

# City Management Plan workshop briefing notes

## Wellbeing

### What are the issues?

In Westminster health inequalities mirror the pattern of deprivation concentrated in the north west and south of the City. To reduce health inequalities in these areas and across the city, all development should strive to achieve a healthy and safe environment that contributes to people's well-being.

#### HEALTH

There is strong evidence of the links between the wider determinants and health inequalities. Wider determinants that affect an individual's health are illustrated in Figure 1 over the page. Health is an overarching issue with permeates much of the policy framework. The existing Unitary Development Plan contains a number of policies that seek to reduce health inequalities. The new City Management Plan is likely to contain a similar range of policies which seek to increase employment opportunities; provide better education; secure affordable housing; protect and encourage accessible community facilities and shops; enhance the vitality and viability of the district centres; improve quality, reliability, efficiency, safety and directness of routes for those walking, cycling and public transport and protect and enhance open space. (See briefing notes on the Social and Community Facilities, Natural Environment and Improving Travel Choice and Managing the Public Realm).

Obesity is a growing concern in the UK and Westminster. This has been reflected in the representations received from Westminster's Primary Care Trust. Access to healthy food is seen as a key issue

in addressing obesity. The London Borough of Waltham Forest has recently taken a strong policy stance to try and address childhood obesity and community health, by adopting a new Supplementary Planning Document (SPD) in March this year to control the provision of hot food take way shops. The SPD seeks to control location of these uses and proximity to schools, youth facilities and parks, ensure appropriate concentrations of hot food take way establishments, protect residential amenity, address community health, reduce the impact of proposals on the public realm, ensure appropriate extraction facilities are in place, ensure highway safety, access and manage the disposal or products and litter.

To try and address community health and access to healthy food this briefing note asks a number of questions on this subject.

In Westminster the Thames riverside provides an attractive setting for new development (residential and public uses – public houses, restaurants and tourist attractions) and provides recreational opportunities. Water sports, riverside walks and open spaces adjacent to the river provide opportunities for residents to adopt healthier lifestyles, including increased walking and safe cycling, and are supported by the council.

#### SAFETY

Crime and the fear of crime can have a negative impact on health. Westminster has over 1 million workers and visitors who enter the city everyday.



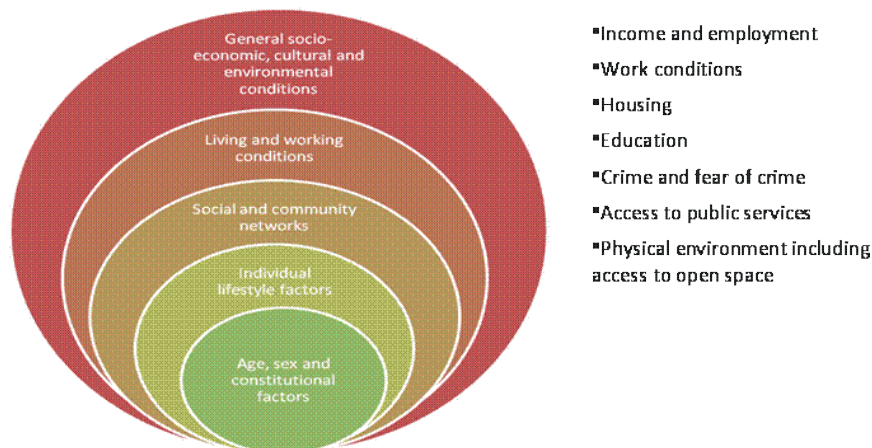


Figure 1

This volume of people, nationally important buildings, visitor attractions (in the West End) and government related functions (in Whitehall) give rise to additional security and terrorist concerns. A recent consultation document by the Home Office and Communities for Local Government states that crowded places are most at risk from a terrorist attack. Westminster has many crowded places therefore counter terrorism design principles need to be considered to create safer places and buildings so people are protected. To implement protective security measures and reduce the vulnerability of crowded places to terrorist attack requires the involvement of a range of local partners. The City Council is the coordinating body for managing overall risk locally working closely with the Police, fire and rescue authorities and health trusts. Owners and operators of buildings will continue to be responsible for considering any mitigating risk actions to address identified risks. The Counter Terrorism Service Advisors (CTSAs) within the Police force are responsible for making recommendations on risks locally. They are directed by National Counter Terrorism Security Office (NaCTSO). Planning can contribute to reducing the risk of terrorist attack by creating well designed places.

Road safety is key issue, approximately 300 people die or are seriously injured each year in Westminster. Creating a city where people feel and stay safe is important. The design of buildings and spaces is important to create places to allow people to move safely, feel safe, and reduce the opportunity for criminal activity. Issues around safe movement of people are dealt with in more detail in the workshop on Improving Travel Choice and Managing the Public Realm.

In some residential areas concerns, about antisocial behaviour and safety relating to traffic flows have lead to requests to gate mews or other small streets. The council also receives applications for new gated housing schemes. The gating of communities keeps out non-residents, reduces legibility, makes walking and cycling less convenient and it effectively privatises parts of the public realm. This approach is therefore in conflict with policies in the Core Strategy which seek to improve legibility, permeability and encourage sustainable transport creating inclusive places.

Concern has also been expressed in the past from residents about the crime and anti-social behaviour that can be associated with betting offices and amusement arcades.

#### AIR POLLUTION

Westminster suffers from poor air quality as a result of the tens of thousands of vehicles which come into the city each day, the many boilers heating buildings, each emitting pollutants into the atmosphere, compounded by the dense network of roads which can act to trap air pollution, preventing it from dispersing. It is estimated that 60% nitrogen oxide emissions come from domestic gas boilers.

There is a significant body of evidence linking exposure to air pollution with serious negative health effects and for this reason the area is governed by European and national legislation which seeks to reduce levels in respect of specified pollutants. Westminster declared the whole of the borough an Air Quality Management Area in 1999, as part of the Local Air Quality Management (LAQM) process following concerns at the high levels of nitrogen dioxide (NO<sub>2</sub>) and particulates (PM<sub>10</sub>). Despite

actions to tackle this pollution, there are continued breaches of air quality targets, which are predicted to continue. The council is currently preparing an update for its existing Air Quality Management Strategy for Westminster.

#### NOISE POLLUTION

Like most urban areas, noise levels in Westminster exceed the guideline levels set by the World Health Organisation (WHO) by a significant margin. Noise levels and individual noise incidents can cause annoyance and irritation and have a negative impact on sleep, health, learning and communication and more broadly on quality of life. Reducing noise pollution and its impacts is therefore an important objective.

Westminster's diverse built form, density, mix and pattern of commercial and entertainment activities, concentration of transport infrastructure and volumes of movement combine and in some locations lead to high levels of noise. This is exacerbated by the 24 hour nature of activities in some parts of the city. As a result, noise levels in Westminster are higher than many other parts of London and there are more incidents of individual noise events. Noise levels are at their highest along noisy transport corridors and in parts of the West End Stress Area. Noise levels in the central areas of the city are on average slightly higher than the rest of the city and tend to reduce into the night more slowly than elsewhere. However, there are also spaces of relative tranquillity in the city, such as the Royal Parks and the city's other open spaces. Quieter environments can also be experienced at the rear of many properties in the city. The council is currently preparing a noise strategy for Westminster.

#### CONTAMINATED LAND

No accurate records exist for industrial processes and waste disposal in Westminster before 1965, therefore land in Westminster may not be free from contamination. The presence of contaminants may have been caused by land uses such as gas

works, sewage installations, landfill, railways, scrap yards, riverside wharves and industrial processes. If land has any history of any of the above uses, developers must conform with the Contaminated Land Act (England) Regulations 2000, made under Part II of the Environmental Act 1995. This involves carrying out a detailed survey and strategy for the remediation of the site. Contaminated land can endanger health if not treated prior to development and leaching from these sites can damage areas of nature conservation.

#### LIGHT POLLUTION

Excessive lighting associated with new development, floodlighting, advertising boards and street lighting can detract from the character of Conservation Areas, listed buildings, and affects wildlife. Light pollution can also have a negative impact on health, affecting sleeping patterns, creating annoyance to residents, impedes the view of the night sky and an inefficient use of energy. The Clean Neighbourhoods and Environment Act (2005) amends Section 79 of the Environmental Protection Act 1990, and identifies that light pollution is statutory nuisance. The Institution of Lighting Engineers has produced guidance notes for the reduction of obtrusive light/ light pollution. The guidance identifies ways of reducing spill light and glare through specifically designed lighting equipment, altering the beam angles of light, using planning conditions, specialist equipment for sports lighting installations and ways of minimising light spill on up-lighting units. The guidance provides standards for obtrusive light limits for exterior lighting installations.

#### What have you told us?

- It is important to minimise the impacts of retail uses such as betting shops, junk food, vendors close to schools and the negative impact on health, especially in areas of deprivation.
- Community gardens would help people to grow their own food.

- Should promote the vitality and viability of established street markets.
- Welcome access to fresh food includes opportunities for people to grow food as well as purchase it.
- Young people need to feel safe in recreation areas.
- Concerns about river safety.
- We should promote community protection through CCTV installations and revenue commitments to support growth projections.
- S106 agreements should be used for improved lighting and design not CCTV.
- Support for policies on designing out crime.
- Drink related incidents, security, terrorism issues need to be considered in planning applications to enable integrated public realm design improvements and street management.
- Community safety plans should be used to determine planning applications
- Support for low level canalside lighting to increase security and so as not to disturb wildlife.
- Concerns were raised about the air pollution from traffic (particularly stationary traffic) and dust emissions from construction.
- One consultee pointed out that there was an increase in hospital admissions and people living with Circulatory Obstructive Pulmonary Disorder in Westminster, air pollution has a direct impact on this health problem.
- Air conditioning, traffic noise, noise escape from entertainment premises (including those with open frontages) and noise from buildings works are also particular problems.
- Vibration can have adverse effects on health and wellbeing, but also on the fabric of a building.
- Where complete separation of noise sensitive properties from noise generating properties can't be achieved, design measures related to layout are preferable to relying solely on acoustic glazing.
- It has to be accepted that within a busy city it is inevitably noisier than rural locations.
- Planning is not the only mechanism to tackle noise issues.
- Existing standards are too onerous and perhaps inappropriate dense urban environment like Westminster.
- Light pollution should be controlled through encouragement and penalties, lights in unoccupied commercial and government buildings should be switched off to prevent wasting energy.
- Attention needs to be given to how planning can assist and minimise light pollution.
- Policies are required in CMP on the remediation of contaminated land where appropriate and preliminary sites risk assessments on sites with potential, known or suspected contamination.

## Policy context

PPS23 in respect of Pollution sets out that air and light pollution are legitimate considerations. PPG 24 highlights the key considerations for applications for noise-sensitive developments and activities which generate noise. PPS 1 places an emphasis on development that supports communities and contributes to creating safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community. Central Government promotes crime prevention as part of the design process. Policy 4B.6 of the London Plan states that local authorities should seek to create safe, secure and accessible environments. Westminster has several Supplementary Planning Guidance notes with respect to security matters, which provide additional guidance on crime and security issues. These documents will be updated as part of the LDF process. A Supplementary Planning Document may be developed on Terrorism and Security.

## Current Unitary Development Plan Policy 2007

STRA 15 seeks to protect and improve the residential environment and residential amenities and make the best use of the city's housing stock.

STRA 18 seeks to reduce the fear of crime, actual crime and nuisance for residents, businesses and visitors.

STRA 23 (B): seeks improve road safety by implementing accident remedial measures, where appropriate introducing facilities to help pedestrians, cyclists, motorcyclists, buses and commuter coach services.

STRA 34 (A) sets out the councils aim to improve air quality through Westminster's Air Quality Management Plan and other measures, support measures to improve surface and ground water quality, and prevent and remedy land contamination.

TRANS 1 seeks to reduce the effects of traffic on the environment (including air pollution, reduction in the emission of greenhouse gases, noise and visual intrusion) by limiting road traffic, introducing traffic management and calming measures and giving higher priority to walking, cycling and public transport.

TRANS13 restricts the development of new or enlarged facilities unless they are essential for public or emergency services. This is in recognition of the noise nuisance and disturbance that can be caused by helicopters.

SS 6 this policy seeks to maintain the retail function of centres to ensure that new development does not harm residential amenity or local environmental quality as a result of smells, noise increased late night activity, disturbance, parking or traffic.

ENV 5 this encourages developments to include measures to minimise air pollution and emission of odours and seek a reduction in pollutants.

ENV 6 aims to minimise and contain noise from development; to protect noise sensitive properties

from noise disturbance; to protect tranquil areas; and to reduce noise from transport.

ENV 7 seeks to limit disturbance from plant, machinery and internal activity' and sets requirements for maximum noise emissions to be 10 – 15dB LAeq15 below existing noise levels where background noise is in excess of WHO levels and 5-10dB where noise levels do not exceed WHO guideline levels.

ENV 8 encourages the cleaning up of contaminated land. This policy sets the requirement for developers to carry out a detailed site investigation into the level of contamination in the soil and/or groundwater/surface waters. In necessary conditions may be applied to the site to ensure a further detailed survey and strategy and measures for remediation of the site.

ENV10 seeks to ensure that light apparatus on buildings will minimise light pollution. Conditions are attached to ensure that no glare or conflict with street or traffic lighting; minimal upward light spill and that energy efficient equipment is used.

DES 1 (B) seeks to secure amenity, accessibility and community safety the policy has the following criteria

- adopt appropriate design measures,
- provide safe and convenient access for all,
- adopt design measures to reduce the opportunity for crime and anti social behaviour,
- where proposed incorporate appropriately designed and positioned security fixtures,
- maintain a clear distinction between private and public space around buildings and ensure the informal surveillance of public space.

DES 7 (B) should be designed to prevent or minimise light pollution or trespass and may be restricted as to maximum hours of operation or levels of illumination, especially in residential areas.

RIV 11 this policy expects suitable safety features in development proposals these include buoyancy aids, particularly near activities like water sports or public uses, open spaces, leisure or tourist facilities, grab chains and information signage. The policy seeks to make the Thames and its banks a safe place.

### **Core Strategy Publication Draft 2009 (subject to agreement)**

This new policy seeks to ensure that all development should make a contribution towards improving health safety and well-being. It sets out criteria which new proposals will need to meet.

#### **Contact**

Helena Merriott & Sara Dilmamode  
City Planning Group, Westminster City Council  
11th Floor, City Hall, 64 Victoria Street  
London SW1E 6QP  
020 7641 2860 / 3983  
hmerriott@westminster.gov.uk /  
sdilmamode@westminster.gov.uk

#### **Further Information**

The London Plan – Consolidated with Alterations Since 2004 (2008)

Adopted Unitary Development Plan (2007)

Core Strategy Publication Draft

PPG 24 Planning and Noise (1994)

PPS 1 Delivering Sustainable Development (January 2005)

PPS 23 Planning and Pollution Control (November 2004)

Safer Places The Planning System and Crime Prevention (April 2004)

Safer Places A Counter Terrorism Supplement – consultation document (April 2009)

Working Together to Protect Crowded Places – consultation document (April 2009)

Westminster Noise Measurement Survey, (2008)

Westminster Noise Attitudes Survey, (2008)

Westminster Noise Issues and Options Report

Westminster Open Space Study, (2008)

Designing out Crime in Westminster (1998)

Public CCTV Systems : Guidance for Design and Privacy (1998)

Clean Neighbourhoods and Environmental Act (2005) this amends the Environmental Protection Act (1990)

The agenda for the Wellbeing workshop is as follows:

## Welcome and introduction

by Councillor Summers – 10 mins

## What should we do?

1. Should we do more to provide better access to healthy food for example:

- By restricting the concentrations of A5 uses – hot food takeaways within district centres (setting a percentage threshold and preventing clustering) and/or supporting proposals for these uses in close proximity (400m) of schools, youth facilities and parks?
- Do you support the continued use of UDP policy SS 6. This policy protects retail centres from a concentration of non retail units (this includes A5 uses) in any individual frontage or parade?
- How can we support existing / new street markets that provide opportunities for people to access to affordable fresh food?
- Where appropriate should we require community gardens in some new developments or contribute towards provision elsewhere in the vicinity?

2. Do you support the continued use of existing policy DES 1 part (B) ? Should this be supported with a more detailed set of set of counter terrorism design principles and other aspects of safety to create safer buildings and public realm? See Appendix 1 for more information

- Are there specific counter terrorism measures that you think should not be incorporated into developments in Conservation Area?
- Strengthening our working relationships with Crime Prevention Design Officers.
- Other safety measures – Should we have specific design measures to improve river safety and road safety to reduce the number of annual accidents.

3. Do you agree that gating public streets or permitting gated communities should generally be resisted? Are there any circumstances where gated communities should be allowed? What criteria should be applied to these schemes?

4. Do you consider that for reasons of health and wellbeing the council should restrict amusement arcades and betting shops?

## AIR POLLUTION

5. Should we require developers to submit an emissions reduction strategy linked to floor space of the development, as part of an air quality assessment to be paid for by the applicant?

6. How can we better integrate air quality considerations into the design and construction of buildings to ensure it is an initial consideration in any planning application?

7. Should planning obligations be sought to abate or reduce air pollution? In what circumstances would it be appropriate and how could an appropriate tariff be identified?

## LIGHT POLLUTION / CONTAMINATION

8. Should we introduce additional measures/design guidance to reduce light pollution for example:

- To prevent flood lighting on certain buildings and conditions.
- Establish design guidance to limit light pollution for exterior lighting units similar to that detailed by the Institution of Lighting Engineers

9. Should we change our current policy approach to contaminated land?

1 hour 20 mins

BREAK – 15 mins

## NOISE POLLUTION

10. The UDP requires WHO guidelines to be met in residential development; these are 35dB LAeq16 indoors during the day and 30dB LAeq8/ 45dB LAMAX during the night. A consequence of these guidelines is that it is very difficult to provide residential in some locations. Are there locations in the city where this requirement should be applied more flexibly? If so, how can we ensure development incorporates adequate protection against noise?

11. Should there be additional controls on plant and machinery on the basis of noise pollution and other adverse environmental effects? For example, should there be general presumption against air conditioning, in particular for residential properties or listed buildings and what, if any, would be the exceptions?

For example only accept units located over a set distance of operable windows in residential properties.

12. Where permitted, the current UDP requirement is for new plant to demonstrate that maximum noise emissions will be 10dB-15db below the minimum background noise levels in areas exceeding WHO guidelines and 5-10dB where noise levels do not exceed WHO guidelines. Should these standards be carried forward into the City Management Plan? Should there also be a requirement be made for post completion testing to be paid for by the applicant to ensure the maximum emission standards are achieved?

13. Should noise standards be changed/and/or enhanced by specific policy requirements on site layout and other broader acoustic measures for example:

- protecting the quieter rears of properties;

- requirements for residential development, when part of mixed use developments, be located and oriented to the quietest part of the site;
- introduction of specific measures to limit noise intrusion in open spaces which provide areas of relative tranquillity, such as parks, public squares and their environs?

14. How can we better integrate noise quality considerations into the design and construction of buildings to ensure it is an initial consideration in any planning application?

15. Are there any other issues that have not been covered above?

16. Are there issues that the Council should be aware of in its lobbying process?

Workshop time – 3 hours

## Appendix 1

Do you support the continued use of existing policy DES 1 part (B) ? Should this be supported with a more detailed set of set of counter terrorism design principles, and other aspects of safety to create safer buildings and public realm? for example:

- Design buildings to prevent hiding places around buildings and within façades.
- Incorporate CCTV, public address systems, building layout (utilities in secure rooms – security managing entrances, exits and buildings as a whole) where necessary.
- Assess the risks of underground car parks and seek measures to mitigate these risks.
- Consideration of traffic management and calming measures in schemes to prevent opportunities for vehicle bombs. Effective access controls for goods vehicles in service areas.
- Encourage blast resistant measures in planning applications (alongside others as detailed in Annex 1 Safer Places a Counter Terrorism Supplement)
- Are there specific counter terrorism measures that you think should not be incorporated into a Conservation Area.
- Strengthening our working relationships with Crime Prevention Design Officer. Other safety measures – Should we have specific design measures to improve river safety and road safety to reduce the number of annual accidents

Further details can be found in the Safer Places Counter Terrorism Supplement (See Annex A & B):  
[www.homeoffice.gov.uk/documents/cons-2009-crowded-places/](http://www.homeoffice.gov.uk/documents/cons-2009-crowded-places/)

Design measures identified in the Secured by Design website - please see web site:  
[www.securedbydesign.com/pdfs/SBD-principles.pdf](http://www.securedbydesign.com/pdfs/SBD-principles.pdf)