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Introduction

This scoping report has been prepared as the first stage of the Integrated Impact Assessment (IIA) for Westminster’s City Plan (including the City Management Policies). It sets out the scope of the IIA and the key social, environmental and economic baseline evidence (including plans and programmes relevant to the review) for Westminster, the issues around these matters and where possible likely future conditions. The report includes the proposed IIA Assessment Framework, and the reasons why the 17 objectives which will form the benchmark for the IIA have been chosen. This report aims to provide sufficient information on the proposed approach and seeks feedback to help inform the ongoing preparation of the IIA. Table 1 details the five stage approach for the preparation of the IIA.

The IIA fulfils the requirement for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), which is the requirement of the Strategic Environmental Assessment Directive EC/2001/42 (SEA Directive) and for the council to undertake an Equalities Impact Assessment for all decisions. Although not a statutory requirement a Health Impact Assessment has also been included in the IIA, as good practice. This integrated approach avoids the need to undertake and report on separate assessments, seeks to reduce any duplication of assessment work and benefits from a shared understanding of the policies.

Table 1

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<th>Stage 1</th>
<th>Scoping Report –This stage</th>
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<tr>
<td>Assemble to evidence base to inform the IIA and establish a framework for undertaking the appraisal (in the form of sustainability objectives).</td>
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<th>Stage 2</th>
<th>IIA Report</th>
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<tr>
<td>Appraise the plan objectives and policies against the framework taking into account the evidence base. Propose mitigation measures for alleviating the plan’s adverse effects as well as indicators for monitoring the plan’s sustainability.</td>
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<th>Stage 3</th>
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<td>Prepare an Integrated Impact Assessment Report documenting the appraisal process and findings.</td>
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Stage 4
Consult stakeholders on the plan and IIA.

Stage 5
Monitor the implementation of the plan including its sustainability effects.

Annual Monitoring Report (AMR)

Consultation arrangements

The scoping report has been sent to the following specific organisations:

- Natural England (Statutory);
- Environment Agency (Statutory);
- English Heritage (Statutory);
- Greater London Authority;
- Westminster Equalities Partnership;
- Inner North West London PCT.

This report will also be published on the council’s website. Other stakeholders will be provided with the opportunity to comment on the IIA Report when it is published alongside the Publication draft Westminster’s City Plan.

If you require any further information on this IIA Scoping Report or wish to make a representation please contact or respond to:

Sally Alderman
City Planning Group
City Hall
64 Victoria Street
London SW1E 6QP
020 7641 2503
Email: salderman@westminster.gov.uk

The consultation period for this document is 5 weeks commencing 4 October 2012 and closing 9 November 2012.
Overview of the Westminster Plan Process

1. The Core Strategy

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


2. The Core Strategy NPPF Revision

1.2 The National Planning Policy Framework (NPPF) was published on the 27th March 2012, with immediate effect. To ensure conformity with the NPPF the council has produced the Core Strategy NPPF Consultation Draft which contains the following alterations:

- changes arising from the NPPF;
- changes arising from the Localism Act 2011 and other recent legislative changes;
- updates to the London Plan;
- other updates such as statistics or fixing grammatical errors.

1.3 The formal consultation on the Core Strategy NPPF revision (in accordance with Regulation 19 of the Local Planning Regulations 2012) took place between 24th July 2012 and 14th September 2012. This consultation also sought views from the Mayor of London as to the general conformity of the Core Strategy NPPF Revision with the London Plan.

This document can be viewed at:
http://www.westminster.gov.uk/services/environment/planning/nppf-revision-to-the-core-strategy/

1.4 A review of consultation comments received is now taking place and subject to this review, the council intends to submit the Core Strategy NPPF Revision to the Secretary of State by the 31st October 2012, to be followed by an Examination in Public, at a date to be determined.
1.5  An Integrated Impact Assessment (IIA) report was produced in July 2012 to accompany the Core Strategy NPPF Revision. The report was subject to the same formal consultation as the Core Strategy NPPF Revision (Paragraph 1.3 above) and no comments have been made in respect of this document. The IIA report can be viewed at:  

3.  The City Management Plan

1.6  Work started in 2008 on the City Management Plan (CMP) as the second Development Plan Document (DPD) in Westminster’s Local Development Framework (LDF), to sit alongside Core Strategy as a separate document and to contain the more detailed criteria against which planning applications will be considered.

1.7  Since 2008 there has been extensive consultation on developing the City Management Plan. The council has endeavoured to undertake an open approach to involving communities and stakeholders and has inserted additional consultation stages into the document process to provide opportunities for early involvement. These stages have been as follows:

- **Consultation Workshops in the summer of 2009.**
  
  Details can be viewed here:
  
  http://www.westminster.gov.uk/services/environment/planning/ldf/cmp-workshops/

- **Consultation on Policy Options: January 2010 to March 2011**
  
  Details can be viewed here:
  

- **Consultation on the City Management Plan: November 2011 to March 2012**
  
  Details can be viewed here:
4. Westminster’s City Plan

1.8 Rather than have two separate planning documents, the Core Strategy (NPPF Revision) and the City Management Plan, in line with the NPPF, the council is now working on a single local planning policy document called Westminster’s City Plan. This will combine both the strategic policies contained in the Core Strategy and will include the detailed development management plan policies against which planning applications will be considered (previously developed as The City Management Plan). This IIA scoping report has been drafted in respect of the detailed development management policies in the emerging Westminster’s City Plan.
2. **Requirement for an Integrated Impact Assessment**

2.1 Under the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) including a Strategic Environmental Assessment (SEA) is required for all Development Plan Documents.

Paragraph 165 of the NPPF states that:
*A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.*

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

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

2.3 The Equalities Duty has three aims. It requires public bodies to have due regard of the need to:

1. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;

2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it and;

3. Foster good relations between people who share a protected characteristic and those who do not share it.

2.4 Having ‘due regard’ for advancing equality involves:

1. Removing or minimising disadvantages suffered by people due to their protected groups;

2. Taking steps to meet the needs of people from protected groups where these are different from the needs of other people;
3. Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

2.4 The Equality Act 2010 also provides rights for people not to be directly discriminated against or harassed because they have associations with someone who has a protected characteristic.

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

2.5 This scoping report for Westminster’s City Plan IIA was carried out ‘in-house’ in August/September 2012.
3. **Baseline Information**

**The requirement for Baseline Information**

3.1 An important part of the scoping process for the IIA is to set out the current baseline conditions in Westminster. This information is a starting point to help identify the key sustainability issues and problems and establishes the current context from an economic, social and environmental perspective. The SEA Directive requires information on the evolution of baseline conditions to help inform if conditions are already improving or worsening, and the rate of such change. The following section therefore includes information on projections and trends ‘the likely future conditions’, where this information is available.

1. **Economic conditions**

**Baseline Information**

3.2 Westminster functions as a national and international centre for business, shopping, arts and culture, and entertainment. It accommodates 590,000 jobs, 14% of all of London’s jobs, and more than the City of London and Canary Wharf combined.\(^i\)

3.3 Westminster’s 46,000 businesses have a diverse and balanced employment offer, particularly when compared to other areas of the capital such as the City of London\(^ii\). Seventy percent of Westminster businesses are small employing less than five people, and about 85% employ less than ten people.\(^iii\)

3.4 There are also a large number of multi national corporations, headquarters and large companies located in Westminster, there are nearly 750 enterprises with over 100 employees, nearly half of which are in areas such as Paddington and Victoria, where most of the larger office spaces and floorplates are located.\(^iv\)

3.5 The Core Central Activities Zone (Core CAZ), particularly the West End, accommodates the greatest proportion of Westminster’s office stock. There was a net increase in the overall amount of office floorplates in this area, of 70,400 sqm between 1996 and 2010/2011.\(^v\)

3.6 The majority of the office floorspace gains between 1996 and 2010/11 were in the Paddington Opportunity Area. Westminster has a diverse range of office floorspace with...
parts of the West End up to the start of the recession in 2008 having the highest rents in the world.

3.7 Westminster is at the heart of the creative sector and contains the highest number of Creative Industry jobs (89,751) in London and 8% of all creative jobs in the UK.\textsuperscript{vi}

3.8 Higher Education employs over 20,000 people in Westminster, this category includes universities, language schools, arts related colleges and some other higher education uses.\textsuperscript{vii}

3.9 Westminster is particularly important to London’s visitor economy with an unrivalled range and combination of visitor attractions and hotel accommodation. It is the most visited London borough with over 55 million trips per year. \textsuperscript{viii} It is home to London’s theatre district with 38 theatres, 60 cinema screens and four concert halls.\textsuperscript{ix} There are over 430 hotels in Westminster, providing 26% of London’s hotel bedrooms. \textsuperscript{x}

3.10 The West End is the entertainment heart of London and is internationally renowned. There are over 2,800 entertainment uses and more licensed premises than any other local authority. There are nearly 500 pubs bars and wine bars, over 1,000 restaurants licensed to serve alcohol and 136 licensed night clubs and dance venues, 20 casinos and nearly 60 traditional private member clubs.\textsuperscript{xi}

3.11 Retail is a major part of Westminster’s economy, being a significant draw for shoppers from all over the world, while acting as one of the city’s most significant industries in terms of employment. Vacancy rates of shops are low in the West End and most of Westminster. Prime zone A retail rents are amongst the highest in the world and continue to rise, currently achieving over £1000 per sqft in parts of the West End such as Bond Street.

3.12 During August 2012 an average of 6 million shoppers visited the West End every week. The overall trend in recent months and years has been for decreased footfall while conversely sales have grown. Public Realm schemes continue to improve the shopping environment and landlord investment continues to improve the building stock in Regent Street and Oxford Street.

3.13 The seven larger shopping centres outside of the Core CAZ have generally improved in terms of vitality and viability. Surveys in late 2011 showed that vacancy rates have decreased in all seven of these centres compared to recent years, and the proportion of retail uses has increased in five of the seven centres.
3.14 Outside the larger centres Westminster has a number of local shopping centres. When last surveyed in 2007, the unit vacancy rate had dropped in over half of these local shopping centres, had remained the same in around a quarter, and had risen in a quarter. This shows that overall the viability of these centres remains good, although there is variation between the size, function and range of services on offer through these centres, and their long term vitality and viability.

3.15 There are no Strategic Industrial locations in Westminster.

3.16 The North West Economic Development Area (NWEDA) is the principle area of economic renewal containing a high proportion of social housing. Only 2% of jobs in Westminster are located in the in four main wards of NWEDA. There are three Opportunity Areas: Paddington, Tottenham Court Road (part Camden) and Victoria.

**Issues and Problems**

3.17 Westminster is highly developed with mostly high land values and development is often about refurbishment and renewal of building stock rather than significant land use change. Economic development in Westminster is directed to the three Opportunity Areas, NEWDA and the Core Central Activities Zone.

3.18 In order to improve the local economy and the skills and prospects of residents in NWEDA a key priority is to maximise opportunities that promote sustainable economic growth and create employment.

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

3.20 The economy of Westminster has not been immune from the recession. However, research xii shows that the mix of uses in Westminster means it has been better protected than other locations dominated by one commercial main use.

**Likely Future conditions**
3.21 Westminster is expected to accommodate growth in employment of about 19,000 people between 2012/13 to 2026/27 to about 720,000.\(^{xiii}\)

3.22 Results from the 2009 London Office Policy review indicated that office based employment is likely to grow in London by 303,000 between 20011 and 2031.\(^{xiv}\)

3.23 The future of Westminster’s office market is however uncertain, in particular given potential changes in the Town Planning Use Classes Order to enable offices to change to residential without planning consent.

2. Social Conditions

Baseline Information Westminster’s Residents

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

3.25 The London Data Store estimated that in 2011, 71% of the population in Westminster was white, with 29% of black, Asian, minority, ethnic backgrounds of which 8% were black (Caribbean, African and other) and 14% Asian including 4% from India and 3% from China. \(^{xvii}\)

3.26 The 2001 census was the first to try and capture information about people’s religion, and the response was optional.\(^{xviii}\) At this time over half of Westminster’s residents were Christian (55%) with the next largest group of residents stating that they had ‘no religion’ (16%). Islam was the third largest religion (12%) with 4.3% of Westminster population following Judaism.

3.27 It is difficult to estimate the size of the Lesbian, Gay, Bisexual and Transgender (LGBT) population and this matter was not addressed in the 2011 Census. Research carried out by Sigma and applied to Westminster suggests that some 10,165 LGBT people live in Westminster.\(^{xix}\) This, however is a conservative estimate and does not consider the large LGBT population who work and visit the city.
3.28 Westminster is a place of contrast, with the poorest resident’s 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.xx

3.29 Over half of Westminster’s residents are educated to at least degree level, with over two thirds educated to A- level and beyond. This is 59% above the average for England and 36% above the average for London.xxxi

Issues and problems

3.30 The ethnicity data only partially shows how diverse the population is with a wide number of nationalities within each group. Westminster’s prominence as a cultural and business destination attracts migrants from all over the world and as additional pull there are sizable Arab and Chinese communities which are more prevalent in the city and who attract more in-migration from their country of origin.

3.31 The presence of a LGBT scene in Soho suggests that in Westminster the consideration of the needs of LGBT people should be greater than in the rest of the U.K.

Likely Future conditions

3.32 The estimated population of Westminster in 2031 is 239,596. The ethnicity breakdown for 2013 is estimated to be similar to the current situation. 69% of the population will be white and 31% of black, Asian, minority, ethnic backgrounds. Seven percent of which will be from of the African countries and 15% from Asian countries.xxxii

Baseline information Health and Wellbeing

3.33 Health inequalities including life expectancy are closely linked to patterns of deprivation. Although across Westminster life expectancy for both men and women is higher than the England average, it is very variable across the city. The City of Westminster Local Economic Baseline Study (2011) identifies that 42% of Westminster’s deprived population live in the four Wards that make up most of NWEDA: Church Street, Westbourne, Queens Park and Harrow Road. Life expectancy is 16.6 years lower for men and 9.9 years lower for women in the most deprived areas of Westminster than in the least deprived areas.xxxiii

3.34 Since 2004, the level of multiple deprivation in the worst affected wards has decreased despite this Westminster still contains some of the most deprived areas in London. xxiv Queens Park and Church Street are amongst the top 10% of deprived wards in the country, Harrow Road and Westbourne amongst the 10 – 20% most deprived, and
Churchill ward amongst the 20 – 30% most deprived. At a sub-ward level, there are also smaller groupings of deprived residents, such as some communities in the West End.

3.35 The Westminster Primary Care Trust (PCT) and NHS 2011 Health profile estimates that in Westminster 15% of adults and 29% of Year 6 children are classified as obese, with approximately 99 deaths a year potentially being attributable to obesity. A lower percentage than average of pupils in Westminster spend at least three hours each week on school sport.

3.36 The council encourages schools to develop travel plans which look at ways in which more pupils can be encouraged to walk or cycle to school. At present 68 out of 88 schools (77%) have a Travel Plan in place, and 46 of these (52%) are current, with the remainder in need of review.xxv

3.37 The Indices of Deprivation includes a measure for the outdoor living environment, and measures air quality and road traffic accidents. All of Westminster falls within the worst 20% of areas across the UK for this measure.

3.38 Road safety is a significant issue within Westminster. Approximately 300 people (residents, workers and visitors) die or are seriously injured on roads each year. This is approximately three times the London average.xxvi

3.39 Crime in Westminster fell by 18% between 2000 and 2006 xxvii Crime levels are affected by the one million people entering Westminster each day and over half of recorded crime is committed within the West End and St James’s wards and even this is concentrated within specific parts of those wards.xxviii The Government and related functions in and around Whitehall give rise to additional security concerns and challenges including those related to terrorism.

3.40 There is a much stronger correlation between deprivation and the fear of crime as opposed to actual crime statistics, with residents in Westbourne, Queen’s Park and Harrow Road feeling the least safe.

Issues and problems

3.41 Whilst Westminster is generally viewed as a place of affluence, there are pockets of significant deprivation.

3.42 Although Westminster generally performs well on health indicators, patterns of health inequality mirror the patterns of social and economic deprivation and there are a number of key areas where the city performs less well or where there are specific issues that arise because of the characteristics of the city.
3.43 Encouraging residents to integrate physical activity into their daily routine in the form of walking or cycling to work, school or other services can help to tackle the obesity problem. Notwithstanding that rates of walking in Westminster are already comparatively high (see transport baseline).

3.44 Crime and fear of crime can have considerable negative impacts on health, including increased levels of stress and anxiety, including fear of going out alone, therefore impacting on levels of physical activity and loss of confidence. Creating a city where people feel safe and stay safe is a priority for Westminster.

**Likely Future conditions**

3.45 The Local Implementation Plan sets a target to reduce road traffic casualties to 171 on all roads in Westminster by 2019-2020.

3.46 The Health and Wellbeing Strategy 2011 contains aims to improve life expectancy, an improved quality of life for people living with injury, disability or long term conditions and improvements to the wider environment to improve the wider determinants of health.

**Baseline Information Westminster’s Housing**

3.47 Westminster is one of the most expensive places in the country in which to rent or purchase a home, with prices of property for sale of £5 - £10 million not uncommon. Average house prices are double that for the whole of London and over ten times the average Westminster household income.

3.48 Westminster 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%) xxx. The housing sector reflects Westminster’s role at the centre of a world city.

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

3.50 About 12% of households contain members with support needs i.e. have a physical disability, are frail elderly, or have a mental health problem.
3.51 Almost half of Westminster’s population live in one-person households and about 12% of the population are in over-crowded homes.

3.52 Houses with gardens form only 10% of Westminster’s housing stock.

3.53 The residential market is underpinned by wealth generated from across the globe. Existing and new housing is purchased by overseas investors as part of Westminster’s global city role.

3.54 Due to the built up nature of Westminster, the scarcity of land, and the lack of industrial land, there are currently no suitable sites for Gypsies and Travellers.

**Issues and problems**

3.55 Westminster has the second highest house prices in the country, and the need for new affordable housing is significantly above the Inner London average. Unlike many other parts of London there is a lack of surplus industrial land that can be ‘released’ for housing. Such sites make a significant contribution to meeting borough housing targets. Change within Westminster is typically small-scale and achieved through the sensitive redevelopment of smaller sites and refurbishment of existing buildings.

**Likely Future conditions**

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

3.57 There is an estimated delivery of 4015 new housing units over the next five years (2012-2016/17), 733 new units over the next 6-10 years 92017/18-2021/22) and 120 new units over 11-15 years 2022/23-2026/27). xxxiii

3.58 Westminster has a lower proportion of residents aged under 20 and over 60 years than London or England as a whole. This is expected to shift over the period to 2028, with a growth in the numbers of children and young people, particularly children under five.

3.59 The growth in overseas investment is anticipated to rise and house prices to increase.

3 **Environmental Conditions**

**Baseline Information Heritage, Design and Public Realm**

3.60 Westminster has in excess of 11,000 listed buildings (more than any other local authority in the country), and 56 conservation areas covering 75% of its land area. 82%
of conservation areas have adopted conservation area audits. Westminster has 21 listed historic squares and gardens and 85 ‘London Squares’ which enjoy protection under the London Squares Preservation Act 1931. In 2010-2011 30 listed buildings in Westminster were on the English Heritage at Risk Register.

3.61 Seventeen of the 27 views identified in the London Plan are either to or from Westminster and the city is crossed by 5 important viewing corridors including those to Westminster’s World Heritage Site: the Palace of Westminster and Westminster Abbey including St Margaret’s Church. Westminster’s World Heritage Site was inscribed in 1987 and is only one of 28 such sites in the UK.

3.62 Westminster is characterised by its settled, low scale townscape and there are relatively few buildings taller than 6-8 storeys.

3.63 There are two scheduled ancient monuments and five archaeological priority areas but there are other areas which may have unrecorded archaeological potential, especially the Thames foreshore banks and river walls.

3.64 There has been a steady increase in applications for basement extensions in recent years and in 2011-12 Westminster dealt with 182 applications (161 of these were approved).

3.65 Westminster has a legacy of good quality accessible and secure streets. Many streets have already been decluttered, and this process continues. Some streets would benefit from upgrading, and in some parts of the city street management needs to be improved, particularly with regard to tables and chairs and other clutter on the footway. Westminster has an impressive collection of historic street furniture, much of it listed.

Issues and Problems

3.66 The heritage assets are a key contributor to Westminster’s special character and economic well-being. The baseline of Westminster is the existing historic built environment, which is a finite resource and a reservoir of embodied energy.

3.67 It is unclear how many buildings in Westminster have had sustainability measures fitted and the current environmental performance from existing buildings has not been measured.

3.68 There is a need to retrofit the historic building stock and ensure economic viability whilst protecting the intrinsic character of Westminster. There is also increasing need to
incorporate sustainable design measures to improve environmental performance and mitigate impacts of climate change.

**Likely Future Conditions**

3.69 The identification of (non designated) heritage assets will be an increasingly important task, as this type of heritage asset was not explicitly recognised in previous policy.

3.70 The potential cumulative impacts of basement developments will need to be monitored to ensure no adverse impact on hydrology, geology, flooding or biodiversity and any structural impacts.

3.71 Loss of front gardens to hard standing could have a cumulative impact on biodiversity and hydrology as well as character of the townscape.

3.72 An increasing number of shared surface streets may come forward following the success of Exhibition Road.

**Baseline Information Open Space**

3.73 The Open Space network in Central Westminster is different to elsewhere in London and includes the River Thames, canals, Royal Parks and London Squares.

3.74 Westminster contains five Royal Parks: Regent’s Park, Kensington Gardens, Hyde Park, Green Park and St.James’s Park, providing 250 hectares of open space. These are designated in the London Plans as Metropolitan Open Land. They have an estimated 25 million visits per year and comprise 89% of Westminster’s public open space.

3.75 Open spaces are an integral part of Westminster’s architectural heritage and essential to its unique character. The Royal Parks and River Thames form the settings of world famous landmarks such as the Palace of Westminster and Buckingham Palace and Westminster’s open spaces feature in many of the city’s important views. Over half of Westminster’s open spaces have heritage designation, with 85 London Squares and 21 English Heritage listed parks and gardens (including the Royal Parks).

3.76 The Blue Ribbon Network is of strategic importance to London and comprises the following: River Thames, the Grand Union and Regents canals, the Serpentine and Long Water in Hyde Park and Kensington Gardens.

**Issues and Problems**
3.77 The Royal Parks provide the only metropolitan sized public spaces in Westminster and therefore are important in providing open landscapes and tranquillity amidst a busy, heavily built up area and have significant heritage, ecological and natural conservation value.

3.78 With the exception of the Royal Parks and Paddington Recreation Ground, other parks in Westminster are small. Thirty-eight percent of open space in Westminster is private and not accessible to the public. There is both an overall and localised shortage of open space in Westminster.

3.79 Conventional calculations of the amount of public open space per 1,000 head of the population is not a useful measure in Westminster due to the pressure on open spaces from non-residents, the geographical concentration of open space in the Royal Parks and the deficiencies in the northwest and south of the city.

3.80 The Thames and the canals are important for providing habitat and wildlife corridors and fulfil other environmental functions such as drainage and play important roles in transport, recreation and education.

**Likely Future conditions**

3.81 The London Plan seeks to increase the green space in London by 5%.

**Baseline Information other green infrastructure and Biodiversity**

3.82 Green infrastructure comprises parks and gardens including residential gardens, linear open spaces, trees and living roofs and walls, roof terraces and balconies which individually and collectively provide habitat for a diverse range of species.

3.83 Although it is densely developed Westminster has a diverse ecology. The following wildlife have all been spotted in Westminster: The robin, dunnock, blackbird, song thrush, starling, blackcap, tawny owl, stock dove, great spotted woodpecker, stag beetles, hedgehogs, five different species of bat, reptiles and amphibians, including frogs, toads and smooth newts. St John’s Wood is recognised as one of the best small open spaces in inner London for birds.

3.84 The built environment is recognised as an important habitat for biodiversity, with over 70% of the city comprising built structures. This habitat is currently deficient in wildlife.

3.85 Westminster has over 30 designated Sites of Importance for Nature Conservation (SINC) all of which are to be protected and enhanced for their biodiversity and ecological value.
There are 634 different kinds of flora and fauna in Westminster including the rare cornflower, chamomile, native bluebell and London Rocket.

3.86 Some species protected by national and Environmental legislation (Protected Species) are present in Westminster, such as bats and birds during nesting. Westminster also has many Priority Species and Priority Habitats which are set out in Biodiversity Action Plans for Westminster, London and the UK.

**Issues and Problems**

3.87 Supporting the natural environment increases habitats, improves air quality and helps towards mitigating climate change.

3.88 The built environment represents one of the best opportunities to improve biodiversity in Westminster.

**Baseline Information Climate Change**

3.89 Climate change is a global problem and the baseline is not local to Westminster. The Governments’ latest UK Climate Change Projections suggest by the 2050’s London could see an increase in mean summer temperature of 2.7 degrees, an increase in mean winter rainfall of 15% and a decrease in mean summer rainfall of 18% over a 1961-1990 baseline. \(\text{xxxv}\)

**Issues and Problems**

3.90 Climate change is cause of many of the environmental problems. Beyond direct climate change impacts, such as health problems due to heat or damage to buildings and infrastructure due to flooding, the indirect impacts on cities can be much broader. Climate change will affect air temperature and quality, biodiversity, and the local micro-climate, exacerbating some and lessening others.

3.91 Preparing for extreme weather and further climate change is about managing risks and increasing our resilience to them – it is therefore as much about the economy, quality of life and social equality, as about the environment.

3.92 Many of the vulnerabilities to climate impacts stem from London’s ‘urbanisation’. Creating well managed and used green spaces and building community capacity will increase Westminster’s resilience and improve quality of life. Because of its central location Westminster suffers disproportionately from the effects of London’s urban heat island and, in central areas, this is exacerbated by the 24 hour nature of this part of the
city. Noise and poor air quality are also relevant to this issue as they increase reliance on air conditioning, which further contributes to localised heating effects, noise and energy consumption.

**Likely future conditions**

3.93 Central London is already vulnerable to extreme weather, in the form of floods, droughts, heatwaves and very cold weather. Westminster has already experienced some changes to its climate including warmer wetter winters and hotter, drier summers in the future. Extreme weather, such as heatwaves and very heavy rainfall is expected to become more frequent and intense. Very cold winters will still occur, though they will become less frequent. Climate change is recognised as an increasingly significant challenge. Central London including Westminster is likely to suffer more regularly from the adverse effects of the heat island effect and be more susceptible to storm water flooding.

**Baseline Information Air Quality**

3.94 PM10 levels across London declined slowly in the 1990’s but have remained stable since 2001. Westminster monitoring data indicate that City PM10 levels are roughly similar to the annual long term objective but still exceed the short term objective limit. For NO2, the picture is significantly worse. Although levels have initially declined, the trend has not continued and Westminster currently exceeds both short and long term objectives.

3.95 There are two pollutants of major concern, nitrogen dioxide and particulate matter. The levels of these pollutants are in excess of nationally required standards and are having adverse effects on the environment and health of the people in Westminster.

**Issues and Problems**

3.96 Poor air quality in Westminster is the result of a very high number of vehicles, emissions from boilers used to heat buildings and a high density of roads and buildings which prevent the dispersal of pollution.

3.97 Air quality is not just an environmental issue, but adversely affects health and can reduce the quality of life. Some evidence also suggests that exposure to poor air quality can reduce life expectancy.

**Likely Future conditions**
Commercial and domestic gas emissions are predicted to account for 44% of the NOx emissions in Westminster by 2015 making NOx combustion emissions slightly greater than those from road traffic.

**Baseline Information Flooding**

Westminster’s Strategic Flood Risk Assessment (SFRA, 2010) indicates the greatest risk of flooding is from the River Thames and from surface water flooding. Westminster has an extremely high level of flood protection from fluvial and tidal flooding including the Thames Barrier and the Embankment wall. The council has identified areas at risk from potential breaches in the Embankment Wall. The SFRA identified areas at the highest risk of surface water flooding, these will be reviewed in the forthcoming Surface Water Management Plan.

Climate change predictions indicate rising sea level which will have an impact on the risks of flooding from the River Thames. Flood risk is managed through embankment and flood barriers including the Thames Barrier. The Environment Agency is considering new approaches to flood defences that will protect Westminster and London into the next century. Westminster will continue to update its flood risk advice based on changes to flood risk management options.

**Likely Future Conditions**

Climate change predictions indicate increased volume and intensity of rainfall, which will result in greater risks of surface water flooding incidents as drainage capacity is exceeded. The use of Sustainable Urban Drainage Systems will become increasingly important in the adaptation to climate change.

**Baseline Information Thames Tunnel**

38 million tonnes of raw sewage is released into the Thames each year affecting water quality and biodiversity. Thames Water is developing plans for a Thames Tunnel. This is a scheme to reduce and limit pollution from the sewerage system for the whole of London, in order to comply with EU Urban Waste Water Treatment Directive (1991). The Thames Tunnel project, if approved, is due to commence after 2012 and be completed by 2025. The council supports necessary infrastructure, subject to detail and assessment of impacts.

**Baseline Information Carbon and Green House Gas Emissions**
Of the 406 local authorities in the UK, Westminster has the 5th highest greenhouse gas emissions, and which increased by 5.5% between 2009 and 2010. However, unlike other significant emitters, Westminster’s carbon footprint is not linked to large scale industrial activity, which can be more easily reduced. Rather it is the cumulative impact of many small occupiers, with 74% of the emissions from the use of commercial occupiers, particularly electricity. This is much higher than national average which puts emissions from buildings commercial and domestic at about 40%.xxxviii

Issues and Problems

The focus of action to improve air quality has largely been on road transport. However, the relative importance of emissions from non-road transport sources is increasing with emissions from buildings becoming proportionately more important. This is because there have been gradual improvements in vehicle technologies with engines becoming cleaner and initiatives such as the London Low Emission Zone (LEZ) have prompted earlier renewal of vehicle fleets.

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

Baseline Information Heat and Power Networks

The Pimlico District Heating Undertaking (PDHU) is the oldest district heating system in the UK and provides heat and power to a large number of homes and commercial premises in the South of Westminster and this power is also sold to the national grid and achieves considerable carbon savings. There is now a second system at Whitehall which can provide heat and electricity for 18 government departments.

Issues and Problems

The larger the network the greater the synergies and savings and the more efficient the system becomes. These networks are a significant part of Westminster’s strategy to deliver reductions in greenhouse gas emissions.xxxix

Likely future conditions
The Whitehall PDHU may have the potential to be networked more widely and there are opportunities in both the Victoria and Paddington Opportunity Areas, where it is possible to get network system in at the earliest design stage.

**Baseline Information Noise**

In 2008/09 the council received 16267 noise complaints. The Westminster Noise Strategy (draft 2010) identifies that average noise levels in Westminster are 62 decibels (dB) LAeq in the day (07:00 – 19:00 hrs) and 55.7dB LAeq in the night (23:00 – 07:00 hrs. This compares to WHO guidelines which say that in order to protect the majority of people from being seriously annoyed, the sound pressure levels on balconies, terraces and outdoor living areas should not exceed 55dB LAeq for steady continuous noise in the day and 45dB LAeq and 60dB LAmx at night. Road traffic is the main source of noise, and it is the biggest cause for concern amongst residents. Some 37% of residents when asked said that road traffic noise had bothered them in the last 12 months. Other major sources of noise include construction work, road works, aircraft, neighbours, commercial premises and air conditioning units.  

**Issues and Problems**

New technology may offer a range of benefits, for example electric and hybrid vehicles are being used because of reduced carbon and air pollution emissions, but also have the potential to be quieter than other vehicles. An expansion in the use of quieter technology has significant potential to reduce noise levels.

Noise can lead to annoyance and have a negative impact on sleep and learning and communication. The mixture of land uses and volume of vehicle and pedestrian movement combine to create a complex urban environment and the sound environment reflects this complexity. Activities in many parts of Westminster are 24 hour in nature which contributes significantly to the problem and means that the quiet night-time period is shorter in many parts of the city.

**Likely Future conditions**

Westminster aims to reduce number of noise complaints by 15,000 by 2013/14.

**Baseline Information Waste**

The council strongly supports the need to prevent the production of waste in the first instance. The amount of household waste recycled in Westminster has been increasing to 23% in 2007/8, whilst just 14% of municipal waste is currently sent to landfill.
3.114 On an average day more than 600 building projects are underway in Westminster. 10.4m tonnes of construction, excavation and demolition waste were produced across London in 2008. This is equivalent to 47% of all waste produced.

Issues and problems

3.115 Across London it is estimated that there is a need for 22 hectares of additional land in order to effectively manage waste. xlii

Likely Future conditions

3.116 The London Plan seeks to ensure that there are facilities to deal with 100% of waste arising in London by 2031, including an increase in the composing and recycling of municipal waste to 60% by 2031 and commercial and industrial waste to 70% by 2020.

Baseline Information Transport (Economic, Social and Environmental Issues)

3.117 Westminster is probably the most comprehensively served location by public transport in the country and one of the best served in the world. There are four main rail termini, 32 underground stations with 10 of the 12 tube lines running through the city; 4 river bus piers with commuter services; and some 157 daytime, night bus and 24 hour bus routes that also pass through Westminster. European, National and local express coach services also serve the City. xliii

3.118 Westminster’s highway network is consists of: 323 kms of carriageway for which the council is the Highway and Traffic Authority; 568 kms of footway for which the council is the Highway and Traffic Authority 27.5 kms of carriageway which is part of the Mayor of London’s Transport for London Road Network (TLRN) 55 kms of footway which is part of the TLRN.

3.119 In 2008 307 kilo tonnes of Co2 emissions emanated from all sources of ground based transport in Westminster.

3.120 The percentage of people whose main part of their journey is undertaken by foot is a relatively high 38% compared to outer London, as are users of the London Underground and Bus networks which combine to 35% whereas the combined car and motorcycle/scooter rate is a much lower 14% and cycling 3%. In the 2001 census, the percentage of Westminster residents without access to a car was 56%. xliiv

3.121 In 2010 the on-street parking stock was well used across the borough and consists of 33,000 Resident bays, 4,149 Visitor Pay by Phone bays, 2,604 other Paid visitor bays, 3,274 Shared use resident bays, 6,150 Paid for motorcycle bays, 7,818 cycle parking
spaces, 220 White Badge disabled bays, 480 Blue Badge bays, 102 Car Club bays, 154
taxi ranks providing 676 spaces, 223 rest/shelter spaces for taxis, 55 Coach bays, 21
Electric charging bays and other more specialist bays such as Diplomatic and Doctor
bays.xlv

3.122 Between 2002 and Autumn 2010 the average number of cyclists who entered the
Central London congestion charging area during charging hours increased significantly
by 127%. In 2009 the proportion of trips by London residents made by cycle where the
trip origin is in Westminster was 2.8% xlvi

 Issues and Problems

3.123 The concentration of commercial premises (office, retail and entertainment venues)
raises particular challenges in terms of noise from servicing and deliveries. But this
concentration may also offer opportunities in terms of innovative transport schemes:
for example, through freight consolidation schemes or quieter deliveries schemes.
Promoting safe and fuel efficient driving techniques for vehicles, including heavy goods
vehicles, can also have significant noise minimisation benefits.

3.124 Unrestrained use of motor vehicles results in increased congestion and emissions.
Cycling and walking are healthy, efficient and sustainable forms of transport which can
often result in quicker journey times.

 Likely Future conditions

3.125 The projected job growth in Westminster of about 19,000 people between 2012/13 to
2026/27 is likely to result in around 240,000 more journeys per day into Central London.
The implementation of Crossrail by 2018 is proposed to help cater for some of the
projected growth outlined above. CBRE predicts that it will be the single most important
transport infrastructure project to be undertaken in the UK for decades and will reshape
the capital’s property markets, particularly the office market in areas such as Paddington
where it is likely to double in size by 2020. It will also help to sustain the West End’s
leisure and entertainment sectors.xlvii

3.126 The promotion of electric cars and car clubs in the planning policies and lobbying tfl for a
more efficient bus fleet will help in the reduction of Co2 emissions from vehicles.

3.127 The Local Implementation Plan sets the following targets for 2026 : to increase the
proportion of trips by London residents made by foot in Westminster where the trip
origin is in Westminster to 39.3 %, to increase the proportion of cycle trips by London
residents where the trip origin is Westminster to 5%, decrease the Co2 emissions
emanating from all sources of ground based transport in Westminster to 168 kilo-tonnes.
4. Relevant Plans, Programmes and Strategies

4.1 As part of the IIA process a comprehensive review of relevant plans programmes and strategies has been carried out. This review ensures that the any relevant information contained within these documents is taken on board for the preparation of the IIA for Westminster’s City Plan as required by the SA/SEA process. The documents have been set out in accordance with their spatial significance and grouped accordingly as International, National, Regional (London wide), Neighbouring Authorities and Local (Westminster).

**International**

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

Kyoto protocol to the United Nations framework convention on climate change.


**National**


Climate Change Act 2008.


Planning Act 2008

Planning and Compulsory Purchase Act 2004


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


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

Regional


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


Mayor’s Tree and Woodlands Supplementary Planning Guidance (2012) Mayor of London.

**Neighbouring Authorities**

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

London Borough of Brent – Core Strategy (adopted 12 July 2010).

London Borough of Camden – Core Strategy (adopted 8 November 2010).

Royal Borough of Kensington and Chelsea – Core Strategy (adopted 8 December 2010).

**Local**

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

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


Core strategy LDF Adopted January 2011


Core Strategy NPPF Revision (Draft) 2012 Westminster City Council.

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


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


Local Development Scheme (2012)


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


5 Key Sustainability Issues

5.1 The proposed sustainability issues set out in this section have been informed by the examination of baseline information and the review of plans and programmes in the previous sections, 3 and 4 and with regard to the IIA Assessment Framework for the Core Strategy NPPF Revision and the SA/SEA for the Core Strategy (adopted January 2011).

• The creation of cohesive inclusive and safe communities.

5.2 Westminster has a growing and diverse population with a high proportion of short term migrants. It is a place of economic contrast with areas of significant deprivation. As well as the provision of social and community facilities access to local services including shops can improve community interaction. Over half of the crime in Westminster is committed in the West End but the fear of crime is most evident in the most deprived areas of the city.

Objectives 1 and 2.

• Provision of housing in particular affordable housing.

5.3 Westminster has the second highest house prices and the third highest market rents in the country. Unlike other parts of London there is a lack of surplus industrial land that can be released for housing and new housing is mainly achieved through ‘small scale’ development. The London Plan seeks a minimum average of 770 new homes to be delivered annually in Westminster.

Objectives 3 and 4.

• Inequalities in Health and Wellbeing.

5.4 There is a spatial contrast in life expectancy in Westminster, with life expectancy for men some 16 years less in the most deprived parts of Westminster and obesity is evident in both adults and children. Throughout Westminster there are high accident rates, areas of open space deficiency, poor air quality and high noise levels. Crime and the fear of crime can have considerable negative impacts of health including increased levels of stress and anxiety. The fear of crime is more evident in the more deprived wards in Westminster. Deprivation is linked to a number of issues around a lesser quality of life and health and wellbeing.
Objectives 2, 9, 10, 11 and 15.

- **To support climate change adaption by reducing green house gas and carbon emissions and the use of natural resources, improve air quality and minimise flood risk.**

5.5 Poor air quality is the result of the high number of vehicles and emissions from buildings. Westminster has the 5th highest greenhouse gas emissions in the UK and carbon emissions from the use of commercial occupiers is 74%, which is higher than the national average which is about 40%. Westminster is most at risk from river and surface water flooding.

Objectives 5, 6, 7, 8, 9, 11, 15.

- **Biodiversity**

5.6 Although densely developed Westminster is an important habitat for biodiversity but with over 70% already developed the best opportunity for improving biodiversity is through built structures. Supporting the natural environment can help towards mitigating against climate change and improving air quality.

Objectives 4, 8, 9.

- **To reduce noise and the impact of noise.**

5.7 Traffic is the main cause of noise complaint in Westminster although the high level of activity and 24 activity in some parts of Westminster contribute significantly to the problem. Noise is not just an environmental issue but can adversely affect health and wellbeing.

Objectives 4 and 10.

- **To encourage sustainable transport.**

5.8 Westminster is well served by public transport but suffers from high levels of traffic and resultant pollution and noise. Given the proximity of residential and commercial premises in Westminster and good public transport links the number of journeys undertaken by foot is high and therefore there are good opportunities for improving sustainable transport for both residents and visitors in Westminster. The Local Implementation Plan for Westminster aims to increase cycle journeys from 2.8% to 5% by 2026 and decrease Co2 emissions to 168 kilo-tones. Cycling and walking can have a positive impact on health and wellbeing.
Objectives 4, 5, 6, 7, 8, 9, 10 and 11.

- **To minimise waste**

5.9 Given the immense pressure and shortage of large suitable sites for waste disposal it is difficult for Westminster to deal with its own waste output the council therefore strongly supports the need to prevent the production of waste in the first instance.

Objectives 5, 9 and 12.

- **Heritage, design and public realm**

5.10 Westminster’s existing townscape and character is dominated by the high concentration and significance of its heritage assets, many of which are of national and international importance and which is a finite resource. With this high quality baseline there is a need to achieve excellence in new design, which will respect and build on this inheritance but that will also be accessible, safe and sustainable. The majority of the existing public realm is also of high quality and needs continual management to withstand the complex and sometimes conflicting demands.

Objectives 13 and 14 and 15.

- **To protect and seek opportunities to increase open space**

5.11 Despite the wealth of prestigious open spaces such as the Royal Parks, the River Thames and London Squares there is both an overall and localised shortage of open space in Westminster. Open spaces are important for not only for their environmental value but also in terms of providing a space for relaxation and exercise and are an important addition to the health and wellbeing of residents and visitors to the city.

Objectives 4, 7, 8, 9 and 15.

- **To support sustainable economic growth**

5.12 Westminster is a national and international centre for business, shopping, arts, culture and entertainment. Westminster’s residential population swells to over one million during the daytime resulting from workers, visitors and tourist. Only 2% of jobs are located in the most deprived parts of Westminster (the North Westminster Economic Development Area). The London Plan estimates there will be a growth in employment in Westminster of about 19,000 people by 2027.
5.13 The following table outlines the relationship the identified sustainability issues have with the issues that are required for consideration in Annex 1 of the SEA Directive.

Table 2 The relationship between SEA Issues and identified Sustainability Issues

<table>
<thead>
<tr>
<th>Key SEA Issues</th>
<th>Sustainability objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biodiversity</td>
<td>7, 8, 9, 14, 16</td>
</tr>
<tr>
<td>Population</td>
<td>1, 2, 3, 4</td>
</tr>
<tr>
<td>Human Health</td>
<td>2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 14, 15, 16, 17</td>
</tr>
<tr>
<td>Fauna</td>
<td>5, 8, 9, 15</td>
</tr>
<tr>
<td>Flora</td>
<td>5, 8, 9, 15</td>
</tr>
<tr>
<td>Soil</td>
<td>5, 8, 9, 15</td>
</tr>
<tr>
<td>Water</td>
<td>6, 7</td>
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<tr>
<td>Air</td>
<td>5, 8, 9, 11, 15</td>
</tr>
<tr>
<td>Climatic Factors</td>
<td>5, 6, 7, 8, 9</td>
</tr>
<tr>
<td>Material Assets</td>
<td>3, 13, 14, 15</td>
</tr>
<tr>
<td>Cultural Heritage</td>
<td>13, 14, 15</td>
</tr>
<tr>
<td>Landscape</td>
<td>7, 8, 14, 15</td>
</tr>
</tbody>
</table>
6. **The Assessment Framework**

6.1 The Sustainability Appraisal Framework is the methodology which will enable the sustainability effects of the policies in Westminster’s City Plan to be analysed, compared and critically assessed.

6.2 The establishment of appropriate objectives and indicative guide questions/sub-criteria is central to the IIA assessment process. The IIA Framework is based on the 17 sustainability objectives identified in the Core Strategy Sustainability Report (November 2009) and reviewed using the information in Sections 3, 4 and 5 of this scoping report and to ensure the objectives meet the environmental protective’s set out in the SEA Directive.

6.3 The Sustainability Appraisal Framework has been enhanced to include key objectives from the council’s Equality Impact Assessment (2008) and the Single Equality Scheme 2010-2013; Improving Opportunities-Maximising Potential (Consultation Draft 2010) and the Health Impact Assessment (2006).

6.4 Appendix 1 contains the criteria used for the consideration of the EIA and Health objectives and sub-criteria used in the IIA.

6.5 Table 3 (below) shows the Integrated Impact Assessment Framework which will be used for the assessment of new policies in Westminster’s City Plan. The sub-criteria questions help in analysing the issues to be considered in the objectives.

**Table 3 Integrated Impact Assessment Framework**

<table>
<thead>
<tr>
<th>SA/HIA/EQIA Objective</th>
<th>SA/HIA/EQIA sub criteria for assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) To create cohesive, inclusive and safe communities</td>
<td>Will it improve access to local services? Shopping? Community facilities? Will it increase ability to influence decision making (neighbourhoods)? Will it encourage engagement in the community activity? Will it empower communities? Will it promote positive relationships between communities and groups of people? Does it provide equal opportunities for use, function and access to the built environment for all equality groups?</td>
</tr>
<tr>
<td>2) To reduce crime and fear of crime</td>
<td>Will it reduce actual crime? Will it reduce fear of crime?</td>
</tr>
<tr>
<td>3) To ensure provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized</td>
<td>Will it reduce homelessness? Will it increase range of affordable housing? Will it reduce number of unfit homes? Will it create high quality homes? Will it improve life chances for all equality strand groups?</td>
</tr>
<tr>
<td>Units</td>
<td>Questions</td>
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<td>----------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
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<tr>
<td>4) To promote and improve health and well being</td>
<td>Will it help improve health inequalities?</td>
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<td></td>
<td>Will it reduce death rates?</td>
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<td></td>
<td>Will it increase participation in sport and leisure activities for all low participation groups?</td>
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<td></td>
<td>Will it tackle hate crime?</td>
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<td>Will it provide access to a healthy diet and encourage healthy lifestyles?</td>
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<td></td>
<td>Will it encourage a physically active lifestyle (helping to reduce obesity)?</td>
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<td></td>
<td>Will it create healthy workplaces?</td>
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<tr>
<td>5) To reduce greenhouse emissions and support climate change adaptation</td>
<td>Will energy need be met through renewable sources? Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel? *</td>
</tr>
<tr>
<td></td>
<td>Will it reduce ozone depleting emissions?</td>
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<td></td>
<td>Will it reduce emissions through retrofitting new technology?</td>
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<td></td>
<td>Will it reduce heat island effects on people and property?</td>
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<tr>
<td>6) To reduce use of natural resources e.g. water, energy</td>
<td>Will it reduce water consumption and improve water efficiency?</td>
</tr>
<tr>
<td></td>
<td>Will it reduce energy consumption? *</td>
</tr>
<tr>
<td>7) To minimise flood risk, promote SUDs, protect surface and groundwater quality</td>
<td>Will it minimise flood risk from all sources of flooding? *</td>
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<tr>
<td></td>
<td>Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience?</td>
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<td></td>
<td>Will it reduce combined sewer overflow events?</td>
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<tr>
<td>8) To protect, enhance and create environments that encourage and support biodiversity</td>
<td>Will it protect, enhance and increase biodiversity and protect habitats?</td>
</tr>
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<td></td>
<td>Will it reduce preserve SINCs?</td>
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<tr>
<td></td>
<td>Will it improve access to and promote educational value of sites of biodiversity interest?</td>
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<tr>
<td></td>
<td>Will it conserve and enhance species and habitats?</td>
</tr>
<tr>
<td>9) To improve Air Quality</td>
<td>Will it improve air quality? *</td>
</tr>
<tr>
<td></td>
<td>Will it reduce emissions of key pollutants?</td>
</tr>
<tr>
<td>10) To reduce noise and impact of noise</td>
<td>Will it reduce noise concerns and noise complaints?</td>
</tr>
<tr>
<td></td>
<td>Will it reduce noise levels? *</td>
</tr>
<tr>
<td>11) To reduce need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport</td>
<td>Will it reduce volumes of traffic?</td>
</tr>
<tr>
<td></td>
<td>Will it encourage walking and cycling? *</td>
</tr>
<tr>
<td></td>
<td>Will it increase proportion of journeys using modes other than the car?</td>
</tr>
<tr>
<td>12) To reduce waste production and increase recycling, recovery and re-use of waste</td>
<td>Will it reduce consumption of materials and resources?</td>
</tr>
<tr>
<td></td>
<td>Will it reduce household waste?</td>
</tr>
<tr>
<td></td>
<td>Will it increase recycling, recovery and re-use?</td>
</tr>
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<td></td>
<td>Will it reduce construction waste?</td>
</tr>
<tr>
<td>13) To protect and enhance the historic environment and architectural, archaeological and cultural heritage</td>
<td>Will it protect heritage sites and cultural value?</td>
</tr>
<tr>
<td></td>
<td>Will it protect strategic views?</td>
</tr>
<tr>
<td></td>
<td>Will it protect listed buildings and their settings?</td>
</tr>
<tr>
<td></td>
<td>Will it help preserve, enhance and record archaeological features and their settings?</td>
</tr>
<tr>
<td>14) To enhance public realm and street improvements</td>
<td>Will it reduce litter?</td>
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<tr>
<td></td>
<td>Will it enhance the quality of public realm?</td>
</tr>
<tr>
<td></td>
<td>Will it improve access and mobility for all equality group strands? *</td>
</tr>
<tr>
<td>15) To protect, enhance and seek opportunities to increase open space</td>
<td>Will it improve open space?</td>
</tr>
<tr>
<td></td>
<td>Will it improve landscape character?</td>
</tr>
<tr>
<td></td>
<td>Will it minimise development on Greenfield sites?</td>
</tr>
<tr>
<td>16) To ensure equal opportunities to improve</td>
<td>Will it improve qualifications and skills? **</td>
</tr>
<tr>
<td></td>
<td>Will it reduce unemployment? *</td>
</tr>
</tbody>
</table>
| local opportunities and support sustainable economic growth? | Will it provide jobs for those most in need?  
| | Will it improve earnings?  
| | Will it help adults into work and tackle child poverty by increasing number of volunteer parents engaged in employment, education and training?  
| 17) To maintain economic diversity, increase local opportunity and support sustainable economic growth | Will it improve business development and environment?  
| | Will it improve business resilience and economy?  
| | Will it encourage new business start ups, small businesses and opportunities for local people?  
| | Will it promote business in key sectors?  
| | Will it promote regeneration, reducing disparity?  
| | Will it provide employment opportunities for out of work residents?  

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

**In the Health Impact Assessment (HIA) element the impacts on the groups listed below will be considered:**

| Population groups – HIA | Unemployed  
| | Low Income  
| | Homeless / Street Community  
| | Refugees and asylum seekers  
| | Ethnic groups  
| | Learning difficulties  
| | Physical disabilities  
| | Carers  
| | People who experience domestic violence  

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

5.6 The predicted effects of each new policy in Westminster’s City Plan will be analysed against each of the sub-criteria for the 17 main objectives and will be scored as follows:
Major positive ++, Minor positive +, Neutral 0, Minor negative –, Major negative – –

With a commentary to include an overall summary and on long and short term positive and negative effects, mitigation/changes to plan and on uncertainty/risks and cumulative effects, where appropriate dependent on the scope of the policy it is assessing.

Appendix 2 contains the detailed IIA appraisal template that will be used to score the emerging policies based on the 17 objections and associated sub-criteria.
6. **Next steps**

6.1 This Scoping Report and its consultation fulfils the requirements relevant to Stage 1 of the IIA process as set out in Table 1 (Pages 2/3).

6.2 There will be a five week consultation period for this scoping report. Amendments will be made to this report to incorporate stakeholder feedback where appropriate.

6.3 Stage 2 will run alongside the preparation of Westminster’s City Plan by assessing all emerging draft policies against the 17 objectives as set out in the IIA Framework using the appraisal template set out in Appendix 2.

6.4 An Integrated Impact Assessment Report (Stage 3) will then be produced which details the process undertaken and results of the assessment. Key stakeholders will be consulted on the Integrated Assessment Report and changes made where appropriate. Any comments received will also as appropriate feed into the Examination in Public (which is anticipated to take place early in 2014).
References for Section 3

i Business Register and Employment Survey 2010-11

ii Business Register and Employment Survey 2010-11

iii Business Register and Employment Survey 2010-11

iv City of Westminster Local Economic Assessment Baseline Study, 2011

v Core Strategy The NPPF Revision July 2012

vi City of Westminster Local Economic Assessment Baseline Study, 2011

vii City of Westminster Local Economic Assessment Baseline Study, 2011

viii City of Westminster Local Economic Assessment Baseline Study, 2011

ix Westminster City Council Land Use Survey data 2009

x Accessible Hotels in London Study 2010.

xi Statement of Licensing Policy Westminster City Council 2011


xiii GLA Economics working paper 51

xiv London Office Policy Review 2009 Ramidus Consulting Ltd, Roger Tym and Partners, GLA. At the time of writing the 2011 London Office Policy Review was not published but this section will be updated once these statistics become available.

xv 2011 Census

xvi ONS, Annual Population Survey 2010


xviii At the time of writing this information had not been disseminated for the 2011 census but it will be included in the IIA baseline as soon as it becomes available.


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

xxi City of Westminster Local Economic Assessment Baseline Study, 2011


xxiii 2011 NHS Health Profile of Westminster
xxiv Westminster City Plan 2006-2016
xxv Local Implementation Plan a Transport Delivery Plan up to 2031- Westminster City Council 2011
xxvi London Accident Analysis Unit, London Road Safety Unit, Transport for London Street Management, 2008
xxvii Crime statistics provided to Westminster City Council by the Metropolitan Police 2008.
xxix Westminster City Plan 2006-2016
xxx Housing Needs Assessment, 2006
xxi GLA rent maps for NW8 (lower quartile)
xxii Hometrack data for lowest quartile/area
xxiii 5-15 year housing delivery schedule- Westminster City Council 2011
xxv The London Plan July 2011 Paragraph 1.31
xxvi The Mayor’s Air Quality Strategy – Mayor of London, 2011
xxvii Core Strategy The NPPF Revision July 2012
xxviii Local and Regional CO2 Emissions for 2005-2009 by local authority, 2011 and 2010 Local Authority Carbon Dioxide Figures-Department of Climate and Energy Change 2012.
xxix Retrofitting Soho, 2008
x Westminster Noise Strategy 2010
xli Local Implementation Plan a Transport Delivery Plan up to 2031- Westminster City Council 2011
xlii Draft SPG Land for Industry and Transport 2012 Mayor of London
xlii Local Implementation Plan a Transport Delivery Plan up to 2031- Westminster City Council 2011
xliii Local Implementation Plan a Transport Delivery Plan up to 2031- Westminster City Council 2011
xliii Local Implementation Plan a Transport Delivery Plan up to 2031- Westminster City Council 2011
xliv Local Implementation Plan a Transport Delivery Plan up to 2031- Westminster City Council 2011
xlvi Local Implementation Plan a Transport Delivery Plan up to 2031- Westminster City Council 2011
xlvii Local Implementation Plan a Transport Delivery Plan up to 2031- Westminster City Council 2011
xlx Local Implementation Plan a Transport Delivery Plan up to 2031- Westminster City Council 2011
Appendix 1


Equalities

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

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

1. Educational Attainment

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

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

2. Health and well-being

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

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

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

3. Economic well-being

Help adults into work and tackle child poverty by increasing the number of vulnerable parents engaged in employment, education and training.
Reduce the number of young people not in education, employment or training.

4. Staying safe

Tackle hate crime.

5. Place –shaping and Community

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

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

1. Community Cohesion/ Place Shaping Objective

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

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

2. Economic Well-being Objective

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

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

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

- Will it provide employment opportunities for out of work residents in NWEDA?

4. Health and Wellbeing Objective

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

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

Health and Wellbeing

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

Impacts considered on the following groups:

<table>
<thead>
<tr>
<th>Population groups – HIA</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Children 0-16</td>
<td>Unemployed</td>
</tr>
<tr>
<td>Young Adults 16-25</td>
<td>Low Income</td>
</tr>
<tr>
<td>Adults 25-65</td>
<td>Homeless / Street Community</td>
</tr>
<tr>
<td>Older Adults 65+</td>
<td>Refugees and asylum seekers</td>
</tr>
<tr>
<td>People with alcohol and other drug problems</td>
<td>Ethnic groups</td>
</tr>
<tr>
<td>People with long term illness</td>
<td>Learning difficulties</td>
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<tr>
<td>People with mental health</td>
<td>Physical disabilities</td>
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<tr>
<td>Residents</td>
<td>Carers</td>
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<tr>
<td></td>
<td>People who experience domestic violence</td>
</tr>
</tbody>
</table>
Health Impact Assessment Objectives.

**Lifestyle Objectives**

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

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

**Live Work Factors**

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

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

**Socio – economic Factors**

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

- Will it promote community safety?
- Will it crime, fear of crime and disorder?
- Will it create safer places which lead to a reduction in accidents?
- Will it improve access to education, training and employment?
- Will it promote healthy workspaces?
- Access to arts and leisure
- Access to services
- Will it improve housing conditions?
## 1. Integrated Impact Assessment: For Policy No. XXXXX

<table>
<thead>
<tr>
<th>Sustainability, Equality and Health Objectives</th>
<th>Detailed decision making sub-criteria including EIA and HIA</th>
<th>Score</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. To create cohesive, inclusive and safe communities</strong></td>
<td>• Will improve access to local services? 0</td>
<td></td>
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<tr>
<td></td>
<td>• Shopping? 0</td>
<td></td>
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<td></td>
<td>• Community facilities? 0</td>
<td></td>
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<td></td>
<td>• Will in increase ability to influence decision making (neighbourhoods)? 0</td>
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<td></td>
<td>• Will it promote positive relationships between communities and groups of people? 0</td>
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<td></td>
<td>• Does it provide equal opportunities for use, function and access to the built environment for all equality groups? 0</td>
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<td>• Will it empower communities? 0</td>
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<td>• Will it encourage engagement in community activity 0</td>
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<td><strong>2. To reduce crime and fear of crime</strong></td>
<td>• Will it reduce actual level of crime?** 0</td>
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<td></td>
<td>• Will it reduce fear of crime?* 0</td>
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<td>• Will it tackle hate crime? 0</td>
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<td><strong>3. To ensure the provision of appropriate housing types to</strong></td>
<td>• Will it reduce homelessness?* 0</td>
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<tr>
<td></td>
<td>• Will it increase a range of affordable housing?* 0</td>
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<tr>
<td>reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units</td>
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<tr>
<td>• Will it reduce the number of unfit homes? 0</td>
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<td>• Will it result in high quality homes?** 0</td>
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<tr>
<td>• Will it improve life chances for all equality strand groups 0</td>
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<tr>
<th>4. To promote and improve health and well – being</th>
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<tbody>
<tr>
<td>• Will it help health and equalities?** 0</td>
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<tr>
<td>• Will it reduce death rates? 0</td>
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<tr>
<td>• Will it improve access/movement? 0</td>
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<tr>
<td>• Will it encourage healthy lifestyles? 0</td>
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<tr>
<td>• Will it increase participation in sport and leisure activities for all low participation groups? 0</td>
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<tr>
<td>• Will it provide access to a healthy diet and encourage healthy lifestyles? 0</td>
</tr>
<tr>
<td>• Will it encourage a physically active lifestyle (helping to reduce obesity)? 0</td>
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<tr>
<td>• Will it create healthy workplaces? 0</td>
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<tr>
<th>5. To reduce greenhouse gas emissions and support climate change adaption</th>
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<tbody>
<tr>
<td>• Will energy need be met through renewable sources? 0</td>
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<tr>
<td>• Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel? 0</td>
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<tr>
<td>• Will it reduce ozone depleting emissions? 0</td>
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<tr>
<td>• Will it reduce emissions through retrofitting new technology? 0</td>
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<tr>
<td>• Will it reduce heat island effects on people and property? 0</td>
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<tr>
<th>6. To reduce the use of natural resources e.g. water, energy</th>
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<tbody>
<tr>
<td>• Will it reduce water consumption? 0</td>
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<tr>
<td>13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage</td>
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<tr>
<td>• Will reduce construction waste?</td>
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<tr>
<td>• Will protect heritage sites and cultural value?</td>
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<tr>
<td>• Will it protect strategic views?</td>
</tr>
<tr>
<td>• Will it protect listed buildings and their settings?</td>
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<tr>
<td>• Will it help preserve, enhance and record archaeological features and their settings?</td>
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<tr>
<td>• Will it help preserve, enhance and record archaeological features and their settings?</td>
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<tr>
<th>14. To enhance public realm and street environment</th>
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<tr>
<td>• Will reduce litter?</td>
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<tr>
<td>• Will it enhance the quality of public realm?</td>
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<tr>
<td>• Will improve access and mobility for all equality group strands?*</td>
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<tr>
<th>15. To protect, enhance and seek opportunities to increase open space throughout the borough</th>
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<tbody>
<tr>
<td>• Will it improve open space?*</td>
</tr>
<tr>
<td>• Will it improve landscape and character of open space?</td>
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<tr>
<td>• Will it minimise development in Greenfield sites?</td>
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<tr>
<th>16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth</th>
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<tbody>
<tr>
<td>• Will it improve qualifications and skills??</td>
</tr>
<tr>
<td>• Will reduce unemployment?*</td>
</tr>
<tr>
<td>• Will provide jobs for most in need??</td>
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<td>• Will improve earnings?</td>
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<tr>
<td>• Will it help adults into work and tackle child poverty by increasing the number of volunteer parents engaged in employment, education and training?</td>
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<tr>
<th>17. To maintain economic diversity,</th>
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<tr>
<td>• Will improve business development and</td>
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<td>Option</td>
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<tr>
<td>Will improve business resilience and economy?</td>
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<tr>
<td>Will it encourage new business start ups and opportunities for local people?</td>
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<tr>
<td>Will it promote business in key sectors?</td>
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<td>Will it promote regeneration, reducing disparity?</td>
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<tr>
<td>Will it provide employment opportunities for out of work residents?</td>
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</tbody>
</table>

For the **EIA** the following protected characteristics were considered:
Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation

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

IIA Assessment

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

Overall Summary

Long Term positive effect –
Short term –
Long term negative effects –
Mitigation/Change to plan –
Cumulative effects –
Uncertainties/risks –
Monitoring significant effects –