipeline' monitoring' and yearly GOAD retail surveys, and supported by work completed on Conservation Area Audits, published Action Plans and other documents, highlighting the local distinctiveness of areas within the CAZ and the requirement for employing different approaches to managing development in different parts of this area. Such an approach is entirely in keeping with PPS12 in terms of ensuring local distinctiveness. Based on this assessment Preferred Option 7 was drafted to designate a boundary to reflect the indicative boundary as set out in the London Plan (February 2008), but to show locally distinct areas. This is illustrated in Map PO7 which also shows the emerging boundary for CAZ.

- 5.36 The sustainability appraisal showed both positive and negative characteristics for the options; however the overriding consideration in adopting this wider area for CAZ in Westminster is the requirement to be in general conformity with the London Plan.
- 5.37 The Issues and Options document included the option to extend the CAZ frontage designations along the entirety of the Edgware Road and to include the Marylebone Road Flyover and Westway. By Preferred Options Stage this had become an Alternative Option (AO7C), given the required changes of CAZ boundary to be in conformity with the London Plan. For reasons of economic generation these areas identified at Issues and Options Stage were included in the North Westminster Economic Development Area as shown on Map PO14 in the Preferred Options document. In terms of the Edgware Road, evidence shows that the area to the north of Church Street is predominantly residential. That part of the Edgware Road in the east between the Marylebone Flyover and Church Street exhibits CAZ characteristics and was therefore included in the CAZ.
- 5.38 Some of the policies proposed, and the alternatives, that were possible, were limited, making significant differences in terms of sustainability objectives, negligible
- 5.39 In the period between the Preferred Options stage the and Submission version of the Core Strategy further assessments of the views of stakeholders, the evidence base and any proposed approach with regard to the Sustainable Appraisal took place. In particular locally distinctive areas were refined and mapped and policy frameworks drafted for:
- Paddington Opportunity Area:
  - Victoria Opportunity Area
  - Tottenham Court Road Opportunity Area
  - Core Central Activities Zone
  - Marylebone and Fitzrovia (including the named streets of Edgware Road, Baker Street, Marylebone Road, Portland Place, Park Crescent and Great Portland Street)
  - Knightsbridge
  - Pimlico
  - Royal Parks

#### PADDINGTON OPPORTUNITY AREA

- 5.40 The Special Policy Area status for Paddington was first introduced by the City Council in 1988, in response to the need to recognise the impact of the area of

considerable development pressures on a number of sites and its role as one of London's key transport hubs. Centred around Paddington Station and the Grand Union Canal Basin this area represents the single largest development location within Westminster and a site of strategic importance. Since its designation a number of substantial mixed use developments have been completed, which have changed the face of the area. Development in Paddington has been characterised by partnership working to minimise negative impacts and maximise local benefits within the Opportunity Area and surrounding areas suffering deprivation.



MAP 15 PADDINGTON OPPORTUNITY AREA

5.41 The boundary of the Paddington Special Policy Area was reviewed as part of the preparation of the UDP (adopted 2007). Since this review two additional sites, which are adjacent to the Paddington Special Policy Area, came forward with major redevelopment potential (as noted below in Option 2C). The London Plan 2004 designated Paddington as an Opportunity Area. As the boundary of the Special Policy Area is of strategic importance the following question was asked in the Issues and Options document:

#### Option 2C – Economic activity in North Westminster

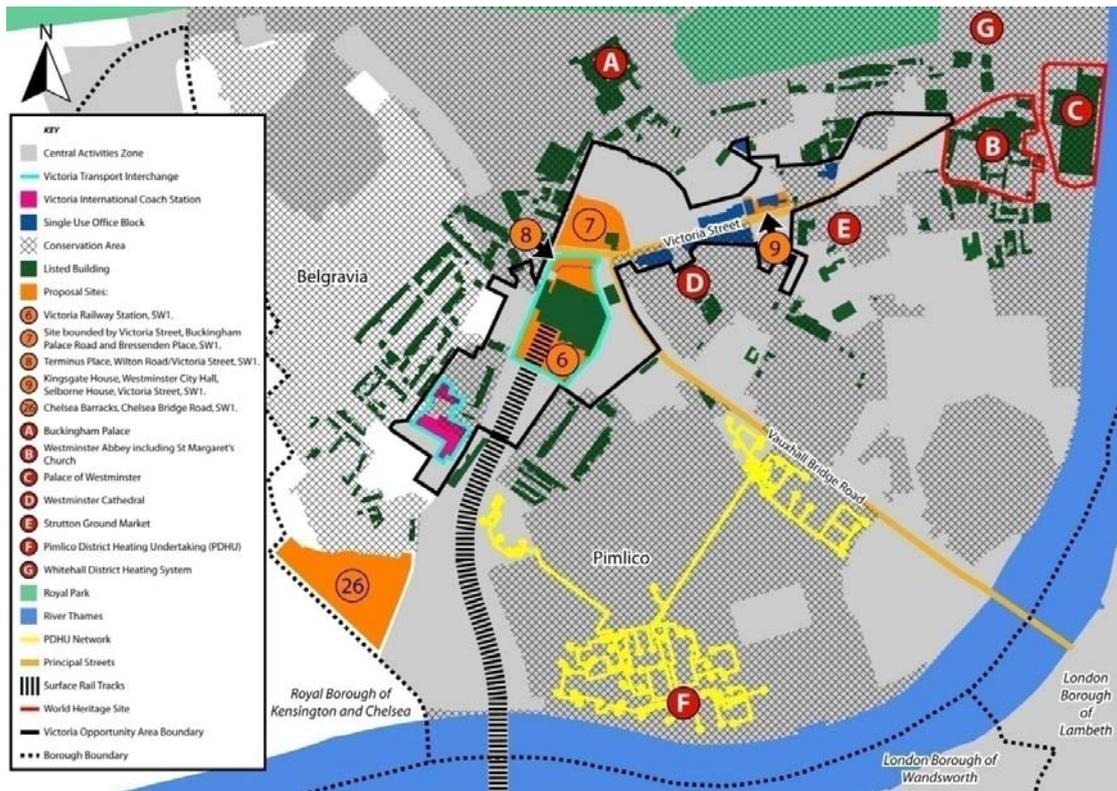
In order to encourage economic activity in the north of the City, should we:

- (i) extend the Paddington Special Policy Area to include the North Westminster Community School and Dudley House sites?

- 5.42 In order to come up with the preferred and alternative options as set out in the Preferred Options Document (Published July 2008) a detailed assessment of stakeholder and community views, evidence and the contribution of the option to sustainable development, and the requirements of regional and national policy and guidance. This generated three options including the Preferred Option (PO12). The preferred option for Paddington included its designation as an Opportunity Area and an enlarged boundary including the North Westminster Community School and the Dudley House sites. Stakeholders were generally supportive of the Opportunity Areas. Failure to designate Paddington as an Opportunity Area would result in a non-conformity issue with the London Plan (February 2008) The preferred option was considered to have a positive social, economic and environmental impact in terms of sustainability and the option was considered to continue the mixed use approach within the Paddington area to revitalise the surrounding area, including the Economic Development Area. Although it was recognised that the major development of the area had slowed down it was considered that the policy approach for Paddington would achieve the indicative growth figures set out in the London Plan. Alternative Option 12-A excluded the North Westminster Community Site and the Dudley House sites following concern from four community/amenity groups. Alternative Option 12-B suggested the designation of the Paddington Area boundary as set out in the Mayor of London's Central Sub-Regional Development Framework (SRDF). This area was included in the original designation of the Paddington SPA but was subsequently removed because of the lack of development potential on this land, which consists of railway tracks and sidings. The commentary and Sustainability Appraisal of these options provided similar outcomes.
- 5.43 In the period between the Preferred Options stage the and Submission version of the Core Strategy further assessments of the views of stakeholders, the evidence base and any proposed approach with regard to the Sustainable Appraisal took place and the strategic policies were drafted

## **VICTORIA OPPORTUNITY AREA**

- 5.44 The Victoria Opportunity Area is a key location within the Central Activities Zone, where projected growth is expected to bring forward new homes and employment opportunities. The boundary for this Opportunity Areas is identified in the London Plan and within the Sub-Regional Implementation Framework for Central London. The London Plan paragraph 5.37 makes reference to the fact that Victoria station is one of the busiest in London and there is capacity in the surrounding areas for intensification. In light of this it sets out targets for the delivery 1,000 new homes and 8,000 new jobs.



MAP 16 VICTORIA OPPORTUNITY AREA

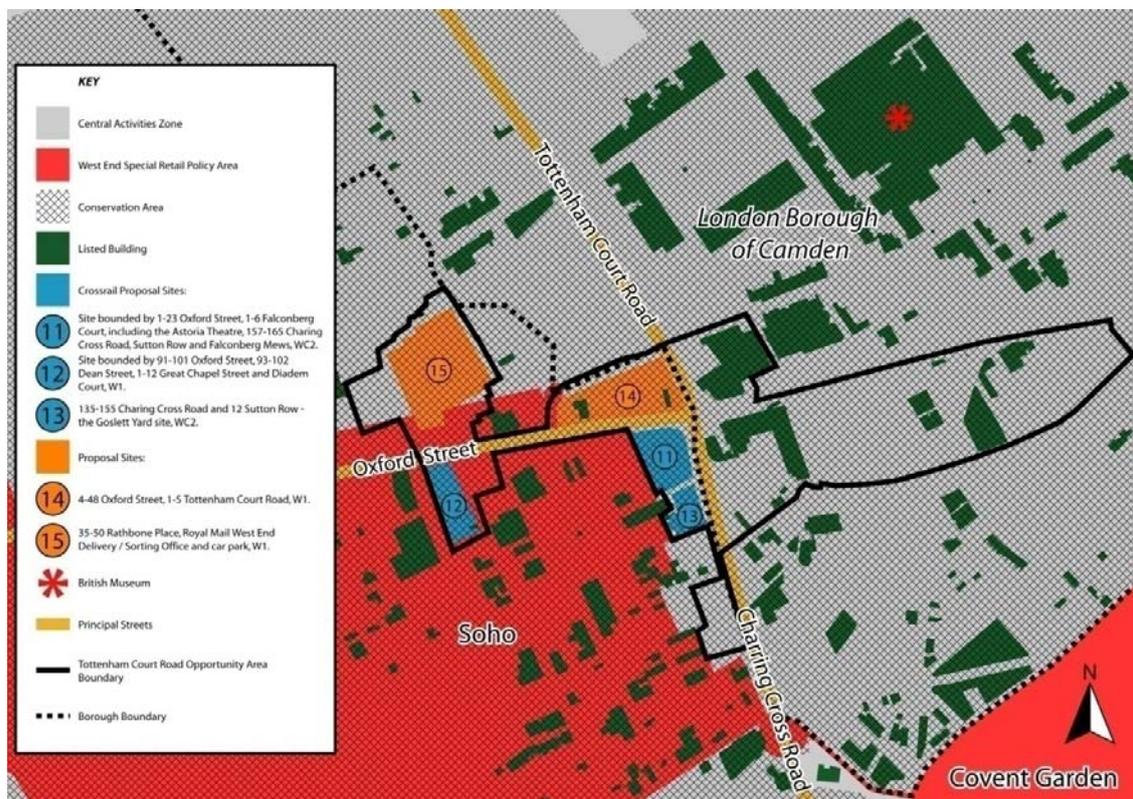
- 5.45 The Submission draft Core Strategy boundary is a result of the discussions on possible development sites in and around the Victoria Area. The size of the final boundary of the Opportunity Area is approximately 37ha.
- 5.46 It includes the area east along Victoria Street, Map CS4 Victoria Opportunity Area in the Core Strategy Submission draft and includes the many approved development sites including Ashdown House, Kingsgate House and Wellington House which offers potential for large scale regeneration and growth. It also includes sites to the south including Terminus Place, Victoria railway and coach stations and surrounding sites. The sites will be contained in the Victoria Area Planning Brief.
- 5.47 The Issues and Options Core Strategy document asks whether Victoria should be designated as an 'Area for Intensification' or be re-designated an 'Opportunity Area' as proposed in the Draft Further Alterations to the London Plan (September 2006). The designation of the area as an Opportunity Area sought to significantly increase development. The 'Area of Intensification' identified 2,000 new jobs and 200 new homes, while the 'Opportunity Area' increased the provision to 8,000 new jobs and 1,000 new homes. Map 1 in the Issues and Options report identifies the London Plan indicative boundary for the area, Map 2 identifies the Opportunity Areas within in it.

- 5.48 However, following consultation on this document the Mayor published 'The London Plan Spatial Development Strategy for Greater London Consolidation with Alterations since 2004 (February 2008), this re classified Victoria as an 'Opportunity Area'. This meant that this question was no longer suitable to ask as Victoria became an Opportunity Area in conformity with the London Plan. The majority of comments received at this stage supported the Option 2B, with some concerns about the need for appropriate infrastructure and careful consideration of residential amenity.
- 5.49 The Sustainability Appraisal identified that this option provides a number of social and economic benefits. However, it was acknowledged that the intensification of uses would create a number of negative environmental impacts, although these would be mitigated through other policies in the Core Strategy. Issues outlined at this stage include the need for sustainable design and construction, "green" management plans and requirement for public transport and public realm improvements to support new development. The provision of social and community facilities to support the delivery of infrastructure was seen as important.
- 5.50 These sustainability issues were considered in more detail at the Preferred Options stage. Preferred Option 11 identified that Victoria should be designated as an Opportunity Area. This resulted in detailed priorities within the Preferred Option regarding securing significant improvements in pedestrian and vehicular routes, cycle facilities, Pimlico District Heating Undertaking, local employment initiatives and social and community facilities.
- 5.51 The Preferred "boundary" for the area was shown on Map PO11. This boundary reflects the areas identified in Westminster's adopted Victoria Area Planning Brief (April 2006). This boundary identifies key sites where the council had identified development opportunities. This brief was subject to consultation and includes the views of all relevant stakeholders with these sites agreed as development opportunities. The boundary of this area is 21.46ha. The Alternative Option presented was 11-A, the option presented by the GLA in the Sub - Regional Development Framework. This area is comprised of 51 ha. The Council and Network Rail have concerns about this proposed boundary as it affects the railway corridor, sidings and depot which are part of the operational railway land that does not have development potential. It was also felt the Chelsea Barracks site was some way from the main interchange, comments received showed support for both these boundaries.
- 5.52 This option is sustainable and well balanced in terms of social, economic and environmental objectives. The final boundary for the Opportunity Area detailed in the Core Strategy Submission Draft / Submission document has a

different boundary from the boundaries presented in the Preferred Options. The area now covers 37.32ha. This revised boundary was developed by officers and considers key development opportunities which the city council are aware of and anticipate will come forward during the period of the plan. This is the same boundary which will be detailed in the revised draft Victoria Area Planning Brief which is due to be consulted on later this year. The revised boundary reflects comments made by residents at the South Area Forum and GLA. The draft Sustainability Appraisal of the Submission Draft document states that overall the policy will have a positive impact on Victoria. The policy will secure a range of improvements to the area which create a better quality environment for all residents through improvements to the public realm, transport infrastructure and heritage assets.

### TOTTENHAM COURT ROAD OPPORTUNITY AREA

5.53 London Plan paragraph 5.36 recognises that there is particular potential to enhance the attractions of the Tottenham Court Road/Eastern Oxford Street Area and to realise its development potential. It sets out targets for this ‘Opportunity Area’ to achieve at least 1,000 new homes and capacity for 5,000 new jobs between 2001 and 2026.



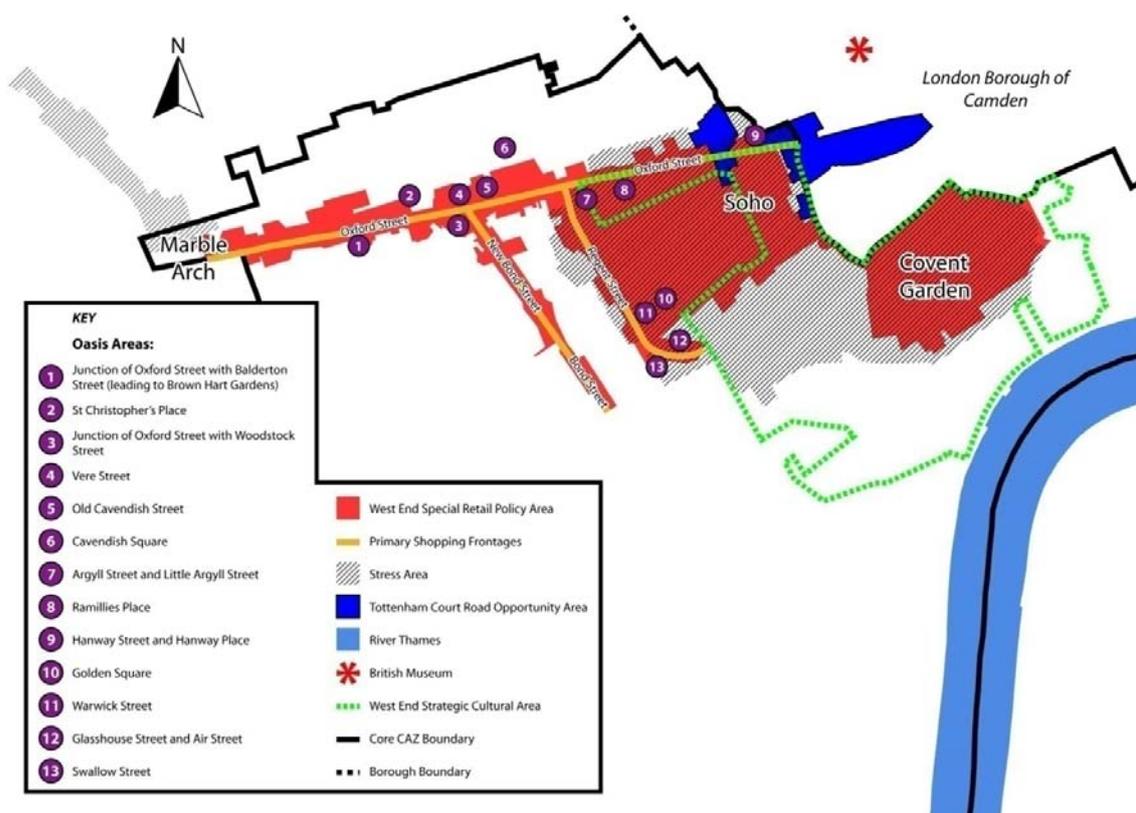
MAP 17 TOTTENHAM COURT ROAD OPPORTUNITY AREA

- 5.54 Westminster's Core Strategy Submission document boundary reflects the indicative boundary in the Mayor's Sub-Regional Development Framework (SRDF). It includes sites required and appropriate for the development of Crossrail, a large postal sorting office site and a large retail site at the junction of Oxford Street and Tottenham Court Road, all of which offer potential for large-scale regeneration and growth. The SRDF highlights additional sites across a wider area in the London Borough of Camden which will be expected to absorb a large proportion of the predicted growth.
- 5.55 The boundary/potential sites for inclusion in Westminster's part of this Opportunity Area were set out in the council's Issues and Options report May 2007, with Map 2 showing Potential Development Sites (taken from the ORB Action Plan) and Development sites with planning briefs (now adopted) relating to Crossrail Line 1. Maps 1 and 3 showed the potential boundary for the 'Area of Intensification/Opportunity Area'.
- 5.56 In Option 2B of the Issues and Options consultation document, we asked whether the Victoria and Tottenham Court Road 'Areas of Intensification' should be re-designated 'Opportunity Areas' as proposed in the draft further alterations to the London Plan. However, following consultation on this document, the Mayor published 'The London Plan Spatial Development Strategy for Greater London Consolidated with Alterations since 2004', (February 2008), which re-classified Tottenham Court Road as an 'Opportunity Area', making Option 2B of the Issues and Options document somewhat redundant. The majority of consultees at Issues and Options stage agreed that we should designate Tottenham Court Road as an Opportunity Area to be in general conformity with the London Plan.
- 5.57 The Sustainability Appraisal of this option highlighted social and economic benefits, that would be relevant to some extent, regardless of the detailed Opportunity Area boundary. It recognised that any negative effects could be mitigated through other policy measures to, for example, improve the public realm. Problems associated with intensified use could be offset by the provision of green management plans.
- 5.58 These issues were taken forward through the Preferred Options stage. The Preferred "boundary" was shown on map PO13, with details added to the preferred option to set out mitigation measures such as the requirement for public transport and public realm improvements to be provided with suitable new developments. The Sustainability Appraisal at this stage recognised that this option provided a well balanced sustainable approach for development. There weren't considered to be any appropriate or indeed necessary alternatives, as the Opportunity Area (OA) already included the area's key

development sites, and not adopting an OA would have raised conformity issues with the London Plan.

5.59 Following advice from the GLA on the Preferred Option, we drew a boundary line linking up the key development sites, as presented in the Core Strategy Submission document. Further details were added to the policy to clarify its specific objectives. The draft Sustainability Appraisal of the Submission Draft document highlighted the potential positive impact of the TCROA policy on public realm and pedestrian movement. Development here, including improvements to public transport provision, will act as a catalyst for further private sector investment and improve the built fabric, with the increase in passenger numbers and visitors proposed to be mitigated through public realm improvements and way finding schemes.

### WEST END SPECIAL RETAIL POLICY AREA



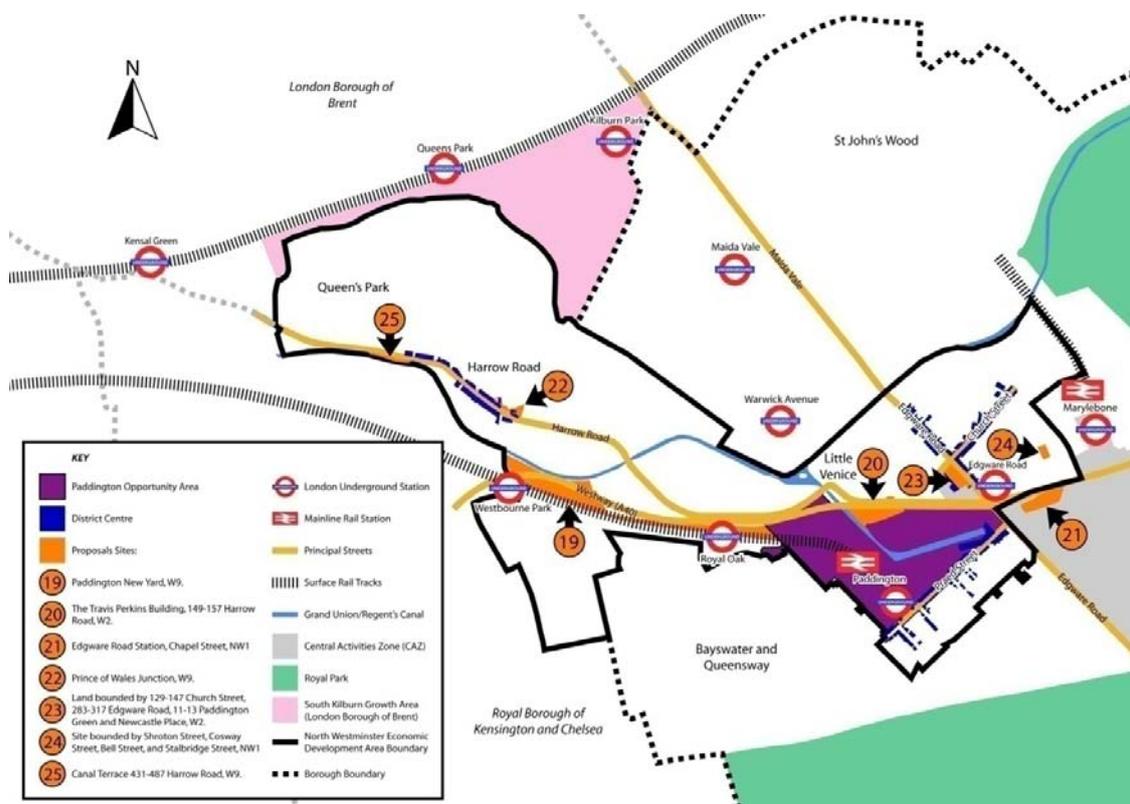
MAP 18 WEST END SPECIAL RETAIL POLICY AREA

5.60 The Report of the Mayor's West End Central Retail Area Planning and the London Plan, which in turn has been developed by the council.

- 5.61 Development Commission November 2006 made recommendations for tackling the transport and infrastructure issues that are key to sustaining the West End as a world class shopping destination. The work of the Commission led to the Mayor proposing a West End Special Retail Policy Area in the draft further alterations to the London Plan.
- 5.62 Westminster's WESRPA boundary covers the main concentration of retail activity along and in proximity of the Primary Shopping Frontages, in general conformity with the Mayor's London Plan.
- 5.63 In addition it includes key sections of the New West End Company Business Improvement District (as NWEC requested), and wider Soho and Covent Garden areas (again requested through consultation). As paragraph 5.181 of the London Plan explains: the West End Special Retail Policy Area (focused on the frontages along Oxford, Bond and Regent streets, Tottenham Court Road and part of new Oxford Street) is by far the largest retail area in London and the UK.
- 5.64 Option 4A of the Issues and Options consultation document asked if we should designate a West End Special Retail Policy Area (WESPRA) as proposed by the Mayor, and if so, what the WESPRA should seek to do. As the WESRPA was a concept at this stage, no indicative boundary line was mapped.
- 5.65 Although the council originally questioned the need for this additional policy layer in its response to the draft further alterations to the London Plan, it has subsequently taken the opportunity to designate a WESPRA to enhance the west end as a global shopping destination.
- 5.66 In response to consultation on the Issues and Options, slightly more people responded that we should designate a WESRPA, rather than not. The Sustainability Appraisal of this stage highlighted the social and economic benefits of designating a WESRPA. Promoting an area as a visitor destination can have positive economic and social effects, providing job and training opportunities, although the intensification of uses can have adverse environmental effects, some of which can be mitigated against, for example by requiring sustainable design, and improvements to the public realm.
- 5.67 Three spatial options for the West End were set out in the Preferred Options consultation document, as shown on map PO10.

- 5.68 Preferred Option 10 was to designate a West End Special Retail Policy Area (WESRPA) with regard to the London Plan, within which: retail growth; an improved pedestrian environment; improved public transport provision and access to it; and improved linkages to and from surrounding shopping areas and visitor attractions, were all listed as priorities.
- 5.69 The Sustainability Appraisal at this stage highlighted that this option would help meet the international need for retail floor space in central London, and that as the West End is highly accessible by public transport, so this option could help reduce use of private cars.
- 5.70 Alternative Option 10-A proposed a WESRPA covering a wider area including Carnaby Street, Soho and Covent Garden, the social, environmental and economic impact of which would differ very little from that of the Preferred Option above.
- 5.71 Maintaining the council's existing Unitary Development Plan (UDP) approach to protecting retail in the International Centre's Primary Shopping Frontage, without designating a WESRPA (Alternative Option 10-B), would have raised general conformity issues with the London Plan. Similarly, option A.5.1 to not designate a WESRPA, and allow the market to dictate where retail concentrations occur was rejected because it is contrary to mayoral guidance, and could have detrimental effects on this internationally important shopping area. Option A.5.2 to designate a WESRPA covering the whole of the West End was also rejected as it would dilute the WESRPA policy aim.
- 5.72 The submission draft WESRPA boundary is based around that of alternative option 10A. Although Soho and Covent Garden do not provide the same scale of retail development as found in the Primary Shopping Frontages (Oxford, Regent and Bond streets), they are still important to the West End's retail function, and would benefit from improved retail space. Their inclusion was requested through consultation on the Preferred Options document.
- 5.73 The policy has been drafted to offer greatest protection for the Primary shopping Frontages and their environs, whilst encouraging improvements to the wider West End/Soho/Covent Garden area. The submission draft policy was written to encourage appropriate retail growth and an improved pedestrian environment which would benefit this wider area.

## NORTH WESTMINSTER ECONOMIC DEVELOPMENT AREA



MAP 19 NORTH WESTMINSTER ECONOMIC DEVELOPMENT AREA

5.74 The North Westminster Economic Development Area has been designated to encourage economic development, growth and tackle social deprivation in this area. The London Plan Policy 2A.7 designates most of this area as an area for regeneration prioritising this as an area for action and investment.

5.75 Westminster's Submission Draft Core Strategy document has a boundary for the area which largely reflects the Enterprise Zone identified in Westminster's Economic Development Strategy (2008-2011). It includes four of the five wards suffering the greatest deprivation within Westminster Church Street, Westbourne, Harrow Road and Queen's Park. Within the Boundary of the EDA is the Paddington Opportunity Area and the Paddington Business Improvement District.

5.76 At the Issues and Options stage Option 2C Economic Activity in North Westminster, asked a number of questions. The questions related to (i) extending the boundary of the existing Unitary Development Plan designation for Paddington Special Policy Area to include the North Westminster Community School and Dudley House site (included in section above on Paddington Opportunity Area), (ii) extend the Edgware Road and Marylebone

Road CAZ frontage designations (this is dealt with in the section above on CAZ), (iii) allow greater flexibility for non-retail commercial uses in the Church Street and Harrow Road District Shopping Centre. (iv) Should we designate an 'Enterprise Zone' in the north west of the City where 'affordable business space', similar to affordable housing should be provided in certain schemes. This was accompanied by a new boundary for the North Westminster Economic Development area, which broadly reflects the boundary included in the Economic Development Strategy, with the Paddington BID added to ensure that economic initiatives and benefits are a catalyst for the wider regeneration of the north west. See Map 1 Issues and Options report May 2007, Map 2 also identifies the Opportunity Sites in this area.

- 5.77 The Sustainability Appraisal of this option highlighted a number of social, economic and environmental benefits. Together these would contribute to the holistic regeneration of North Westminster. However, the appraisal recognised that intensification of uses in the area would create more traffic, subsequently air and noise pollution. These negative impacts would be mitigated by other policy options.
- 5.78 To establish the way forward and to come up with the Preferred Option and Alternative Option in the Preferred Options document all comments from consultation were reviewed. This generated the three options found in the Preferred Options document. These included the designation of the North Westminster Economic Development Area boundary as presented in the Issues and Options see Map PO14 North Westminster Economic Development Area. The alternatives included retaining the current North West Westminster Special Policy Area (NWWSPA) as shown on the Map AO14B. Retaining this approach was discounted as it was felt that the existing designation should include Church Street, which is Westminster's most deprived ward and any policy approach should stimulate economic and social regeneration should be included in the Core Strategy. An Alternative Option 14-A which was not to designate an area in the north west of Westminster, but instead to apply the approach currently used for sites outside of the Central Activities Zone, in other words no intervention. The North Westminster Planning Study (2000) Final Report October 2000 does not support this option and indicates the need for a different approach to regenerate this part of Westminster. Failing to designate this area would result in a non-conformity issue with the London Plan.
- 5.79 The Sustainability Appraisal for PO14 had the most positive social, economic and environmental affects of all the options presented under the heading promoting Economic Activity in North Westminster. The other two options have a neutral social and environmental impacts and overall negative economic impacts. Alternative Option 14-A does not deal with the economic

situation and wider deprivation in area. Alternative Option 14-B limits people's chances to access economic opportunities, fails to maintain and build on economic diversity and encouraging local employment in this area has a negative economic impact.

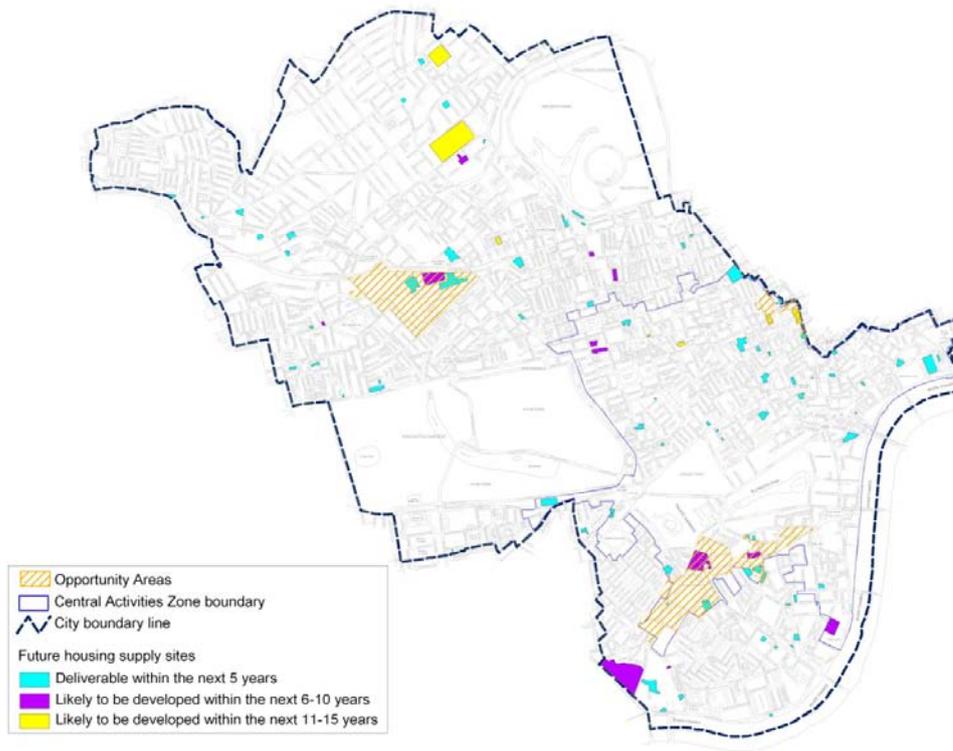
5.80 The final boundary in the Submission Draft / Submission Core Strategy stage reflects PO14 as a result of comments made by stakeholders and communities. Minor amendments were made to the boundary around the western edge of the Paddington Opportunity Area to ensure the North Westminster EDA Boundary followed the Paddington Opportunity Area. The draft Sustainability Appraisal at this stage recognised that this option provided a support for investment and enterprise, diversified the range of businesses in the district shopping centres and secured social and community facilities for local people. Therefore, this represents a holistic approach to regenerating the area. Negative environmental impacts still affected the area despite this improvements the public realm and other policy approaches towards reducing pollution would make a contribution towards mitigating these.

#### PRIORITY AREAS FOR HOUSING

5.81 The priority for housing has been a longstanding policy in Westminster. Although there are no strategic policies in the UDP which set this out, the reason and justification for Policy STRA 14: Protecting and Providing Housing, states '...it is important that housing should continue to be the highest priority in the Plan.' This priority needs to be continued through the LDF because:

*PPS3 states that LPAs must deliver new homes to meet growing needs, and that housing should be on brownfield sites to safeguard greenfield sites Population is projected to increase Borough Housing Target is 680 pa to 2011 when it is likely to increase. High levels of overcrowding and homelessness in Westminster Need for sustainable communities in central parts of Westminster to add diversity and vitality to commercial character More residents in Westminster can play a part in reducing the need to travel/commute. The Issues and Options document therefore set out the quandary:*

- How to strike the balance between growth in housing and employment whilst meeting our housing challenges.



MAP 20

The following comments were received on this matter:

- If there are other benefits such as pioneering sustainability measures or other public realm and infrastructure improvements which benefit the whole area but only in such cases otherwise the need for housing remains the key priority.
- We are in agreement with the City Council's policies which give priority to the provision of housing in Westminster and also that the diversity of uses provides an attractive environment.
- ....adapting to, and mitigating, the effects of climate change and delivering sustainable development should be the highest priority of the Core Strategy. Indeed, this should probably replace the current highest priority which is attached simply to the provision of housing in the RUDP.
- The priority must remain social rented housing. This is particularly important in Westminster where in most areas of the City very high well - above - average incomes are needed to access intermediate housing.
- Homes for low income persons a priority.
- The City Council should continue to meet the needs of increased numbers of affordable units as the top priority (small units) and second priority to family sized larger units – according to the best demographic and demand data available.

- Affordable housing should be the first priority, but we recognise the difficulties and extra costs that arise from providing a mix of uses in the one development. We are flexible as to where affordable housing should be provided, it is not necessary always to provide it in the vicinity of the commercial development.
- Following on from the Issues and Options consultation, It was considered necessary to have a clear strategic policy statement in the Core Strategy which stated what the priority land use was in different areas. The Preferred Options document therefore sought to ascertain whether there was support for housing as a priority, and whether there should be areas with different priorities, and if so which areas should have other priorities.
- The Preferred Options document, published in July 2008 sought to gain views on this issue by presenting the following policy options:

PO 1b) (part):

Having housing as the priority across Westminster except in specified circumstances in the OAs, WESRPA, NWEDA, and SPAs.

AO 1A :Having housing as priority use Citywide

AO 1B: Housing should not be the priority use in CAZ

5.82 PO 1b) was chosen as the preferred option because it contributed most to meeting the stated objectives, most conformity with the London Plan, and the most positive sustainability appraisal of the 3 options. AO 1A was not chosen as the preferred option because it does not include the important exceptions cited in the preferred option which are essential to meet the objectives of the London Plan, the regeneration of North Westminster, and protect the character of the SPAs. AO 1B: was not chosen as the preferred option because a) Excluding the Central Activities Zone (CAZ) from the general presumption that housing will be the priority use would be to reduce the supply of new homes coming forward, and fail to deliver an appropriate mix of uses. Between a quarter and a third of future new homes in the city are expected to be located in the Central Activities Zone and its exclusion would jeopardise the achievement of the City Council's housing targets. Housing is also important to the unique mixed use character of Westminster's CAZ, b) The exceptions specified in the preferred option, which with the exception of NWEDA, are within the CAZ, are considered to respond to the specific circumstances of those areas, and c) this option had the least favourable sustainability appraisal.

The Sustainability Appraisal of PO 1b was in summary:

5.83 This option has a positive social impact by ensuring the provision of appropriate housing types to meet homeless, affordable, intermediate, over

crowding and family unit demands; and by promoting health and well being. It has a positive impact on 3 of the 11 criteria by employing sustainable design and construction, minimising flood risk, and reducing the need to travel. It has a neutral economic impact.

- 5.84 The Sustainability Appraisal of AO 1A was in summary: Increasing the number of homes will have a positive social impact by ensuring the provision of appropriate housing types to meet homeless, affordable, intermediate, over crowding and family unit demands; and by promoting health and well being. However, there would be a negative effect on the economy as commercial floorspace is lost to housing. If negative environmental effects are to be avoided it is vital that developments should adhere to the highest sustainability standards

The Sustainability Appraisal of AO 1B was in summary:

- 5.85 This option would have a neutral social impact on all 4 criteria. This is because much fewer homes would be built in the CAZ therefore the community living in CAZ would not be increased nor would additional social and community facilities be provided. Fewer new housing developments would also mean fewer new affordable homes (and therefore less provision to tackle homeless and overcrowding needs) with the consequential effects on health and well-being. However, there would be a positive effect on the economy as commercial floorspace is increased; ensuring equality of opportunity and improve opportunities for education, training and employment and maintain economic diversity increase local opportunity and support sustainable economic growth. If negative environmental effects are to be avoided it is vital that developments should adhere to the highest sustainability standards. Unlike the other 3 options, this option does not score a positive for criteria 11 - reducing the need to travel as fewer new residents in the CAZ but more jobs as a result of the increase in commercial development, means more people travelling into central London from outside rather than being able to walk to work.

- 5.86 Comments received on these 3 options were:

- Equal priority for encouraging commercial and residential development in Core CAZ reflecting the need to ensure adequate capacity to meet future demand for new commercial space within the country's most important strategic office location
- Making housing the priority use in WESRPA, North West Economic Area and SPAs should not preclude other appropriate uses where they support the resident population.

- Whilst housing is identified as the priority use across Westminster, PO1(b) excludes housing as a priority use in SPAs, and PO1(b) constrains the potential for properties and land to be redeveloped for residential use.
- Housing should not be a priority use in existing retail centres, especially as retail growth is to be directed to them. Retail centres, including the WESRPA and CAZ, should therefore be cited as exceptions.
- The recommendation that the prime retail Tottenham Court Road Station site (Ref H) includes residential is not supported
- The Hanover Square Great Portland Estates Development (Ref X) is identified as including residential, but the inclusion of residential elements within the three key shopping streets is not supported.
- PO1 does not properly support the delivery of the Spatial Vision (specifically the city's 'continued economic success') because it does not place equal emphasis on the delivery of housing and new commercial development (with too little emphasis placed on the latter).
- Objection to the designation of specified sites for uses other than residential (in PO1(d)).
- PO1(b) should recognise that there may be circumstances other than the 4 scenarios listed where uses other than housing may be appropriate for a site (e.g. to meet the requirements of a particular occupier).
- It is not appropriate that sites qualifying under PO1(a) as suitable locations for commercial development (i.e. within CAZ) should be regarded in the first instance for residential use.
- There is concern that the role of housing in the CAZ is over emphasised to the detriment of commercial uses which includes retail uses.
- The role increased and improved commercial floorspace has to play in the future economic wellbeing of Westminster must be given the highest priority.
- The Property Division would express its concern that those sites which, due to their size; relatively short-term availability; and unconstrained nature; have been identified as Opportunity Areas within the 2008 London Plan, are excluded from PO1, which states that housing should be the priority use. This approach puts at risk housing delivery in Westminster as it is those sites which fall within the Opportunity Areas that have the greatest potential to accommodate significant amounts of new housing.
- The Council must recognise that simply promoting sites for business development does not address the underlying market forces which make North West Westminster an unattractive proposition for employers, which include the perception of the area, the quality of the public realm,

crime and antisocial behaviour and a comparatively failing retail centre in Harrow Road. This is of particular concern when vacant sites are not being brought forward for residential development because the Council is promoting the use of the sites for commercial schemes.

5.87 In taking into account these comments and the sustainability appraisal, the Core Strategy (Submission draft) policy CS14 states:

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

5.88 The supporting text to this policy provides further explanation as follows:

- To achieve and exceed Westminster's housing targets it is necessary to protect existing housing and have housing as the priority use across the city.
- In most circumstances employment uses will be permitted to change use to residential, and residential use will need to grow alongside expansion in commercial floorspace.

5.89 Policies relating to Special Policy Areas (Policy CS2), the Opportunity Areas (Policies CS3, CS4 and CS5), Core CAZ and the West End Special Retail Policy Area (Policies CS6 and CS7), and North Westminster Economic Development Area (Policy CS12) have other priorities in addition to housing.

5.90 Reference to the SPAs was dropped from the Submission draft policy as detailed policies on the SPAs will be included in the City Management Plan.

5.91 The Local Spatial policies evolved through out the development of the Core Strategy and a summary of these are shown in Table M below

**TABLE M** EVOLUTION OF LOCAL SPATIAL POLICIES IN THE SUBMISSION DRAFT CORE STRATEGY

Key Strategic Spatial Options	Issues and Options	Preferred Options	Submission Draft
CAZ	<p>This sets out the current UDP Approach to CAZ, CAZ Frontages, PSPA</p> <p>Option 2A – Central Activities Zone Boundary</p> <p>Should we extend the CAZ boundary as proposed in the draft further alterations to the London Plan?</p>	<p>Map PO7 contains a map showing: Boundary for CAZ, Boundary for Core CAZ Boundary for a number of special policy areas Thames Policy Areas</p> <p>Readers are invited to comment on the CAZ boundary and taking different approaches to different parts of CAZ.</p> <p>Alternative Options propose Keeping the UDP CAZ boundary not adopting LP boundary LP boundary but exclude Royal Parks (this option is mapped) Extend LP boundary to include more of Edgware Road and Marylebone Road (this option is mapped)</p>	<p>Core CAZ and CAZ are identified in the Core Strategy CS1, CS3,CS4, CS5, CS6,CS8, CS9 , CS10,CS11</p>
Victoria Opportunity Area	<p>Should the Victoria and Tottenham Court Road ‘Areas of Intensification’ be re-designated ‘Opportunity Areas’ as proposed in the draft further alterations to the London Plan and can the projected</p>	<p>Victoria - preferred option is mapped</p> <p>Alternative Options:</p>	<p>Victoria Opportunity Area CS4</p>

Key Strategic Spatial Options	Issues and Options	Preferred Options	Submission Draft
	increase in jobs and homes be accommodated?	1 wider alternative boundary encompassing	
Paddington Opportunity Area	Should we extend the Paddington Special Policy Area to include the North Westminster Community School and Dudley House sites?	<p>Paddington – preferred option is mapped as including North Westminster Community School and Dudley House</p> <p>Alternative Options:</p> <p>Designate the extent of the Paddington Opportunity Area as the same as the Paddington Special Policy Area</p> <p>Designate the extent of the Paddington Opportunity Area as set out as an indicative working boundary in the Mayor of London’s Central Sub Regional Development Framework (SRDF)</p>	Paddington Opportunity Area CS3
Tottenham Court Opportunity Area	Should the Victoria and Tottenham Court Road ‘Areas of Intensification’ be re-designated ‘Opportunity Areas’ as proposed	<p>Preferred option is mapped</p> <p>No alternative options identified.</p>	The Submission draft takes forward the preferred option boundary. Tottenham Court Road Opportunity Area, CSS5
in the draft further alterations to the London Plan and can the projected increase in jobs and homes be accommodated?			

Key Strategic Spatial Options	Issues and Options	Preferred Options	Submission Draft
West End Special Policy Retail Area	Option 4A – West End Retail Special Policy Area Should we designate a West End Special Retail Policy Area (WESPPA) as proposed by the Mayor in the draft further alterations to the London Plan? If so what should the WESPPA seek to do?	Preferred Option 10 The preferred options boundary for PO10 WESPPA is shown on Map PO10  Alternatives options (also shown on map PO10):  Widening WESPPA to include Carnaby St, Soho & Covent Garden  Maintain existing UDP approach focussed on Primary Shopping Frontages solely rather than wider West End area.	The Submission draft WESPPA is widened to include Carnaby St, Soho & Covent Garden taking forward the alternative CS7
North Westminster Economic Development Area	Highlights the existing North Westminster Special Policy Area identified in the UDP and the need to improve local employment in NW Westminster.  Option 2C (iv) states “designate an ‘Enterprise Zone’ in the north-west of the City where ‘affordable business space’, similar to affordable housing, should be provided in certain schemes?”	PO14 – Designate NWEDA shown on Map PO14  Alternative options: Retain the NWSPA in UDP (mapped in Map AO 14B)  Do not have a NWEDA	CS 12

Key Strategic Spatial Options	Issues and Options	Preferred Options	Submission Draft
Priority Areas for Housing	Highlights the projected increase in population and Westminster's borough target and the acute need for affordable homes, as well as the world city function, and asks how to strike the balance between growth in housing and employment whilst meeting these housing challenges.	PO1 Having housing as the priority across Westminster except in specified circumstances in the OAs, WESRPA, NWEDA, and SPAs. AO1A Having housing as priority use Citywide AO1B Housing should not be the priority use in C	CS 14 Residential use is the priority across Westminster except where specifically stated. Areas with different priorities are the OAs, WESRPA, and NWEDA

## APPRAISAL OF PROPOSED SUBMISSION DRAFT CORE STRATEGY

5.92 This section summarises the potential significant effects of the implementation of the Submission draft Core Strategy, looking at cumulative, short, medium and long term; permanent or temporary; and cross boundary implications. The appraisal process identified these effects and informed the recommendations for mitigating or avoiding negative impacts, as shown on policy assessments and summarised in this section. Before undertaking the detailed policy assessment a high level appraisal of the Core Strategy Vision and Objectives was undertaken to determine possible conflicts and synergies between the Core Strategy objectives and sustainability objectives.

### CORE STRATEGY VISION AND OBJECTIVES

5.93 Westminster's Core Strategy sets out the vision for the city of Westminster up to and beyond 2025, and puts in place a policy framework to deliver that vision. Westminster's Core Strategy is the principal document in the LDF. All future documents in the LDF will flow from, and have to be consistent with, the Core Strategy. The Core Strategy has set a vision for the pattern and location of development in Westminster and builds on the plans and programmes of its partners in Westminster to deliver this vision. The Core Strategy was developed in the context of other plans and Strategies, to provide a comprehensive planning framework. It has taken into account plans and strategies that affect Westminster, the London Plan and national planning policies. Links to these plans and strategies are available on our website:

[www.westminster.gov.uk/ldf](http://www.westminster.gov.uk/ldf)

### THE WESTMINSTER CITY PLAN 2006-2016

5.94 The City Plan, required by the Local Government Act 2000, is the Sustainable Community Strategy for Westminster. It sets a vision for the future and outlines key aims and priorities to achieve this vision over the next ten years. It is prepared by Westminster's City Partnership, and all partners share in its visions and goals. The City Plan's vision is that by 2016

5.95 "Westminster will be the best city to live in, work and visit in the UK, a vibrant city with great quality of life, strong, united communities and excellent services, offering real opportunities for everyone to achieve a better future.

5.96 The City Plan is the 'umbrella strategy' for other strategies and plans for all of the partners. The LDF should be the 'spatial expression' of the City Plan,. The goals of the City Plan are:

- An improving city environment – Developing a safer, more sustainable, well designed and distinctive city: A safer city; A more sustainable, cleaner and greener city; A well-designed and distinctive city
- Better life chances for all our citizens – Improving health, care, housing, learning, employment and enterprise opportunities in an economically thriving city: A better city for children and young people: A city of opportunity where everyone can improve their life chances, well being and health; A strong city economy with a skilled workforce and successful businesses
- Strong, united and engaged communities – Building a stronger and more united city: A more united city; A stronger voice for local people in shaping their city
- Customer tailored services – Better meeting customer needs, better understanding community priorities, and delivering to meet them: Accessible services; locally focused services

#### WESTMINSTER'S LOCAL AREA AGREEMENT (2008-2011)

5.97 This is an agreement between Westminster City Partnership and the government whereby funding is provided to deliver agreed outcomes, and is effectively the delivery agreement of the sustainable community strategy, the City Plan. The funding is used to support a range of local services, delivered either by the council, local health services or the Police, or commissioned from other providers. The outcomes framework in the Local Area Agreement (LAA) provides a clear and effective delivery mechanism for the aims of our local strategic partnership as articulated in our City Plan.

5.98 There are four interlinked themes/goals running through the City Plan. These are set out below with associated Local Area Agreement priorities, and with examples of how the LDF can contribute to their delivery. The LDF will play a key role in delivering the City Plan vision and objectives, and Local Area Agreement priorities.

#### ONE CITY PROGRAMME (2005-2010)

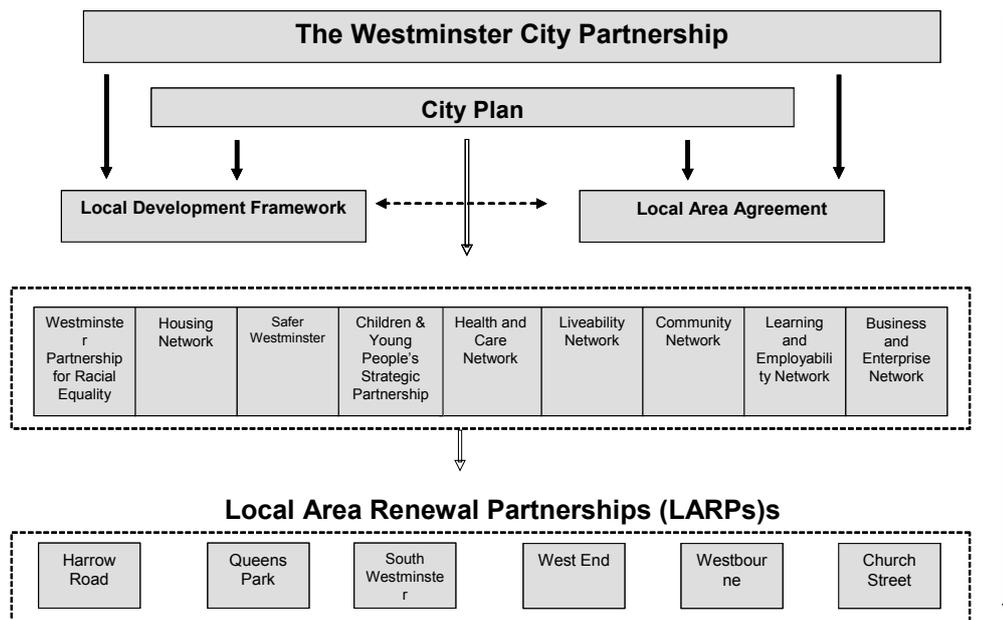
5.99 1.8.7 Westminster City Council's 'One City' programme (2006-10) shows how the City Council will take forward the City Plan's priorities. The Council's objective is to make Westminster the best governed city in the world that is bound together by strong communities and supported by excellent services. To achieve this One City has four strands:

- Order, covering the management of the street environment;
- Opportunity, covering social service, leisure, housing and education

- Enterprise, including plans for business, employment and training;
- Renewal, covering the future of our streets and open spaces.

5.100 In addition to the City Plan, the Local Area Agreement and One City Programme, there are a number of other locally based plans and strategies that influence the Core Strategy. Appendix 2 identifies those relevant Westminster City Council plans and strategies, and those of our partners.

**Structure of the Westminster City Partnership**



**FIGURE 8** STRUCTURE OF WESTMINSTER CITY PARTNERSHIP

**WESTMINSTER’S SPATIAL VISION**

5.101 The Core Strategy’s vision for the future of Westminster – seeks to implement the City Plan’s (the sustainable community strategy) vision whilst addressing the challenges facing the City and taking into account other plans and strategies and views of the community and stakeholders.

5.102 It seeks to implement the City Plan’s Vision that by 2016 “Westminster will be the best city to live in, work and visit in the UK, a vibrant city with great quality of life, strong, united communities and excellent services, offering real opportunities for everyone to achieve a better future.”

5.103 To make Westminster the foremost world class sustainable city; A city which values its unique heritage and accommodates growth and change to ensure

the city's continued economic success while providing opportunities and a high quality of life for all its communities and a high quality environment for residents, workers and visitors alike.

- 5.104 Westminster's Core Strategy Vision has been modified since the previous Core Strategy Preferred Options to include a high quality environment as part of its key aims. This spatial vision give a detailed description of the intent for growth development in the city and addresses the borough's challenges to protect its heritage, accommodate population and economic growth and provide jobs and high quality of life over the next 20 years. Westminster is significantly constrained and predicted change is likely to be incremental.
- 5.105 There is a clear link between the Spatial Vision and the Core Strategy objectives.
- 5.106 The spatial vision is positive from sustainability prospective, with in terms of delivering high quality of life, a high quality environment and sustainable economic growth, while safeguarding its heritage.
- 5.107 Westminster is seeking to ensure it protects and improves social, economic and environmental quality.
- 5.108 In order to realise the vision, effective implementation of policies in the Core Strategy, City Management Plan and other Supplementary Planning Documents, is essential. Other factors such as the health of the economy, and working in partnership will also help contribute to delivering the spatial vision for Westminster.
- 5.109 The vision is short, and more detail on the aims of the vision is given in the Core Strategy Objectives.

#### CORE STRATEGY OBJECTIVES

- 5.110 The Core Strategy Objectives have been modified since the previous Core Strategy Preferred Options, resulting in more objectives.
- 5.111 The objectives for Westminster are not specifically locally distinctive or unique; Westminster shares many of the aspirations and aims of other local authorities across the country. However, Westminster also faces particular issues and challenges, such as accommodating strategic land uses within a unique Central

London mix, heritage assets, lack of available land, housing and competing land uses, people pressure, inequalities, adaptation to and mitigating for climate change which are all reflected in the vision and objectives.

The main Core Strategy objectives are set out in Table N below.

**TABLE N WESTMINSTER CORE STRATEGY OBJECTIVES**

	Objective
1	To accommodate growth and change that will contribute to enhancing London's role as a world class city, including its international business, retail, cultural and entertainment functions within the Central Activity Zone; whilst maintaining its unique and historic character, mix, functions, and townscapes.
2	To sensitively upgrade Westminster's building stock to secure sustainable and inclusive exemplary design which minimises energy and resource consumption and the production of waste, reduces the impacts of local environmental pollution and meets both today's needs and those of the future, including the effects of a changing climate; creating attractive places that function will whilst ensuring that the historic character and integrity of Westminster's built fabric and places is enhanced.
3	To maintain and enhance the quality of life, health and wellbeing of Westminster's residential communities; Ensuring that Westminster's residents can benefit from growth and change, providing more employment and housing opportunities, safety and security, and better public transport and local services; to work with partners to foster economic vitality and diversity, improved learning skills, and improved life chances in areas of deprivation.
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.
5	To manage pressures on the city from its national and international roles and functions, business communities and tourism, including the 2012 Olympics and Paralympic Games and their legacy, and to ensure a safe and enjoyable visitor experience.
6	To accommodate the safe and efficient movement of growing numbers of people entering and moving around Westminster by facilitating major improvements to the public transport system, improving public realm and pedestrian environment, managing vehicular traffic, and making walking and cycling safer and more enjoyable.
7	To protect and enhance Westminster's open spaces, civic spaces and Blue Ribbon Network, and Westminster's biodiversity; including protecting the unique character and openness of the Royal Parks and other open spaces; and to manage these spaces to ensure areas of relative tranquillity in a city with a daytime population increased every day by over 1 million workers and visitors.

## ANALYSIS OF CONFLICTS AND SYNERGIES BETWEEN CORE STRATEGY AND SUSTAINABILITY OBJECTIVES

Sustainability Objective									
Compatible	Neutral or uncertain	Incompatible							
1 Cohesive, safe communities	=	=	+	+	=	=	=	=	
2 Reduce crime and fear of crime	=	=	+	=	=	=	=	=	
3 Housing types	=	=	+	+	=	=	=	=	
4 Health and well-being	=	+	+	+	=	=	=	=	
5 Climate Change	+	+	=	=	=	+	+	+	
6 Sustainable Design	+	+	+	=	+	=	=	=	
7 Flood risk and Water Quality	-	+	=	=	=	=	=	+	
8 Biodiversity	-	+	=	=	=	=	=	+	
9 Air Quality	=	+	=	=	=	=	=	+	
10 Noise	-	+	=	=	=	=	=	+	
11 Reduce Travel	+	-	+	=	+	+	+	=	
12 Reduce Waste	-	+	-	+	+	=	=	=	
13 Cultural Heritage	+	+	=	=	+	=	=	+	
14 Public Realm	=	+	=	=	+	+	+	=	
15 Open Space	=	+	=	=	=	=	=	+	
16 Equality of Opportunity	+	+	+	+	+	=	=	=	
17 Economic Diversity	+	+	+	=	+	+	+	+	
Core Strategy Objective	1 Growth	2 Heritage	3 QoL	4 Housing	5 Tourism	6 Transport and public realm	7 Open space, biodiversity and health and well being		

**FIGURE 9** COMPATIBILITY MATRIX FOR CORE STRATEGY OBJECTIVES AND SUSTAINABILITY APPRAISAL OBJECTIVES

- 5.112 The Westminster Core Strategy objectives are in general accordance with the sustainability objectives and principles. The aim of testing the Core Strategy objectives against the sustainability objectives set out in the framework was to check that this is the case. The Core Strategy objectives have been tested against the SA objectives by means of a compatibility matrix. Figure 8 below shows the potential tensions between Sustainability Objectives and Core Strategy objectives.
- 5.113 Where possible tensions were identified, thought and consideration has been given to how tensions can be avoided or mitigated as illustrated in Table O below and reflected where appropriate in the Core Strategy.
- 5.114 The scale of significance of some effects will depend on implementation of policies in the Core Strategy, City Management Plan DPD, Supplementary Planning Documents, Planning Briefs and Area Action Plans.
- 5.115 Generally the effects of strategic vision and local spatial policies are predicted to be long term, and permanent.
- 5.116 Although it is inevitable that some conflicts between the Core Strategy and sustainability objectives exist, it is clear overall that the majority of objectives are compatible.
- 5.117 Key conflicts arise from the need for economic growth, housing provision, including affordable housing, jobs and the need to preserve the natural and historic environment. Population growth, housing and job targets require that this space be found and the impacts on the natural and historic environment avoided or mitigated.
- 5.118 Whether these conflicts happen and how significant they may be will depend, in part, on how the objectives are implemented and whether negative effects are avoided through the implementation of safeguarding policies in the Core Strategy DPD and City Management Plan DPD and Supplementary Planning Documents, such as Sustainable Design SPD.
- 5.119 Economic growth objectives largely conflict with environmental objectives. This is predominantly due to the potential effects such as increased traffic, congestion, increased population living in new homes, increased resource use and waste generation.

- 5.120 The need to minimise flood risk, waste production and to conserve resources are inconsistent with the need for more housing and economic growth. It is therefore essential that mitigation through planning obligations and S106, as well as implementation of Building Regulations are used to help deliver sustainable buildings, reduce and avoid flood risk and reduce waste produced and resources used. Mitigation through City Management Plan Development Plan policies and Supplementary Planning Documents and their implementation will also help to mitigate for consequences of conflicting objectives.
- 5.121 Net increases in emissions, resource use and waste likely compared to current baseline.
- 5.122 This is significant, as these problems already exist in the city and standards are already being exceeded for Air Quality on major roads, and Noise nuisance in certain areas.
- 5.123 Some Core Strategy objectives identified that conflict with sustainability objectives, may not cause significant effects. For example, Growth and quality of life may result in increased traffic, poorer air quality and climate change impacts. It may come about that local journeys may increase but longer journeys may reduce.
- 5.124 Housing and economic growth may conflict with environmental objectives, with regard to traffic, water and energy use, air quality, climate change, waste production and movement. Where this does occur it is essential to reduce or avoid these effects as much as possible.
- 5.125 Some of the potential conflicts identified are inevitable as delivering some of the objectives in the Core Strategy will be a trade off between different sustainability issues. To meet housing needs, as set out in higher level policy in the London Plan requires Westminster to deliver a certain level of growth and therefore the priority for the DPD is to maximise benefits of housing provision and mitigate the negative effects.
- 5.126 This is also the case for providing capacity for new jobs and is a priority in the DPD.

5.127 Taking account of the synergies and conflicts of the Core Strategy and Sustainability Objectives a number of recommendations to enhance or mitigate effects have been proposed. These are detailed in Table O below.

**TABLE O** RECOMMENDATIONS FOLLOWING APPRAISAL OF CORE STRATEGY OBJECTIVES

Core Strategy Objective	Recommendations
<p>1 To accommodate growth and change that will contribute to enhancing London’s role as a world class city, including its international business, retail, cultural and entertainment functions within the Central Activity Zone; whilst maintaining its unique and historic character, mix, functions and townscapes.</p>	<p>This objective focuses mainly on the Central Activity Zone, reflecting its role as a business, retail and cultural centre of the city. It is recommended that the objective be re-written to include ‘sustainable growth and change’.</p>
<p>To sensitively upgrade Westminster’s building stock to secure sustainable and inclusive exemplary design which minimises energy and resource consumption and the production of waste, reduces the impacts of local environmental pollution and meets both today’s needs and those of the future, including the effects of a changing climate; creating attractive places that function will whilst ensuring that the historic character and integrity of Westminster’s built fabric and places is enhanced.</p>	<p>No specific recommendations. This objective aims to protect, preserve and conserve resources Westminster.</p>
<p>To maintain and enhance the quality of life, health and wellbeing of Westminster’s residential communities; Ensuring that Westminster’s residents can benefit from growth and change, providing more employment and housing opportunities, safety and security, and better public transport and local services; to work with partners to foster economic vitality and diversity, improved learning skills, and improved life chances in areas of deprivation.</p>	<p>Objective to be re-written to include. ‘sustainable growth and change’</p> <p>Ensuing development makes a significant contribution to improving health outcomes will require specific policies in the forthcoming City Management Plan.</p>
<p>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.</p>	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation in Planning Briefs.</p> <p>It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T</p> <p>Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy</p>

	<p>should continue to develop the Core Strategy's approach to promote public transport, improve infrastructure, and improve public realm.</p>
<p>To manage pressures on the city from its national and international roles and functions, business communities and tourism, including the 2012 Olympics and Paralympic Games and their legacy, and to ensure a safe and enjoyable visitor experience.</p>	<p>Protecting current and developing new tourist attractions will need to be mitigated through other core strategy policies and more detailed policies in the City Management Plan.</p> <p>It is also recommended that greener business practices are encouraged</p>
<p>To accommodate the safe and efficient movement of growing numbers of people entering and moving around Westminster by facilitating major improvements to the public transport system, improving public realm and pedestrian environment, managing vehicular traffic, and making walking and cycling safer and more enjoyable.</p>	<p>Protecting current and developing new tourist attractions will need to be mitigated through other core strategy policies and more detailed policies in the City Management Plan.</p> <p>It is also recommended that greener business practices are encouraged</p> <p>Balancing the needs for hotel and conference facilities with Westminster neighbourhood's need to be managed to ensure the amenity value of neighbourhood's are not impacted upon by hotel and conference activities. Greener business practices will need to be encouraged and mitigated through other Core Strategy policies and forthcoming more detailed policies in the City Management Plan, Noise Strategy, Air Quality Strategy and Action Plan.</p>
<p>To protect and enhance Westminster's open spaces, civic spaces and Blue Ribbon Network, and Westminster's biodiversity; including protecting the unique character and openness of the Royal Parks and other open spaces; and to manage these spaces to ensure areas of relative tranquillity in a city with a daytime population increased every day by over 1 million workers and visitors.</p>	<p>The scale of effect will be dependent on effective implementation of policies. Other policy documents such as the open space SPD and S106 SPD should be used in conjunction with the Core Strategy to ensure most significant effects.</p> <p>Protecting these sites will help preserve them. Consideration should also be given to the pressure that increase growth in population and visitors and commercial activity will have. Further policies should be considered in the City Management Plan to negate the possible negative effects on SINC's.</p> <p>SINC management plans will be required.</p> <p>Protecting the Blue Ribbon network will have a positive effect on cultural heritage, biodiversity and amenity value. Consideration should be given to developing detailed policies to minimise impacts of increased population growth and activity on habitats and specific design issues around open space, and wayfinding .</p>

## HOW HAS THE APPRAISAL MADE A DIFFERENCE TO CORE STRATEGY OBJECTIVES?

- 5.128 The appraisal of the Core Strategy and sustainability objectives has highlighted the potential for conflict, especially between objectives protecting the built and natural environment and those promoting growth and housing. The need to avoid development in the flood plain, and to protect biodiversity, as well as minimising the impact of development on heritage value and amenity have all been considered. Core Strategy policies assume housing targets can be met without compromising the boroughs' open space, natural or historic environment.
- 5.129 Most of these conflicts are avoided or minimised through the inclusion of safeguarding policies in the Core Strategy. However the use of S106 and planning conditions may be required to mitigate for harmful effects. These detailed policies are being developed through the City Management Plan DPD and thematic supplementary planning documents.
- 5.130 All options were fully appraised before rejecting options. Mitigation measures were also considered.

## DETAILED APPRAISAL OF SUBMISSION DRAFT CORE STRATEGY POLICIES

- 5.131 The methodology used to Sustainably Appraise the proposed Submission draft Core Strategy policies is set out in this section of the report. A summary of the findings of the appraisal is presented. During the development of the Core Strategy Submission draft, the SA process has led to changes to earlier drafts of the Core strategy and therefore measures to improve sustainability performance have been incorporated into policies.
- 5.132 A full audit trail of policy changes from Issues and Options to Preferred Options and Publication Draft can be found in Appendix 5
- 5.133 Also included, below is a description of the effects and proposed mitigation and enhancement measures relevant to the latest version of the Core Strategy and any outstanding SA recommendations.
- 5.134 This chapter describes the impacts that the Submission draft Core Strategy Policies will have, looking at cumulative; long, short and medium term; permanent or temporary; and cross boundary implications. The appraisal process identified these effects and informed the recommendations for mitigating or avoiding negative impacts as shown on policy assessments. Before undertaking this detailed policy assessment the appraisal results for the

overall Core Strategy objectives against sustainability objectives were considered and a summary of the overall significant effects identified.

5.135 A detailed appraisal was undertaken for each policy, in the proposed Submission draft Core Strategy. Each of the SA objectives and sub criteria, as set out in developing a sustainability framework, were considered.

5.136 A set of generic significance criteria was developed to provide guidance to help scoring significance when completing the SA matrices. This was a score based on a five point scale against each of the sustainability objectives, taking account of the sub criteria.

5.137 The results of the detailed assessment are presented as matrices in Appendix 4. Each matrix includes:

- A set of generic significance criteria was developed to provide guidance to help scoring significance when completing the SA matrices. This was a score based on a five point scale against each of the sustainability objectives, taking account of the sub criteria.

Score	Description	General Comments
Major Negative (--_)	<p>An option likely to lead to significant damage/loss or series of long term negative effects, leading to large scale and permanent negative impacts on the sustainability objectives being appraised.</p> <p>An option, policy or group of policies that may also have significant cumulative and indirect detrimental impact and/or degrade conditions outside the specific policy or project area- will have negative transboundary effects.</p> <p>An option or policy or group of policies which is likely to threaten environmental thresholds/ capacities in areas already under threat.</p> <p>The detrimental effects of the option, policy or group of policies will be hard to reverse and are unlikely to be easily mitigated through policy or project</p>	<p>Major negative scoring should be considered where effects are irreversible and difficult to mitigate.</p> <p>Significant effects are those which either impact a large amount on a specific receptor or group or potentially have smaller impact but on a particular sensitive or important receptor or group.</p> <p>Where effects are uncertain, but there is some likelihood of a significant impact, a precautionary approach to scoring will need to be</p>

	<p>intervention.</p> <p>any damage or detrimental effect in ot too environmentally sensitive areas, issues or landscapes which are recognised and / or protected locally, regionally, nationally or internationally should be scored as a major negative.</p>	<p>applied.</p> <p>Major negative scores should be recorded without taking inot account potential for mitigation, sinter there is no guarantee that any mitigation measures (policies) will be implemented or successful. In all cases whre major negative scores are assigned, policy improvement recommendations should be made.</p>
<p>Mix (e.g. ++/-, +/- etc)</p>	<p>The effect is likely to be a combination of beneficial and detrimental effects, particulary where effects are considered on sub-issues, areas or criteria.</p> <p>For example an option, policy or group of policies, may enhance the viability of certain protected species or habitats, but through this damage exsting (non-native) habitats which may themselves be important.</p>	<p>Such mixed effects will be hard to predict, but could be significant in the long term, or when taken with other effects (cumulative).</p> <p>A mixed effect score may also be combined with an uncertain score (?)where the relative balance of effects, or the nature of the effects remains uncertain.</p>
<p>Uncertain(?)</p>	<p>The effect of an option, policy or group o policies, cannot or is nott, known or is too unpredictable to assign a conclusive score. The appraiser is not sure of the effect.</p> <p>Where the effect is genuinely uncertain an uncertain score should be assigned (rather than attempt to give a positive, negative or neutral score. Uncertainty should be acknowledged rather than attempt spurious accuracy , which is likely to result in greater divergence amongst different appraisers.</p>	<p>This may be the case where a policy covers a range of issues, or where the manner in which a policy is implemented will have a material impact on the effect it will have.</p> <p>Equally it may be the case that there is insufficient evidence, information or expertise to come to a satisfactory conclusion about whether an effect is likelyt o be positive or negative.</p>

		In these circumstances commentary should be provided as to how the policy may be improved/clarified to ensure a positive effect.
Major Positive (+)	<p>An option, policy or group of sites likely to lead to significant opportunity /improvement or a series of long term improvements, leading to large scale and permanent benefits to the sustainability objectives being appraised.</p> <p>A major positive effect is also likely to have a cumulative effect and indirect beneficial impact and/or improve conditions outside the specific policy or area - will have positive transboundary effects.</p>	<p>Major positive scores must be justified with description of the impacts likely to lead to a major beneficial effect.</p> <p>Significant effects are those which either impact a large amount on a specific receptor or group or potentially have a smaller impact but on a particularly sensitive or important receptor or group.</p> <p>Significance may also reveal to existing targets set locally, regionally or nationally , such as for waste management, air pollution, educational achievement etc</p> <p>Through reference to the baseline the likelihood, scale, time frame and permanence of effects can be recorded.</p>
Minor positive (+)	<p>An option, policy or group of policies/sites likely to lead to moderate improvement in both short and long term, leading to large scale temporary or medium scale permanent benefits to the objective being appraised.</p> <p>Even where beneficial effect are felt to be</p>	<p>Minor positive scores should be justified with description of the impacts likely to lead to a beneficial</p> <p>Commentary may be</p>

	<p>temporary, they should not be easily reversible (to detriment of objective) in the long term.</p> <p>A minor positive effect is likely to hail or reverse historic negative trends.</p>	<p>appropriate on how a minor positive policy or option could be strengthened and /or any uncertainties and factors which have led to a minor as opposed to major positive effect being recorded.</p>
Neutral (0)	<p>An option, policy or group of policies which is unlikely to have any beneficial or negative impacts/effects on the objective being appraised in either the short or long term.</p> <p>This may include the continuation of a current trend - thus the condition of an issue may continue to decline/improve, however, the appraisers judgement is that the policy is having no effect on the current trend</p>	<p>Neutral scoring should only be used where it is likely that the effect will be neither positive, nor negative.</p> <p>Where positive and negative effects are likely to cancel each other out this should be recorded as mixed,(see above) rather than neutral.</p> <p>A neutral score is not the same as 'uncertain' where an appraiser is not sure if an effect is likely to be positive and negative (see above for more detail) .</p>

- A commentary on potential positive and negative effects on each SA objectives
- The duration of the effects,
- The cumulative impacts; and
- An overall summary commentary of the potential effects of the policy, proposed enhancement and mitigation measures, including recommendations on clarifying policy or supporting text from a sustainability perspective.

The significance criteria aim to provide a degree of transparency as to the reasoning behind allocating individual scores, such that anyone reading the SAR should be able

to understand the rationale behind the score, even if they do not entirely agree with the score.

5.138 The overall assessments of the effects for each of the Core Strategy policies are set out in Appendix 4. Below, are summaries of the effects of the Core Strategy policies. These have been subdivided in line with the structure of the Submission draft Core Strategy into:

- Local Spatial Policies (CS 1 – CS 13)
- City Wide Spatial Policies (CS14 – CS 23)
- Creating Places (CS 24 – CS 44)

5.139 For each of the sections of the Core Strategy, a summary of the potential significant effects is included with a separate table summarising potential mitigation and enhancement measures and SA recommendations.

5.140 The policies included in the Core Strategy, subdivided into sections, are listed in Table T below. The full wording of each policy can be found on the detailed policy assessment matrices in Appendix 4 and, in the proposed Submission draft Core Strategy itself.

**TABLE P** POLICIES INCLUDED IN SUBMISSION DRAFT CORE STRATEGY

Local Spatial Policies	
CS 1	Mixed Use in the Central Activities Zone
CS 2	Special Policy Areas
CS 3	Paddington Opportunity Area
CS 4	Victoria Opportunity Area
CS 5	Tottenham Court Road Opportunity Area
CS 6	Core Central Activities Zone
CS 7	West End Special Retail Policy Area
CS 8	Marylebone and Fitzrovia
CS 9	Knightsbridge
CS 10	Pimlico
CS 11	Royal Parks
CS12	North Westminster Economic Development Area
CS 13	Outside CAZ and NWEDA

City Wide Spatial Policies	
CS 14	Optimising Housing Delivery
CS 15	Meeting Housing Needs
CS 16	Affordably Housing
CS 17	Gypsies and Travellers
CS 18	Commercial Development
CS 19	Offices and other B1 Floorspace
CS 20	Retail
CS 21	Tourism, Arts and Culture
CS 22	Hotels and Conference Facilities
CS 23	Entertainment Uses
Creating Places	
CS 24	Heritage
CS 25	Views
CS 26	Buildings and use of international and national importance
CS 27	Design
CS 28	Health, Safety and Well being
CS 29	Flood Risk
CS 30	Air Quality
CS 31	Noise
CS 32	Planning Obligations and delivering infrastructure
CS 33	Social and Community Infrastructure
CS 34	Open Space
CS 35	Sites of Importance for Nature Conservation
CS 36	Westminster's Blue Ribbon Network
CS 37	Biodiversity and Green Infrastructure
CS 38	Decentralised Energy Networks
CS 39	Renewable Energy
CS 40	Pedestrian Movement and Sustainable Transport
CS 41	Servicing and Deliveries
CS 42	Major Transport Infrastructure

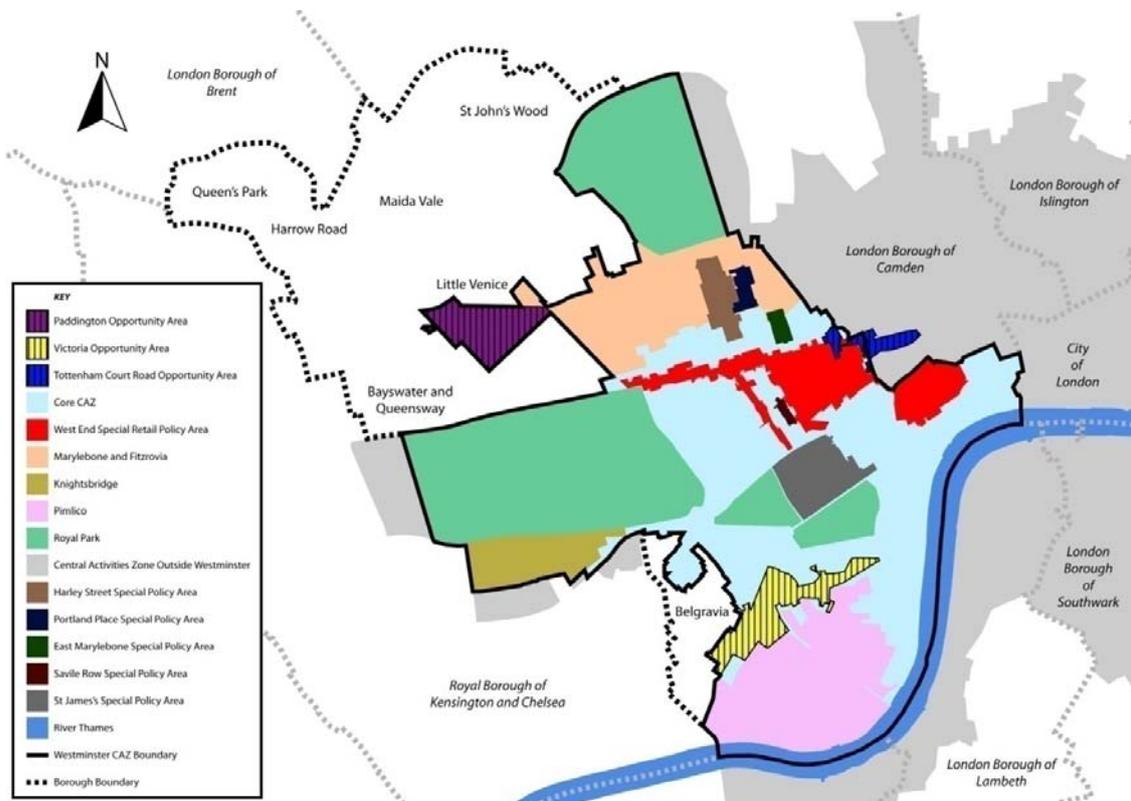
CS 43	Sustainable Waste Management
CS 44	Flood Related Infrastructure.

## Appraisal of significant social, environmental and economic effects of proposed Submission draft Core Strategy Policies

5.141 Set out below is the description of the findings of the appraisal of the Submission draft Core Strategy policies. All of the policies were fully appraised given the scale of changes made to the structure of the Core Strategy and merging of policies following consideration of the representations made during consultation on the Preferred Options Core Strategy and its Sustainability Appraisal.

5.142 The Core Strategy has been subdivided into three sections and the policies in each section have been assessed and summarised as a group.

### LOCAL SPATIAL POLICIES



MAP 21 STRATEGIC SPATIAL AREAS IN WESTMINSTER

- 5.143 The Local Spatial policies set out development targets and sustainability principles for the Central Activity Zone, Victoria, Paddington and Tottenham Court Road Opportunity Areas (as designated in the London Plan), Special Policy Areas in St James' and Savile Row, West End Special Retail Policy Area, Marylebone and Fitzrovia, Knightsbridge, Pimlico and North Westminster Economic Development Areas. It also takes account of the Millbank Strategic Cultural Area and its role in supporting creative industries and culture.
- 5.144 These policies provide the strategic spatial context for the rest of the Core Strategy, and the subsequent City Management Plan DPD and future Supplementary Planning Documents and Area Action Plans.
- 5.145 The SA considered how the sustainability objectives would be affected if the Local Spatial Policies were not implemented and these are set out in the table below as well as the effects of implementing the Local Spatial Policies.

Local Spatial Policy	Business as usual if plan is not implemented how what would be the effects on sustainability objectives.
CS1 Mixed use in CAZ	Mixed use policy very similar to UDP but it now covers a wider area by including Marylebone and Fitzrovia, Knightsbridge, and Pimlico. So there should be more housing provided but a negative economic impact in these 3 areas. The other difference is a raised threshold for A1 or private D1 or D2 uses to 400 sq m. This will have a positive economic effect but only a minimal (not worth noting?) impact on housing delivery as such small schemes would be unlikely to have provided housing; though may have made a contribution to the affordable housing fund.
CS2 Special Policy Areas	There would be a marginal effect on the sustainability objectives for the East Marylebone and Portland Place SPA's . The Core Strategy involves a small reduction in boundary of the SPA's from that designated in the adopted UDP. There is no change in the boundary of the Harley Street SPA and therefore no impact. Both Savile Row and St.James's are new SPA's (not in the UDP) and will have a positive impact in particular on objectives 1, 4 and 17 in terms of ensuring the retention of a diverse range of businesses in Westminster
CS3Paddington Opportunity Areas	The adopted UDP directs commercial development to the Paddington SPA as does the Core Strategy. The Core Strategy recognises the maturity of the area and builds on the success of previous partnership work and providing employment opportunities (objectives 4 and 17. If the Core Strategy policy was not implemented the following objectives in particular are unlikely to materialise: The opportunity for place making and improving the public realm to encourage walking and cycling (objectives 14 and 15); a new heat and power network (objectives 5 and 9).
CS4 Victoria Opportunity Areas	This is a new Opportunity Area and ensures the Core Strategy is in conformity with the adopted London Plan. Policy CS4 ensures that growth is directed to this part of Westminster and that development is appropriate to Victoria and benefits the surrounding area. Without such a co-ordinated policy approach

	the sense of place within and around Victoria is unlikely to be improved. This policy will have a particularly positive impact on objectives 3 (housing) 13 (heritage) and 16 and 17 economic criteria.
CS5 Tottenham Court Road	If this Core Strategy policy was not implemented, improvements to the public realm, which could help to reduce the fear of crime and improve access and increase mobility, may not be achieved (objectives 6, 7 and 14). The provision of A1 retail use at basement to first floor levels on Oxford Street could still be achieved under the existing UDP policies so the sustainability impact of implementing this part of the policy would be negligible, however not designating the area as an Opportunity Area and allowing flexibility in the provision of residential floorspace, may limit the opportunities for business development in this area which would not help to achieve objective 13, and would be contrary to London Plan policy.
CS6 Core Central Activity Zone	CS6, CS8, CS9 and CS10 are the key component of the local spatial policies for the Central Activities Zone (CAZ) and ensure the Core Strategy does not conflict with the adopted London Plan and raise issues of conformity. Without this Core Strategy policy framework it would not be possible to direct commercial activity to the most appropriate locations within the CAZ. The principle approach to the Core CAZ is not significantly different to the UDP in terms of sustainability objectives.
CS7 West End Special Retail Policy Area	If this policy was not implemented, then improvements to the retail and pedestrian environment of the West End, including improved access to shopping facilities and service uses, may not be achieved (objectives 1 and 2). Opportunities to reduce fear of crime and actual crime through improvements to the public realm may also be lost, along with opportunities to reduce opportunities to improve access and movement (objectives 6, 7 and 14). Conversely, not allowing flexibility in the requirement for residential floor space as part of new commercial development could result in more residential provision within this policy area (objectives 8 and 9) if the policy were not to be implemented. Provision of retail growth along the Primary Shopping Frontages could be achieved under the existing UDP policies (objectives 1 and 2), so the sustainability impact of implementing this part of the policy would be negligible.
CS8 Marylebone and Fitzrovia	See comments on CS6 above. This area is outside the UDP CAZ boundary but is inside the London Plan CAZ boundary. To continue with the exiting UDP approach would directly conflict with the London Plan and raise issues of non conformity. The recognition of diversity and local distinctiveness evident in the Core Strategy (and not implicit in the UDP) encourages and overall sustainable approach to development in Westminster.
CS9 Knightsbridge	See comments on CS6 above. This area is outside the UDP CAZ boundary but is inside the London Plan CAZ boundary. To continue with the exiting UDP approach would directly conflict with the London Plan and raise issues of non conformity. The

	recognition of diversity and local distinctiveness evident in the Core Strategy (and not implicit in the UDP) encourages and overall sustainable approach to development in Westminster.
CS10 Pimlico	See comments on CS6 above. This area is outside the UDP CAZ boundary but is inside the London Plan CAZ boundary. To continue with the exiting UDP approach would directly conflict with the London Plan and raise issues of non conformity. The recognition of diversity and local distinctiveness evident in the Core Strategy (and not implicit in the UDP) and in particular where the ‘village’ character with associated local uses and sense of small scale shops and services and local market is recognised, encourages and overall sustainable approach to development in Westminster.
CS 11 Royal Parks	There would be no significant impact as policy CS11 reflects the existing policy approach in the UDP (policies ENV14, ENV17 and DES12
CS 12 North Westminster Economic Development Area	The designation of this area builds on the existing North West Westminster SPA in the UDP, extending north to include Church Street ward. The Core Strategy policy recognises the need to regenerate the area in a holistic way. The policy will have impact on sustainability objectives as new development will lead to increased consumption of resources and in the short term negative environmental impacts. In the longer term the provision of better open space will support objective 15. This policy will have a particularly positive impact on objectives 16 and 17 economic criteria. Securing economic benefits for the local community. The improvement of local services, community facilities and partnership working in the area will have a positive impact on objective 1. If the Core Strategy policy was not implemented it is likely that economic development would be limited and deprivation would not be tackled though improvements in housing, open space and the provision of local services.
CS 13 Outside CAZ and NWEDA	There would be limited impact as policy CS13 reflects the existing policy approach in the UDP. CS13 does additionally allow for new community and leisure floorspace in parts of St John’s Wood District Shopping Centre, which would benefit to the community and is a positive social impact.

#### POTENTIAL POSITIVE EFFECTS

5.146 Local Spatial policies in Westminster’s Core Strategy take a mixed use approach to development. This approach aims to provide jobs and homes, in close proximity to each other and to public transport, focussed in high density development in specific areas. These policies also aim to improve the natural and built environment and public realm, to improve quality of life, and to reduce inequality and poverty.

#### Growth and jobs

- The Westminster Opportunity Areas in Paddington, Victoria and Tottenham Court Road also encourage a mixed use approach, to try and attain the most sustainable growth and development possible. Focusing development in OA's and CAZ will have good public transport links, significant social and economic benefits, improved access, amenities and jobs.
- CS3, CS4 and CS5 are predicted to deliver capacity for 23,500, 8,000 and 5,000 new jobs respectively, alongside provision of 300, 1,000 and 1,000 new homes. Delivering these will help reduce homeless, provide opportunities for local jobs and ensure continued economic growth in the city. This will lead to better quality of life and reduced poverty.
- Concentrating growth in key areas such as CAZ, and the Opportunity Areas will encourage a modal shift from private car to public transport, it will encourage walking, and cycling is predicted to have health and environmental benefits due to reduce noise and air pollution from traffic. However, these may be outweighed by effects of construction and its short term noise disturbance, and increased pressure on the natural and built environment from population growth.
- Ensuring development takes place on previously developed land which, in Westminster, is a given, provides opportunities to remediate potentially contaminated land.
- Encouraging high quality design and the creation of distinctive places will have positive effects on social and environmental objectives especially with regard to public realm and cohesive communities.
- Commercial growth in CAZ, and the Opportunity Areas and the protection of employment areas in Savile Row and St James are predicted to improve employment opportunities for local people, encourage training and skills development, which in turn is predicted to have significant economic and social benefits, enhancing Westminster image as location for business, and encouraging investment.
- Increased activity in CAZ and the Opportunity Areas are predicted to reduce fear of crime as a result of natural surveillance by increased activity.
- Westminster's approach to economic growth in the North Westminster Economic Development Area, will promote business growth, inward investment, and training and skills in one of the city's most deprived wards, and is predicted to have significant benefits in providing local jobs, reducing poverty and inequality.
- It is predicted that improving North Westminster Economic Development Area will have significant benefits. Social benefits secured by improving Maida Hill Market, will have a positive effect on joining local communities.

- Improving public realm in the West End Special Retail Policy Area is predicted to improve access to retail and increase commercial growth.
- Improving the West End Special Retail Policy Area will improve access to shops and services for locals and visitors alike.
- Directing local town centre uses to Warwick Way and Tachbrook Street is predicted to provide local access to local jobs and services.

### **Housing**

- Increased housing, in particular affordable housing, is predicted to have major positive effects by alleviating the current need and help providing a decent homes.
- Marylebone and Fitzrovia, and Pimlico are appropriate for residential development and it is predicted the provision of housing in these areas will lead to reduce homelessness, improved quality of life and reduce inequalities.

### **Health**

- The protection of St Mary's Hospital will ensure local health service provision.
- The protection of Street Markets in Berwick Street and the encouragement of Seasonal markets in Rupert street will enable access to fresh foods locally and reduce the need to travel.
- Provision of facilities to improve cycling opportunities and improved public realm and pedestrian movement are predicted to have a positive effect on health.

### **Inequality**

- It is predicted that the economic growth, improved access and movement and the provision of new jobs and homes will reduce poverty and inequality in the city.

### **Energy**

- The provision of on site energy generation and CHP facilities will reduce need for borough in energy supplies.

### **Transport**

- Improved public transport provision at Tottenham Court Road and Bond Street are predicted to improve access and increase use of public transport. It is also predicted that this will lead to increase number of shoppers which will increase commercial growth, which in turn may lead to more jobs for locals and commuters.

### **Tourism**

- Directing tourism, arts and cultural activities to the 3 Strategic Cultural Area in Knightsbridge, West End and Millbank existing clusters is predicted to have a positive effect on improving and protecting cultural heritage in the City.

### **Development on previously developed land**

- Focussing development in Opportunity Areas is predicted to have positive effect on ensuring previously developed land and buildings are central to growth. This will also ensure any land remediation issues are addressed.

All of the positive effects outlined above are predicted to be long term permanent effects.

The spatial policies are designed to act in synergy, each supporting and enhancing the other.

All of the potential positive effects related to economic growth, investment and development facilitating infrastructure delivery will be dependent on the health of the wider economy. The current economic downturn during the first years of the plan may negate or delay positive effects.

## **POTENTIAL NEGATIVE EFFECTS OF LOCAL SPATIAL POLICIES**

5.147 Although the Local Spatial Policies are predicted to have a number of significant positive effects, it is inevitable that there are some likely significant negative effects as a consequence of the level of growth and development being proposed in the city. Clearly the role of the London Plan in setting growth targets in the City of Westminster, means that the options in this regard are limited and consequently Westminster has sought to focus, where possible, on minimising negative effects through safeguarding policies proposed in the Submission Draft Core Strategy.

5.148 CS 3, 4 and 5 set out the proposed level of jobs and housing growth in Opportunity Areas, are predicted to have the most significant negative effects, particularly with regard to environmental objectives. These effects are predicted to be caused at all stages of growth from construction, to occupation and operation, of new development and are likely therefore to give rise to

short term, long term, temporary and permanent effects. Effects could include increased use of resources, energy and water consumption, air and noise pollution and vehicle traffic and congestion.

5.149 Other policies with potential negative effects are generally minor in relation to the Growth policies for the Paddington, Victoria and Tottenham Court Road Opportunity Areas. .

5.150 The potential negative effects arising from Local Spatial Policies are inevitable given the predicted population increase and economic regeneration proposed.

### **Traffic and congestion**

- Increased vehicular traffic, congestion and associated pollution are predicted, with increased residential, visitor and working population. This would also lead to increased greenhouse gas emissions leading to greater impact on climate change, reduced air quality and increased noise, along with increased pressure on open space and local services.
- Given these predicted negative effects, the Local Spatial Policies have been developed to include provision for access to public transport by encouraging high density development around transport nodes as well as improved public realm and open space.

### **Noise nuisance**

- Increased noise and nuisance are predicted. These may be long term or short term and temporary due to construction and permanent due to increased traffic and high density mixed use development.

### **Use of Resources**

- An increase in resource use and consumption, increased greenhouse gas emissions and increased construction and household waste generation are predicted. The level of growth will lead to approximately 5000 new home during the life time of the plan

### **Greenhouse gas emissions**

- Whilst CS 27 Design seeks to mitigate for these effects on Climate change, by encouraging new development to minimise water and energy use, and CS43 advocates sustainable waste management and CS 40 seeks to encourage and provide for cycling and walking and sustainable transport, it is predicted that

there will inevitably be a net increase in Greenhouse Gas emission, energy use and water consumption.

- The city’s mixed use approach promotes public transport, walking and cycling and concentrates housing, employment, retail and leisure facilities in CAZ, and OA’s. Further detail on mitigation and enhancement proposed for LSP and other recommendations arising from SA.
- Overall, given the strategic nature of Local Spatial Policies most of the mitigation and enhancement will be met either by other policies in the Core Strategy or are recommended for inclusion in the City Management Plan DPD.

**TABLE Q CORE STRATEGY LOCAL SPATIAL POLICIES, MITIGATION AND RECOMMENDATIONS**

	Local Spatial Policy	Mitigation / enhancement SA recommendations
CS 1	Mixed Use in the Central Activities Zone	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation as set out in Planning Briefs.</p> <p>It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to</p> <p>Other policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy’s approach to promote public transport, improve infrastructure, and improve public realm.</p> <p>Core Strategy infrastructure needs to be taken into account in the forthcoming Infrastructure plan</p>
CS 2	Special Policy Areas	No significant negative effects are predicted, It is recommended that detailed policies for individual SPAs are developed in the City Management Plan.
CS 3	Paddington Opportunity Area	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation in Paddington Planning Briefs.</p> <p>It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to</p> <p>Other policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy’s approach to promote public transport, improve infrastructure, and improve public realm</p>

		Core Strategy infrastructure need to be taken into account in the forthcoming Infrastructure plan
CS 4	Victoria Opportunity Area	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation in Victoria Planning Briefs.</p> <p>It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to.</p> <p>Other policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy’s approach to promote public transport, improve infrastructure, and improve public realm</p> <p>Core Strategy infrastructure need to be taken into account in the forthcoming Infrastructure plan</p>
CS 5	Tottenham Court Road Opportunity Area	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation in Tottenham Court Road Planning Briefs.</p> <p>It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to</p> <p>Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy’s approach to promote public transport, improve infrastructure, and improve public realm</p> <p>Core Strategy infrastructure need to be taken into account in the forthcoming Infrastructure plan</p>
CS 6	Core Central Activities Zone	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation. It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to</p> <p>Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy’s approach to promote public transport, improve infrastructure, and improve public realm.</p> <p>Core Strategy infrastructure need to be taken into account in the forthcoming Infrastructure plan</p>

CS 7	West End Special Retail Policy Area	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation of policies.</p> <p>It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to</p> <p>Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy's approach to promote public transport, improve infrastructure, and improve public realm</p> <p>The success of established wayfinding strategies will need to be built on to help achieve the aims of this policy. Waste management systems , and the encouragement of greener business practices will help minimise predicted negative impacts of this policy</p>
CS 8	Marylebone and Fitzrovia	The predicted effects will be dependent of scale of growth, and will need to be mitigated by further policies in the Core Strategy or through more detailed policies in the City Management Plan.
CS 9	Knightsbridge	The predicted effects will be dependent of scale of growth, and will need to be mitigated by further policies in the Core Strategy or through more detailed policies in the City Management Plan.
CS 10	Pimlico	The predicted effects will be dependent of scale of growth, and will need to be mitigated by further policies in the Core Strategy or through more detailed policies in the City Management Plan.
CS 11	Royal Parks	Outdoor events need to be managed and limited in terms of number and scale of events. The Council needs to work in partnership with the Royal Parks Agency. -.Noise management measures as set out in the forthcoming in Noise Strategy
CS12	North Westminster Economic Development Area	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation. It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to</p> <p>Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy's approach to promote public transport, improve infrastructure, and improve public realm</p> <p>Core Strategy infrastructure need to be taken into account in the forthcoming Infrastructure plan</p>
CS 13	Outside CAZ and NWEDA	The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation. It is recommended that the City

		<p>Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to</p> <p>Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy's approach to promote public transport, improve infrastructure, and improve public realm</p>
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### Summary of potential effects of Local Spatial policies

- 5.151 The Local Spatial policies are predicted to have a positive effect against SA objectives. Positive effects are thought to be felt across the borough and will benefit the whole community. These effects are also likely to be more significant in the Opportunities Areas and Growth Areas and the immediate surrounding areas.
- 5.152 Major significant positive effects are predicted for commercial and economic growth, but it should be noted that these effects will be depend on development taking place in accordance with policy expectations, which are in turn dependant on the wider global economy. The positive effects of the Local Spatial policies may be delayed or not delivered in the early years of the plan as a result of the economic downturn.
- 5.153 When considered, outside the Core Strategy's mitigating policies the Opportunity Areas and North Westminster Economic Development Area are likely to have the greatest significant negative effects. These are particularly relevant in terms of environmental objectives and are the consequence of the scale of growth proposed. It is inevitable that there will be impacts on air quality and noise related to construction in the short, medium and long term. And that increased growth will lead to greater use of resources, energy consumption, emission, waste production, traffic and pressure on open space. Other policies likely to have negative effects are likely to be minor by comparison to these.
- 5.154 Positive effects are dependant on the ability of housing development to enable provision of contributions to improve of social infrastructure. This would reduce the scale of potential positive effects, or they may not be realised at all.
- 5.155 Likelihood of infrastructure needs arising from new development and increased population in Westminster will depend on how successful, in

practice, the policies and the infrastructure investment framework are in ensuring development includes or finances the infrastructure requirements identified

- 5.156 Other infrastructure such as open space provision, sports and play area provision, appraisal identified a risk that sufficient supply may not be delivered.
- 5.157 Where negative effects have been predicted , mitigation and enhancement recommendations have been made .
- 5.158 In Appendix 1 of the Core Strategy there is a list of proposed sites within the areas of the Local Spatial Policy Areas. These were not considered as part of the SA as they were not considered of significant scale to warrant individual appraisal. However any possible effects from development of these sites within the Local Spatial Policy Areas are reflected in the assessment of the Local Spatial Policies.

#### CITY WIDE POLICIES

- 5.159 One of the key characteristics of Westminster is its large residential population. Over 230,000 residents live in the city and is predicted to grow from 234,131 residents to 243,000 residents by 2025.
- 5.160 The nature of Westminster and lack of surplus industrial land for redevelopment, this is a considerable constraint on meeting housing needs and borough housing targets. The three major Opportunity Areas in Paddington, Victoria and Tottenham Court Road have been designated for major growth in housing.

#### POTENTIAL POSITIVE SIGNIFICANT EFFECTS

##### Housing

- Housing led mixed use development is central to providing housing in Westminster. It has potentially long term positive effects reducing number of unfit homes and improving quality of housing stock, and potentially reducing homelessness
- CS 14 Optimising Housing delivery aims to deliver and exceed the city's housing targets as set out in the London Plan and residential use is the priority across Westminster, except where specifically stated.
- Protecting residential uses, floorspace and land will have significant positive effect on provision of housing in Westminster to reduce homelessness, improve the quality of homes. The provision of housing and social

infrastructure are predicted to have positive effect in reducing poverty, social exclusion, improved health and quality of life.

- CS 15 Meeting Housing needs will have a positive effect on meeting the needs of the whole community creating mixed tenures. Houses of multiple occupation will be protected and it is predicted that this will have a positive effect on reducing homelessness from migrant communities. Protecting specialist housing floorspace is predicted to have a positive effect on provision of housing for the whole community.
- CS 16 Affordable Housing will have a positive effect on provision of housing for whole community. The city council's target of at least 22% of new homes being affordable by 2012 and to exceed 30% up to 2025, will ensure homes are available for all sectors of the community, and it is predicted that this will have social benefits by reducing inequalities and improving quality of life
- The provision of homes throughout Westminster is also predicted to reduce the need to travel.

### **Business and Employment**

- Commercial growth will have significant positive long term effects, on economic growth objectives, which are likely to encourage start ups, and provide business opportunities and employment. The limitation of growth to a size and scale appropriate to the character and function of the area will protect local distinctiveness and the historical and heritage value of the areas.
- Focussing major new office development in Paddington, Victoria and Tottenham Court, the Core Central Activity Zone and specified locations in Marylebone and Fitzrovia, and North Westminster Economic Development Area will protect sensitive areas such as SINCs, conservation areas and cultural areas.
- Potential major positive economic effects are predicted in major economic growth and regeneration areas stated above. The provision of commercial, retail, offices, entertainment, will create a cohesive mixed use development, providing jobs for local communities and commuters alike.
- Local shops for local people will reduce the need to travel
- The provision of hotel and conference facilities is predicted to have a positive economic effect, providing jobs and improving facilities for visitors, businesses alike.
- Entertainment uses are predicted to have significant positive effects on economic growth objectives and provide jobs for locals.

## POTENTIAL NEGATIVE EFFECTS

5.161 Given the predicted growth in population and the housing targets, negative effects are inevitable. These effects will be mainly with regard to environmental objectives.

### **Use of resources**

- Increased population will lead to increase use of resources, increased water and energy consumption and increased greenhouse gas production, and waste production.

### **Pressure on open space**

- Increased residential, tourist and working population will lead to increased pressure on open space and the local services and facilities.

### **Noise nuisance and air quality**

- Construction of new residential and commercial development will lead to short term impacts temporary negative effects from noise pollution and poor air quality.
- Longer term noise effects may occur as a result of entertainment uses and increased visitor numbers may result in increased pressure on already stressed areas, leading to more crime.

### **Lack of floorspace**

- The protection of residential housing and floorspace is predicted to reduce the availability of commercial floorspace and growth and vice versa.

## SUMMARY OF CITY WIDE POLICIES SIGNIFICANT EFFECTS

5.162 The proposed growth in residential population, increased retail, commercial, entertainment, tourism, art and cultural offers are predicted to lead to positive social and economic effects. Commercial activities and provision of housing are also likely to have, inevitable negative impacts on environmental objectives such as noise, air quality, open space, waste production and energy and water consumption and production of greenhouse gases. These negative effects have been taken into account in the Core Strategy and other strategies and details on how these will be mitigated for are detailed in the table below.

5.163 The provision of housing, needs to be in line with social infrastructure improvements. Positive benefits are dependant on enabling the provision of contributions to improvements to social infrastructure which is dependent on sufficient development on a cumulative scale, and with adequate critical mass to encourage infrastructure investment. If social infrastructure is not brought on line with new housing the potential positive benefits may not be realised in the long term.

**TABLE R CITY WIDE POLICIES AND MITIGATION AND SA RECOMMENDATIONS**

	City Wide Policies	Mitigation /recommendation
CS 14	Optimising Housing Delivery	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation in Planning Briefs.</p> <p>It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to</p> <p>Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy’s approach to promote public transport, improve infrastructure, and improve public realm.</p>
CS 15	Meeting Housing Needs	<p>The predicted effects will be dependent on scale of growth, and will need to be mitigated by further policies in the Core Strategy or through more detailed policies in the City Management Plan. Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy’s approach to promote public transport, improve infrastructure, and improve public realm.</p>
CS 16	Affordably Housing	<p>The predicted effects will be dependent on scale of growth, and will need to be mitigated by further policies in the Core Strategy or through more detailed policies in the City Management Plan. Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy’s approach to promote public transport, improve infrastructure, and improve public realm.</p>
CS 17	Gypsies and Travellers	<p>This policy deals needs to be applied effectively and detailed policies to manage gypsy and traveller sites need to be developed in the City Management Plan. Temporary sites may become available as part of redevelopment and the policy criteria need to be applied effectively to make this happen.</p>
CS 18	Commercial Development	<p>Increased commercial growth will need to be mitigated through other policies in the Core Strategy and more detailed policies in</p>

		the forthcoming City Management Plan. Consideration should also be given to other forthcoming policy documents such as air quality strategy and action plan, noise strategy, sustainable design SPD and Climate change Adaptation and Mitigation Strategy.
CS 19	Offices and other B1 Floorspace	<p>The scale of the effects predicted will be dependent on the implementation of other policies in the Core Strategy, as well as site specific implementation. It is recommended that the City Management Plan provides detailed policies to mitigate for negative effects and enhance positive effects. These are set out in detail in Mitigation section Table T issues to be addressed and policies this recommendation is relevant to</p> <p>Other forthcoming policy documents such as the Air Quality Strategy and Action Plan, Noise Strategy, Sustainable Design SPD and Climate Change Mitigation and Adaptation Strategy should continue to develop the Core Strategy's approach to promote public transport, improve infrastructure, and improved public realm</p>
CS 20	Retail	Prioritising housing throughout the rest of Westminster will help mitigate for the protection of retail provision in designated shopping centres. It is also recommended that greener business practices are encouraged
CS 21	Tourism, Arts and Culture	<p>Protecting current and developing new tourist attractions will need to be mitigated through other core strategy policies and more detailed policies in the City Management Plan.</p> <p>It is also recommended that greener business practices are encouraged</p>
CS 22	Hotels and Conference Facilities	<p>Protecting current and developing new tourist attractions will need to be mitigated through other core strategy policies and more detailed policies in the City Management Plan.</p> <p>It is also recommended that greener business practices are encouraged</p> <p>Balancing the needs for hotel and conference facilities with Westminster neighbourhoods need to be managed to ensure the amenity value of neighbourhoods are not impacted upon by hotel and conference activities. Greener business practices will need to be encouraged and mitigated through other Core Strategy policies and forthcoming more detailed policies in the City Management Plan, Noise Strategy, Air Quality Strategy and Action Plan.</p>
CS 23	Entertainment Uses	This policy approach has designed in mitigation for adverse impacts. Further detailed policies with the precise requirements will need to be developed in the forthcoming City Management Plan. Other forthcoming policy documents that should be taken into account such as air quality strategy and action plan, noise strategy, sustainable design SPD and climate change adaptation and mitigation SPD.

## CREATING PLACES POLICIES

5.164 This section sets out the city council's intentions with regard to the delivery on infrastructure in relation to development in the city.

5.165 These policies are considered to be not appraisable for sustainability effects, as it is the implementation of other policies in the Core Strategy ( in particular Opportunity Area's, CAZ etc) , and the forthcoming infrastructure plan along with policies included in the forthcoming CMP DPD which would dictate the scale and type of effects.

## SIGNIFICANT EFFECTS OF CREATING PLACES POLICIES

5.166 The Creating Places policies are largely safeguarding and supplementary policies that are predicted to mitigate for and enhance development throughout the city, with positive effects on social, economic and environmental objectives of the SA.

### **Heritage, Views and Buildings of international importance**

- CS 24 Heritage, CS 25 Views and CS 26, buildings and uses of International Importance to protect and preserve established uses and characters are likely to have significant positive effects on of Westminster's heritage assets, and economy , in terms of tourism, and retain its value at the centre of a world city. It will positively effect preservation of material and cultural assets.

### **Design**

- Westminster's Sustainable Design policy CS 27, advocates exemplary standards for inclusive and sustainable design. It is predicted to have a significant positive effect on environmental objectives to reduce the use of energy and water, to minimise waste and facilitate recycling, to enhance biodiversity, to reduce noise and air pollution and to reduce, reuse and recycle construction waste and materials.
- If this policy is implemented effectively, it is predicted to have a significant effect on the city's ability to deliver sustainable development. This is a significant safeguarding policy for growth in Westminster.

### **Health, Safety and Wellbeing**

- If the Health, Safety and Wellbeing policy is implemented effectively it will have a positive effect, it is predicted to reduce crime and fear of crime, reduce the risk from terrorism and improve health and well being, reduce

inequalities. It is predicted to positively effect the development of cohesive communities.

### **Flooding**

- Directing highly vulnerable uses away from Flood Zone 3 will reduce risk of impact of flooding on these. The prevention of new residential units below the tidal breach flood level and extensions to residential at basement level is predicted to reduce the number of people at risk from flooding.

### **Air Quality**

- CS 30 requires a reduction of air pollution, this is predicted to have a significant positive effect on air quality across the city.

### **Noise**

- CS 31 requires development to minimise noise and vibration, and to secure improvements to Westminster's Sound environment. This is predicted to have a significant positive effect on the sound environment in the city.

### **Infrastructure**

- Creating Places requires the provision of adequate social and transport infrastructure. It is likely that infrastructure needs will arise from new development and increased population in Westminster and its delivery is likely to be dependent on how successful, in practice, the policies and the infrastructure investment framework are in ensuring development includes or finances the infrastructure requirements identified.
- The Core Strategy doesn't set out specifically where new infrastructure will be provided but provides a framework for the development of mechanisms that would improve the link between growth and infrastructure. It is proposed that detailed policies for infrastructure provision be set out in the forthcoming CMP DPD and SPD's and planning briefs. This should be informed by the Investment and Infrastructure plan.
- Delivery of growth scenarios is also dependent on the health of the wider economy, If the current economic downturn continues, the first years of implementing the plan may be negated or delay potential positive effects.
- It is felt that the infrastructure policies can not be assessed in terms of sustainability, as while potential positive effects arising from Infrastructure policies predicted for social objectives, it is likely that, in large parts the

impacts of construction and population growth may have potential significant negative effects.

Potential negative term effects of infrastructure may include:

- Increased need to travel and traffic congestion
- Significant increase in use of natural resources, waste generation and potential noise nuisance
- Significant increases in greenhouse gas emissions and energy use.
- Increased short and long term water demand and potential negative effect on water quality, hard-surfacing increasing run off.
- Potential long term increase in risk of flooding associated with surface water run off , reduction in permeable surfaces and increase in intensity of urban heat island effect due to high density development.
- Development growth and population increases could exacerbate existing deficits in social infrastructure and open space/ sports/ play space provision.

### **Open Space**

- The council's aim to protect and enhance open space will have a positive effect on health and wellbeing, and quality of life. Securing new open space in large scale development will help mitigate additional pressure on open space.

### **Sites of Importance for Nature Conservation (SINCs)**

- The protection of SINCs will have a positive impact on protecting habitats and species and hence biodiversity at these sites.

### **Blue Ribbon Network**

- The protection and enhancement of the Blue Ribbon Network (CS26) will have positive effect on biodiversity, cultural heritage and material assets and access. It is predicted to have a positive effect by reducing the need for road traffic and encourages travelling by riverboat.

### **Biodiversity and Green Infrastructure**

- Protecting and enhancing Biodiversity and Green Infrastructure (CS37) is predicted to have a positive effect on biodiversity, habitats and species.

## Energy Networks and Renewable Energy

- Protecting Decentralising Energy Networks (CS38) is predicted to have a positive effect on reducing greenhouse gas emissions.
- Maximising renewable energy provision (CS39) to achieve at least 20% reduction on carbon dioxide emissions is predicted to have a significantly positive effect on environmental objectives to adapt to climate change.

## Sustainable Transport and Pedestrian Movement

- Provision of sustainable transport and improved pedestrian movement is likely to lead to healthier lifestyles, reduced need for road transport and reduced emissions.
- CS 41 Servicing and deliveries is felt not to be assessable in Sustainability Terms.
- Major Transport Infrastructure proposals as with social infrastructure are thought not to be assessable in sustainability terms.
- Creating Places policies generally relate to policies which aim to protect and enhance specific environmental and social features and aspects of development. This will help mitigate for negative effects of growth policies.
- Potential negative effects relate to Employment and Growth areas and are associated with potential environmental effects as a result of increased commercial activity and traffic.

**TABLE 5** CREATING PLACES POLICIES MITIGATION AND SA RECOMMENDATIONS

	Creating Places	Mitigation /Recommendations.
CS 24	Heritage	Protecting old buildings stock and heritage assets may lead to inefficient use of resources. It is felt that other policies in the core strategy and forthcoming city management plan will need to consider detailed policies on retrofitting old buildings to make them more resource efficient. Forthcoming policy documents such as air quality strategy and action plan, noise strategy and climate change adaptation and mitigation strategy along with sustainable design SPD also take account of the negative effects of protecting old building stock.
CS 25	Views	Specific policy approaches for specific local views will need to be developed in the forthcoming Local Views SPD
CS 26	Buildings and use of international and national importance	Protecting buildings and uses may have negative effects which will need to be mitigated through other Core Strategy policies and more detailed retrofitting policies in the forthcoming City Management Plan and Sustainable Design SPD
CS 27	Design	Detailed Sustainable Design policies will need to be developed

		in City Management Plan and Sustainable Design SPD taking account of construction, habitation and operation on new buildings and retrofitting old building stock.
CS 28	Health, Safety and Well being	Ensuing development makes a significant contribution to improving health outcomes will require specific policies in the forthcoming City Management Plan.
CS 29	Flood Risk	<p>Surface Water Flooding is the most likely cause of flooding in Westminster. It would therefore be necessary for the forthcoming City Management plan to set out detailed policies for managing flood risk, and to include flood resistance and flood resilience measures in the sustainable design SPD and incorporate flood risk mitigation measures such as Sustainable Urban Drainage. . The detailed policies should consider greenroofs, habitat creation.</p> <p>It is recommended that highly vulnerable uses be directed away from Flood Zone 3 and that residential properties are not developed below the tidal breach level .</p>
CS 30	Air Quality	The scale of the effects on Air Quality will be dependant on effective implementation of the policy. The forthcoming Air Quality Strategy and Action plan should be taken into account along with the Core Strategy.
CS 31	Noise	The scale of the effects on Noise will be dependant on effective implementation of the policy. The forthcoming Noise Strategy should be taken into account along with the Core Strategy.
CS 32	Planning Obligations and delivering infrastructure	No specific recommendations made
CS 33	Social and Community Infrastructure	No specific recommendations made.
CS 34	Open Space	The scale of effect will be dependent on effective implementation of policies. Other policy documents such as the open space SPD and S106 SPD should be used in conjunction with the Core Strategy to ensure most significant effects.
CS 35	Sites of Importance for Nature Conservation	<p>Protecting these sites will help preserve them. Consideration should also be given to the pressure that increase growth in population and visitors and commercial activity will have. Further policies should be considered in the City Management Plan to negate the possible negative effects on SINCs.</p> <p>SINC management plans will be required.</p>
CS 36	Westminster's Blue Ribbon Network	Protecting the Blue Ribbon network will have a positive effect on cultural heritage, biodiversity and amenity value. Consideration should be given to developing detailed policies to minimise impacts of increased population growth and activity on habitats and specific design issues around open space, wayfinding .

CS 37	Biodiversity and Green Infrastructure	The specific protection of species and habitats is identified in the relevant Biodiversity Action Plan, which needs to be implemented effectively to prevent decline of and improved conditions for those species and habitats that are a conservation priority. Sustainable Design policies and detailed flood risk management policies should also take account of the need to protect and enhance biodiversity and green infrastructure.
CS 38	Decentralised Energy Networks	Decentralised heat networks should be considered on a site by site basis, Detailed criteria for the development of Decentralised Heat Networks will need to be included in the forthcoming City Management Plan.
CS 39	Renewable Energy	The options for renewable energy technology in Westminster are challenging. Detailed policies will need to be developed in the forthcoming City Management Plan and Sustainable Design SPD. Renewable Energy options will also need to be developed in the Climate Change Adaptation and Mitigation Strategy. The scale of renewable energy provision in the city will be dependent on new technologies, and effective implementation of policies.
CS 40	Pedestrian Movement and Sustainable Transport	Increase journey's made by modes other than car  Improved access to jobs and between transport interchanges, enhancement as a business location.  Negative - increased number of commuters. Although this is by public transport and environmental and social effects will be less than commuting by private car.
CS 41	Servicing and Deliveries	No specific recommendations
CS 42	Major Transport Infrastructure	No specific recommendations.
CS 43	Sustainable Waste Management	Waste Management is a key issue in Westminster and as such will need to be managed. The scale increased in waste in the city will be influenced by effective implementation of Core Strategy policy and the more detailed policies in the City Management Plan. Waste management should also take account of climate change, air quality, noise , transport and business practices and more detailed criteria and policies for waste management should be included in all of these forthcoming documents.
CS 44	Flood Related Infrastructure.	No specific comments

## SUMMARY OF OVERALL EFFECTS OF CREATING PLACES POLICIES

5.167 Overall the significant effects of the Creating Places policies are likely to support sustainable development including:

- Regeneration and reducing aspects of poverty and social exclusion, such as affordability of homes and access to essential services will lead to long term social cohesion and more sustainable communities.
- Protecting views, heritage and open space will lead to long term permanent visual amenity and quality of public realm.
- Protection and enhancement of open space, SINCs, designated areas and the improvements in Air Quality, Soundscape and design will lead to improved health and wellbeing and benefits in terms of physical and mental health and well being of the population.
- Improving the cityscape, improves image and makes Westminster an attractive location for business, providing business opportunities for local people and reducing unemployment.
- Sustainable design is predicted to have a positive effect on mitigating and adapting to climate change. Inevitable protection policies will have a negative impact on other land uses. Protecting local distinctiveness, open space and housing may, in the short and long term, limit the availability of land for business development.
- Increased activity may lead to permanent long term negative effects associated with resource use, greenhouse gas emissions, air pollution and noise disturbance.

#### OVERALL ASSESSMENT OF CORE STRATEGY

5.168 Clearly, there are issues still to be resolved to ensure sustainable development in Westminster. These issues and their associated policies in the Core Strategy are set out in Table T below and will required further detailed policies in the forthcoming City Management Plan DPD, Noise Strategy, Air Quality Strategy and Action Plan, Sustainable Design SPD and Climate Change Adaptation and Mitigation Strategy. The table also show which Core Strategy Policies the recommendations apply to.

**TABLE T** RECOMMENDATIONS FOR MITIGATION AND ENHANCEMENT TO BE INCLUDED IN FORTHCOMING CITY MANAGEMENT PLAN DPD AND SPD'S

Issue to be addressed	Policies recommendations relevant to.
Development must play key role in promoting regeneration and reducing disparities, particularly in most deprived areas e.g North Westminster etc.	CS 2-7
Development delivers and is phased to meet existing and future need for physical, social and community infrastructure.	CS3-10, CS 33, CS32, CS44
Provision of delivery of a balanced housing stock – including mixed type , size and tenure to meet the need and sufficient provision of	CS14 – 16, CS17

affordable housing adaptable to meet the needs in the long term and provision of appropriate sites for nomadic peoples	
Delivery of borough targets for sites for nomadic peoples.	CS17
Ensuring design and development , layout and inclusion of sufficient open and play space can contribute to health and wellbeing	CS 34, CS33
Designing out crime and encouragement of security conscious design standards in order to reduce crime and fear of crime.	CS 28
Creating communities going beyond physical construction of homes and facilities to encourage a sense of community, identity, welfare and pride	CS 28
Ensure development contributes to delivering on the commitment to reduce the need to travel, encourage efficient patterns of movement and encourage modal shift to walking, cycling and public transport	CS 2- 5, CS43
Promote the role that design can play in relation to environmental factors , such as water efficiency, energy efficiency, climate change adaptation, flood resilience etc	CS27
Enhancing air quality through design and development and protecting new and existing residents from poor air quality.	CS30
Ensuring gardens are protected from inappropriate development or conversion ( e.g. conversion of parking space)	CS34, CS
Delivering improved water quality, efficiency and water conservation as well as enhancing riparian areas throughout the borough	CS 27
Reducing greenhouse gas emissions associated with development, maximising energy efficiency and the use of renewable energy sources	CS27
Ensuring development that delivers adaptation to the impacts of climate change including managing risk such as increased subsidence/heave	CS 27, 38, 39
Setting out detailed requirements for sustainability statements which are a requirement for all major development proposals and proposals for sensitive uses.	CS 27
Managing flood risk , minimising risk to people and property and encouraging use of SUDs, where appropriate	CS 29 and CS 44
Ensuring biodiversity, habitat and species are protected and enhanced as well as promoting tree planting.	CS37, 35, 34
Encouraging provision of opportunities for environmental educations, signage and information board	CS 36,37, 35
Remediation of potentially contaminated land, the protection of land and soil quality	CS 27
Supporting waste minimisation, recycling and reuse of resources and the use of renewable materials as well as compliance with standards and protocols, such as Code of Construction Practice	CS 43

Ensure enhancement of landscape, townscape and public realm is delivered and the impact of development on views is managed	CS33, 34,24,25
Redevelopment in Strategic Growth areas and economic development area will need to improve landscape and environment and apply principles of sustainable design.	CS12, 13
Ensuring conservation and enhancement of historic and cultural environment	CS 27, 24,
Ensuring economic development and employment/business opportunities are accessible to local people, and encouraging inward investment.	CS18, 19, 20, 21, 22, 23, CS 1-7, CS 12 – 13

5.169 Taking account of these issues further detailed policies are recommended for consideration in the City Management Development Plan Document. These are set out below.

### **Key Issue (1) Climate Change and Sustainable Development**

5.170 How to mitigate against climate change and ensure that the City plays its part in delivering sustainable development?

- Carbon efficiency
- Renewable Energy
- Air Quality
- Noise
- Light
- Waste Management
- Flooding
- Protecting gardens
- Basement Excavation
- Parking standards for motorcycles and bicycles

### **Key Issue (2) Growth, Change and Economic Activity**

5.171 How and where to accommodate growth and change and how to maintain economic diversity and vitality?

- Central Activities Zone Boundary
- Central Area Frontages
- District Shopping Centres

- Local Shopping Centres
- Street Markets
- Creative Industries Special Policy Area
- Music Venues
- Offices outside the CAZ
- Regeneration of Harrow Road
- Small offices

### **Key Issue (3) Housing and Employment**

5.172 Striking the balance between growth in housing and employment whilst meeting our housing challenges?

- Residential and commercial mixed use schemes.
- Affordable homes
- Providing a Range of Housing Sizes
- Housing Density
- Special Needs Housing
- Houses in Multiple Occupation (HMOs)
- Protection of existing Hostels

### **Key Issue (4) Local Distinctiveness**

- Westminster's role as a world class City while maintaining local distinctiveness
- Special Policy Areas
- Protection of views
- Public Art
- Permanently Moored Vessels on the Thames
- Public Realm
- Signing and Wayfinding
- Servicing

### **Key Issue (5) Building Communities**

5.173 How to build cohesive, tolerant and neighbourly communities?

- Strengthening the provision of Community Facilities.

- Enhanced financial contributions towards the provision of community services.
- Childcare provision
- threshold for providing play space / social and community facilities
- Local Area Agreements
- Management of the public realm
- Gated Communities
- Security measures
- Crime Hotspots

### **Key Issue (6) Night Time Economy**

5.174 How to balance the needs of the night time economy with a large and growing residential population and the needs of the day time economy?

- Stress Areas
- Low impact entertainment uses
- No further entertainment uses
- Casinos

### **Key Issue (A) Delivery Mechanisms**

5.175 How to deliver the objectives of the local development framework most effectively

- Priorities for planning benefits
- Formulae for planning contributions
- Credit approach to planning contributions

### **Key Issue (B) Structure of the document**

5.176 How to ensure new spatial planning policies maintain Westminster's uniqueness / local distinctiveness

- Number of policies
- Presentation of policies

5.177 This list is not exhaustive, but it does give an indication of the level of detail that will need to be addressed in the City Management Plan to ensure all possible negative effects are avoided or minimised as Westminster grows over the lifetime of the plan.

#### SUMMARY OF OVERALL SIGNIFICANT EFFECTS OF THE SUBMISSION DRAFT CORE STRATEGY

5.178 Overall the Submission draft Core Strategy policies are predicted to have positive effects on sustainability, particularly, in terms of social and economic objectives.

5.179 The positive effects are predicted to improve community cohesion, reduce crime and fear of crime, provide improved public realm and access, provide homes, particularly affordable homes, to improve public transport, along with social and community infrastructure. All of these effects are likely to be most pronounced in the Opportunity Areas and North Westminster EDA.

5.180 The positive environmental effects are likely to include improved public realm, access, pedestrian movement; standards of design and construction and the reduced need to travel. The protection policies for heritage, open space, views, air quality, noise, Sites of Importance for Nature Conservation (SINCs), biodiversity and green infrastructure are also likely to have significant positive effects.

5.181 However, the economic and population growth in Westminster is likely to have a net negative impact on environmental objectives, particularly, with regard to Use of resources, water and energy consumption, the production of waste, increased traffic.

5.182 The Submission draft Core Strategy focuses much of the population and economic growth in the Opportunity Areas, NWEDA and CAZ, this will increase pressure on open space and increase demand on local services, transport and resources, such as water and energy, which will contribute to greenhouse gas emission and possible heat island effects in the city.

#### SUMMARY OF OVERALL CUMULATIVE EFFECTS OF THE SUBMISSION DRAFT CORE STRATEGY

5.183 This section provides a summary of the predicted overall cumulative effects of the implementation of the Core Strategy. It looks at the impact of the positive

and negative effects of the Submission draft Core Strategy on particular receptors, for example, communities in deprived areas, population, in terms vulnerability, worklessness, restricted access to transport, businesses, and looks at the likely positive and negative effects

**TABLE U** CUMULATIVE EFFECTS OF PROPOSED SUBMISSION CORE STRATEGY

Cumulative effects	Receptor	Causes/Comments
Potential significant positive effects		
improved access and availability of social and community facilities	Deprived communities, particularly where transport is an issue	The Core Strategy tackles issues such as local services for all, with a specific policy on social and community infrastructure as well as emphasising the need for provision in Opportunity Area policies and North Westminster Economic Development Area .
Provision of developments supporting and contributing to the creation of safe, accessible and sustainable communities, reducing fear of crime and actual crime	Residents, workers and visitors (particularly relevant for young and old, and deprived communities)	A design out crime approach has been promoted in the growth and regeneration Opportunity Area Policies in particular, which look to improve public realm, encouraging walking, providing community facilities and training. These are likely to have long term positive effect on crime and fear of crime, by creating a vital and active environment and natural surveillance. This is also supported by design policies. .
Provision of housing needs, with wider choice, mix, size, type, location and support to mixed communities	Residents now and in the future	There are specific policies on maximising housing provision and in particular affordable housing in the city. Housing provision is a key driver in the Core Strategy and the provision of houses and protection of residential use is likely in have a positive effect on the number of homes in Westminster.
Provision of cycling facilities, paths, improved pedestrian movement through good design	Visitors, residents and workers	Overall the Core Strategy encourages growth and regeneration around transport hubs, and requires the provision of facilities for cycling and improved public realm and improved pedestrian movement.  There are specific policies in the Core Strategy for transport infrastructure.  The pedestrian movement and sustainable transport strategy focuses on the need to deliver means of transport other than private motorised vehicles. Public

Reduce the need to travel, especially by car.  Provision of multimodal transport interchanges		realm and wayfinding improvements will also enhance pedestrian movements. Policies promoting sustainable transport are included in the core strategy. Provision for green transport, cycling facilities and walking will be developed further in the City Management Plan.
Promote and facilitate sustainable patterns of urban development and land use through quality design taking account of historic character of Westminster	General population	There are a number of policies in the Core Strategy that promote high quality design , protect the historic environment and require an improved public realm.
Enhanced viability of Westminster as the Economic hub for central London without detrimental effect on environment.	Businesses and population	Many of the policies in the Core Strategy seek to deliver economic and commercial growth and the provision of jobs for local and general population. The diversity of businesses in Westminster is acknowledged, and it is this diversity that need to be maintained and enhanced to provide jobs for locals and commuters alike. Enhancing Westminster as a business hub by implementing improvement in public realm policies, improved transport and overall high quality design and landscaping will help maintain its reputation as a sustainable world city.
Increased pressure on existing facilities and amenities	Local population	The Core Strategy focuses growth in key major development areas and describes in detail how these areas should be developed and how they should take account of pressures on existing facilities and amenities.
Reduce affordability of housing	Existing residents, especially in deprived areas	Whilst the Core Strategy seeks the provision of affordable housing, the risk still exists that, improved public realm, transport, amenity , open space, wayfinding may lead to increases in house prices. The implementation of the affordable housing policy along with maximising housing provision is delivered to meet the requirements of those in need.
Increased pressure on open space, biodiversity and habitats	Flora and Fauna  Local People (Open space provision)	The Core Strategy explicitly protects biodiversity and green infrastructure (CS37) , SINC (CS 35) and Open Space (CS 34) which will help minimise negative effects of growth. Inevitably given the proposed scale of economic and population growth there is likely to be increased pressure on open space and wildlife which will need to be addressed in the City Management Plan

		and other forthcoming SPDs
Increased noise and nuisance	General population, especially close to main roads and major development areas	<p>Noise and nuisance can be short term temporary in terms of construction, or long term and permanent in terms of habitation and operation of buildings.</p> <p>The predicted population growth and economic growth are likely to have a cumulative impact on both residents and workers and may lead to deteriorating quality of life/ wellbeing and possible health inequalities. due to noise nuisance.</p> <p>The Core Strategy and forthcoming Noise Strategy emphasise this and will need to be developed to mitigate potential effects.</p>
Increased traffic and congestion	Air Quality, General population, cyclists, pedestrians	<p>Air Quality is a key issue in Westminster with some of the most polluted road in the UK. Increased growth in the city may lead to increased traffic and congestion with the added effect on air quality, health and climate change which may impact on pedestrian, residents and cyclists. The Sustainable Transport policy and Air Quality policy in the Core Strategy addresses this, but is in conflict with cumulative impact of development from increased commercial growth, improved entertainment, tourism, arts and cultural offer along with increased office development will all add to the already significant pressure on transport.</p> <p>Management and minimisation will need to be effective to deal with the potential scale of impact on air quality.</p>
Increased greenhouse gas emissions	Environment and vulnerable groups, such as those with poor health, and those affected by climate change in terms of flooding, and heat island effects	<p>Many of the sources of greenhouse gas emissions may increase due to the proposed level of growth in Westminster. Increases in transport, construction, habitation and operation of buildings and facilities may all impact on greenhouse gas emissions. The Core Strategy sets out its approach to decentralised energy, renewable energy, and sustainable design which will all need to be implemented alongside the forthcoming climate change adaptation and mitigation strategy.</p>
Climate change adaptation; increased risk of flooding , pressure on drainage and sewerage infrastructure and urban heat island effect	Land, water, environment, within and beyond the city, pollution and water and energy prices can lead to fuel poverty in vulnerable groups.	<p>Increased development to meet housing and job targets is likely to result in the development in areas identified as at risk of flooding. Development will also add to the pressure on current drainage and sewer systems and increase hard surfacing and increase the risk of surface water flooding. Climate change is predicted to lead to more intense rainfall events, which will exacerbate this. Hotter summers are also predicted which will exacerbate heat island effects. These must all be taken into account in Westminster's forthcoming Climate Change adaptation and mitigation strategy.</p>
Increased use of resources and waste	Land, air, water, environment within and	<p>Energy and water consumption, and the production of waste are likely to increase in line with growth in Westminster. This is likely at all stages of development</p>

generation.	beyond the city, also lead to cost implications for most vulnerable groups.	from construction, to occupation to operation. These issues will need to be addressed in more detailed policies in the forthcoming City Management Plan.
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**Cumulative effects of proposed Submission draft core strategy with development plans in adjacent boroughs.**

5.184 Table V, below shows the proposed housing and job figures for Westminster, as well as proposed figures in adjacent boroughs. The data was compiled from the London Plan and existing and emerging borough spatial planning documents.

5.185 The proposed increase in population of up to 10,000 over the next 10 years is significant and it represents a 3 % increase in city’s population. Population growth target to 2026 is 243,000.

**TABLE V** PROPOSED HOUSING AND EMPLOYMENT FIGURES FOR WESTMINSTER AND ADJACENT BOROUGHGS

Borough	2007/8 – 2016		2016 -2026/7		2026/27	
	Homes	Jobs	Homes	Jobs	Homes	Jobs
<b>Westminster</b>	<b>6,300</b>	-		--	<b>6,800</b>	
Paddington OA					3000	23,200
Victoria OA					1,000	8,000
Tottenham Court Road OA					1,000	5,000
NWEDA	-	-	-	-	-	-
<b>Brent</b>						
Wembley	11,200		10,300		22,000	14,000
Alperton	1,500		1,000		11,500	10,000
Burnt Oak/Colindale	1,400		1,100		2,500	
Church End	700		100		800	
South Kilburn	1,400		1,000		2,400	
Park Royal	-	-	-	-	-	4,400
<b>Camden</b>	<b>5,950</b>				<b>5,950</b>	<b>39,500</b>
West Hampstead interchange, Swiss Cottage and surrounds					2,000	500
Kilburn High Road	-	-	-	-	-	-
<b>Kensington and</b>	<b>3,500</b>				<b>3,500</b>	

Chelsea						
Kensal Area						

5.186 To the north of Westminster, two of Brent's key growth areas are close to the Paddington Opportunity Area. The proposals for south Kilburn include the provision of 2,400 new homes by 2026. This along with the 3,000 new homes proposed in the Paddington Opportunity Area may have significant effects on the north of the city.

5.187 To the east of Westminster the Tottenham Court Road Opportunity Area has cross boundary links with Camden.

5.188 These proposals have not been appraised in detail, but the scale of the proposed development north of the city may increase the number of people crossing the borough boundary, increasing pressure on open space, which is a specific issue in North Westminster, increased demand on resources and local services and increased need to travel.

5.189 Positive effects may occur as new homes provided in south Brent may provide homes for working population in Westminster and reduce pressure on open space. The table below summarises how development in adjacent boroughs may benefit or negatively affect Westminster.

#### CUMULATIVE EFFECTS FROM DEVELOPMENT IN ADJACENT BOROUGHES

**TABLE W CUMULATIVE EFFECTS FROM DEVELOPMENT PROPOSED IN ADJACENT BOROUGHES**

Cumulative effects	Receptor	Causes/Comments
Potential significant positive effects		
improved access and availability of social and community facilities	Deprived communities, particularly where transport is an issue	Where adjacent borough provide community and social facilities within easy reach this could provide a positive cumulative impact, reducing pressure on local services in the city.
Provision of housing needs, with wider choice, mix, size, type, location and support to mixed communities	Residents now and in the future	Where adjacent boroughs provide homes in an easily accessible location, this may have a positive impact if it provides homes for people who work and visit Westminster.

**TABLE W CONTINUED**

Potential significant negative effects		
Cumulative effects	Receptor	Causes/Comments
Increased pressure on existing facilities and amenities	General population, vulnerable groups, particularly in areas of deprivation	North Westminster is an area of deprivation and the provision of new homes in south Brent may increase pressure on existing facilities and amenities.
Reduce affordability of housing	general population, overcrowded households	Lack of affordable housing provision may result in increased deprivation. Demand for property may reduce affordability due to lack of supply.
Increased pressure on open space, biodiversity and habitats	Flora and fauna, local population	The provision of 2400 new homes north of the city in South Kilburn may add to the pressure on open space, and wildlife in an area that is already deficient in both.
Increased noise and nuisance	General population, vulnerable groups, those living close to main roads	Increased housing in adjacent boroughs may increase traffic and hence noise in Westminster, the movement of freight lorries and waste lorries through the city may increase.
Increased traffic and congestion	Air, general population, those with health issues and living close to main roads	Significant development in adjacent borough may increase traffic, and congestion, may lead to reduced air quality
Increased greenhouse gas emissions	Global environment, vulnerable groups who are susceptible to flood risk and climate change	Adjacent boroughs may add to greenhouse gas emissions in Westminster due to increased traffic.
Climate change adaptation; increased risk of flooding , pressure on drainage and sewerage infrastructure and urban heat island effect	Global environment, vulnerable groups who are susceptible to flood risk and climate change	Adjacent boroughs may add to greenhouse gas emissions in Westminster due to increased traffic
Increased use of resources and waste generation.	No significant cumulative effects from adjacent boroughs.	

5.190 The Core Strategy will have a number of significant effects on certain groups. It tackles issues such as local services and social and community infrastructure which will benefit the community as a whole. It has housing provision as the key driver, and is particularly focused on high density development in the Opportunity Areas, which will minimise impacts on other land uses across the

city. Increased traffic and congestion as a consequence of growth is predicted to have health implications particularly for those who live on main roads.

- 5.191 Long term cumulative effects are predicted on biodiversity and open space given likely increases in residential, working and visiting population. Increased use of resources is also predicted to lead to increased greenhouse gas emissions.

## PROPOSED MITIGATION MEASURES

- 5.192 The assessment of Core Strategy policies highlighted the need for mitigation measures to reduce any potential negative effects of the policies and to enhance potential positive effects.
- 5.193 Many of the significant effects on the natural environment, including biodiversity, water, air, and flood risk have been assessed as negative, as have the effects of increased waste production and use of natural resources, energy and demands on local services, which are all predicted to occur along side population and economic growth. The scale of these effects will, in part, be due to how policies will be applied and implemented. It is also recognised that these effects will need to be avoided or mitigated for through other policies in the Core Strategy or through policies in the forthcoming City Management Plan DPD and supplementary planning documents.
- 5.194 Table X below summarises significant effects and presents ways to avoid or mitigate for any negative or uncertain effects.

**TABLE X SIGNIFICANT EFFECTS MITIGATION AND ENHANCEMENT AND PROPOSED PLAN CONTAINING MITIGATION AND ENHANCEMENT.**

Negative effect – increased use of resources
Mitigate through City Management Plan DPD (2010) and Sustainable Design SPD (2010) Promote green business practices and accreditation schemes. Ensure sustainable design of new premises to minimise use of natural resources and reduction in greenhouse gas emissions. Ensure growth in areas with good transport links to reduce need for road transport.
Negative effect – increase use of water
Mitigate through City Management Plan DPD (2010) and Sustainable Design SPD (2010) Water efficiency targets for sustainable homes, for example, 110l/head/day. Apply code for sustainable homes. Use A rated appliances. Rainwater harvesting and attenuation.. Infrastructure for new supplies for major developments take time and this should be taken into account prior to development going ahead. Water butts and drought resistant

landscaping can help
Negative effect – increase pressure on biodiversity and open space.
Mitigate through City Management Plan (2010) and Sustainable Design SPD (2010) Green roofs, habitat creation, sustainable design and layout. Minimise light and noise pollution, provide tranquil, protected areas for habitats and species in line with BAP. Link biodiversity to open space, and green infrastructure networks, encourage signage and community participation to protect and enhance biodiversity in the city. Use planning obligations, BAP, designations to safeguard habitats, species and promote creation of new habitats in new developments.
Negative effect Increased use of energy
Mitigate through City Management Plan (2010) and Sustainable Design SPD (2010) Installation of CHP in the city, PHDU, Whitehall, if possible. Encourage accreditation for energy efficient business practices. Use ground source heat/cooling, where appropriate. Consider use of biogas, for example anaerobic digestors. Look at product lifecycles and alternative construction materials and retrofitting existing building stock. Ensure sustainable design and renewable energy sources, where possible.
Negative effect ncreased waste production
Mitigate through City Management Plan (2010) and Sustainable Design SPD (2010) Minimise waste production, deal with as close to source as possible. Reduce, reuse and recycle waste, where possible. Encourage greener business practices and sustainable construction practice. Code for sustainable homes approach to waste should be encouraged. Waste management plans for major site and specific uses may be required. Provide storage space for segregating and recycling waste.
Negative effect increased noise reduced air quality , increased pressure on open space.
. Mitigate through City Management Plan (2010) and Sustainable Design SPD (2010) Air Quality Strategy and action plan, and Noise Strategy Nuisance from increased commercial activity will need to be minimised to reduce impact on residential amenity, health and wellbeing. Detailed policies for noise, waste and well being will need to be considered. Code for construction practice should be applied to minimise impacts of major development on resources
Negative effect Inefficient use of resources in old building stock
Mitigate through City Management Plan policies and Sustainable Design SPD, Local Views SPD Retrofitting old building stock with emerging new technologies should be encouraged and best practice examples of sustainable new technologies in an historic environment should be used to demonstrate how this should be done.
Negative effect Increase flood risk
Mitigate through City Management Plan DPD (2010) and Sustainable Design SPD (2010) Direct development away from high risk areas. Apply sequential and exceptions test. Make buildings flood resistant and resilient. Highly vulnerable uses should be prohibited in flood zone 2/3. Make use of flood warning and emergency procedures. Use SUDs, permeable paving, green roofs, on-site attenuation for effective drainage. Require site specific flood risk assessments, where necessary. Adequate space for maintenance and renewal of flood risk management assets
Negative effect Increased pressure on open space
Mitigate through City Management Plan policies , Economic Development Strategy and Sustainable Design SPD and Open Space SPD Create open space, design out crime and ensure access to open space. Integrate multimodal transport solutions to add benefits

Negative effect Increased congestion and traffic
Mitigate through City Management Plan policies , Economic Development Strategy and Sustainable Design SPD and Open Space SPD Ensure development takes account of transport links and reduces the need for motorised vehicles. Encourage provision for cycling and walking
Positive effect enhanced to provide housing
Enhance through City Management Plan policies Encourage change of use where hotels have negative impact on residential amenity.
<b>Positive effect reduce use of resources through sustainable design</b>
Enhance through City Management Plan policies , and Sustainable Design SPD and Open Space SPD Mitigate through City Management Plan (2010) and Sustainable Design SPD (2010) Air Quality Strategy and action plan, and Noise Strategy Ensure sustainable design of new developments and ensure housing standards are set to provide sustainable homes which minimise demand for transport, encourage cycling and walking and ensure minimal use of resources and the use of alternative fuels that reduce negative impacts on air quality.

## SECTION 6

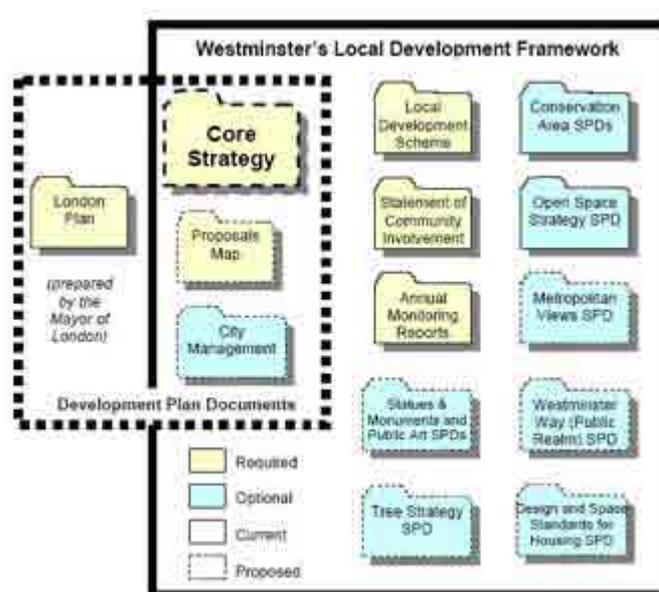
### IMPLEMENTATION AND MONITORING

#### Links to other plans, programmes and projects

6.1 Westminster's Core Strategy is part of a hierarchy of plans, and has evolved taking this into account. It is part of Westminster's Local Development Framework, a portfolio of documents which together provide a comprehensive policy framework for the city.

6.2 The Core Strategy is the key document in that portfolio; all other documents will follow from it.

6.3 The Core Strategy is one of two Development Plan Documents that Westminster is preparing. The other is the City Management Plan, containing more detailed policies for determining planning applications.



6.4 The portfolio will also include a number of Supplementary Planning Documents. All of these documents are being prepared in accordance with the timetable set out in the Local Development Scheme, and undertaking consultation in accordance with the Statement of Community Involvement.

6.5 The Core Strategy sets out the vision for the City of Westminster up to and beyond 2025, and puts in place a policy framework to deliver that vision.

6.6 It has been developed by Westminster City Council, working with key stakeholders and the wide and varied communities across the borough. It has been agreed by the Westminster City Partnership and is the Spatial expression of their document – the Westminster City Plan.

- 6.7 The Core Strategy is also part of a broader hierarchy of plans, and which will be neither developed nor delivered in isolation. Links and relationships with other plans, programmes and projects at a local, regional (London) and national level have been taken into account and the Core Strategy sets out the strategic objectives and policies for the LDF, linking into other relevant plans, programmes and policies.
- 6.8 However, how these objectives are met is dependent on implementation of the Core Strategy Policies and, the City Management Plan, which will provide more detailed Development Control Policies.
- 6.9 Central to the Core Strategy is the need for sustainable development as set out in Securing the Future – UK Government Sustainable Development Strategy, and for specific aspects such as housing, in particular affordable housing, waste management, energy and transport. It has been designed in line with regional targets, as set out in the London Plan,
- 6.10 Additionally, the Core Strategy is linked to local plans, such as Local Implementation Plans, which aids delivery of the London Transport strategy in the city and Biodiversity Action Plan.

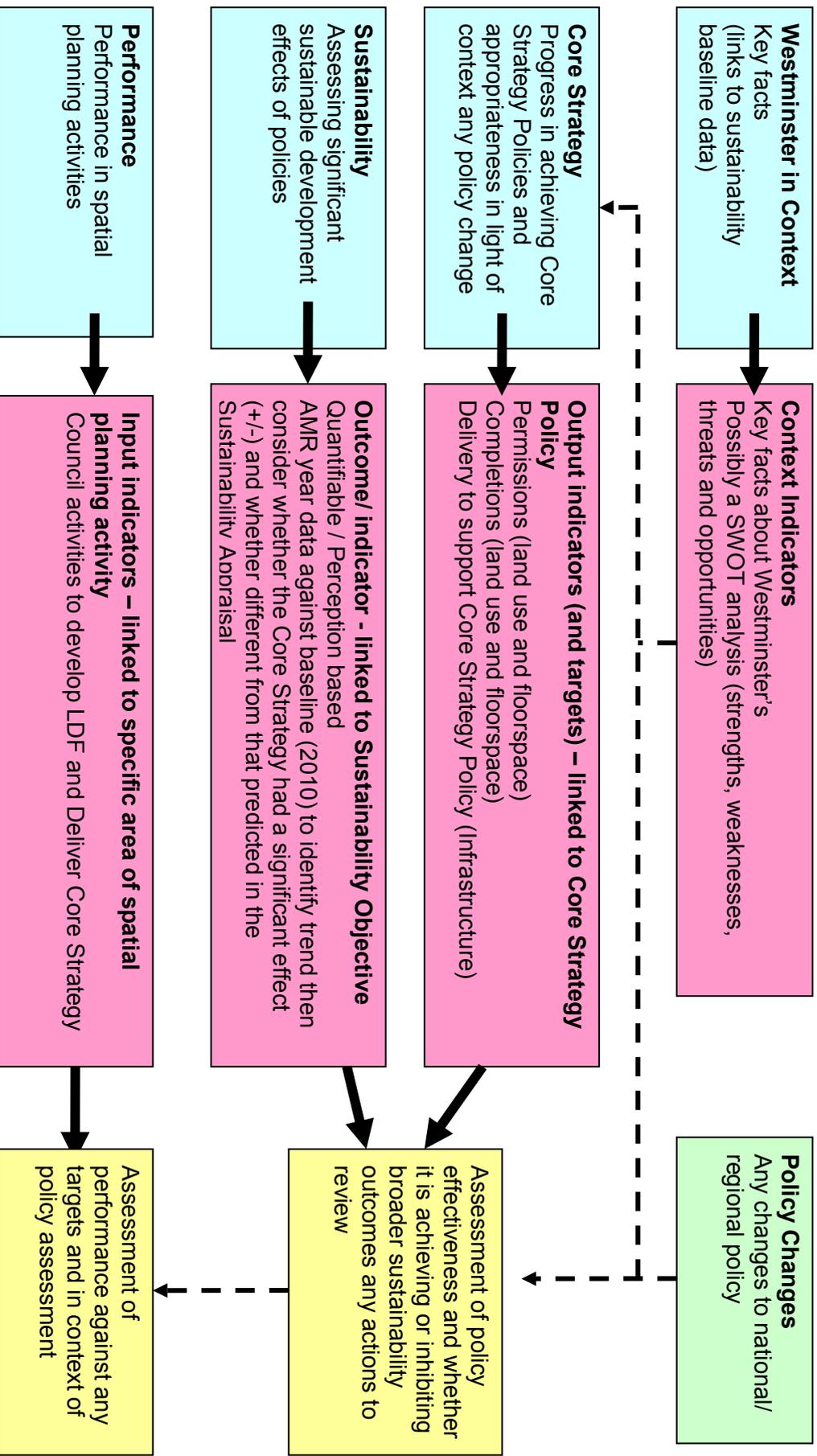
#### PROPOSALS FOR MONITORING

- 6.11 The SEA regulations ( The Environmental Assessment of Plans and Programmes Regulations (England ) 2004 (Statutory Instrument 2004 No 1633) requires that significant environmental effects of a plan or programme to be monitored and that the Environmental Report ( incorporated into this SA Report) should include a description of measures ‘envisaged’ for monitoring the implementation of the plan.
- 6.12 Regulation 17 (i) of the SEA Regulations states that “ the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.
- 6.13 Schedule 2 (paragraph 9) states that the Environmental Report should include “a description of the measures envisaged concerning monitoring in accordance with regulation 17’.

- 6.14 Following its adoption, implementation of the Core Strategy will be monitored and reported as part of the Annual Monitoring Report which will provide the basis against which to measure the effectiveness of policies. We will also monitor the significant sustainability effects of implementing the Core Strategy as required by the SA process.
- 6.15 Monitoring performance against SA objectives , and identifying where they are being achieved and where they are not, is vital , so that appropriate remedial action can be taken.
- 6.16 The Planning and Compulsory Purchase Act 2004 requires the local authority to prepare an Annual Monitoring Report (AMR) which should set out the extent to which the policies and objectives of DPDs and SPDs making up the LDF are being achieved.
- 6.17 ODPM (now CLG) has published a good practice guide on monitoring LDF (LDF; A good practice guide, ODPM(DCLG) March 2005 which suggests:
- Contextual Indicators – which provide monitoring the background in which the LDF operates
  - Output indicators – which enable monitoring of specific polices included in the LDF and
  - Significant effects indicators – which monitoring ‘effects’ identified in the SA.

This approach is practical and is reflected in Westminster’s AMR 2007/8 which considers how significant effects will be incorporated into the wider AMR process as required for the LDF in the future. The Annual Monitoring Report will be produced in December each year.

FIGURE 10 POTENTIAL MONITORING APPROACH IN FUTURE AMRS



# SECTION 7

## CONTEXTUAL AND OUTPUT INDICATORS

- 7.1 Contextual indicators will be used in the AMR to set the baseline situation in Westminster. These will include indicators for demographics, socio-economic data indices of deprivations, and economic data such as house prices, state of the environment, Public Transport Access Level (PTAL).
- 7.2 Output indicators are already reported in the Annual Monitoring Report. These include the following.

## CORE OUTPUT INDICATORS

Commercial (Office, retails, hotels and entertainment uses) and CAZ,

- C1 BD1 Total amount of additional floorspace – by type
- C1 BD2 Total amount of employment floorspace on previously developed land
- C1 BD3 Employment land available by type
- C1 BD4 Total amount of floorspace for town centre use (includes cas/casf/pspa, district and local shopping centres).

## LOCAL OUTPUT INDICATORS

- L1 C1 Office floorspace completed by area (CAZ, Paddington SPA, Creative Industries SPA, North West Westminster)
- L1 C2 Local Indicator Shopping Floorspace by Area
- LI MIX1 Gains from floorspace from mixed use development with a net increase of over 200sqm in CAZ
- L1 MIX2 All net floorspace change in CAZ/CAZF (A1 includes primary frontage)
- L1 MIX 3 Total completions by use class in Paddington SPA
- L1&E1 Hotels and Hotel Bed rooms by Area.
- L1&E2 Temporary Sleeping Accommodation
- L1& E3 Entertainment Uses by Use Class and Area ( Stress Area, CAZ, Westminster)
- L1&E4 Number of Theatres and Expansion of Theatre Floorspace

- L1 SOC 1 Proposed Social and Community Floorspace
- L1 SP 1 Permissions for Medical Uses in Harley Street Special Policy Area
- L1 SP2 Portland Place Special Policy Area Survey Results
- L1 Permission and Completions in Arts, Culture and Educations Special Policy Area ( museum and gallery floorspace)

## HOUSING

- C1H1 Plan period and Housing Targets
- C1 H2 (a) Net additional dwellings in previous years, C1H2 (b), Net additional dwellings in reporting year and NI 154 Additional Homes Provided, C1H2 Net additional dwellings in future years and NI159 Supply of Ready to Develop Housing Sites C1 H2 (d) Managed delivery target.
- C1 H3 New and converted dwellings on previously developed land
- C1 H4 Net additional pitches (gypsy and traveller)
- C1 H5 Gross affordably Housing Completions (same as NI 155)
- C1 H6 Housing Quality - Building for Life Assessments (Monitoring approach to be determined. )
- L1 H1 Loss of Housing
- L1 H2 Affordable Housing as a Percentage of all Housing Completions
- L1 H3 Affordable Housing on site/off site/payment in – lieu to Affordable Housing Fund.
- L1 Housing by tenure and room size
- L1 H5 Empty properties brought into use for housing.

## ENVIRONMENT

- N1 193 Municipal Waste landfilled
- N1 192 household waste recycled
- C1 E1 Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds
- C1W1 Capacity of new waste management facilities by waste planning authority
- C1W2 Amount of municipal waste arising, and managed by management type by waste planning authority
- C1 E2 Change in areas of Biodiversity importance.

- C1 E3 Renewable Energy generations
- L1 En 1 Air Quality (Nitrogen Dioxide and PM10)
- L1 En 2 Noise complaints
- L1 En 3 Loss of designated Open Space
- L1 En 4 Satisfaction with Open Spaces
- L1 En 5 Sustainable Analysis of Planning Applications
- L1 En 6 Perception of Environmental Problems

## SIGNIFICANT EFFECT INDICATORS

- 7.3 Guidance that relates to monitoring LDF states that significant effect indicators should be linked to SA objectives and indicators. This should enable comparison between predicted effects (as set out in the appraisal) and actual effects as a consequence of implementation of policies (as set out in Core Strategy) . When considered alongside the contextual and output indicators, sufficient numbers of significant effects indicators should be developed to ensure robust assessment of policy implementation.
- 7.4 Table Y below sets out the potential indicators for significant sustainability effects as identified throughout the SA process, which significant effects relating to one or more sustainability objectives.
- 7.5 Where data already exists, relevant indicators included in the proposed Core Strategy and Current AMR are identified against each significant effect. Where there is a potential gap in data or a relevant indicator doesn't exist , this is stated and potential proxy indicators are proposed.
- 7.6 Westminster City Council is required to identify unforeseen adverse effects at an early stage and to undertake remedial action. It is vital the Westminster regularly reviews its contextual indicators, undertake monitoring discussions, internally and externally and consider other external sources of research and information in order to identify unexpected effects and outcomes, and review monitoring requirements as a result.

TABLE Y MONITORING PREDICTED SIGNIFICANT EFFECTS OF THE IMPLEMENTED CORE STRATEGY

Significant effects (relevant to SA objectives )	Existing indicators	Targets, trends, baseline	Potential gaps and additional indicators.
<b>Potential Positive Effects</b>			
<b>Increased housing development</b>	LI households assisted to relieve pressures on overcrowding	NI 158 % of decent council homes 2009/10: 100% (target 100%)	
	LI on number of people sleeping rough on a single night in Westminster	100-200 per night average 1600 different people 2006/7	
<b>AMR indicators linked to housing figures</b>	C1H1	London Plan Target 680	
	C1H2 (a-d)	06/07 – 657 07/08 – 683 08/09 – 716 Projected 09/10 – 564 10/11 – 651 11/12 – 549 12/13 – 960 13/14 – 960 14/15 – 547 15/16 – 547 16/17 - 612	
	C1H3 new and converted dwellings on previously developed land (gross)	100% - 752 units 08/09	

	C1H4 Net additional pitches (gypsy and traveller)	0 – 08/09	
	C1H5 Gross affordable housing completions ( same as NI 155)	Social rented 214 – 08/09 Intermediate – 92 Affordable total 306	
	LI H1 loss of housing	9 – 08/09	
	LI H2 units under construction	13 – 08/09	
	LI H3 affordable housing on site	232 – 08/09	
	LI H4 Housing by Tenure and room size ( see end table )	<b>See Table Z</b>	
	LI H5 Empty properties brought into use for Housing	250 – 08/09	
	Local indicator on the number of intermediate housing opportunities	Intermediate – 92 (08/09)	
	NI 154 % number of households living in temporary accommodation	2454 (08/09) Target 09/10 1788	
	NI 155 Number of affordable homes delivered (gross)	NI 155 Number of affordable homes delivered (gross) - 289 (includes transfers in and out of tenure)	
	NI 158 % of decent council homes	100% (target 100%)	
<b>Reduced social exclusion and inequalities deprivation, including improved access to services and amenities</b>	NI 2 % of people who feel they belong to their neighbourhood	49% (April 09)	

	NI 3 Civic participation in London Area	2008/9: 19.9% (no target) London: 17%, National: 14%.	
	NI 6 participation in regular volunteering	2008/9: 20.7% (no target) London: 20.8%, National: 23.2%	
	NI 4 % of people who feel that they can influence decisions in their locality	40% (target 42%)	

Improved townscape and public realm	Number of street cleansing complaints	Year	Street cleansing complaints	
		06/07	895	
		07/08	911	
		08/09	1037	
	LI EN 6 Perception of environmental problems	<p>Traffic fumes (30%)            Poor air quality (30%)            Rubbish/litter (26%)            Domestic noise (19%)            Lack of trees / flowers (17%)            Commercial noise (11%)</p>		
	No of historic squares, listed buildings, conservation areas etc.	<p>85 London squares            &gt;11,000 listed buildings and structures            21 listed historic squares and gardens            75% city covered by Conservation Areas</p>		
	Number of strategic and local	16 of 26 strategic views		

	views	mentioned in London Plan are relevant to Westminster Numerous local views.	
<b>Reduced crime and fear of crime</b>	NI 17 Perceptions of anti-social behaviour	20% (April 09) target 19%	
	NI 20 Assault with injury crime rate	2943 offences (target 3088)	
	NI 16 Serious acquisitive crime rate	7147 ( Target 6,844)	
<b>Improved public transport infrastructure</b>	Mode of transport journeys to work % (ONS)	<b>See tables 1&amp;2 at end</b>	NI 175 Access to services and facilities by public transport, walking and cycling NI 167 Congestion – average journey time per mile morning peak
	NI 198 % of children walking or cycling to school	2007/8: 5.53%	
	PTAL rating	PTAL 6 32 tube stations 79 bus routes	
<b>Increased walking and cycling</b>	Road Traffic Incidents (KSI)	335 - 2008/09 1035 – 2007/08 986 – 2006/07	Mayor of London’s cycle hire scheme.
	Passenger travel modes	Between 2005 - 2008 average of 1.74million trips per day were made in the city. 3% cycle 15% bus	

			19% tube 7% train 14% car 38% walking 3% taxis	
	% children travelling to school by different modes of transport			Data currently unavailable
	Cycling provision		2-3% of travel to work journeys by bicycle. 146 approved Mayor of London Cycle Hire sites (as at Feb 2010).	
<b>Increased investment in regeneration areas</b>	Pipeline data in Economic Zone		BIDS – NW/EC, Paddington, Queensway (proposed ) Edgware Road (proposed) 2004-2008: 314,824sqm net change in office floor space in Paddington SPA.	
	LARPs		Westminster has 5 Local Area Renewal Partnerships Church Street, Queen's Park, Harrow Road, Westbourne, South Westminster.	Pipeline data to be included.
<b>Reduced unemployment</b>	Diversity of economic sectors			
		Economic Sector	%	
		Agriculture, hunting, forestry, fishing	0.1	
		Mining and Quarrying	0.2	



			08			
			08-09	10,800	8.7	
	Average earnings		Year	Median	Mean	
			2002	527.0	874.2	
			2003	555.2	826.7	
			2004	614.2	928.5	
			2005	607.0	959.8	
			2006	638.5	1,113.9	
			2007	670.8	1,038.0	
			2008	702.3	1,154.6	
	% GDP		2.2%			
<b>Improved standards of design and construction in development</b>	Westminster Design Awards winners		Civic Trust Award Winners 2009			
			Reiss HQ			
			Westminster Academy at the Naim Dangoor Centre			
			One Vine Street			
<b>Enhanced public perceptions</b>	Satisfaction surveys		See graph.			
	Open space					
<b>Potential Negative effects</b>						
<b>Reduced affordability of housing</b>	Housing prices		See Sub section			
<b>Increased pressure on open space, biodiversity and habitats</b>	L1 2 changes in area of biodiversity importance	0				
	Green Flags	18 (09/10) for parks and cemeteries				

			2 for parks/cemeteries owned by Westminster but located in other boroughs.		
	LI EN3 loss of designated open space	0			
	Wildlife deficiency	Year	Total Ha	Total deficiency in access	% wildlife deficient
		May 04	2204	277	13%
		Jan 07	2204	370	17%
	BAP targets	Improved local biodiversity active management at local sites reports a score of 52% ( UK average 35%) June 2009			
	SINCS	No of SINCS	% of Open Space		
		33	24%		
	Public concern over noise	Year	Noise visits	Noise complaints	
	Increased noise and nuisance	06/07	43666	17388	
		07/08	40930	15991	
		08/09	47519	16267	
		Reduction in residents		29%	

	bothered by noise	
<b>Increased energy use, greenhouse gas and NI 186</b>	NI 186 Per capita reductions in CO2 emissions in Local Authority Area.	2005 CO2 emissions (kt CO2) Industry and commerce 2,433 (73%) Domestic 491 (15%) Road Transport 415 (12%) Total 3,339 Population (mid year estimate 2005) 223.6 Per capita emissions (t) 14.6
	NI 185 CO2 emissions in Local Authority Operations.	2006 CO 2 emissions (kt CO2) Industry and commerce 2,637 (74%), Domestic 501 (14%) Road Transport 412 (12%) Total 3,550. Population (mid year estimate 2006) 232 per capita emissions (t) 15.3
<b>Climate change adaptation</b>	NI 188	
	NI 189	
<b>Increased use of resources</b>	Sustainability Analysis System	<b>SEE TABLE ZZ</b>
<b>Reduced air quality</b>	NI 194	<b>SEE Figures 1A &amp; 2A below</b>
<b>Increased waste production</b>	Municipal Waste Production	2005/6: 188,959 tonnes 2007/8: 193,523 tonnes Meet targets under landfill directive, most waste is incinerated.
	Hazardous Waste Production	2006: 3,536 tonnes 2007: 4,607 tonnes
	LI % of population served by kerbside collection	100%

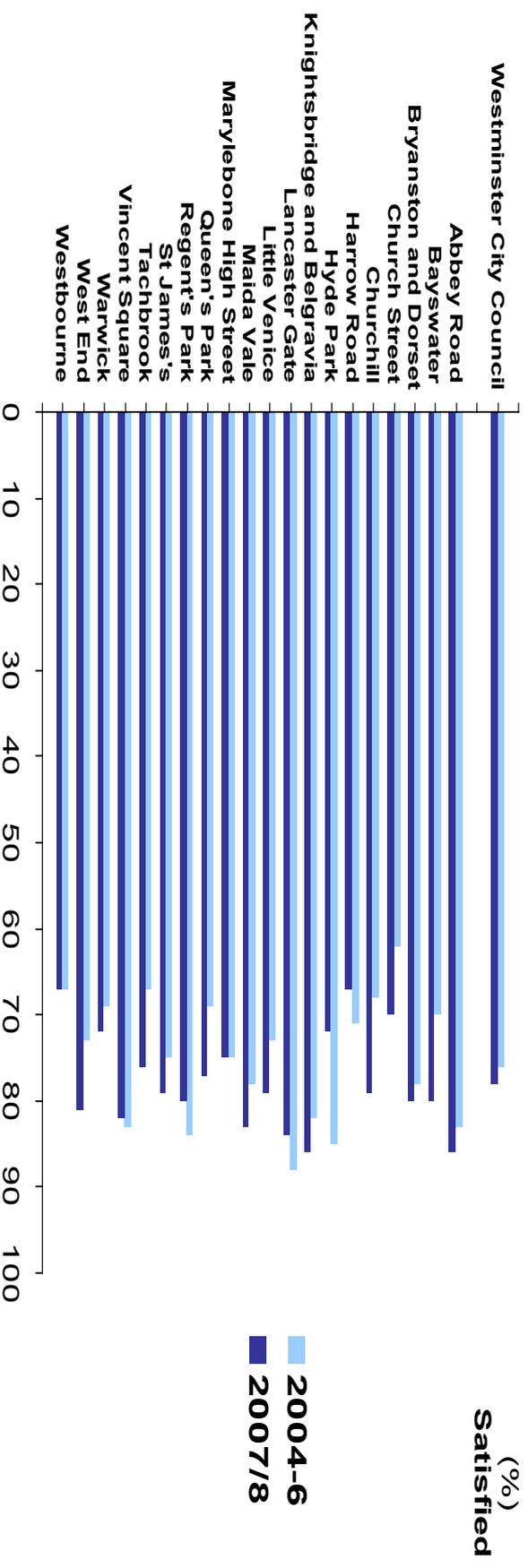
	NI 192 Household waste recycled	22.97% (target ? )	
	NI 193 Proportion of household waste sent to landfill	14.3% (target?)	
	C1 W1 new waste management facilities	0	

TABLE Z AFFORDABILITY OF HOUSING DATA (AVERAGE PROPERTY PRICES 04-08 TO 08-09)

Month	Detached (£)	Semi-Detached (£)	Terraced (£)	Maisonette/Flat (£)	All (£)
<b>Apr-08</b>	1,318,620	1,354,318	1,292,982	577,888	617,605
<b>May-08</b>	1,330,031	1,366,038	1,304,171	582,889	622,950
<b>Jun-08</b>	1,303,661	1,338,953	1,278,313	571,332	610,599
<b>Jul-08</b>	1,301,759	1,337,001	1,276,449	570,499	609,708
<b>Aug-08</b>	1,269,993	1,304,374	1,245,300	556,577	594,830
<b>Sep-08</b>	1,240,388	1,273,968	1,216,271	543,603	580,964
<b>Oct-08</b>	1,242,947	1,276,596	1,218,780	544,724	582,162
<b>Nov-08</b>	1,215,616	1,248,525	1,191,980	532,746	569,361
<b>Dec-08</b>	1,226,395	1,259,596	1,202,549	537,470	574,410
<b>Jan-09</b>	1,196,666	1,229,062	1,173,399	524,441	560,485
<b>Feb-09</b>	1,164,885	1,196,420	1,142,235	510,513	545,600
<b>Mar-09</b>	1,140,883	1,171,769	1,118,701	499,994	534,358
<b>Apr-09</b>	1,122,383	1,152,768	1,100,560	491,887	525,693
<b>May-09</b>	1,141,444	1,172,345	1,119,250	500,240	534,621
<b>Jun-09</b>	1,152,488	1,183,689	1,130,080	505,080	539,794
<b>Jul-09</b>	1,207,695	1,240,390	1,184,213	529,275	565,651
<b>Aug-09</b>	1,227,045	1,260,264	1,203,187	537,755	574,714

FIGURE 11

# Satisfied with... Parks & open spaces



**Question:** Q10: Satisfied with... Parks & open spaces  
**Source:** 3044 Westminster residents, c.150 per ward, aged 16+, October 2007 – January 2008 (Ipsos MORI)

Clearly, detailed monitoring of significant effects will be extensive. However, it is clear that further data will be required to monitor some effects. This data will be collected in the future, depending on cost and availability. Alternative proxy data will be used where necessary.

**TABLE 22 LI En 5; Sustainability Analysis of Planning Applications**

Sustainability Analysis Systems Category	Number of Applications			Total Applications with Sustainability Criteria
	Yes	Negotiated	Condition	
Environmental Performance Statement Submitted	22			22
Ecohomes/BREEAM standard	9			9
Site Waste Management Plan Submitted	5			5
Duct to take smells to high level		3	22	25
Noise Issues		5	171	176
Waste Storage facilities/recycling		19	275	294
Daylight/Sunlight/ enclosure/privacy (amenity)		12	39	51
Protection of trees from development		8	31	39
Landscaping		4	36	40
Preservation of recording of archaeology		1	11	12
Measures to minimise/prevent light pollution		1	2	3
Contaminated Land		1	4	5
Biodiversity promotion		6	55	61
Protected species in SMINCs		0	5	5
Wildlife deficiency increased habitat		0	0	0
Sustainable urban design		0	3	3
Renewable Energy		4	53	57

Water Conservation		0	9	9
Total	36	64	716	818

NOTE Figures include permitted applications with a decision date between 1/4/08 and 31/03/2009 (328 approved applications provided sustainability benefits. The Totals in the table are higher than this figure as some applications have multiple entries under the sustainability analysis system)

**Table 1: Resident Population Travel to Work Method, 2001 Census**

<b>RESIDENT POPULATION</b>	<b>Westminster</b>		<b>London</b>		<b>England</b>	
Works mainly at or from home	9906	11.1%	285935	8.6%	2055224	9.2%
Underground, light rail or tram	28420	31.8%	625224	18.8%	709386	3.2%
Train	3253	3.6%	404414	12.2%	950023	4.2%
Bus, minibus or coach	11071	12.4%	369108	11.1%	1685361	7.5%
Taxi or minicab	1453	1.6%	21608	0.7%	116503	0.5%
Driving a car or van	11809	13.2%	1111762	33.5%	12324166	54.9%
Passenger in a car or van	1103	1.2%	83378	2.5%	1370685	6.1%
Motorcycle, scooter or moped	1123	1.3%	47147	1.4%	249456	1.1%
Bicycle	2496	2.8%	77330	2.3%	634588	2.8%
On foot	17969	20.1%	279340	8.4%	2241901	10.0%
Other	869	1.0%	13888	0.4%	104205	0.5%
<b>Total Workers</b>	<b>89472</b>	<b>100.0%</b>	<b>3319134</b>	<b>100.0%</b>	<b>22441498</b>	<b>100.0%</b>

**Table 2: Total Daytime Population Travel to Work Method, 2001 Census**

<b>DAYTIME POPULATION</b>	<b>Westminster</b>		<b>London</b>		<b>England</b>	
Works mainly at or from home	9906	1.9%	285935	7.5%	2055224	9.2%
Underground, light rail or tram	180687	35.4%	642476	16.9%	706080	3.2%
Train	159235	31.2%	661166	17.4%	945100	4.2%
Bus, minibus or coach	50219	9.8%	376926	9.9%	1682127	7.5%
Taxi or minicab	2577	0.5%	21962	0.6%	115495	0.5%
Driving a car or van	56520	11.1%	1294081	34.0%	12308844	55.0%
Passenger in a car or van	5389	1.1%	92819	2.4%	1368226	6.1%
Motorcycle, scooter or moped	9180	1.8%	55752	1.5%	248824	1.1%
Bicycle	10571	2.1%	78804	2.1%	632231	2.8%
On foot	23752	4.7%	281338	7.4%	2231539	10.0%
Other	1907	0.4%	14396	0.4%	82430	0.4%
<b>Total</b>	<b>509943</b>	<b>100.0%</b>	<b>3805655</b>	<b>100.0%</b>	<b>22376120</b>	<b>100.0%</b>

Figure 12 Air Quality: Particulates Monitoring 2004-2008

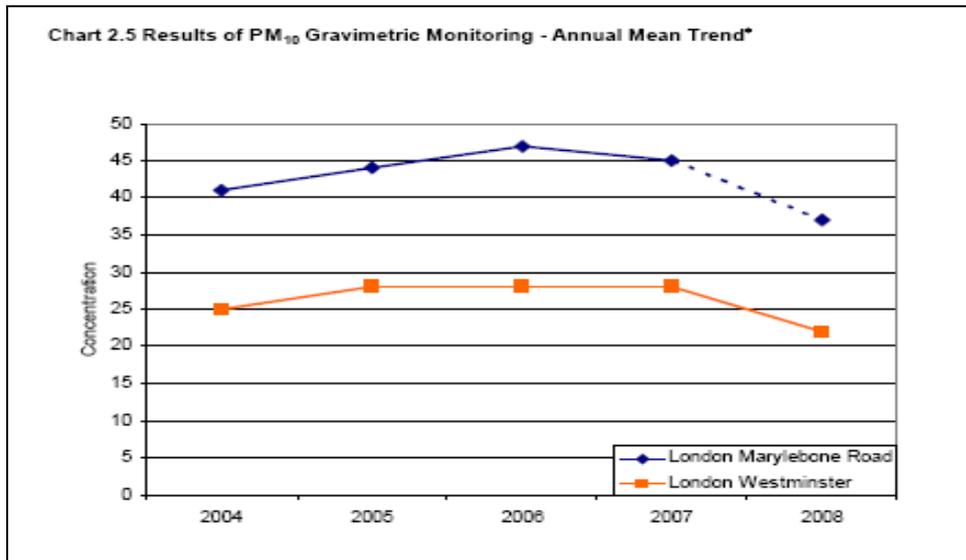
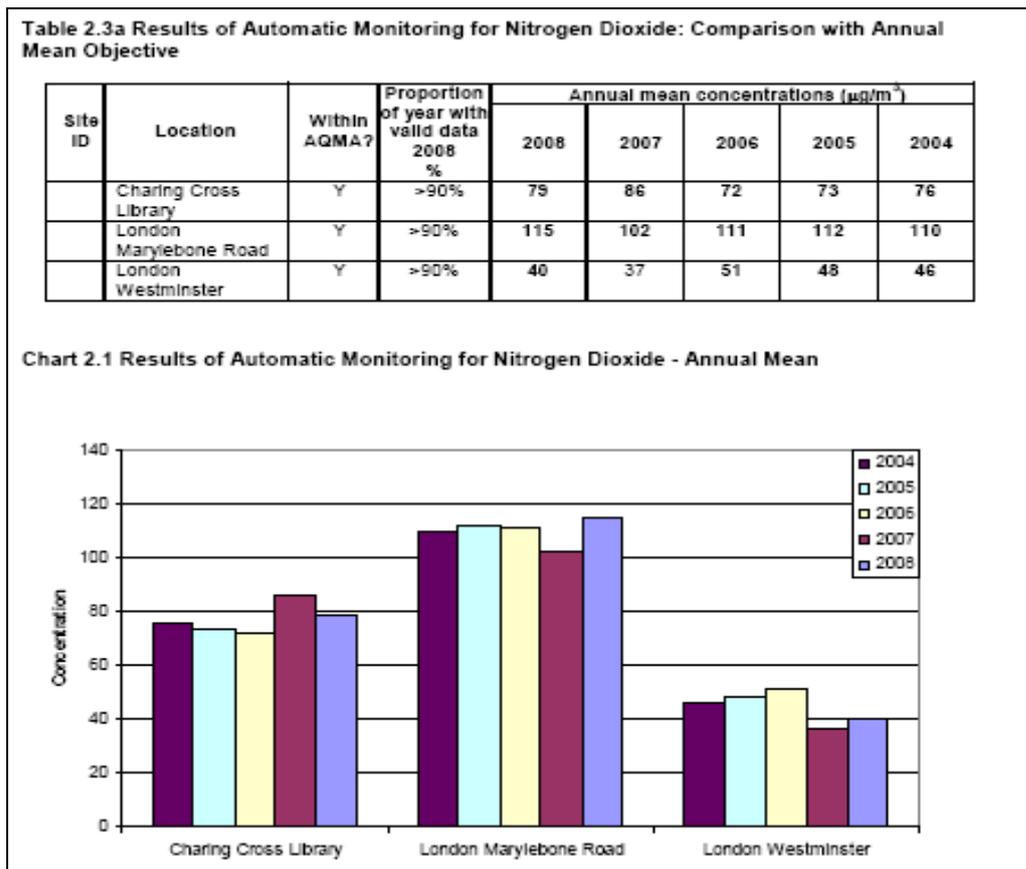


Figure 13 Air Quality: Nitrogen Dioxide Monitoring 2004-2008



## Conclusion

The Core Strategy DPD has been subject to Sustainability Appraisal, incorporating SEA and potential significant effects have been identified. The assessment findings conclude that the Core Strategy will positively contribute to sustainable economic growth and social development, and it recognises that there are likely to be potential significant effects on environmental sustainability objectives, such as air quality, noise greenhouse gas emissions, use of resources, energy and water, and increased waste production and pressure on open space and local services within Westminster. Taking this into account the SA has recommended mitigation through other policies in the Core Strategy or through more detailed policies in the forthcoming City Management Plan.



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