Introduction

This scoping report has been prepared as part of stage one of the Integrated Impact Assessment (IIA) for Westminster’s City Plan, which once adopted will include both strategic and city management policies. An IIA scoping report for the city management plan policies has previously been published with consultation carried out between 4 October 2012 and 9 November 2012. This new scoping report includes the comments received in response to this consultation and is an opportunity to refresh the scoping report drafted in 2007 and used in the Sustainability Report for the Core Strategy and for the IIA Report for the NPPF Revision to the Westminster’s Core Strategy (now called Westminster’s City Plan: Strategic Policies), in particular in light of a change in market conditions, new evidence and trends which are set out in a series of policy topic based consultation booklets (see part 1 of this document for further information). This new IIA Scoping Report will ensure a robust foundation for the Integrated Impact Assessment for both the detailed city management policies and any alterations to the strategic policies in Westminster’s City Plan.

Scoping

This report presents the proposed methodology for carrying out the IIA for Westminster’s City Plan. The purpose of the report is to present information on the proposed scope of the assessment including:

- An overview of Westminster’s City Plan;
- The Integrated Impact Assessment approach;
- The key baseline information and identification of key issues;
- The plans, programmes and strategies relevant to the review;
- The proposed objectives and IIA Assessment Framework;
- Next steps in the process.

The IIA Assessment Framework is the methodology which will enable the, environmental, social and economic sustainability impacts and equalities, health and crime and disorder effects and of the policies in Westminster’s City Plan to be analysed, compared and critically assessed. This scoping 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 consider the equalities impacts for decisions under the Public Sector Equalities Duty (section 149 of the Equality Act 2010) April 2011. The IIA also considers crime and disorder matters in accordance with The Crime and Disorder Act 1998 (Amended by the Police and Justice Act 2006). Although not a statutory requirement a Health Impact Assessment has also been included in this IIA, as good practice, to ensure policies where possible, actively promote health gain for the local population, reduce health inequalities and do not actively damage health. This is particularly important in light of the Health and Social Care Act 2012 which transferred statutory responsibility for public health to local authorities. 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- Stages of the Integrated Impact Assessment (IIA)

<table>
<thead>
<tr>
<th>Stage one</th>
<th>Scoping Report – This Stage</th>
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<tbody>
<tr>
<td>Assemble the 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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<tr>
<th>Stage two</th>
<th>Appraisal Framework Assessment</th>
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<tr>
<td>Appraise the plan objectives and policies against the IIA Assessment Framework taking into account the evidence base. Propose mitigation measures for alleviating the plan’s adverse effects as well as indicators for monitoring the plan’s sustainability.</td>
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<th>Stage three</th>
<th>IIA Report</th>
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<tr>
<td>Prepare an Integrated Impact Assessment Report documenting the appraisal process and findings.</td>
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<tr>
<td>Stage four</td>
<td>IIA Report</td>
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<td>Consult stakeholders on IIA Report.</td>
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<th>Stage five</th>
<th>Authorities Monitoring Report (AMR)</th>
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<tr>
<td>Monitor the implementation of the plan including its sustainability effects.</td>
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**Consultation arrangements**

This scoping report will be sent to the following organisations:

- Natural England;
- Environment Agency;
- English Heritage;
- Greater London Authority;
- Equalities Groups
- Central London and West London Clinical Commissioning Groups

Natural England, the Environment Agency and English Heritage are statutory consultees as set out in The Environmental Assessment of Plans and Programmes Regulations 2004. In addition the Scoping Report will be sent to the Greater London Authority, the 108 equalities groups contained on our planning policy database and the relevant commissioning groups. Other general consultation bodies, relevant agencies bodies and consultees registered on Westminster’s Policy Framework consultation database will be provided with an opportunity to comment on the draft IIA report.
1. The Local Plan – Westminster’s City Plan

Westminster’s City Plan once adopted will consist of both strategic and detailed city management policies. Although initially the city management policies were going to be in a separate document called the City Management Plan, the NPPF talks about the preparation of a single Local Plan containing both strategic and detailed policies and legislation has been changed to enable this. Once adopted, this single document will be called Westminster’s City Plan and will provide a comprehensive source of planning policy for Westminster. The above diagram shows Westminster’s current policy framework. The following section provides an overview of Westminster’s plan process to date.

Strategic Policies

1.2 Westminster’s City Plan: Strategic Policies, which was adopted on 13 November 2013, sets out the vision for Westminster up to 2025 and beyond and puts in place a strategic policy framework to deliver that vision. This document is based on a review of the Core Strategy adopted in January 2011 and has been fully reviewed and updated to ensure consistency with the National Planning Policy Framework (NPPF), and the London Plan published by the Mayor of London in July 2011.
1.3 Westminster’s City Plan: Strategic Policies was subject to an Integrated Impact Assessment and the report can be viewed here. This built on The Core Strategy Sustainability Appraisal Report which included a Strategic Environmental Assessment (November 2009), which can be found here with associated appendices here. The 2007 scoping report is available to view here.

City Management Policies

1.4 Work on developing the detailed city management policies began in 2008 and will be ongoing until their inclusion in and adoption of Westminster’s City Plan (anticipated late 2015/early 2016). The Council has undertaken an open approach to involving communities and stakeholders, with additional (informal) consultation stages during the document development process to provide opportunities for early and on-going involvement in policy development. The steps taken to date are as follows:

- **Regulation 18 - Notification of the intent to prepare the plan October/November 2008 (Statutory Stage)**
- **Consultation Workshops in the summer of 2009 (Informal Stage)**
- **City Management Plan Policy Options: January 2011 (Informal Stage Consultation from January 2011 to March 2011)**
- **City Management Plan Consultation Draft: November 2011 (Informal Stage Consultation from November 2011 to March 2012)**
- **Regulation 18-Notification of the intent to revise Westminster’s Core Strategy to prepare a single local plan for Westminster May 2012 (Statutory Stage)**

1.5 In 2012 the Council published an IIA Scoping Report for Westminster’s City Plan and focusing on the detailed city management policies. This document can be viewed here. This scoping report was subject to a five week consultation period between 4 October 2012 and 9 November 2012. Appendix 1 contains the comments received from English Heritage, Natural England, the Environment Agency (who are the statutory consultees as set out in The Environmental Assessment of Plans and Programmes Regulations 2004) and sets out how these comments have been incorporated into this new scoping report. It was considered necessary to refresh the scoping report to ensure a robust base for the Integrated Impact Assessment and in light of new baseline evidence and published documents.

Developing Westminster’s Local Plan Topic Based Booklets
Given significant changes to market conditions in Westminster and in light of the 2011 Census and other new information, a further round of informal consultation was started in 2013, with the publication of a series of topic based booklets. The booklets build upon the policy approach published in the City Management Plan Consultation Draft November 2011, taking into account previous consultation responses and updating the draft policies to include the most recent data, new evidence and trends. Consultation on individual topic based booklets will enable a focused and engaged discussion on key issues, as opposed to consultation on a full statutory plan document which must cover all issues evenly and with a view to the final legal context it must operate in. It also allows issues to be dealt with on a topic basis, making the consultation more manageable for consultees. The following topic based booklets have already been subject to consultation:

- Basements
- Mayfair and St James’s
- Flood Risk
- Housing Need, Delivery and Quality
- Westminster’s Economy
- Food, Drink, Entertainment, Tourism Arts and Culture
- Social and Community uses

The following booklets (which may be subject to name changes) will be published for consultation throughout 2014:

- Affordable Housing
- Mixed Use
- Heritage Assets, Views and Tall Buildings
- Design
- Health, Well-being and Personal Safety
- Pollution Control
- Open Space and Green Infrastructure
• Public Spaces and Advertisements
• Transport
• Spatial Strategy and Implementation
• Energy

1.7 The booklets along with details on how to comment can be viewed on the Council’s [website](#) as they are published. They will also be available for inspection at City Hall reception, 64 Victoria Street, London SW1E 6QP, in Westminster libraries or on request by calling 0207 641 2503.

Following this stage and subject to consultation comments and changes to any strategic polices the Council may decide to conduct further informal consultation prior to the publication of the local plan in accordance with Regulation 19.

**The London Plan**

1.8 The Mayor is responsible for London wide strategic planning, including the preparation of his spatial development strategy (known as ‘the London Plan’ – the latest version was published in July 2011). Revised early minor alterations to the London Plan were adopted on 11 October 2013, to ensure consistency with the NPPF and a Further Alterations version was published for consultation on 15th January 2014. Planning policies in Westminster must be in general conformity with the London Plan.
2. **The Integrated Impact Assessment Approach**

2.1 The integrated approach avoids the need to undertake and report on separate assessments, seeks to reduce any duplication of assessment work and benefits from a shared understanding of the policies. The IIA incorporates the statutory requirements of a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). In addition to these requirements it will also explicitly consider equalities, community safety and health. This report also includes reference to the Council’s corporate priorities as set out in The City Council’s Better City Better Lives Year 2 document (March 2014) and how these relate to the IIA objectives (These are shown in Table 3 pp.67-69).

2.2 Under Section 19 (5) of the Planning and Compulsory Purchase Act 2004, a Sustainability Appraisal (SA) is required for all Development Plan Documents. This should incorporate a Strategic Environmental Assessment for the purposes of the EU Strategic Environmental Assessment Directive EC/2001/42 and the UK Environmental Assessment of Plans and Programmes Regulations 2004.

2.3 Annex 1 of the SEA Directive states that the assessment should include information on the *likely significant effects on the environment, including on issues such as;*

   (i) biodiversity;
   (ii) population;
   (iii) human health;
   (iv) fauna;
   (v) flora;
   (vi) soil;
   (vii) water;
   (viii) air;
   (ix) climatic factors;
   (x) material assets;
   (xi) cultural heritage, including architectural and archaeological heritage; and
   (xiii) the inter-relationship between the issues referred to in subsections (i) to (xii).

2.4 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.*
2.5 The Council has a statutory duty to consider the equality impacts of its decisions. The public sector equalities duty (set out in Section 149 of the Equality Act 2010) came into force on 5 April 2011. This 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.

2.6 The equalities duty has three aims. It requires public bodies to have due regard to 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.

2.7 Having ‘due regard’ for advancing equality involves, in particular having regard to the need to:

1. Remove or minimise disadvantages suffered by people due to their protected groups;

2. Take steps to meet the needs of people from protected groups where these are different from the needs of other people;

3. Encourage people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

2.8 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.

2.9 Section 17 of the Crime and Disorder Act 1989 gave the lead responsibility for crime and disorder reduction to the police and local authorities as well as a duty to consider crime and disorder in all their activities. The definition of Section 17 was amended by the Police and Justice Act 2006 to state that ‘Without prejudice to other obligations imposed on it, it shall be the duty of each authority to which this section applies to
exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all it reasonably can prevent, a) crime and disorder in its area (including antisocial behavior and adversely affecting the local environment) and, b) the misuse of drugs, alcohol and other substances in its area. The impact of reduction in crime and disorder in accordance with Section 17 will be considered by an assessment of each policy against Objective 2 (to reduce crime and the fear of crime) in the Integrated Impact Assessment Framework. The City Council’s strategic priorities in terms of Section 17 of the Crime and Disorder Act 1987 (as amended by the Police and Justice Act 2006) are set out in Safer Westminster Partnership – Crime and Disorder Reduction Strategy 2011-14.

2.10 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. The purpose of an HIA is to ensure that the policies where possible, actively promote healthy living for the local population, reduce health inequalities and do not actively damage health. This is particularly important in light of the Health and Social Care Act 2012 which transferred statutory responsibility for public health to local authorities.

2.11 Westminster’s Joint Health and Wellbeing Strategy - Healthier City, Healthier Lives (2013) sets out long term goals to improve the health and wellbeing of Westminster’s residents, workers and visitors (2013-28) with short term Strategy Priorities up to 2016 and long term goals as follows:

- Improving the environment in which children and young people live, learn, work and play;
- More people live healthier for longer and fewer die prematurely;
- A safe, supportive and sustainable Westminster where all are empowered to play as full a role as possible;
- People are supported to access quality care closer to home;
- People living with injury, disabilities, long term conditions and their carers have quality of life, staying independent for longer.

2.12 Both the long term goals set out in Healthier City, Healthier Lives and the built environment factors that are most likely to influence health in Westminster (see paragraph 6.4 for further detail) will be considered as part of the IIA Assessment Framework.
The City Council’s Better City Better Lives Year 2 document (March 2014) sets out a number of corporate ambitions which will help make Westminster a sustainable place in which to work, live and visit. These ambitions are linked to IIA Framework objectives as follows:

A Safer Healthier City

- Visible, effective enforcement combined with pro-active, long term interventions to improve local community safety (IIA Framework objectives 1, 2, 11 and 14);
- Longer, healthier independent lives where all are empowered to play as full a role in society as possible (IIA Framework objectives 1 and 4);
- Strong, responsible families which give every child the best start in life (IIA Framework objectives 3 and 4).

A More Connected City

- People help themselves and each other before asking the council for help (IIA Framework Objective 1);
- Increase in the number of people who make a positive voluntary contribution to the City (IIA Framework objectives 1 and 4);
- Residents and businesses have a greater role in decision making (IIA Framework Objective 1);
- Sustainable investment in infrastructure (IIA Framework objectives 4, 11 and 14);
- A Connected City - People from different backgrounds get on well together (IIA Framework Objective 1);
- Sustainable investment in infrastructure (IIA Framework objectives 4 and 11);

An Enterprising City

- Enterprising and sustainable local public services that make our funds go further (IIA Framework Objective 4);
- School leavers and adults with barriers to work are better able to enter employment (IIA Framework objectives 2 and 16);
• *A distinctive and sustainable destination of choice for investment* (IIA Framework Objective 17);

• *Conditions for start-ups and SMEs to be created and grow, particularly those owned by residents investment* (IIA Framework Objective 16).
3. **Baseline Information**  
The requirement for Baseline Information

3.1 An important part of the IIA scoping process 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 and can assist in any future monitoring of the policies. 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. As well as the baseline conditions set out by issue the following section also therefore includes information on projections and trends -‘the likely future conditions’- where this information is available.

**Economic conditions**

*Map of Westminster showing key economic designations*
Employees

3.2 Westminster functions as a national and international centre for business, shopping, arts and culture, and entertainment. It accommodates 673,000 jobs (2013)\(^1\), 14% of London’s employee total. It contains the most workplace jobs of any London borough by some distance, and more than the City of London and Canary Wharf combined.\(^2\) Approximately one million people set foot in Westminster every day for work, study and leisure purposes.\(^3\)

3.3 Employee jobs are overwhelmingly located in the two central wards of St.James’s and the West End, which combined account for nearly two thirds of all Westminster jobs.

Businesses

3.4 Westminster has the single largest number of businesses of any London borough, with 50,100 businesses currently in the city. This is around 12% of London’s total and is increasing.\(^4\) These businesses contribute £40 billion or 3.1% to National Output.\(^5\)

3.5 The majority of Westminster’s businesses are small, with 85% of VAT registered businesses having fewer than ten employees.\(^6\) There are also a 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 the Paddington and Victoria Opportunity Areas, where most of the larger office spaces and floorplates are located.\(^7\)

3.6 As part of an assessment of business competition in 2013, Westminster was ranked top across London in terms of wellbeing, costs, connectivity, talent and enterprise.\(^8\)

Westminster has a very diverse economy, however the key broad sectors by business numbers are the Knowledge Economy (17,000 businesses) and retail/entertainment/leisure (11,600).\(^9\)

Offices

3.7 Offices are the second largest land use in Westminster making up 27% of all floorspace. Westminster’s office stock accommodates over 17,500 businesses with a rateable value of over £2.6 billion.

3.8 There are three Opportunity Areas in Westminster: Paddington, Victoria and Tottenham Court Road (part of which is within the London Borough of Camden), designated in the London Plan and in Westminster’s City Plan: Strategic Policies. The majority of the office
floorspace gains in Westminster between 1996 and 2010/11 were in the Paddington Opportunity Area.

3.9 Office floorspace increased for 12 of the 13 years prior to the downwards trends starting in 2010/11, when the CAZ lost over 120,000 sqm of office floorspace over three years (mainly to residential use) which equates to all the gains in floorspace made over the four years preceding 2010/11. If all the developments granted permission, currently in the office pipeline were to be completed this would result in a further loss of 64,000 sqm of office floorspace, as shown in the graph below.

**Annual net change in office floorspace (sqm) 1996 – 2012 and total B1 stock in the CAZ**

![Graph showing annual net change in office floorspace and total B1 stock in the CAZ between 1996 and 2012.]

3.10 The Core Central Activities Zone (Core CAZ), particularly the West End, accommodates the greatest proportion of Westminster’s office stock. In 2013 the West End was recognised as the most expensive office market in the world (previously Hong Kong held this title).

3.11 Deloitte Real Estate comment that developers in the West End were fast to react to improving market conditions. The demand for new space has come for super-prime space from hedge funds, private equity and wealth management businesses, which is reflected in the high rents being paid, with deals in excess of £120 per sq ft recorded for the very best space in Mayfair and £130 per sq ft in St. James.
3.12 Westminster has a diverse range of office floorspace and small offices (<250sqm) represent 18.9% of the total office floorspace in the city.\textsuperscript{xiv}

3.13 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{ xv} The majority of creative industries operate from B1 office floorspace, with only 1% actually operating within the B1c light industrial floorspace use class.\textsuperscript{xvi} Although there are parts of Westminster, such as Soho with clusters of B1c light industrial uses.

3.14 There are no Strategic Industrial locations in Westminster.

**Westminster a Global Economy**

3.15 Westminster includes buildings for the state and national government, acting as a generator for employment and as a tourist attraction. Royal Palaces sit alongside the home of government, acting as an international focus point for events and ceremonies.\textsuperscript{xvii}

3.16 Britain contains headquarters of 29 ‘Global 500’ companies; seven of these are in Westminster, including BP, BAE Systems and the Rio Tinto Group.

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

3.18 There are 96 Embassy/High Commissions in Westminster and the majority of these (83) are inside the Central Activities Zone.\textsuperscript{xix}

3.19 There are currently five Special Policy Areas (SPA’s) in Westminster with the following specialisms:

- Harley Street - medical facilities;
- Portland Place - institutional uses;
- East Marylebone - wholesale showroom uses;
- Savile Row – tailoring;
- St. James’s - private member’s clubs, art galleries, and niche retail.
The North West Westminster Economic Development Area (NWEDA)

3.20 The North West Economic Development Area (NWEDA) which includes the Paddington Opportunity Area, was designated in the Core Strategy (Adopted 2011) as an area where the Council wishes to encourage more economic activity and enterprise. Much of NWEDA is primarily a residential with a high proportion of social rented housing. 42% of Westminster’s deprived population live in the four electoral wards that comprise most of NWEDA, these are: Church Street, Westbourne, Queen’s Park and Harrow Road. 40% of Westminster’s Job Seekers Allowance claimants reside in these four wards.\textsuperscript{xx}

3.21 The average rent for small sized offices in NWEDA is considerably below the Westminster average of £562 per sqm (£52 per sq ft), standing at £306 per sqm (£28 per sq ft) in NWEDA.\textsuperscript{xxi}
3.22 Retail is a major part of Westminster’s economy, particularly in the international retail centre of the West End is a significant draw for shoppers from all over the world, while acting as one of its most significant industries in terms of employment. Experian estimate that in 2012 there were 6,800 shops in Westminster, employing around 60,000 people. During August 2012 an average of 6 million shoppers visited the West End every week. 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 £1,000 per sq ft in parts of the West End such as Bond Street.

3.23 Westminster’s Town Centre Hierarchy caters for a diverse range of needs and markets. The International Shopping Centres (Oxford Street, Regent Street, Bond Street and Knightsbridge) are the nation’s most eminent shopping streets and a major location for flagship and iconic department stores. The Core CAZ contains a variety of comparison retail and includes specialist shopping in Soho and Covent Garden and the high-end and
luxury retail in Mayfair and St. James’s. The CAZ Frontages are mixed use streets with a predominant retail focus (such as Marylebone High Street, Baker Street and Victoria Street). Outside of the central area there are a range of high street style centres, including the Queensway/Westbourne Grove Major Shopping Centre with a borough wide catchment area. The District Centres (including St John’s Wood High Street and Harrow Road) are key neighbourhood centres providing convenience and some comparison retail alongside other town centre uses and local services. In addition there are 39 Local Centres across Westminster which provide convenience shopping focused centres providing essential accessible locations for local residents.

3.24 The Council regularly commissions health checks of its shopping centres the detailed results of which can be found here

Food, Drink, Entertainment, Tourism Arts and Culture

3.25 Westminster hosts a number of high profile and internationally recognised events throughout the year such as international film premiers, the Proms at the Royal Albert Hall, the BAFTAs and London Fashion Week. It is also home to world renowned centres of arts, culture and theatres such as the National Gallery, the Tate Gallery, the Royal Colleges of Art and Music, Theatreland and the Royal Opera House. Westminster also has a sporting presence as the home of international Cricket at Lords Cricket Ground, and the city hosted several sports events during the 2012 Olympics e.g. beach volleyball and cycling events.

3.26 Westminster provides world-class and world-renowned entertainment and leisure. More than 28 million people visit the city each year. The evening population is estimated to be around 400,000 people and in some wards the night-time population is five times that of the resident population. Westminster has the largest night time economy in the UK with a yearly turnover of £3 billion in 2009.

3.27 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; 136 licensed night clubs and dance venues; 20 casinos and nearly 60 traditional private member clubs.

3.28 Westminster plays an important role in London’s visitor economy with an unrivalled range and combination of visitor attractions and hotel accommodation. Around 40% of London’s hotels and guesthouses are located in Westminster. With the attraction of
iconic heritage such as the Houses of Parliament, Westminster Abbey and Buckingham Palace it is the most visited London borough with over 55 million trips per year.xxx

3.29 The food, drink, tourism and entertainment sector accounts for 97,606 jobs in Westminster, which is 15.2% of all Westminster jobs.xxxi

3.30 Home to London’s Theatreland, Westminster has 38 theatres, 60 cinema screens and four concert halls with combined seating capacity for over 50,000 people.xxxii

**Issues and Problems**

3.31 So many people coming into Westminster including workers, visitors and tourists, puts pressure on existing infrastructure, local services, transport and the public realm. Such intense activity is part of what makes Westminster exciting and vibrant and of economic significance, but is also one of its greatest challenges.

3.32 The influx of visitors 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 can detrimentally affect air quality and crime levels and cause unsociable levels of noise. Westminster had 63,178 crimes reported in the past year which equates to a 28.8 crimes per 100 people. This is much higher than the London average of 10.0 crimes per 100 people. However, this does not necessarily indicate how likely residents are to become victims of crime and crime in Westminster is heavily skewed by having major tourist attractions, shops and a thriving night time economy.xxxiii The high volume of people, nationally important buildings, visitor attractions and government-related functions also give rise to particular security risks, and specific concerns in relation to terrorism.

3.33 Westminster is densely developed and its generally very high land values means 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.

3.34 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.

3.35 The economy of Westminster has not been immune from the recession. However, researchxxxiv shows that the mix of uses in Westminster means it has been better protected than other locations dominated by one commercial main use.
3.36  The loss of office floorspace to residential (see para 3.9) may be cause for concern if the trend continues.

Likely Future conditions

3.37  The working population of Westminster is projected to increase from 656,000 in 2011 to 750,000 in 2036.\textsuperscript{xxxv}

3.38  The exact impact on Westminster’s economy from the trend in office to residential development is unclear. However, a policy approach may be required to ensure there is no detrimental impact and loss in either the mixed use character of central Westminster or the overall quantum of office accommodation.

3.39  Overcrowding on the existing public transport system may impact on the desire of new businesses to locate in Westminster and may be off-putting for visitors who come to shop and use the entertainment facilities. However overcrowding may be partly resolved by Crossrail.

Social Conditions

Westminster’s Residents

3.40  The population of Westminster mid 2012 is estimated to be 223,853.\textsuperscript{xxxvi}

\textbf{Make up of Households -2011 Census}

\begin{figure}[h]
\centering
\includegraphics[width=0.5\textwidth]{households.png}
\caption{Make up of Households -2011 Census}
\end{figure}

3.41  Single adults make up the majority of households in Westminster, although there is a wide variety of household composition, with a cumulative total of 22% families with children. Westminster has proportionally more working age people than London or England, a similar percentage of elderly population (24,500 over 65s) and fewer children
The city contains 6,900 short-term migrants, which is highest number of any local authority in England. The population of Westminster ‘churns’ at approximately 30% each year and even more in some parts of the city.

3.42 The 2011 census shows that the number of households has increased by 16% since the last census in 2001.

3.43 The majority of residents have lived in Westminster between 3-10 years. The majority of residents (53%) were born outside the UK, which is the 3rd highest proportion in London. Westminster is more ethnically diverse than most other London boroughs: 38% of residents are from non-white ethnic groups. The three main places outside the UK where residents were born are: EU countries (14%), the Middle East (7%) and North America (4%). At least 74 different languages are spoken by residents of Westminster. Other than English which is spoken, as a first language by 69% of the population, the other main languages are: Arabic, French, Spanish, Italian and Portuguese.

3.45 The above graph shows that the number of under 15 year olds has increased in Westminster in the past 10 years.

3.46 In common with the rest of England, an increasing proportion of Westminster residents will be elderly over the next years. The number of residents aged 65 or over is forecast to rise from 25,175 (2012) to 28,101 by 2020, and to 34,336 by 2031, representing an increase in the proportion of the population from 11.25% to 13.7%. It is noticeable that numbers increase particularly rapidly after 2017. This is a similar rate of increase to that of London as a whole. In terms of actual numbers, this represents a 36% increase of 65s or over by 2031. In terms of the numbers of very elderly residents (85 or older), these
are forecast to increase from 3,168 in 2012, to 4,052 in 2020, and to 5,768 in 2031. This is an increase in their proportion in the population from 1.4% to 2.3%. The figures increase most particularly after 2021. In terms of the actual numbers, this represents an 82% increase of 85+ residents in Westminster, a slightly faster rate of increase than that for London as a whole (80%).

3.47 With the ageing of the population, people from Black and Minority Ethnic communities are likely to account for an increasing proportion of people aged 65 and over.

3.48 The 2011 Census Figures show that the proportion of residents specifying their religion as Christian has decreased since 2001 census from 55% to 45%. Islam is the second highest religion recorded by Westminster residents, with the proportion of residents specifying this religion increasing from 12% in 2001 to 18% in 2011. 20% of Westminster residents stated they had no religion, which has increased from 16% in the 2001 Census.

3.49 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. This, however is a conservative estimate and does not consider the large LGBT population who work in and visit the city.

Issues and problems

3.50 In Westminster the most common household size is one person per household; such households tend to be inefficient users of energy, often using as much or more electricity and water than a typical family household. However, despite having a large proportion of single households, Westminster is also home to many families. The population is ethnically diverse and the 30% churn indicates the transient nature of the population. Westminster’s prominence as a cultural and business destination attracts migrants from all over the world.

Likely Future conditions

3.51 The estimated population of Westminster in 2031 is predicted to be 250,663 by 2031 and 260,090 by 2041. Population growth and household size and type has an impact on a number of policy matters including housing, social infrastructure, transport, waste and the environment.
A comparison of recent census data shows that the number of children in Westminster has increased. This is likely to place additional demand for certain types of services, and in particular school places.

**Health and Wellbeing**

The Index of Multiple Deprivation (2010) identifies 39% of households in Westminster as not deprived in any dimension. However, 2% of households in Westminster which are mainly in the north west of the city are in the top 5% most deprived in England. In 2013 the electoral constituency of Westminster North had 36% of children living in poverty; this was as high as 48% in Westbourne Ward.

In 2013 the median household income for Westminster was £36,000, with an upper quartile of £60,000 and a lower quartile of £19,000. The ward with the lowest medium household income is Church Street with £24,000 and the highest is Marylebone High Street with £42,000.

Westminster’s adult obesity rate is 15% which is lower than the London average (21%), but the rate is likely to be almost double in deprived areas compared to affluent areas. In addition, the obesity rate among primary school children (year 6) is 23% which is higher than the average for London.
3.56 Life expectancy for men in Westminster is 81 years, compared to 79 for London as a whole, for women the comparable figures are 85 in Westminster and 83 for London as a whole. However, life expectancy is 16.9 years lower for men and 9.7 years lower for women in the most deprived areas compared to the least deprived areas.

3.57 In February 2013 there were 10,785 claimants of Employment Support Allowance/Incapacity Benefit (ESA/IB) across the city. The claimant rate is 5.6% of the population, which is similar to the London average of 5.5%. However, 52% of people claiming ESA/IB in Westminster have a mental/behavioural condition, which is the second highest proportion of the 33 London boroughs.

3.58 The 2011 census showed that Westminster has the second highest proportion in England of lone parent households not in employment (57.7%).

3.59 At the time of the 2011 Census, 69% of Westminster residents were economically active, which was lower than the London rate of 72%, and the England average of 70%. Of the economically inactive residents, the majority were students. 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.

3.60 Over a third of adults are recorded as taking part in one or more 30 minute plus sessions of exercise at least moderate intensity once a week. This is similar to the London participation rate of 36% and the England rate of 35%.

Issues and problems

3.61 Whilst Westminster is generally viewed as a place of affluence and overall performs well in health indicators, there are pockets of significant deprivation and patterns of health inequality mirror the patterns of social and economic deprivation particularly in the north west of the city.

3.62 Westminster has a higher than average London level of childhood obesity. Encouraging children to integrate physical activity into their daily routine in the form of walking or cycling to school and encouraging play may help to tackle the obesity problem.

Likely Future conditions

3.63 The built environment is a contributing factor affecting the health and well-being of a local population. For example access to play space, open space, education, shopping and transport choices (e.g. healthy food and safe pedestrian environments), safe and healthy
working environment and low pollution all combine to contribute to health. Access to housing with high sanitation levels and access to healthcare also contribute to a high standard of healthy living. Planning policy may be able influence these matters, in particular where there are significant spatial disparities as evident in Westminster.

**Baseline Information Westminster’s Housing**

3.64 Westminster has approximately 105,772 residential properties; the majority of these are purpose built privately rented flats/maisonettes.\textsuperscript{viii}

### Household Tenure (2011 Census)

3.65 Westminster’s housing sector differs markedly from other areas of London and in part reflects Westminster’s role at the centre of a world city. Average house prices in Westminster are the second highest in the country. In July 2013, average weekly rents for 1 and 2 bedroom flats (£425 and £610 respectively) were more expensive than the London average. Between 2003 and 2012 there were 3,335 sales of property valued at more than £2 million, which represents 8% of the total number of transactions in Westminster but accounted for more than 40% of value. Most of these properties are either occupied by owners or rented to London workers.\textsuperscript{lix}
3.66 34,721 people whose main home is located in Westminster have a second address elsewhere in the UK or abroad, this represents 16% of all residents and is some indication of part-time occupation. This is higher than the London average of 6%.lx In March 2011 Council Tax records show that 4% of properties in Westminster were long term empty or vacant.lxi

3.67 In August 2012, older people/physical disability services supplied by the council supported 2,406 people in the community. lxiii 45% of older people aged 65 plus live alone in Westminster. lxiii

3.68 The current tenure profile of Westminster’s older population shows a very balanced split between the principle tenures of social rented, private rented and owner occupied. Westminster differs from many other authorities from the relatively low levels of older residents in the owner-occupier sectors, and the high levels in the private rented sector. Perhaps particularly significant that nearly a third of residents aged over 85 are in the private rented sector. 32% of people aged 85 or over are in the private rented sector, as are a quarter of those aged between 65 and 84. lxiv

3.69 The Housing Needs Survey 2006 showed a surplus of private one bed units and large shortfall of family sized units (3+ bedrooms). The 2011 Census revealed that there is still an overcrowding problem, mainly focused in the North West of Westminster.

3.70 There are 363 HMOs in Westminster, accommodating around 3500 people. lxv It is estimated that there are 2,900 purpose built student rooms and between 1,300 and 3,000 properties privately rented by students in Westminster. lxvi

**Issues and problems**
3.71 Westminster’s central residential market attracts interest from global investors as well as prime/super prime investors based in the UK. This helps enhance Westminster’s global city role and the owners of these premises may help make a significant positive contribution to London’s economy and by implication the UK as a whole.

3.72 Westminster has the second highest house prices in the country and average house prices are over ten times the average Westminster household income.\textsuperscript{lxvii} The 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. There is typically a waiting list of about 5,500 ‘households in priority need for social housing and a further 20,000 households who do not qualify for social housing and cannot afford market housing.\textsuperscript{lxviii} Westminster’s struggle to provide affordable housing is exacerbated by the fact that unlike many other parts of London there is a lack of surplus industrial or other vacant land that can be ‘released’ for housing, which increases the cost of land. Change within Westminster is typically small-scale and achieved through the sensitive redevelopment of smaller sites and refurbishment of existing buildings. However recently there has been an increase in residential floorspace resulting from a change of use from existing office accommodation.

3.73 Housing plays an important role in the wellbeing of individual households and communities and in the shaping of neighbourhoods. Those parts of Westminster with the highest concentrations of social housing and overcrowding are also those which suffer from deprivation.

3.74 There is no identified need for provision of Gypsy and Traveller accommodation in Westminster.

**Likely Future conditions**

3.75 It is difficult to predict if the market trend in developers bringing forward office to residential schemes will continue. This will depend on a number of matters including wider market and financial considerations. It is also unclear how this trend will impact the provision of affordable housing in Westminster as private developers often cite viability reasons for not providing on - or off-site affordable housing.

3.76 The Further Alterations to the London Plan (January 2014) sets a minimum 10 year target for Westminster of 10,677 (new homes for the period 2015- 25), an average of 1,068 per year.
Westminster’s population is aging at a similar or slightly faster rate than the London average. If the existing trend continues in terms of the type of housing occupied by the older population there will be a need for privately rented accommodation suitable for elderly residents including that need wheelchair-accessible accommodation.

**Environmental Conditions**

**Heritage, Design and Public Realm**

Westminster has in excess of 11,000 listed buildings and structures (more than any other local authority in the country), and 56 conservation areas covering almost 77% of its land area. 82% of conservation areas have adopted conservation area audits. Westminster has 21 listed historic squares and gardens as set out in the Registered Parks and Gardens of Historic Interest in Westminster document. Westminster’s 85 ‘London Squares’ 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.

Seventeen of the 27 views identified in the London Plan are either to or from Westminster and the city is crossed by five 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 across the UK.

Local views are also important in Westminster’s lower scale built environment and these are identified in Conservation Area Audits for individual areas. These can be found [here](#).

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

There are two scheduled ancient monuments (The Jewel Tower and The Chapter House and Pyx Chambers in the Abby Cloisters) and five archaeological priority areas but there are other areas which may have unrecorded archaeological potential, especially the Thames foreshore banks and river walls.

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

Westminster has a legacy of good quality accessible and secure streets. Many streets have already been de-cluttered by the removal of unnecessary street signs and barriers.
etc, and this process continues. Some streets would benefit from upgrading, and in 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

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

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

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

Likely Future Conditions

3.88 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.

3.89 The potential cumulative impacts of basement developments will need to be monitored to ensure no adverse impact on adjacent structures, hydrology, geology, flooding or biodiversity.

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

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

Open Space

3.92 The Open Space network in Central Westminster is different to elsewhere in London and includes the River Thames, canals, Royal Parks and London Squares.
3.93 Westminster contains five Royal Parks: Regent’s Park; Kensington Gardens; Hyde Park; Green Park and St. James’s Park, which cumulatively provide 250 hectares of open space. These are designated as Metropolitan Open Land, and as such have a protected status similar to that of the Green Belt. They comprise 89% of Westminster’s public open space and it is estimated that 25 million people visit them per year.

3.94 22% of Westminster’s surface has green space coverage, which is 9% below the London average for a borough. 50% of households in 4 of the 20 electoral wards in the city have deficient access to nature (as defined by being more than 1 kilometre walking distance from an accessible Metropolitan Borough Site of Interest in Nature Conservation).

3.95 Open spaces are an integral part of Westminster’s heritage and essential to its unique character. The Royal Parks and River Thames form essential elements of the 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 protected local 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).

3.96 The Blue Ribbon Network is of strategic importance to London and includes the River Thames, Grand Union and Regent’s canals, the Serpentine and Long Water (in Hyde Park and Kensington Gardens).

3.97 There is both an overall and localised shortage of open space in Westminster.

Areas of deficiency in public open space and accessible play space

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Areas of deficiency in public open space and accessible play space

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Areas of Public Open Space Deficiency

Areas deficient in publicly accessible play zone and areas deficient in Open Play

City boundary
Issues and Problems

3.98 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, densely built up area and have significant heritage, ecological and natural conservation value. Beyond the Royal Parks (and with the exception of Paddington Recreation Ground), Westminster’s parks are small in size.

3.99 Westminster has a total of 172 Open Spaces (excluding 10 civic spaces), which cover an area of 527 hectares, of which 454 hectares (86%) have public access and 73 hectares (14%) are private spaces.

3.100 There is both an overall and localised shortage of publically accessible open space; in particular green space, in Westminster and the difficulty in finding appropriate new sites make the protection of existing sites important.

3.101 Accessible safe green space is shown in particular to reduce mental distress and depression in children. Access to a garden or living a short distance from green areas, as well as leading to improvements in the environment are associated with general improvements in mental health and wellbeing. Older people, children and people suffering from obesity, cardio-vascular diseases, diabetes, mental distress and depression are most likely to have a lack of access to green space. Consequently they also miss out on the stimulation that can be given by the sight of and interaction with living and moving greenery.

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

3.103 Public events in Westminster’s open space can cause harm if not appropriately managed.

Likely Future conditions

3.104 Open space is a finite resource and often its loss is incremental rather than through wholesale development. Without policy intervention Westminster’s open space could be lost through development, but appropriate policies can protect and extend it. There are a number of positive environmental, health and wellbeing and heritage impacts resulting from open space. Of these perhaps the most significant in the context of a changing climate is its contribution to mitigate urban heating.
3.105 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. The Grand Union Canal is the only watercourse in Westminster containing fish and has been designated a ‘good’ status under the Thames Water Directive Framework.

3.106 Although it is densely developed Westminster has a diverse ecology. The following wildlife have all been spotted in Westminster: 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 Local Nature Reserve is recognised as one of the best small open spaces in inner London for birds. The Grand Union Canal fish population mainly consist of mixed coarse species, generally thought to be in healthy condition. The most common species are bream, roach, perch, tench and carp.

3.107 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, but an increase in the number of living roofs and walls is having a positive impact on this.

3.108 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 in Westminster including the rare cornflower, chamomile, native bluebell and London rocket.

3.109 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 protected in Biodiversity Action Plans for Westminster, London and the UK.

3.110 As shown on the map below some parts of Westminster are identified as being areas of wildlife deficiency as they are deficient in access to Metropolitan or Borough Sites of Importance for Nature Conservation.
Areas of Wildlife Deficiency

Issues and Problems

3.111 Supporting the natural environment increases the number of and improves the quality of habitats, improves the wellbeing of the city’s users and residents, improves local air quality and helps towards mitigating the negative impacts of climate change.

3.112 The provision of private spaces, roof terraces, balconies, and living roofs and walls can make an important contribution to green infrastructure. Utilising opportunities to enhance biodiversity is important throughout Westminster, particularly in areas of wildlife deficiency.

Likely future conditions

3.113 It is unlikely that there will be any significant increases in accessible green spaces due to the high development pressures in Westminster. Therefore the use of buildings for green infrastructure is likely to be a major contributor towards improving biodiversity in the city.

Climate Change

3.114 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 a 2.7 degree increase in mean summer temperature, a 15% increase in mean winter rainfall and an 18% decrease in mean summer rainfall over a 1961-1990 baseline. The impact of a changing climate in London are shown in the table below (taken from the Mayor of London’s Climate Change Adaptation Strategy, 2011). 

| Rising temperatures | Summers will be hotter. By the middle of the century, the average summer day is projected to be 2.7°C warmer and very hot days 6.5°C warmer than the baseline average. By the end of the century the average summer day is likely to be 3.9°C warmer and the hottest day of the year could be 10°C hotter than the hottest day today. Winters will be warmer, with the average, mid-century winter’s day being 2.2°C warmer and a very warm winter day 3.5°C above the baseline. Very cold winters will still occur, but will occur less frequently. |
| Seasonal rainfall | Summers will be drier. By the middle of the century, the average summer is projected to be 19% drier and the driest summer 39% drier than the baseline average. By the end of century average summers could be 23% drier. Winters will be wetter. By the middle of the century, the average winter is projected to be 15% wetter and the wettest winter 33% wetter than the baseline average. |
| Tidal surges | Tidal surges are not projected to increase in frequency or height, except under an extreme scenario, where a 70cm increase has been projected. |
| Sea level rise | Sea levels are projected to rise by up to 96cms by the end of the century. An extreme projection of a 2 metre increase has been generated using the latest ice-sheet modelling published after the IPCC (Intergovernmental Panel on Climate Change) Fourth Assessment report. |

Issues and Problems

3.116 Climate change is a cause of many environmental problems, e.g. heat-related health issues, flooding damage to buildings and infrastructure. But the indirect impacts upon cities can be much broader. Climate change will affect air temperature and quality, biodiversity, and the local micro-climate, exacerbating some and lessening others.

3.117 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.

3.118 Many of the vulnerabilities to climate impacts stem from London’s ‘urbanisation’. Creating well managed and used green spaces and building efficient 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’ (which is defined as an area significantly warmer than surrounding areas due to human activity) 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 pollution and energy consumption.

Likely future conditions

3.119 Central London is already vulnerable to extreme weather, in the form of floods,
droughts, heat waves 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 heat waves and very heavy rainfall such as that
experienced in early 2014 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 surface water and storm water flooding.

Air Quality

3.120 Poor air quality in Westminster is the result of a complex urban environment with very
high number of vehicles travelling through the city, emissions from boilers used to heat
buildings and a high density of roads and buildings which prevents the dispersal of
pollution. Parts of Westminster have some of the worst air quality levels in the country.
There are two air pollutants of major concern for Westminster: nitrogen dioxide (NO₂)
and particulate matter (PM). PM10 levels across London declined slowly in the 1990’s
but have remained stable since 2001. Westminster’s monitoring data indicates that
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 the short and long term objectives for lower levels.

3.121 Traffic emissions from road vehicles such as heavy goods vehicles (HGV’s), light goods
vehicles (LGV’s), buses and coaches, cars and taxis are the major contributor to PM₁₀
pollution across Westminster. The emissions from road sources account for 67% of
all PM₁₀ emissions in Westminster.

3.122 As engine technology has improved, the significance of contributions from gas
combustion including both commercial and domestic sources has been a growing
concern, to the point where emissions from this source are now slightly greater than
those from road traffic. Commercial and domestic gas combustion together accounts
for 44% of the NOₓ emissions.
3.123 The areas of the highest levels of pollution are along main roads and at major traffic junctions. Higher levels of pollution also relate to areas of high development density such as the West End. Areas with the lowest levels of pollution relate to areas of low density development or open spaces such as Hyde Park.

**Issues and Problems**

3.124 Air quality does not just affect the environment but has direct implications for human health. Research shows that poor air quality can reduce the quality of life by causing health problems, especially in those who are more vulnerable such as children, the elderly and those with pre-existing conditions. There is considerable research showing a link between exposure to air pollution and effects on health and, importantly, for particulate matter, studies have been unable to identify a safe level at which there is no effect on health.

3.125 Studies show that poor air quality principally affects respiratory and cardiovascular systems with some initial symptoms being sore eyes and nose, itchy irritated throat, coughing and troubled breathing. There is also evidence that high levels of air pollution can trigger an increase in admissions to hospital and contribute to the premature death of those people that are more vulnerable to daily changes in levels of air pollutants. Pollutants have the following effects on health:

- **PM$_{10}$ particles (10 microns diameter)**
  Certain to cause lung cancer, asthma, bronchitis symptoms especially in the young.

- **PM$_{2.5}$ particles (2.5 microns diameter)**

- **PM$_{0.1}$ particles (0.1 microns diameter)**
  Probable evidence this is the main cause of harm, passing throughout the body and driving system inflammation.

- **NO$_x$ & O$_3$ gas**
  Causes respiratory disease at levels found in London and most UK and EU cities. CVD, COPD, diabetes patients more vulnerable
3.126 A report on ‘Long-Term Exposure to Air Pollution: Effect on Mortality’ published in 2009 by Committee on the Medical Effects of Air Pollutants (COMEAP) states that population life expectancy is shorter in areas of high pollution when compared to areas with less pollution.

Likely Future conditions

3.127 Westminster’s population swells to over one million every weekday. This influx impacts both on energy use and transport services. In addition people are generally using more energy to heat their homes and water than in the past. Actions to improve air quality may have helped mitigate some of the impact that population growth may have caused, but there has been only very little improvement to overall air quality and, given the predicted increases in population, more needs to be done in order to meet the national objectives.

3.128 The pressure on the streets of Westminster means that road transport emissions remain a key source of air pollution and CO₂ emissions, although emissions from transport sources have somewhat reduced in the last decade as engines become cleaner and the Low Emissions Zone was introduced across London in 2008. There are increasing conflicts between the need for growth, and the pressures that this growth creates on the environment. Space is at a premium with pressure to build more and greater urban density could mean more emissions from domestic, commercial and industrial energy generation and heating.

The significant pressure to reduce emissions of greenhouse gases, particularly CO₂, is leading a drive for more renewable energy. Whilst increased use of renewable energy is to be encouraged, certain technologies and fuels such as biomass (e.g. wood pellets and chips) can have harmful consequences for air quality, and other emerging fuels such as liquid biofuels and biogas may have some currently unclear consequences for local air pollution.

In addition, increasing population leads to higher numbers of people exposed to poor air quality, which may have significant health service implications.

Flooding

3.129 Westminster’s Strategic Flood Risk Assessment (SFRA, 2010) indicates the greatest risk of flooding is from the River Thames and from surface water flooding. Flood Zones 2 and 3 contain 27,000 existing properties: 18% of all properties in Westminster.
Westminster has an extremely high level of flood protection from fluvial and tidal flooding including the Thames Barrier and the Embankment wall.

3.130 In highly developed areas, such as Westminster, surface water flooding occurs when intense rainfall is unable to soak into the ground or enter drainage systems, because of blockages, breakages in water pipes or where drainage capacity has been exceeded. Westminster has experienced localised surface water flooding in the past (e.g. at Victoria Underground station resulting in its temporary closure). While there have been significant regional flooding events which have affected Westminster (e.g. the 1928 and 1947 Thames floods), the city has not suffered any past floods which had significant harmful consequences registered on a national scale (such as the summer 2007 and winter 2013/2014 floods). The SFRA identifies areas at the highest risk of surface water flooding, and there are approximately 46,000 properties within areas of surface water flooding at a potential depth of >0.1m and 11,800 properties in areas at risk of flooding to potential depths of >0.3m.

**Flood Zones and Areas most at risk of Rapid Inundation**

![Flood Zones and Areas most at risk of Rapid Inundation](image)

3.131 Climate change projections indicate rising sea level will have an impact on the risks of flooding from the River Thames. However 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

3.132 Climate change predictions indicate increased volume and intensity of rainfall, which will result in greater risks of surface water flooding incidents as current drainage capacity is exceeded. The use of Sustainable Urban Drainage Systems\(^1\) will become increasingly important to minimise surface water flooding and mitigate the impacts.

Water

3.133 The River Thames is the primary source of water supply in London. Two thirds of London’s supply is taken from the freshwater River Thames, a further 22% comes from the River Lee and the remaining 15% comes from groundwater.

3.134 The average consumption of water in Westminster in 2010-2011 was 166.5 litres per person per day, which is slightly lower than the 168 litres per day in 2000-01. The five year average for Westminster between 2006-07 and 2010-11 is 160.8 litres per day. All of these figures are significantly higher than the average water consumption figure for England and Wales of 150 litres per person per day.\(^{lxxx\text{i}}\) Nearly a quarter of Westminster households now have a water meter - an increase from 15% in 2000-01.\(^{lxxx\text{ii}}\)

3.135 No major (Category 1)\(^2\) pollution incidents were recorded in Westminster between 2005 and 2010. However, 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 Tideway Tunnel –a major sewer running underneath the Thames that will help tackle the problem of overflows from existing historic sewers and will protect the River Thames from increasing pollution.\(^{lxxx\text{iii}}\) As part of the proposals there will be a worksite and long term creation of new public realm on the Victoria Embankment Foreshore. The Secretary of State’s decision on the Thames Tideway Tunnel is due in 2015, with construction from 2017.

Issues and Problems

3.136 London has been declared an area of serious water stress by the Environment Agency. Water consumption in Westminster is already significantly above the average for England and Wales.

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\(^1\) Sustainable Urban Drainage Systems (SUDs) are a sequence of water management practices(1) and facilities(2) designed to drain surface water in a manner that will provide a more sustainable approach than what has been the conventional practice of routing run-off through a pipe to a watercourse.

\(^2\) Category 1 – major, persistent, extensive or serious impact or damage to air, land, water, people, property, ecosystems, habitats and/or amenity
Likely future conditions

3.137 Water is a precious resource (increasingly so as the population continues to grow and the climate change brings about drier summers) and therefore ways need to be found to reduce consumption. Water consumption per person will need to be reduced given pressures on supply from an expanding population and climate change; this will require both increased water use efficiency and increased water recycling.

Carbon and Green House Gas Emissions

3.138 London’s total emissions of CO$_2$ from domestic, industry/commercial and transportation sectors have increased from 41,630 kilo tonnes in 2009 to 43,886 kilo tonnes in 2010. Between 2005 and 2009, Westminster’s carbon emissions fell from 3,315 to 3,045 kilo tonnes. However, in 2010, the total rose to 3,213 kilo tonnes. This pattern mirrors all London authorities which have seen increased emissions levels following years of improvement. Westminster has the 5$^{th}$ historic carbon emissions in the UK. Historically, Westminster has always had the highest emissions in London, given its built up nature and 24 hour activity, and over the last few years Westminster has not seen any major reduction in its emissions whereas most other authorities have reduced emissions. However, unlike other parts of the country, 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 commercial and domestic buildings at about 40%.

Issues and Problems

3.139 With 3,401 kilo tonnes of carbon emitted in 2009, Westminster has some of the highest carbon emissions in the UK, larger than that of other major cities such as Edinburgh and Manchester which are considerably larger in terms of area and population. Approximately 75% of Westminster’s carbon emissions come from the commercial sector (which includes office, retail and entertainment) and with 15% from domestic users and 10% from transportation.

3.140 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 carbon reduction targets.

Likely future conditions

3.141 Data produced by the Department of Energy and Climate Change for 2005 to 2011\textsuperscript{1xxxvi} indicate that the emissions of carbon dioxide from Westminster have remained fairly constant; much greater progress will be needed in future years if Westminster is to contribute to meeting regional and national carbon reduction targets and mitigating global climate change.

Heat and Power Networks

3.142 The Pimlico District Heating Undertaking (PDHU) is the UK’s first combined heat and power network and provides low carbon, low cost heating and hot water services to 3,256 homes, 50 commercial premises and three schools in the area. Electricity produced is also sold to the national grid and achieves considerable carbon savings, as well as subsidising the PDHU operation financially. There is also a system at Whitehall which can provide heat and electricity for 18 government departments, and its ability to connect to Pimlico is being actively pursued.

Issues and Problems

3.143 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 combat fuel poverty and deliver reductions in greenhouse gas emissions by providing residents and businesses with cost-competitive, low carbon heat, whilst also enabling areas to benefit from future technological advances in heat generation plant.\textsuperscript{1xxxvii}

Likely future conditions

3.144 The Pimlico and Whitehall district heating undertakings have the potential to be networked more widely and there are early opportunities in both the Victoria and Paddington Opportunity Areas, where it is possible plan a network in at the earliest design stage. Whilst the Decentralised Energy Masterplan for Westminster\textsuperscript{1xxxvii} concludes that most of the City is technically and commercially viable for heat networks, it also recognises that public sector support will be essential to roll out a network over the less dense areas. This will help deliver carbon reduction, reduce fuel poverty and deliver local energy security, but significant decisions are to be made regarding the potential level of intervention by the Council.
Noise

3.145 In 2008/09 the council received 16,267 noise complaints. The Westminster Noise Strategy (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 noise 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. When asked, 37% of residents 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. lxxxix

Issues and Problems

3.146 New technology such as electric and hybrid vehicles are being used because of reduced local carbon and air pollution emissions, but can also have be quieter than other vehicles. An expansion in the use of quieter technology has significant potential to reduce noise levels.

3.147 Westminster’s noise levels exceed WHO guidelines. Noise can have a negative impact on sleep, learning and communication and generally lead to annoyance. The mixture of land uses and volume of vehicle and pedestrian movement combine to create a complex urban environment and the sound environment is intrinsic to 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 and comparably noisier than other cities.

Likely Future conditions

3.148 Westminster is noisy and without intervention and strategies, noise levels are unlikely to decrease.

Waste

3.149 There has been a marked reduction in municipal waste collected in Westminster over the last few years, from 250,000 tonnes in 2001 to 178,000 tonnes in 2013. Half of the

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3 Laeq Ambient noise is normally measured as Laeq. Laeq T is the equivalent A-weighted sound pressure level that gives the energy average of a fluctuating sound level measured over a specified time duration. LAmx. The maximum A-weighted, sound pressure for a discrete event or over a specific time period (LAmx T).
municipal waste collected comes from businesses, 40% from residents and 10% from street litter.\textsuperscript{xc} The majority of municipal waste in Westminster is paper and card (34%) followed by kitchen waste 22%.

\textbf{Municipal Waste Management Tonnages (1999-2013 and projected to 2026)\textsuperscript{xci}}

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{municipal_waste_management_tonnages.png}
\caption{Municipal Waste Management Tonnages (1999-2013 and projected to 2026).}
\end{figure}

3.150 78% of waste is transferred to Energy from Waste (EfW) facilities, whilst 14% is recycled and 8% goes directly to landfill outside of the borough.\textsuperscript{xcii}

3.151 Westminster does not own any waste management or re-use facilities. The majority of waste is delivered to the South East London Combined Heat and Power (SELCHP) facility. Recyclables are delivered to the Brent Waste Transfer Facility from where they are transferred to processors and Material Recycling Facilities (MRFs) at Greenwich, Wandsworth or Southwark. The Brent Waste Transfer Station also accepts general waste when SELCHP is closed at night. This is then transferred back to SELCHEP when it opens, Waste going to land fill is delivered to Wapsey Wood landfill, Gerrards Cross, Buckinghamshire.\textsuperscript{xiii}

3.152 At 22% Westminster has one of the lowest household recycling and composting rates in London in 2013 (the London average is 34%). Although the percentage of recycling has increased from 7% in 2000/1, progress has been reversed in recent years, slipping from 25% between 2010 and 2012 to 22% in 2012/13\textsuperscript{xiv}. In 2011 only 1% of recycling resulted from composting,\textsuperscript{xv} which could be as a result of the high proportion of households (over 90%) living in flats, without access to a private garden.
3.153 Of the 90,000 tonnes of commercial waste collected in 2012/13, only 4,000 was recycled. This represents 5% of all commercial waste collected and the majority of this was from commingled collections. A commercial food waste collection service commenced in Spring 2013. The city council aims to achieve a municipal waste recycling rate of 30% by 2020, 35% by 2025 and 40% by 2031.

![Disposal rate by waste Stream 2012/13](image)

3.154 On an average day more than 600 building projects are underway in Westminster. In 2010 186,000 tonnes of construction demolition and excavation waste was produced in Westminster, this is predicted to rise to 219,000 in 2036.

### Issues and problems

3.155 Predicting the amount of waste generated in Westminster is particularly challenging as street cleaning and commercial services make up 60% of the municipal waste stream.

3.156 In London it is estimated that there is a need for 22 hectares of additional land in order to effectively manage waste. The Draft Further Alterations to the London Plan (published for consultation in January 2014) has reduced Westminster’s waste apportionment from previous estimates to:

- 86,000 tonnes in 2016,
- 119,000 tonnes in 2026
- 121,000 tonnes in 2026
- 123,000 tonnes in 2036.
The lack of available sites in Westminster means the Council has been unable to identify enough capacity within the borough itself to meet these apportionments.\textsuperscript{ci}

3.157 The management of waste contributes towards climate change. Throughout the various stages of its production, transportation, handling, treatment and disposal carbon dioxide and methane is released.

3.158 Methane is 23 times more potent than carbon dioxide as a greenhouse gas and is released as waste decomposes in landfill. Diverting waste from landfill to for example recycling and energy generation facilities is a key priority for all UK local authorities, and the Mayor has set a strategic policy for London to manage the equivalent of 100\% of its waste within its boundaries by 2026.

\textbf{Likely Future conditions}

3.159 There is a strong national and regional drive to reduce the amount of waste going to landfill but without intervention for recycling and composting the amount of waste sent to land fill and incineration is likely to increase. The Further Alterations to the London Plan January 2014 seeks to ensure that there are facilities to deal with the equivalent of 100\% of waste arising in London by 2026. Westminster will need to ensure it can meet these national and regional targets.

\textbf{Transportation and Pedestrians}

3.160 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 157 daytime, night bus and 24 hour bus routes passing through. European, National and local express coach services also serve the city from Victoria Coach Station.\textsuperscript{cii}
3.161 Westminster’s highway network consists of: 350kms of carriageway including 27.5kms of strategic roads managed by Transport for London (TfL), 623 kms of footway including 55km on strategic roads. Westminster’s position at London’s centre, with its unique mix of residential and commercial neighbourhoods, many of the country’s iconic visitor attractions and its dense pattern of development and economic activity means that there are competing demands for use of its highway space throughout the day. For example freight and servicing makes up a quarter of central London weekday traffic; 150,000 taxi passengers use Oxford Street each day; There are 520,000 weekday pedestrians in Oxford Street each day and around 4 million vehicles enter the Congestion Charge Zone per month.

3.162 In Westminster high numbers of people participate in active travel,\textsuperscript{4} with the percentage of people cycling to work higher than the greater London average.\textsuperscript{ciii} The modal share of journeys in Westminster is as follows: 41% walk; 20% use the Underground; 14% bus, 12% use a car or motorcycle; 7% rail; 4% taxi and 3% cycle.\textsuperscript{civ}

\textsuperscript{4} This is an approach to travel and transport focused on physical activity (walking and cycling) as opposed to motorised and carbon dependent means.
Mode of travel for Londoners on an average day, by borough of origin (2009/10 – 2011/12)

![Mode of travel chart]

Source – London Travel Demand Survey

3.163 Between 2000 and autumn 2012 the average number of cyclists per day passing through central London increased significantly by 150%. cv

3.164 In the 2011 census, 63% of Westminster residents said they did not have access to a car. cvi The use of cars in Westminster by its residents is 25% below the greater London average and is the lowest rate in London. cvii

3.165 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 motorcycle bays, 7,818 cycle parking spaces, 220 White Badge disabled bays, 480 Blue Badge disabled 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. cviii

3.166 In 2013 288 kilo tonnes of CO₂ emissions emanated from all sources of ground based transport in Westminster. cix

3.167 The Council encourages schools to develop travel plans which look at ways in which 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. cx

3.168 Between 2005 and 2009 there was an average of 1,695 casualties and 13 fatalities per year on Westminster’s roads, which was the highest in London. cxı

Issues and Problems
Westminster’s function as a centre of business and government requires the movement of people and goods on a large scale without delay. The transport system also gives access to shopping, entertainment and attractions for workers, residents, students and visitors. The existing transport networks within Westminster do not always meet these needs and responsibility for transport in Westminster is shared between the Council and a number of agencies and transport providers including TfL and the Department for Transport.

The high level of demand for transport together with the movement of people into and out of Westminster can have detrimental impacts on the local environment and public realm congestion around popular interchanges e.g. Oxford Circus. The use of motorised vehicles results in increased congestion and emissions leading to poor air quality and noise pollution.

Sustainable transport options (encouraging walking and cycling in particular) are consequently very relevant for Westminster. The density of land use and movement means that many journeys are short and can be made by foot. Walking is considered by many as the best way to improve health. It can help to reduce air and noise pollution and may often result in quicker journey times. Prioritising pedestrian movement will impact on the design of the public realm, for example, by ensuring that proposals to place furniture or other objects do not obstruct safe movement or cause confusion to people unfamiliar with the layout of the city. There are a number of opportunities and challenges associated with the increase in cycling and this can be supported through a wide range of schemes and initiatives.

The concentration of commercial premises (office, retail and entertainment venues), interspersed with residential, and the dense historic urban fabric characteristics of Westminster create particular challenges in terms of servicing and deliveries, safety, noise and disturbance. But this concentration may also offer opportunities for innovative transport schemes that do not risk the safety of other users of the highway or public realm. Promoting safe and fuel efficient driving techniques for vehicles (e.g. no idling), including heavy goods vehicles, can also significantly minimise noise disturbance.

Road safety is a significant issue within Westminster, with the highest number of casualties and fatalities in London. Pedestrians and cyclists are the most vulnerable users of the highway and there has been an increase in accidents resulting in fatal or serious injuries among these groups.
3.174 Parking is a complex and sometimes contentious issue in Westminster, requiring a balance to be struck between competing interests, in a location where land is limited.

**Likely Future conditions**

3.175 The pressure on Westminster’s transport network is going to increase, with a growing population likely to approach 250,000 by 2030 and an increase in employment of around 10% over the same period. The completion of Crossrail by 2018 will help to cater for some of this projected growth. The first Crossrail services through central London will start in late 2018 and an estimated 200 million passengers will use the service each year. It is estimated that Crossrail will bring an extra 1.5 million people to within 45 minutes of central London and will link London’s key employment, leisure and business districts. \(^{\text{cxii}}\)

3.176 Crossrail Line 2 (a rail service linking south-west to north-east London and running through Westminster) is already subject to a safeguarding direction from the Secretary of State. TfL have consulted on two options – a “metro” option for an underground railway between Wimbledon and Alexandra Palace, with stations at Victoria, Piccadilly Circus and Tottenham Court Road and a preferred “regional” option combining underground and overground railway running from Alexandra Palace and Hertfordshire to various locations in south west London and Surrey and with stations at Victoria and Tottenham Court Road. There will be further consultation on the preferred option in 2015.

3.177 There is increasing concern about the environmental impact of transport. The reduction of CO₂ emissions from vehicles could be achieved through the promotion of electric cars and delivery of car club infrastructure and through lobbying TfL for more efficient bus and taxi fleets. Creating more opportunities to enable Westminster’s residents and visitors to walk and cycle also has potential health benefits. This could also lead to a reduction in congestion which in turn may reduce carbon emissions and improve air quality.
4. **Relevant Plans, Programmes and Strategies**

4.1 As part of the IIA scoping 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 relevant documents are set out below 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
- EU Directive 2008/50/EC
- Kyoto protocol to the United Nations framework convention on climate change (2005)

**National**

- Air pollution: Action in a Changing Climate 2010 *DEFR*
- Air Quality Regulations 2010
- Climate Change Act 2008
- Energy and Climate Change for all local authorities Dataset 6222 (2012). *Department of Energy and Climate Change*
- Energy Efficiency and Historic Buildings (2012) *English Heritage*
- Environment Act 1995
- Equality Act 2010


London Borough Environmental Fact Sheet (2011) Environment Agency

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

National Heritage Protection Plan (2011 –ongoing) English Heritage

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

Planning Act 2008

Planning and Compulsory Purchase Act (2004)

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


Planning Practice Guidance (2014)


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

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

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

Understanding Place: Conservation Area Designation, Appraisal and Management (2011) English Heritage
Updated National Waste Planning Policy: Planning for Sustainable Waste Management (2013) *Department for Communities and Local Government*

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

**Regional**


Draft Housing Strategy (2013) *Mayor of London*


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


London Plan (2011) *Mayor of London*

London Plan – Revised Early Minor Alterations (2013) *Mayor of London*


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

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

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

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

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

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


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


Transport Strategy (2010) *Mayor of London*

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

Waste Management Strategies (2011) *Mayor of London*

**Neighbouring Authorities**

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

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

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

Royal Borough of Kensington and Chelsea – Core Strategy (adopted 8 December 2010) and partial review of the Core Strategy (adopted October 2013)

**Local**

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

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

Basement Development in Westminster SPD (Consultation Draft) (February 2014) *Westminster City Council*


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

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


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

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

Cycling Strategy (Consultation Draft) December 2013 Westminster City Council

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


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


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


Health profile 2012- City of Westminster (2012) NHS


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

Local Development Scheme (2012) Westminster City Council

Local Economic Assessment Baseline Study (2011) Westminster City Council
Local Implementation Plan: a Transport Delivery Plan up to 2031 (2011) Westminster City Council


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


The Prime Residential Market in Westminster (Publication forthcoming 2014) Ramidus

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


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

Trees and the Public Realm (2011) Westminster City Council


Westminster City Council Equality Objectives 2012-2016


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


Westminster Profile (2013) Westminster City Council


5 Key Sustainability Issues and Setting Objectives

5.1 The establishment of appropriate objectives and associated sub-criteria is central to the assessment process and provides a way in which the performance and effect of Westminster’s City Plan can be identified and described. The sustainability issues set out in this section form the basis of the objectives. The key sustainability issues have been informed by the examination of baseline information in Section 3 of this scoping report and the review of plans, programmes and strategies in Section 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), and to ensure the objectives meet the environmental protective’s set out in the SEA Directive. The identified sustainability issues are bullet pointed below to include a consideration of why the key sustainability issues have been chosen and which IIA Objective the issues relate to (as set out in the IIA Framework in Table 3 pp 67-69).

- The creation of cohesive inclusive and safe communities

5.2 Westminster has a growing and diverse population with a high population churn. It is a place of economic contrast with areas of extreme wealth and significant deprivation. As well as the provision of social and community facilities, access to local services including shops can improve community interaction. The creation of cohesive and inclusive communities is a key Westminster equalities priority (See Section 6) and may be influenced by development, land use, environmental or social policy considerations.

IIA Objective 1.

- A reduction in crime and the fear of crime (including disorder and antisocial behaviour)

5.3 Westminster has high crime rates but this is mainly linked to the influx of visitors in particular to the night time economy. The high volume of people and crowds, internationally important buildings and functions carried out in the city give rise to security concerns, in particular those associated with terrorism. Local authorities have a duty to consider crime and disorder in all their activities in accordance with Section 17 of the Crime and Disorder Act 1987 (as amended by the Police and Justice Act 2006).

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5 The sub-criteria used for assessment is set out in the form of guide questions in the IIA Framework (Table 3 pp 67-69).
Crime, disorder and antisocial behavior issues cut across a number of policy matters and can usefully be considered as an objective in the IIA.

IIA Objective 2.

- **Provision of housing, in particular affordable housing.**

5.4 There is a large mismatch between income and house prices in Westminster – the borough has the second highest house prices in the country. Space for housing development is extremely constrained and unlike other parts of London there is a lack of surplus brownfield industrial land that can be ‘released’ for new housing. This is therefore normally secured through ‘small scale’ and infill development. Although a recent market trend for office to residential conversions has resulted in a greater number of residential units being permitted site constraints and land prices are particularly problematic for Westminster’s delivery of affordable housing and the Council is required to meet its housing targets. Access to decent housing can play an important role in the wellbeing and health of individuals.

IIA Objective 3.

- **To promote and improve health and wellbeing.**

5.5 Westminster’s unique circumstances give rise to a number of challenges to health, safety and wellbeing. There is a spatial contrast in life expectancy in Westminster, with life expectancy for men 16 years less in the most deprived parts of Westminster compared to the more affluent areas. Health is connected to a number of factors including social and environmental conditions. Throughout Westminster there are high accident rates, areas of open space deficiency, poor air quality and high noise levels, which can all impact negatively on health and wellbeing. Improving the health and wellbeing of Westminster’s residents, workers and visitors is a key Westminster health and wellbeing priority. Westminster a diverse range of cultural facilities and there is a link between cultural wellbeing and health and wellbeing.

IIA Objective 4.

- **To reduce green house gas emissions and support climate change adaption**

5.6 Westminster has the fifth highest carbon emissions in the UK. 74% of carbon emissions come from commercial occupiers, which is higher than the national average (about 40%). Unlike other authorities Westminster has not seen any significant reductions in its
emissions. Climate change is a global problem, however because of its central location Westminster suffers disproportionately from the effects of London’s ‘heat island effect’.

IIA Objective 5.

• **To reduce the use of natural resources**

5.7 Westminster is a densely developed location which has continuing pressure to develop and grow; this can have an impact on the use of natural resources such as water, fossil fuels, quarried materials and wood. The average water consumption per person per day in Westminster is significantly higher than the average per person per day in England and Wales.

IIA Objective 6.

• **To reduce flood risk**

5.8 In Westminster the greatest flood risks are from the River Thames and surface water. Management of flood risk through the planning process is less about avoiding any development in high risk areas and more about locating the most vulnerable uses outside these areas, ensuring that new schemes are designed to reduce and mitigate against flood risk and ensuring developments are safe and include suitable flood resistance and resilience measures. The provision of Sustainable Urban Drainage Systems (SUDs) is increasingly important in reducing surface water flood risk.

IIA Objective 7.

• **Protect and enhance biodiversity**

5.9 Although densely developed, Westminster has a diverse ecology. Westminster has over 30 designated Sites of Importance for Nature Conservation. There are however areas of wildlife deficiency. The best opportunity for improving biodiversity is through integration within built structures. Supporting the natural environment can help to mitigating against the negative effects of climate change and improve air quality.

IIA Objective 8.

• **To improve air quality**

5.10 In Westminster the levels of nitrogen dioxide and particulate matter are in excess of nationally required standards and are having adverse effects on the environment and health.
IIA Objective 9.

- To reduce noise and the impact of noise.

5.11 Noise levels in Westminster are higher than WHO guidelines. Traffic is the main cause of noise complaint in Westminster although the high level and 24 hour nature of activity in some parts of the city contribute significantly to the problem. Noise is not just an environmental issue but can adversely affect health and wellbeing.

IIA Objective 10.

- To encourage sustainable transport.

5.12 Westminster is well served by public transport but suffers from competing activities, high levels of traffic and resultant noise and air pollution. Sustainable transport options are particularly suitable in Westminster given the density of land uses and high PTAL levels. A high number of people already participate in active travel (walking and cycling).

IIA Objective 11.

- To reduce waste

5.13 Waste collection in Westminster is complex and with half of all waste coming from businesses. Household recycling and composting rates are amongst the lowest in London and there is a need to reduce the production of waste in the first instance. Westminster will need to ensure that it can meet national and regional targets.

IIA Objective 12.

- Heritage and design

5.14 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. There are in excess of 11,000 listed buildings and structures and conservation areas cover 77% of Westminster’s land area. 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, sustainable and suitable for modern city life.

IIA Objective 13.

- To enhance public realm and street improvements
5.15 The majority of the existing public realm is of high quality and needs continual management to withstand the complex and sometimes conflicting demands. Improvements to the public realm, in particular by ensuring the pavement is free from obstruction may encourage more people to walk.

IIA Objective 14.

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

5.16 Despite the abundance 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 particular green space, in Westminster. These are important 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.

IIA Objective 15.

- **To ensure equality of opportunities, improve local opportunities and support sustainable economic growth throughout Westminster.**

5.17 Westminster is a place of great wealth and great poverty and this is expressed spatially in the city. The North Westminster Economic Development Area is Westminster’s poorest location and is an economic regeneration area. A flourishing local economy and economically active residents are crucial to delivering sustainable development, addressing both economic and social objectives. A more skilled resident workforce will allow residents to engage in the wider economy within Westminster. Removing barriers to employment can have significant benefits in terms of health, wellbeing, life chances and support local shops and services through increased local spending power.

IIA Objective 16.

- **To maintain economic diversity and support sustainable economic growth.**

5.18 Westminster is viewed as an ‘economic powerhouse’. It functions as a national and international centre for business, shopping, arts, culture and entertainment. This diversity is part of its strength and helps maintain longevity. It has a high percentage (85%) of small businesses and a range of business sizes ensures sustainability. Studies show that Westminster’s diverse economy and mixed use nature (including residential accommodation directly alongside commercial) helped to protect it from the worst of the recent recession. However, a careful balance needs to be maintained between
commercial and residential development – particularly in light of the recent trend for office to residential conversions as residential values rise and become a more attractive investment opportunity.

IIA Objective 17.

5.19 Many of the objectives will overlap in terms of sustainability issues and others may be in conflict. The impact of this will be more evident in the next stage of the IIA (Stage 2) when the individual policies in Westminster’s City Plan are assessed against the objectives.

Relationship between the IIA Objectives and SEA issues

5.20 The IIA report also includes a Strategic Environmental Assessment (SEA) and as such the following table outlines the relationship between the identified 17 IIA objectives (set out above) and those that are required for consideration in Annex 1 of the SEA Directive. Those in bold text indicate the primary objective and the others are linked through outcome or impact.

Table 2 The relationship between SEA Issues and identified IIA objectives

<table>
<thead>
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<th>Key SEA Issues</th>
<th>IIA objectives</th>
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<tbody>
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<tr>
<td>Landscape</td>
<td>4, 8, 14, 15</td>
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6. **The IIA Assessment Framework**

6.1 The IIA Assessment Framework is the methodology which will enable the, environmental, social and economic sustainability impacts and equalities, health and crime and disorder effects and of the policies in Westminster’s City Plan to be analysed, compared and critically assessed.

6.2 Having established the objectives in the previous Section (5), this part of the scoping report sets out the IIA Assessment Framework, including the sub-criteria for the equalities and health considerations.

6.3 The IIA Assessment Framework includes key specific priority objectives from the Council’s Equality Objectives 2012-2016 which are defined in red text in the Assessment Framework. These specific priorities along with any potential impact of the policy on persons who share one or a number of the equalities characteristics (see Table 4 below) will be assessed as part of the IIA process.

6.4 Whilst individual conditions and lifestyle decisions are the principal factors affecting health, the local environment still has a major role to play. Local environmental conditions, such as air quality, noise levels and housing conditions can have a direct impact on health. The built environment can facilitate social interaction and create healthy, inclusive communities, including access to local services, employment opportunities, and safe and accessible environments. The built environment can also affect behavioural choices people make, such as being active by having access to open space and pleasant routes which encourage walking and cycling. Sustainable design policies can reduce waste and emissions which help to address air quality, and can take account of the impacts of a changing climate that can affect health such as overheating and flooding.


6.6 The long term goals set out in Healthier City, Healthier Lives and the built environment factors that are most likely to influence health in Westminster (explained in paragraph 6.4) will be considered as part of the IIA Assessment Framework (shown in blue text in Table 3).
Table 3 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>Objective</th>
<th>sub criteria for assessment including EQIA/HIA considerations:</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 foster an inclusive Westminster community? Will it encourage engagement in the community activity?</td>
</tr>
<tr>
<td>2) To reduce crime and fear of crime</td>
<td>Will it reduce crime, disorder and antisocial behaviour? ** Will it reduce fear of crime, disorder and antisocial behaviour? ** Will it reduce other behaviour adversely affecting the local environment? **</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 units</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 providing housing than can help people stay independent for longer?</td>
</tr>
<tr>
<td>4) To promote and improve health and well being</td>
<td>Will it help improve health inequalities? ** Will it reduce death rates? * Will it improve access/movement? * Will it encourage healthy lifestyles? * Will it improve cultural wellbeing? Will it foster an inclusive Westminster community, specifically through and active engagement in sport and physical activity opportunities? Will it provide access to a healthy diet and encourage healthy lifestyles? Will it encourage a physically active lifestyle (helping to reduce obesity)? Will it create healthy workplaces?</td>
</tr>
<tr>
<td>5) To reduce greenhouse emissions and support climate change adaptation</td>
<td>Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing the need to travel? * Will it reduce ozone depleting emissions? * Will it reduce emissions through retrofitting new technology?</td>
</tr>
<tr>
<td>6) To reduce use of limited natural resources e.g. water, fossil fuels, quarried materials, wood</td>
<td>Will it reduce heat island effects on people and property? *</td>
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<td></td>
<td>Will it reduce water consumption and improve water efficiency?</td>
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<td></td>
<td>Will it reduce consumption of fossil fuels *</td>
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<td></td>
<td>Will use of other natural resources (e.g. quarried materials) be minimised?</td>
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<tr>
<td></td>
<td>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</td>
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<tr>
<td>7) To reduce flood risk, promote SUDs, protect surface and groundwater quality</td>
<td>Will it reduce water consumption and improve water efficiency?</td>
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<td>Will it reduce combined sewer overflow events? *</td>
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<td></td>
<td>Will it reduce water consumption and improve water efficiency?</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 minimise flood risk from all sources of flooding? *</td>
</tr>
<tr>
<td>8) To protect, enhance and create environments that encourage and support biodiversity</td>
<td>Will it reduce combined sewer overflow events? *</td>
</tr>
<tr>
<td></td>
<td>Will it protect, enhance and increase biodiversity and protect habitats?</td>
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<td></td>
<td>Will it preserve SINC?</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 protect, enhance and create environments that encourage and support biodiversity</td>
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<td></td>
<td>Will it protect heritage sites and cultural value?</td>
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<tr>
<td>10) To reduce noise and impact of noise</td>
<td>Will it protect heritage sites and cultural value?</td>
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<td>Will it reduce noise concerns and noise complaints?</td>
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<td></td>
<td>Will it reduce volumes of traffic? *</td>
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<td>Will it encourage walking and cycling? *</td>
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<td>Will it increase proportion of journeys using modes other than the car? *</td>
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<td>12) To reduce waste production and increase recycling, recovery and re-use of waste</td>
<td>Will it reduce noise levels? *</td>
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<td></td>
<td>Will it reduce consumption of materials and resources?</td>
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<td></td>
<td>Will it reduce household waste?</td>
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<td></td>
<td>Will it increase recycling, recovery and re-use?</td>
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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 reduce noise levels? *</td>
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<td></td>
<td>Will it protect heritage sites and cultural value?</td>
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<td>Will it protect strategic views?</td>
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<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</td>
<td>Will it reduce noise levels? *</td>
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<tr>
<td></td>
<td>Will it reduce litter?</td>
</tr>
<tr>
<td></td>
<td>Will it enhance the quality of public realm?</td>
</tr>
</tbody>
</table>
improvements

15) To protect, enhance and seek opportunities to increase open space
Will it improve open space?*
Will it improve landscape character?
Will it improve access to open space? **

16) To ensure equality of opportunities, improve local opportunities and support sustainable economic growth throughout Westminster.
Will it improve qualifications, skills or training? **
Will it reduce unemployment?*
Will it provide jobs for those most in need? *
Will it improve earnings?
Will it support young people, adults and vulnerable parents into employment, education and training?

17) To maintain economic diversity and support sustainable economic growth.
Will it improve business development and environment?
Will it improve business resilience and economy?
Will it encourage new business start ups, small businesses and opportunities for local people?*
Will it promote business in key sectors?
Will it promote regeneration, reducing disparity?**

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

**Table 4 Protected Equalities Characteristics**

The protected equalities characteristics set out in the Equality Act 2010 which will be considered when assessing the impacts of the draft policies in the Integrated Impact Assessment Framework are:

- Age;
- Disability;
- Sexual orientation and gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race - this includes ethnic or national origins, colour or nationality;
- Religion or belief (including lack of belief); and
- Sex (i.e. gender).

6.8 The anticipated effects of each new policy in Westminster’s City Plan will be analysed against each of the 17 Objectives and sub-criteria identified in the Integrated Impact Assessment Framework and will be scored as follows:

- Major positive  ++
- Minor positive  +

---

69
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.
7. **Next steps**

7.1 This scoping report and its consultation fulfils the requirements relevant to Stage 1 of the IIA process as set out in Table 1 (Page 3).

7.2 There will be a six week consultation period for this scoping report and amendments will be made to incorporate stakeholder feedback where appropriate.

7.3 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.

7.4 Stage 3 will then consist of an Integrated Impact Assessment Report which details the process undertaken and explain the results of the assessment. Key stakeholders will be consulted on the Integrated Impact Assessment report (Stage 4) and changes made. Any comments received will also feed into the Examination in Public of Westminster’s City Plan, where appropriate.
7. End Notes

References for Section 3

i Regional Labour Market Statistics (table L101)( November 2013) ONS


iv Experian (2012)


vi IDBR –Office for National Statistics (2013)

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

viii The Santander UK Town and City Index (2013)


x Residential and office pipeline survey (2013) Westminster City Council

xi Cushman Wakefield (19.2.13)

xii London Office Crane Survey Summer (2013) Deloitte Real Estate


xiv The Study of Small Offices in Westminster (2008) DTZ The study (which looked at offices of 250 m2 and below) made the important distinction between small offices occupiers and small office buildings. It found that the overwhelming majority (94%) of the identified small offices were actually part of larger (sub-divided) office buildings. Some 48% of small office occupiers were in buildings of 1000+ sqm and 27% in buildings between 500-1000 sqm

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

xvi Westminster Creative Industries (October 2011 and Statistical update 2010) GVA Grimley and Burns and Owens Partnership Ltd


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

xix Diplomatic List September (2013) Westminster City Council

xx City of Westminster Local Economic Assessment Baseline Study (2011) Westminster City Council
A study of Small offices in Westminster (June 2008) DTZ Research

CBRE Q1 (2013)


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

Statement of Licensing Policy (2011) Westminster City Council

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

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

Business Register and Employment Survey (18.4.13) Nomis

Westminster City Council Land Use Survey data (updated 2009)

Westminster Profile (October 2013) Westminster City Council

Westminster Office Study – Impact of the Recession (December 2009) Drivers Jonas

Draft Further Alterations to the London Plan (January 2014) Mayor of London

ONS Mid-year estimate (2012)

Census 2011

Census 2011

Westminster Profile (October 2013) Westminster City Council

Census 2011

Westminster Profile (October 2013) Westminster City Council


The Local Housing Market Assessment (2014) Ecorys


The London Plan Paragraph 1.31 (July 2011 ) Mayor of London

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

The Mayor’s Air Quality Strategy (2011) Mayor of London


London Atmospheric Emissions Inventory 2008 – Mayor of London August 2010

London Borough Environmental Fact Sheet (November 2011) Environment Agency

London Borough Environmental Fact Sheet (November 2011) Environment Agency

Environent Agency 2013

Environment Agency London Borough Environmental Fact Sheet November 2011

Thames Tideway Tunnel Website February 2014

Local and Regional CO₂ Emissions for 2005-2009 by local authority, 2011 and 2010 Local Authority Carbon Dioxide Figures (2011) Department of Climate and Energy Change

2011 Carbon dioxide emissions for local authority and regional level (January 2013) Department of Energy and Climate Change

Retrofitting Soho, Decentralised Energy Masterplan for the City of Westminster (January 2014) Parsons Brincherhoff

Decentralised Energy Masterplan for Westminster (August 2013) Parsons Brinkerhoff


APPENDIX 1 Consultation Comments on IIA Scoping Report September 2012

How previous comments received in response to consultation on the IIA Scoping Report for Westminster’s City Plan – City Management Policies September 2012 have been taken into account in this new scoping document for Westminster’s City Plan.

<table>
<thead>
<tr>
<th>Summary of Comments</th>
<th>How comments have been taken on board</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>English Heritage</strong></td>
<td></td>
</tr>
<tr>
<td>Generally satisfied with the treatment of the historic environment in the Scoping Report</td>
<td></td>
</tr>
<tr>
<td>Request more specific identification of the pressures on Westminster’s open spaces in paragraphs 3.77-3.80 (p.19) as over-use can harm heritage assets.</td>
<td>Additional text has been added to paragraph 3.103 &amp; 3.104.</td>
</tr>
<tr>
<td>Request the inclusion of identification of local views in Future Conditions.</td>
<td>Additional text has been included in paragraph 3.80 to refer to the importance of local views in Westminster and that these can be found in the conservation area audits for the individual conservation areas and weblink added to these documents.</td>
</tr>
<tr>
<td>Request clarification on whether the list of 21 listed historic garden squares in paragraph 3.60 are those on Registered Parks and Gardens of Historic Interest list</td>
<td>Clarification added in paragraph 3.78</td>
</tr>
<tr>
<td>Note typo in paragraph 3.61 regarding World Heritage Sites.</td>
<td>Typo amended (in paragraph 3.80) this now reads only one of 28 World Heritage Sites</td>
</tr>
<tr>
<td>Request inclusion of the following documents in plans programmes and strategies: National Heritage Protection Plan, Conservation Principles and Guidance on Tall buildings.</td>
<td>These documents have now been added.</td>
</tr>
<tr>
<td><strong>Natural England</strong></td>
<td></td>
</tr>
<tr>
<td>Consider approach and methodology is acceptable and welcome the references to biodiversity.</td>
<td></td>
</tr>
<tr>
<td><strong>Environment Agency</strong></td>
<td></td>
</tr>
<tr>
<td>Request the Thames River Basin Management plan and Water Framework Directive are considered in Section 3 for other green infrastructure and biodiversity.</td>
<td>The Thames River Basin Management plan has been reviewed for baseline information.</td>
</tr>
<tr>
<td>Request that the River Brent and River Lee are included as relevant river catchments.</td>
<td>Although these are part of the WDF river catchments they are some distance from Westminster and therefore are not considered relevant in assessment.</td>
</tr>
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<td>---</td>
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</tr>
</tbody>
</table>
| Request the addition of the following documents:  
  - Groundwater Protection Policy and Practice  
  - Thames River Basin Management Plan  
  - Thames Estuary 2011  
  - Westminster’s Forthcoming Surface Water Management Plan | Documents added  
  
  The Surface Water Management Plan has not yet been published. .The Preliminary Flood Risk Assessment was published in 2011. |
| Request *minimise waste* is reworded to *reduce waste in paragraph 5.9* | Amended in paragraph 5.13 |
| Request word change in paragraph 5.5 and add the words *and mitigation* | Amended in paragraph 5.6 |
| Request the addition of criteria which encourages new development to achieve BREEAM excellent standard. | No change this is considered too detailed for the IIA. |
| Request that the wording of Objective 7 is changed from *minimise* to *reduce*. | Changed as requested. |
| Request that the WFD is added as additional criteria to Objective 8. | WDF considerations most relevant to Westminster are included in Objective 6 – Reduce natural resources e.g. water: Objective 7-Reduce flood risk, promote SUDs and protect surface and ground water quality; Objective 8-Protect, enhance and create environments that encourage and support biodiversity. |
| Except for comments above. In general supportive of the document and satisfied that all key significant environmental issues have been identified. | --- |
### 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>1. To create cohesive, inclusive and safe communities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>* Will improve access to local services including shops and community facilities?</td>
<td>0</td>
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<tr>
<td>* Will in increase ability to influence decision making (neighbourhoods)?</td>
<td>0</td>
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<tr>
<td>* Will it encourage engagement in community activity</td>
<td>0</td>
<td></td>
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<tr>
<td>* Will it foster an inclusive Westminster community?</td>
<td>0</td>
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<tr>
<td>2. To reduce crime and fear of crime</td>
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<tr>
<td>* Will it reduce the levels of crime, disorder and anti-social behaviour?</td>
<td>0</td>
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</tr>
<tr>
<td>* Will it reduce fear of crime, disorder and anti-social behaviour?</td>
<td>0</td>
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<tr>
<td>* Will it reduce other behaviour adversely affecting the local environment?</td>
<td>0</td>
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<td>3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and</td>
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<tr>
<td>* Will it reduce homelessness?</td>
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<tr>
<td>* Will it increase a range of affordable housing?</td>
<td>0</td>
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</tbody>
</table>
meet the demand for affordable housing and family sized units

- Will it reduce the number of unfit homes? **
- Will it result in high quality homes? **
- Will it providing housing than can help people stay independent for longer?

4. To promote and improve health and well – being

- Will it help health and equalities? **
- Will it reduce death rates? *
- Will it improve access/movement? *
- Will it encourage healthy lifestyles? *
- Will it improve cultural wellbeing?

- Will it foster an inclusive Westminster community, specifically through and active engagement in sport and physical activity opportunities?
- Will it provide access to a healthy diet and encourage healthy lifestyles?
- Will it encourage a physically active lifestyle (helping to reduce obesity)?
- Will it create healthy workplaces?

5. To reduce greenhouse gas emissions and support climate change adaption

- Will it reduce greenhouse gas emissions by reducing energy consumption, generating low or zero carbon energy and reducing the need to travel? *
- Will it reduce ozone depleting emissions? *
- Will it reduce emissions through retrofitting new technology?
<p>| 6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood. | Will it reduce heat island effects on people and property? * | 0 |
| | Will it reduce water consumption and improve water efficiency? | 0 |
| | Will it reduce consumption of fossil fuels?* Will use of other natural resources (e.g. quarried materials) be minimised? | 0 |
| | Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources? | 0 |
| 7. To reduce flood risk, promote sustainable urban drainage (SUDs) and protect, surface and ground water quality | Will it minimise flood risk from all sources of flooding? * | 0 |
| | Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience? * | 0 |
| | Will it reduce combined sewer overflow events? * | 0 |
| 8. To protect, enhance and create environments that encourage and support biodiversity | Will it protect, enhance and increase biodiversity and protect habitats? | 0 |
| | Will it preserve SINCs? | 0 |
| | Will it improve access to and promote educational value of sites of biodiversity interest? * | 0 |
| | Will it conserve and enhance species and habitats? | 0 |
| 9. To improve air quality | Will it improve air quality? * | 0 |
| | Will it reduce emissions of key pollutants? * | 0 |
| 10. To reduce noise and impact of noise | Will it reduce noise levels * | 0 |</p>
<table>
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<tr>
<th>11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport</th>
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<td>• Will it lead to reduced consumption of materials and resources?</td>
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<td>• Will increase recovery recycling and re-use?</td>
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<td>14. To enhance public realm and street improvements</td>
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<td>• Will reduce litter?</td>
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<td>• Will it enhance the quality of public realm?</td>
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<td>• Will improve access and mobility for all equality group strands?**</td>
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<td>15. To protect, enhance and seek opportunities to increase open space</td>
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<tr>
<td>• Will it improve open space?*</td>
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<td>• Will it improve landscape and character of open space?</td>
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<tr>
<td>16. To ensure equality of opportunity and improve local opportunities and support sustainable growth throughout Westminster.</td>
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<td>• Will it improve qualifications, skills and training? **</td>
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<td>• Will it promote regeneration, reducing disparity? **</td>
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</tbody>
</table>

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

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

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

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