

# Integrated Impact Assessment

Submission Draft (Regulation 22) Special Policy Areas and  
Policies Map Revision





## **Non-Technical Summary**

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

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

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

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

### **What is the Special Policy Areas and Policies Map Revision to Westminster's City Plan?**

The council notified its intention to revise Westminster's City Plan in a series of revisions by Regulation 18 notice and the Local Development Scheme (March 2015). Once all revisions are adopted Westminster's City Plan will consist of both strategic and detailed

city management policies and will provide a comprehensive source of planning policy for Westminster. The first revisions to Westminster's City Plan are the Basement and Mixed Use Revisions with an examination hearing held in March 2016. The Special Policy Areas and Policies Map Revision is the next phased revision to Westminster's City Plan. This IIA is in connection with Special Policy Areas and Policies Map Revision to Westminster's City Plan.

## **How was the Special Policy Area and Policies Map Revision to Westminster's City Plan Assessed?**

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

### **IIA Objectives**

1. To create cohesive, inclusive and safe communities
2. To reduce crime and the fear of crime
3. To ensure provision of appropriate housing types to reduce homelessness, reduce overcrowded households and meet the demand for affordable housing and family sized units
4. To promote and improve health and wellbeing
5. To reduce greenhouse gas emissions and support climate change adaption
6. To reduce the use of limited natural resources e.g; water, fossil fuels, quarried materials, wood
7. To reduce flood risk, promote sustainable urban drainage, protect surface and groundwater quality

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

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

The IIA process has run alongside the following stages of informal consultation for the Special Policy Areas. The options and draft approaches (some of which have been suggested as a response to consultation) contained in these documents have informed the reasonable alternatives, which is a required stage set out the SEA Directive. Where policies have not been through this process reasonable alternatives have been derived by setting out other reasonable scenarios.

- [City Management Plan Policy Options January 2011](#)
- [City Management Plan Consultation Draft November 2011](#)
- [Mayfair and St. James's Consultation Booklet No. 4 November 2013](#)
- [Westminster's Economy Consultation Booklet No. 6 February 2014](#)

- [Social and Community Uses Consultation Booklet No. 7 February 2014](#)
- [The West End Consultation Booklet No. 19 January 2015](#)
- [Special Policy Area and Policies Map Revision Publication Draft \(Regulation 19\) December 2015](#)

The policies map is a spatial expression of the policies contained in Westminster's City Plan and therefore does not require a separate IIA assessment. The proposed revisions to the Policies Map are either minor amendments, factual updates or reflect policy designations for the Special Policy Areas Revisions. Appendix 7 sets out a schedule of proposed changes, the reason and assessment for the change. An IIA assessment, however, of new Proposals Sites in Flood Zone 3 has been included to demonstrate account of sustainability in the sequential test.

## **The issue**

The council has long protected and encouraged specialist uses in defined Special Policy Areas (SPAs). These areas are recognised for their special local distinctiveness, particularly relating to their land uses. SPAs can help ensure that unique clusters of activity are not lost to other commercial uses. Protection of such unique uses support specific industries' long-term success, and in many cases enhance London's global reputation.

The need to retain existing and to designate new SPAs is monitored to respond to changing circumstances and to address specific, local land use issues. Policies aim to ensure sufficient flexibility within the plan to address specific development pressures, economic circumstances and market conditions.

The Special Policy Areas and Policies Map Revision contains detailed policies to protect and enhance the character and function of the unique clusters of specialist uses, to protect and enhance Harley Street SPA as a centre for medical excellence, Portland Place for institutional uses, to support the unique character of St James's in protecting private members' clubs, art galleries and niche and luxury retail, and Savile Row as a centre for bespoke tailoring. Revisions also propose a new SPA for Mayfair for the cluster of art and antique dealers, in response to the loss of and on-going threat to galleries in the area, and proposes the deletion of the East Marylebone SPA in light of the on-going decline of the numbers of wholesale showrooms in the area, and its reduced role as a centre for wholesale showrooms for the fashion industry. The revision also includes minor changes to some boundaries and factual updates on the adopted

Policies Map, including updates to Proposals Sites reflecting the 5-15 year Housing Supply.

## **Special Policy Areas and Policies Map Revision to Westminster's City Plan**

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

NB Red text shows post Regulation 19 additional modifications

#### **POLICY S2 SPECIAL POLICY AREAS**

**Special Policy Areas are designated to protect and promote specialist uses and functions as follows:**

**Harley Street: Medical facilities**

**Portland Place: Institutional uses**

**Savile Row: Tailoring**

**St James's: Private members' clubs, art galleries, niche retail**

**Mayfair: Art galleries, antiques traders and niche retail**

#### **POLICY CM2.1: HARLEY STREET SPECIAL POLICY AREA**

- 1. All development in the Harley Street Special Policy Area will support and enhance its role as an international centre of medical excellence, complemented primarily by residential use.**
- 2. New medical and complementary facilities will be encouraged.**
- 3. Existing medical facilities, including consultation rooms and related professional and support services, will be protected and their loss of will only be allowed in exceptional circumstances where:**
  - a) the council is satisfied that the premises have been vacant and actively marketed for medical use for at least 12 months at a reasonable market value and attempts to find an occupier have been unsuccessful;**
  - b) the character and function of the area as a centre of medical excellence would not be affected;**

- c) ~~the loss of the medical use will not significantly affect the demand for that particular specialism;~~ and
  - d) the change of use is to other priority uses for the SPA including medical and supporting services, or residential.
- 4. The council will consider land use swaps within the Special Policy Area where it can be demonstrated that:
  - a) there will be no net loss of medical and associated floorspace; and
  - b) the accommodation offered provides higher quality medical space.
- 5. The council will support the provision of new accommodation for patients using medical facilities in the Harley Street Special Policy Area and/or their families, both within the SPA and the surrounding area.

**POLICY CM2.2: PORTLAND PLACE SPECIAL POLICY AREA**

- 1. Development in the Portland Place Special Policy Area will support its continuing role as home to prestigious institutional uses which are particularly suited to the large scale historic buildings characteristic of the area.
- 2. New institutional uses will be encouraged.
- 3. Existing institutional uses will be protected except where the council is satisfied that the premises have been vacant and actively marketed for institutional use for at least 12 months at a reasonable market price/rent and attempts to find an institutional occupier have been unsuccessful.
- 4. Applications for extensions to existing lawful institutional uses to improve the functioning of the establishment will generally be allowed in the Special Policy Area and elsewhere in the Central Activities Zone.

**POLICY CM2.3: SAVILE ROW SPECIAL POLICY AREA**

- 1. Development in the Savile Row Special Policy Area will complement and enhance its role as an international centre of excellence for bespoke tailoring.
- 2. Existing bespoke tailoring uses will be protected.



3. New bespoke tailoring will be allowed, particularly at basement and ground floor levels, and will be secured by legal agreements.
4. New A1 retail will only be permitted at ground, lower ground floor and first floor levels, subject to the following criteria, to be secured by legal agreement where appropriate:
  - a) no bespoke tailoring uses being lost;
  - b) each retail unit being no larger than 300 sqm gross;
  - c) the retail use should sell bespoke, unique, limited edition or one of a kind products; and
  - d) the retail function should be complementary to the character and function of the Special Policy Area.
5. Land use swaps will only be acceptable within the Special Policy Area where the other criteria within this policy are met, and where:
  - a) there is no net loss of bespoke tailoring floorspace, outside of necessary minor alterations to facilitate the land use swap; and
  - b) the accommodation offered provides higher quality or larger bespoke tailoring space.
6. New residential use is not generally appropriate within the Special Policy Area and should be subordinate to the provision of more complimentary commercial uses, including offices. The requirement for residential from office floorspace as set out in Policy S1 Mixed Use in the Central Activities Zone sections (B) and (C) does not apply in the Special Policy Area.

#### **POLICY CM2.4: ST JAMES'S SPECIAL POLICY AREA**

1. Development in the St James's Special Policy Area will build on the character of personalities who have frequented it in the past and its historic relationship with the monarchy, and complement and enhance the sense of history and grandeur and niche retail and leisure offer of the area. ~~'s unique character and status accommodating prestigious and renowned buildings and functions.~~
2. Existing private members' clubs and art galleries will be protected.

3. The council will work with landowners to protect the existing niche luxury and specialist A1 retail floorspace at basement, ground and first floor level and encourage new niche luxury and specialist retail development, particularly those selling goods that fall into the following categories:
  - a) Bespoke
  - b) Unique or one of a kind
  - c) Antique
  - d) Limited edition
4. The council may seek the re-provision of existing gallery space as part of development proposals, to be secured by legal agreement.
5. New retail uses should be in keeping with the character and function of the street or area in which they are located, and where appropriate should sell items or offer services falling in the following categories:
  - a) Bespoke
  - b) Unique or one of a kind
  - c) Antique
  - d) Limited edition
6. New art galleries and private members' clubs are supported and will be secured by legal agreement where appropriate.

**POLICY CM2.5: MAYFAIR SPECIAL POLICY AREA**

1. Development in the Mayfair Special Policy Area will support and enhance its international reputation as a centre for the art trade, complemented primarily by other commercial uses.
2. Existing art galleries and antiques trader uses will be protected. The council will generally seek the re-provision of existing gallery or antique trader space, or space historically used for such purposes, as part of development proposals, to be secured by legal agreement.

3. New art galleries are encouraged and will be secured by legal agreement where appropriate.
4. New retail uses should be in keeping with the character and function of the street or area in which they are located, and where appropriate should sell items or offer services falling in the following categories:
  - a) Bespoke
  - b) Unique or one of a kind
  - c) Antique
  - d) Limited edition
5. The city council will work with landowners to protect and promote clusters of specialist retailers in Mayfair.
6. New residential use is not generally appropriate within the Special Policy Area and should be subordinate to the provision of more complimentary commercial uses, including offices. The requirement for residential from office floorspace as set out in Policy S1 Mixed Use in the Central Activities Zone sections (B) and (C) does not apply in the Special Policy Area.

### **Policies Map**

The proposed revisions to the Policies Map, Appendix 1 and accompanying amendments to text in Westminster's City Plan, are either minor amendments, factual updates or reflect policy designations for the Special Policy Areas Revisions. Further necessary changes to the Policies Map will be covered in other revisions to Westminster's City Plan. Appendix 7 sets out a schedule of proposed changes, the reason and assessment for the change. The Policies Map is a spatial expression of the policies contained in Westminster's City Plan and therefore does not require a separate IIA assessment. An IIA assessment, however, of new Proposals Sites in Flood Zone 3 has been included to demonstrate account of sustainability in the sequential test.

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

Appendix 5 of this report contains the detailed assessments and associated considerations for the Special Policy Areas and Policies Map Revision to Westminster's City Plan for Harley Street, Saville Row, St. James's, East Marylebone, Portland Place and

Mayfair SPAs. An IIA has not been completed for the Policies Map as this is a spatial expression of the policies and assessment of this document at this stage would be an unnecessary duplication of work. An IIA assessment, however, of new Proposals Sites in Flood Zone 3 has been included to demonstrate account of sustainability in the sequential test. A summary of the assessments are as follows:

### **Policy S2 Special Policy Areas**

This policy aims to protect and promote specialist uses and functions in five designated areas, and is neutral overall. It has positive scores for objectives 13 and 17 regarding protecting heritage and supporting a diverse and strong economy. The SPAs are all located in conservation areas with a number of listed buildings, and aim to sustain strategically important clusters of use, which also have strong historic links. There is a long term positive impact on the UK economy and Westminster's role in London's world city status. Whilst the policy proposes deletion of the East Marylebone SPA, this has been in response to the declining number of wholesale showrooms in the area, and its reduced role as a centre for fashion wholesaling.

### **Policy CM2.1 Harley Street Special Policy Area**

This policy aims to support the function of Harley Street as a world renowned centre for medical excellence. It ensures the on-going availability of these uses and therefore the continued importance of the area as a centre for medical excellence in London and the UK. This policy is predominantly neutral. Provision of accommodation for patients and families may affect housing delivery (Objective 3), but this is balanced against the support for the area's international role in medical excellence. It receives a positive score for one sub-criterion in Objective 4. Although it is recognised that these private medical facilities are not readily available for large sectors of the community, the research work that is carried out and improved medical knowledge can in the long run benefit all and potentially improve death dates.

The policy receives positive scores for sub-criteria in Objective 17, including a very positive score for improving business resilience and economy and promoting business in key sectors. The uses in Harley Street and associated uses elsewhere in the Central Activities Zone such as hotels add to the economic diversity of Westminster and help maintain economic sustainability. This policy like other policies for SPAs has been given a neutral score for Environmental Objectives 5, 6, 7, 8, 9. This is because these policies primarily deal with the protection of use. Other City Plan policies will deal with sustainable development matters.

### **Policy CM2.2 Portland Place Special Policy Area**

This policy seeks to encourage and protect institutional uses within Portland Place. Like other SPAs overall this policy is predominantly neutral and receives the most positive scores for Objective 17. The Institutions are not in themselves commercial ventures but the expertise and prestige they embed can have a direct positive impact on businesses and services in key sectors and improve business development and resilience. By their nature these institutions provide specialist training and education for professions. It is however noted that access to this is limited to members of that profession and unlikely to have a significant impact on Westminster's population. The positive score for this sub-criteria in Objective 16 is therefore on balance. There may be an indirect and more cumulative positive impact which benefits the wider community.

It receives a positive score for one sub-criterion in Objective 4, as the research carried out by medical institutions may in the long run have a positive benefit for all. Institutional uses are particularly suited to listed buildings and add to the character of this part of the Harley Street Conservation area and scores positively against this sub-criteria in Objective 13.

### **Policy CM2.3 Savile Row Special Policy Area**

Savile Row is synonymous with bespoke tailoring, with an international reputation. The aim of this policy is to enhance its role as an international centre of excellence for bespoke tailoring, in particular through protection and enhancement of these specialist uses. Overall this policy is positive. It receives a positive score in Objective 13 given the policy seeks to protect and enhance the historic character and function of the area by protecting existing tailors and encouraging new ones. Given there is an important tradition in the bespoke tailoring industry for apprenticeships there is a very positive score for this sub-criterion in Objective 16. This policy is most positive for Objective 17 receiving very positive scores for promoting businesses in key sectors, improving business resilience and the economy and for business development and environment. Savile Row is world renowned, and visitors help generate income in other sectors of the economy including entertainment, retail and hotels. The positive benefits are considered both short and long term.

The policy has a negative score regarding housing delivery (Objective 3), as it prioritises commercial uses, this approach however, takes into account the need to support the strategically important and internationally recognised cluster.

#### **Policy CM2.4 St James's Special Policy Area**

This policy seeks to complement and enhance the area's unique character, in particular through maintaining the existing strong presence of galleries and private members' clubs which are integral to its character and function. As with the other SPA policies the policy approach for St. James's is likely to have a positive impact on economic sustainability criteria. The policy receives very positive scores for sub-criteria in Objective 17. The art galleries are a key ingredient of this area providing both exhibition and retail functions. Visitors may also stay in the luxury hotels in the area, eat at the high end restaurants and visit other retailers in the area. This diversity maintains economic diversity and supports sustainable economic growth. Given the policy seeks to protect and enhance the historic character and function of the area and that the art galleries tend to occupy smaller and more traditional shop type premises, many of which are listed, this policy has a positive score in Objective 13.

This policy has also been given a positive score in terms of improving cultural wellbeing (Objective 4) It is recognised that the protection of art galleries can have a positive impact on those who visit. However, it is considered that private galleries may only be of interest to a fairly limited sector of the population, although access to these premises are normally free, and the sector has actively promoted public engagement. Like the other SPA policies this receives neutral scores for other social and environmental sustainability objectives.

#### **Policy CM2.5 Mayfair Special Policy Area**

This policy aims to support and enhance the Mayfair SPA's international reputation as a centre for the art trade, complemented primarily by other commercial uses. The policy seeks to protect art galleries and antiques traders in this SPA and encourage new art galleries to be secured through legal agreement. As with the other SPA policies the policy approach for Mayfair is likely to have a positive impact on economic sustainability criteria. The policy receives very positive scores for sub-criteria in Objective 17. The art galleries are a key part of this area providing both exhibition and retail functions. Visitors may also stay in the luxury hotels in the area, eat at the high end restaurants and visit other retailers in Bond Street and Savile Row. This maintains economic diversity and supports sustainable economic growth. Given the policy seeks to protect and enhance the historic character and function of the area and that the art galleries tend

to occupy smaller and more traditional shop type premises, many of which are listed, this policy (as for the St James's SPA) has a positive scores in Objective 13.

This policy has also been given a positive score in terms of improving cultural wellbeing (Objective 4) It is recognised that the protection of art galleries can have a positive impact on those who visit. However, it is considered that private galleries may only be of interest to a fairly limited sector of the population, although access to these premises are normally free, and the sector has actively promoted public engagement. The policy has a negative score regarding housing delivery (Objective 3), as it priorities commercial uses, this approach however, takes into account the need to support the strategically important and internationally recognised cluster. Like the other SPA policies this receives neutral scores for other social and environmental sustainability objectives.

### **New Proposals Sites in Flood Zone 3**

The sites include preferred use for residential which is positive for objective 3 in increasing housing provision. While sites are located in Flood Zone 3, Westminster's SFRA concluded that the scarcity of sites meant that development needs cannot be met by sites in Flood Zones 1 and 2 alone, and that sites (both identified sites and windfall sites) in Flood Zone 3 need to be considered suitable for development, subject to the requirements of the Exception Test. Provisions for the exceptions test and to reduce the risk of flooding from development is taken into account by policy S30 when implementation of sites occurs

### **Reasonable Alternatives**

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

- [City Management Plan Policy Options January 2011](#)
- [City Management Plan Consultation Draft November 2011](#)
- [Mayfair and St. James's Consultation Booklet No. 4 November 2013](#)
- [Westminster's Economy Consultation Booklet No. 6 February 2014](#)
- [Social and Community Uses Consultation Booklet No. 7 February 2014](#)
- [Special Policy Area and Policies Map Revision Publication Draft \(Regulation 19\) December 2015](#)

Alternatives include those suggested in the process of informal consultation set out above. Where topics have not been through this process reasonable alternatives have been derived by setting out other scenarios (indicated in the table and below by AO). The assessment tables and a full key to the reasonable alternatives are set out in Appendix 6 and a full description of the findings is contained in paragraphs 5.15- 5.21 of this report. In summary, the 'no policy' approach is the most negative for policy areas, as this would not protect specialist uses which add to the economic diversity and resilience.

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

There have been no changes to the Special Policy Areas and Policies Map Revision to Westminster's City Plan as a result of this IIA.

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

The effects of these policies will be included in our Authority's Monitoring Report.

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

This IIA accompanies the Special Policy Areas and Policies Map Revision to Westminster's City Plan Submission Draft. It is part of the supporting documentation submitted to the Secretary of State and will form part of the examination documents. Consultation responses are summarised in the Consultation Statement which also accompanies the Special Policy Areas and Policies Map Revision as a supporting document.

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



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## **Appendices**

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

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

Appendix 4 - Relevant Plans, Programmes and Strategies – Updated Scoping Report version

Appendix 5 - IIA Detailed Appraisals for the Special Policy Areas Revision to Westminster’s City  
Plan

Appendix 6 - Reasonable Alternatives

Appendix 7 – Schedule of proposed changes to the Policies Map

Appendix 8 – Explanatory note on the Sequential Test and New Proposals Sites in Flood Zone 3

# 1. Introduction

## Integrated Impact Assessment

- 1.1 This IIA report presents the findings of the Integrated Impact Assessment (IIA) of the Special Policy Areas and Policies Map Revision to Westminster's City Plan against the 17 objectives in the IIA Assessment Framework (set out in detail in Table 2 on page 31) which has been prepared to assess the proposed Special Policy Areas and Policies revision to Westminster's City Plan. The report also considers the potential effects of a number of reasonable alternatives to these policies. Table 1 below shows the various stages in the preparation of this IIA (this is based on the five stages of the SA preparation process set out in A Practical Guide to the Strategic Environmental Assessment Directive (ODPM 2005). Appendix 1 of this report illustrates the development of the sustainability process in relation to the development plan process and Appendix 2 sets out the SEA Directive requirements checklist and how these have been covered in this report and in the [Scoping Report](#) June 2014.
- 1.2 Westminster's City Plan will be revised in seven tranches, each taking the formal status of a separate revision to the Plan (this is explained in more detail in Chapter3). There will, therefore, be seven separate IIA reports dealing with the impacts of each of these sets of proposals (although they will inform each other and draw on a common evidence base) and one final IIA Report which will include a comprehensive overview and pick up policies that have been partly changed. The indices to be used for monitoring SPAs (Stage E) will be included in this report and the relevant monitoring indices included in the subsequent IIA reports; however a comprehensive post adoption statement will only be published once all the IIA Reports have been finished and the process concluded.

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

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

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

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

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

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

### **Consultation on IIA Report**

1.4 An IIA Report was issued for public consultation on **4<sup>th</sup> December 2015 to 7<sup>th</sup> February 2016**. In addition to seeking views from statutory consultees this report was made available to all organisations/individuals consulted. No responses were received specific to the IIA.

## **2. Scoping Report Update**

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

### **Response to Consultation**

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

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

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

### **Update of Corporate Vision**

- 2.4 Since writing the Scoping report the city council's corporate vision has been updated. *Better City, Better Lives Year 2*, March 2014 has been replaced with *A City for All* (March 2016). The ambitions in *A City for All* are as follows:

**City of Aspiration** – We will enable all our communities to share in the economic prosperity

**City of Choice** – We will create opportunities for residents, businesses and visitors to make responsible choices for themselves, their families and their neighbourhood.

**City of Heritage** – We will protect and enhance Westminster’s unique heritage so that every neighbourhood remains a great place to live, work, invest in, and visit, both now and in the future.

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

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

## **Baseline Information**

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

## **Special Policy Areas**

2.7 The council has reviewed the relevance of existing SPAs and the need to designate new SPAs in response to development pressure on specialist uses.

- Harley Street Special Policy Area is an internationally renowned centre for medical excellence. It is a recognised strategic cluster in the London Plan<sup>i</sup>
- Portland Place SPA has a cluster of institutional and diplomatic uses, which are particularly appropriate to the scale of the buildings, many of which are listed. The Council published an Institutional Uses Study in 2012<sup>ii</sup>

- Savile Row is internationally renowned for bespoke tailoring and has been the home of men's bespoke fashion for nearly two centuries. The tailors benefit from their agglomeration and shared business, and there is also a range of other retail tailoring uses. There is a concentration of 15 to 20 bespoke tailors predominantly occupying a 120m stretch on the eastern side of Savile Row, including the oldest tailoring houses<sup>iii</sup>.
- St James's has a unique, historic concentration of 19 private members' clubs. The historic, established clubs are mostly located around St James's Square, Pall Mall and St James's Street with 7 occupying Grade I listed buildings. St James's has a very distinct role as an international centre for luxury retail with a longstanding legacy around established streets, together with Mayfair, caters for purpose visits due to the nature of the goods for sale rather than browsing or comparison shopping<sup>iv</sup>.
- St James's and Mayfair is the largest concentrated art market in the world. The area has an unparalleled international reputation for expertise and service, and is also home to several internationally renowned art fairs and ongoing themed art weeks throughout the year. St James's has 70-80 retail galleries and is renowned for old masters work. The auction house, Christies, is also in St James's and the area is very close to the National Gallery and National Portrait Gallery, amongst the most visited free public attractions in the UK. Britain has 29% of the global art and antiques market, much of which flows through the galleries and auction houses in Mayfair and St James's, generating £7.7bn in sales in 2009 and supporting 60,000 jobs.<sup>v</sup>. A campaign, securing over 13,000 signatures petitioned against the redevelopment of a number of galleries in Cork Street.
- East Marylebone: The council published the report Wholesale Showroom Uses in Westminster in 2009<sup>vi</sup> which indicated a decline in the numbers of wholesale showrooms in the area. A survey in 2015 indicates a further decline of the numbers of wholesale showrooms in the area.<sup>1</sup>, provided in the Supporting Information document for this revision.

## Likely Future Conditions

- 2.14 Westminster is home to thriving business clusters and is a hub for commerce. It functions as a national and international centre for business, shopping, arts and culture, and entertainment. The [Scoping Report](#) June 214 recognises (paragraphs 3.6, 3.11, 3.35) the benefits of Westminster's diverse and global economy, to which specialist functions

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<sup>1</sup> Supporting Information Publication Draft (Regulation 19) Special Policy Areas and Policies Map Revision, November 2015

in the SPAs contribute (3.19, 3.22, 3.23). The [Scoping Report](#) also recognises the intense development pressures and demand for space shown by high rents and values for commercial and residential space (paragraphs 3.11, 3.65, 3.71) In light of these development pressures, which are expected to continue, policies to protect and enhance the specialist functions and unique contribution of SPAs is important in sustaining the diversity of Westminster's economy and its international reputation.

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

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



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

- 3.1 The council notified its intention to revise Westminster’s City Plan in a series of revisions by Regulation 18 notice and the Local Development Scheme (March 2015). Once all revisions are adopted Westminster’s City Plan will consist of both strategic and detailed city management policies and will provide a comprehensive source of planning policy for Westminster. The first revisions to Westminster’s City Plan are the Basement and Mixed Use Revisions with an examination hearing held in March 2016. The Special Policy Areas and Policies Map Revision is the next phased revision to Westminster’s City Plan. This IIA Report is for the Special Policy Areas and Policies Map Revision to Westminster’s City Plan.
- 3.2 Once all revisions are adopted Westminster’s City Plan will consist of both strategic and detailed city management policies and will provide a comprehensive source of planning policy for Westminster.

#### **Strategic Policies**

- 3.3 [Westminster’s City Plan: Strategic Policies](#) was adopted on 13 November 2013 and sets out the vision for Westminster up to 2025 and beyond. It puts in place a strategic policy framework to deliver that vision. This document is based on a review of the Core Strategy adopted in January 2011 and has been fully reviewed and updated to ensure consistency with the National Planning Policy Framework (NPPF) published in 2012, and the London Plan -March 2015.
- 3.4 Westminster’s City Plan: Strategic Policies was subject to an Integrated Impact Assessment and the report can be viewed [here](#). This built on The Core Strategy Sustainability Appraisal Report which included a Strategic Environmental Assessment (November 2009), which can be found [here](#) with associated appendices [here](#). The 2007 scoping report is available to view [here](#).

#### **City Management Policies**

- 3.5 Work on developing the detailed city management policies began in 2008 and the steps taken to date are as follows:
- [Regulation 18 - Notification of the intent to prepare the plan October/November 2008 \(Statutory Stage\)](#)

- [Consultation Workshops in the summer of 2009 \(Informal Stage\)](#)
- [City Management Plan Policy Options: January 2011 \(Informal Stage Consultation from January 2011 to March 2011\)](#)
- [City Management Plan Consultation Draft: November 2011 \(Informal Stage Consultation from November 2011 to March 2012\)](#)
- [Regulation 18-Notification of the intent to revise Westminster's Core Strategy to prepare a single local plan for Westminster May 2012 \(Statutory Stage\)](#)
- [Policy Topic based consultation booklets from October 2013 to 31 March 2014 \(including the following containing the draft policies for the Special Policy Areas\)](#)
- [Mayfair and St. James's Consultation Booklet No. 4 November 2013](#)
- [Westminster's Economy Consultation Booklet No. 6 February 2014](#)
- [Social and Community Uses Consultation Booklet No. 7 February 2014](#)
- [Regulation 18 Notice of Revisions to Westminster's City Plan Development Document April 2015 \(Statutory Stage\)](#)

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

### **Special Policy Areas and Policies Map Revision to Westminster's City Plan**

3.7 The policies in the Special Policy Areas and Policies Map Revision are as follows (NB Red text shows post Regulation 19 additional modifications):

## POLICY S2 SPECIAL POLICY AREAS

Special Policy Areas are designated to protect and promote specialist uses and functions as follows:

Harley Street:	Medical facilities
Portland Place:	Institutional uses
Savile Row:	Tailoring
St James's:	Private members' clubs, art galleries, niche retail
Mayfair:	Art galleries, antiques traders and niche retail

### POLICY CM2.1: HARLEY STREET SPECIAL POLICY AREA

1. All development in the Harley Street Special Policy Area will support and enhance its role as an international centre of medical excellence, complemented primarily by residential use.
2. New medical and complementary facilities will be encouraged.
3. Existing medical facilities, including consultation rooms and related professional and support services, will be protected and their loss of will only be allowed in exceptional circumstances where:
  - a) the council is satisfied that the premises have been vacant and actively marketed for medical use for at least 12 months at a reasonable market value and attempts to find an occupier have been unsuccessful;
  - b) the character and function of the area as a centre of medical excellence would not be affected;
  - c) ~~the loss of the medical use will not significantly affect the demand for that particular specialism;~~ and
  - d) the change of use is to other priority uses for the SPA including medical and supporting services, or residential.
4. The council will consider land use swaps within the Special Policy Area where it can be demonstrated that:
  - a) there will be no net loss of medical and associated floorspace; and

- b) the accommodation offered provides higher quality medical space.
- 5. The council will support the provision of new accommodation for patients using medical facilities in the Harley Street Special Policy Area and/or their families, both within the SPA and the surrounding area.

**POLICY CM2.2: PORTLAND PLACE SPECIAL POLICY AREA**

1. Development in the Portland Place Special Policy Area will support its continuing role as home to prestigious institutional uses which are particularly suited to the large scale historic buildings characteristic of the area.
2. New institutional uses will be encouraged.
3. Existing institutional uses will be protected except where the council is satisfied that the premises have been vacant and actively marketed for institutional use for at least 12 months at a reasonable market price/rent and attempts to find an institutional occupier have been unsuccessful.
4. Applications for extensions to existing lawful institutional uses to improve the functioning of the establishment will generally be allowed in the Special Policy Area and elsewhere in the Central Activities Zone.

**POLICY CM2.3: SAVILE ROW SPECIAL POLICY AREA**

1. Development in the Savile Row Special Policy Area will complement and enhance its role as an international centre of excellence for bespoke tailoring.
2. Existing bespoke tailoring uses will be protected.
3. New bespoke tailoring will be allowed, particularly at basement and ground floor levels, and will be secured by legal agreements.
4. New A1 retail will only be permitted at ground, lower ground floor and first floor levels, subject to the following criteria, to be secured by legal agreement where appropriate:
  - a) no bespoke tailoring uses being lost;
  - b) each retail unit being no larger than 300 sqm gross;

- c) the retail use should sell bespoke, unique, limited edition or one of a kind products; and
  - d) the retail function should be complementary to the character and function of the Special Policy Area.
- 5. Land use swaps will only be acceptable within the Special Policy Area where the other criteria within this policy are met, and where:
  - a) there is no net loss of bespoke tailoring floorspace, outside of necessary minor alterations to facilitate the land use swap; and
  - b) the accommodation offered provides higher quality or larger bespoke tailoring space.
- 6. New residential use is not generally appropriate within the Special Policy Area and should be subordinate to the provision of more complimentary commercial uses, including offices. The requirement for residential from office floorspace as set out in Policy S1 Mixed Use in the Central Activities Zone sections (B) and (C) does not apply in the Special Policy Area.

#### POLICY CM2.4: ST JAMES'S SPECIAL POLICY AREA

- 1. Development in the St James's Special Policy Area will build on the character of personalities who have frequented it in the past and its historic relationship with the monarchy, and complement and enhance the sense of history and grandeur and niche retail and leisure offer of the area. ~~'s unique character and status accommodating prestigious and renowned buildings and functions.~~
- 2. Existing private members' clubs and art galleries will be protected.
- 3. The council will work with landowners to protect the existing niche luxury and specialist A1 retail floorspace at basement, ground and first floor level and encourage new niche luxury and specialist retail development, particularly those selling goods that fall into the following categories:
  - a) Bespoke
  - b) Unique or one of a kind
  - c) Antique

- d) Limited edition
- 4. The council may seek the re-provision of existing gallery space as part of development proposals, to be secured by legal agreement.
- 5. New retail uses should be in keeping with the character and function of the street or area in which they are located, and where appropriate should sell items or offer services falling in the following categories:
  - a) Bespoke
  - b) Unique or one of a kind
  - c) Antique
  - d) Limited edition
- 6. New art galleries and private members' clubs are supported and will be secured by legal agreement where appropriate.

**POLICY CM2.5: MAYFAIR SPECIAL POLICY AREA**

- 1. Development in the Mayfair Special Policy Area will support and enhance its international reputation as a centre for the art trade, complemented primarily by other commercial uses.
- 2. Existing art galleries and antiques trader uses will be protected. The council will generally seek the re-provision of existing gallery or antique trader space, or space historically used for such purposes, as part of development proposals, to be secured by legal agreement.
- 3. New art galleries are encouraged and will be secured by legal agreement where appropriate.
- 4. New retail uses should be in keeping with the character and function of the street or area in which they are located, and where appropriate should sell items or offer services falling in the following categories:
  - a) Bespoke
  - b) Unique or one of a kind

c) Antique

d) Limited edition

5. The city council will work with landowners to protect and promote clusters of specialist retailers in Mayfair.
6. New residential use is not generally appropriate within the Special Policy Area and should be subordinate to the provision of more complimentary commercial uses, including offices. The requirement for residential from office floorspace as set out in Policy S1 Mixed Use in the Central Activities Zone sections (B) and (C) does not apply in the Special Policy Area.

### **Policies Map**

The proposed revisions to the Policies Map, Appendix 1 and accompanying amendments to text in Westminster's City Plan, are either minor amendments, factual updates or reflect policy designations for the Special Policy Areas Revisions. Further necessary changes to the Policies Map will be covered in other revisions to Westminster's City Plan. Appendix 7 sets out a schedule of proposed changes, the reason and assessment for the change. The Policies Map is a spatial expression of the policies contained in Westminster's City Plan and therefore does not require a separate IIA assessment. An IIA assessment, however, of new Proposals Sites in Flood Zone 3 has been included to demonstrate account of sustainability in the sequential test.

### **The London Plan**

- 3.18 The Mayor is responsible for London wide strategic planning, including the preparation of his spatial development strategy (known as 'the London Plan' – the latest version was published in March 2015) and forms part of the development plan for Greater London. Planning policies in Westminster must be in general conformity with the London Plan.

## 4. Methodology

### Introduction

- 4.1 The IIA process carried out in Westminster is based on the five main stages of the SEA, as identified in guidance issued by the former Office of the Deputy Prime Minister (2005)<sup>3</sup> and set out in Table 1 (pages 8-9). It is also in accordance with the SEA Directive Requirements checklist which is attached as Appendix 2 of this Report. [The 2014 Scoping Report](#) set out the scope of the IIA, using the baseline information and a review of plans, programmes and strategies to help identify key sustainability and other cross-cutting policy issues. Using this evidence and with regard to previous pre IIA and SA/SEA assessments the Scoping Report established a framework, comprising 17 objectives and associated sub-criteria (the IIA Framework) to be used for the assessment of all policies in preparing Westminster's City Plan. The actual assessment of the policies including the 'reasonable alternatives' will be an on-going process for the seven separate revisions to Westminster's City Plan.
- 4.2 Table 2 shows the IIA Framework. The objectives have been used for the assessment of the reasonable alternatives (contained in Appendix 5) and for the detailed assessments of the Special Policy Areas (contained in Appendix 6).
- 4.3 Although the equalities and health objectives are cross cutting, the IIA Framework includes key specific priority objectives from the Council's Equality Objectives 2012-2016. These are defined in red text in Table 2. The long term goals set out in Westminster's joint Health and Wellbeing Strategy - Healthier City Healthier Lives (2013) - which are most likely to be influenced by the built environment are set out in blue text. Crime and disorder matters in accordance with The Crime and Disorder Act 1998 (amended by the Police and Justice Act 2006) are also considered (particularly in Objective 2).

### Objective development through consultation

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

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<sup>3</sup> A Practical Guide to the Strategic Environmental Assessment Directive, ODPM 2005



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

**Table 2 Integrated Impact Assessment Framework**

<b>SA (SEA)EQIA/HIA Objective</b>	<b>sub criteria for assessment Including EQIA/HIA considerations:</b>
1) To create cohesive, inclusive and safe communities	Will it improve access to local services? Shopping? Community facilities? * Will it increase ability to influence decision making (neighbourhoods)? * <b>Will it foster an inclusive Westminster community?</b> <b>Will it encourage engagement in community activity?</b>
2) To reduce crime and fear of crime	Will it reduce crime, disorder and antisocial behaviour? ** Will it reduce fear of crime, disorder and antisocial behaviour? ** Will it reduce other behaviour adversely affecting the local environment? **
3 ) To ensure provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	Will it reduce homelessness? ** Will it increase the range of affordable housing? ** Will it reduce the number of unfit homes? ** Will it create high quality homes? ** <b>Will it provide housing that can help people stay independent for longer?</b>
4 ) To promote and improve health and well being	Will it help improve health inequalities? ** Will it reduce death rates? * Will it improve access/movement? * Will it encourage healthy lifestyles? * Will it improve cultural wellbeing? <b>Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</b> <b>Will it provide access to a healthy diet and encourage healthy lifestyles?</b> <b>Will it encourage a physically active lifestyle (helping to reduce obesity)?</b> <b>Will it create healthy workplaces?</b>
5) To reduce greenhouse	Will it reduce greenhouse gas emissions by reducing energy

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

environment and architectural, archaeological and cultural heritage	Will it protect strategic views? Will it conserve listed buildings and their settings? Will it help conserve, enhance and record archaeological features and their settings?
14) To enhance public realm and street improvements	Will it reduce litter? Will it enhance the quality of public realm? Will it improve access and mobility for all equality groups? **
15) To protect, enhance and seek opportunities to increase open space	Will it improve open space? * Will it improve landscape character? Will it improve access to open space? **
16) To ensure equality of opportunities, improve local opportunities and support sustainable economic growth throughout Westminster.	Will it improve qualifications, skills or training? ** Will it reduce unemployment? * Will it provide jobs for those most in need? * Will it improve earnings? <b>Will it support young people, adults and vulnerable parents into employment, education and training?</b>
17) To maintain economic diversity and support sustainable economic growth.	Will it improve business development and environment? Will it improve business resilience and economy? Will it encourage new business start-ups, small businesses and opportunities for local people? * Will it promote business in key sectors? Will it promote regeneration, reducing disparity? **

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

## From Framework to Assessments

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

**Green = Positive**

**Amber = Neutral**

**Red = Negative**

Where appropriate this is supplemented with further annotations as follows:

**Major positive                      ++**

Minor positive	+
Neutral	0
Minor negative	-
Major negative	-

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

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

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

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

### Completing the Assessments

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

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

IIA Stage	City Plan Stage	When	Strategic or City Management policies
	<a href="#">Consultation Workshops</a>	Summer 2009	City Management
<a href="#">Final SA Report</a>	Core Strategy Adopted July 2011	2010-2011	Strategic

Reasonable Alternatives for the City Plan IIA	<a href="#">CMP Policy Options</a>	January 2011	City Management
Reasonable Alternatives for the City Plan IIA	<a href="#">City Management Plan Consultation Draft</a>	November 2011	City Management
<a href="#">IIA Report August 2013</a>	<a href="#">Westminster's City Plan: Strategic Policies Adopted November 2013</a>	2012-2013	Strategic
<a href="#">IIA Scoping Report for Westminster's City Plan September 2012</a>	Development and background research for Topic Based booklets. CMP Revision	2012-2013	City Management
<a href="#">IIA Scoping Report for Westminster's City Plan July 2014</a>	<a href="#">Consultation of Topic based policy booklets</a>	2013-2014	Strategic and City Management
<a href="#">IIA Report for Special Policy Areas and Policies Map Revision to Westminster's City Plan – Publication Draft</a>	<a href="#">Special Policy Areas and Policies Map Revision to Westminster's City Plan – Publication Draft</a>	2015	Strategic and City Management
IIA Report for Special Policy Areas and Policies Map Revision to Westminster's City Plan – Submission Draft	Special Policy Areas and Policies Map Revision to Westminster's City Plan – Submission Draft	2016	Strategic and City Management

## **Assumptions and Technical Difficulties**

- 4.7 No technical difficulties have been encountered. However, the process of developing Westminster's City Plan, with various iterations using different names for documents and four of rounds of informal consultation, which began in 2009 is complex. Table 3 above clarifies this matter in relation to the IIA process.
- 4.8 The Scoping Report 2014 is considered sufficiently robust to support this IIA Report for the Special Policy Areas and Policies Map Revision to Westminster's City Plan, especially with the updates to relevant local plans/policies and strategies and to the baseline information as set out in Chapter 2.
- 4.9 It should be noted that any Submission Draft policies will have been prepared in accordance with National Planning Policy Framework (NPPF) March 2012, which has sustainable development as a golden thread running through in terms of policy for plan making. Paragraph 8 of the NPPF advises that '*...to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.*'

## **Habitats Regulation Assessment**

- 4.10 A Habitats Regulations Assessment (HRA) Screening report has been produced as required by the European Habitats Directive (92/43/EEC), enacted by the *Conservation (Natural Habitats) Regulations 1994* (the Habitats Regulations) was sent to Natural England in November 2015 for their comment. The report concludes that Westminster is not situated close enough to any of the designated European Sites for there to be any direct and obvious detrimental effects on these sites as a result of the Special Policy Areas and Policies Map Revision to Westminster's City Plan and therefore a comprehensive Habitats Regulations Assessment is not required for this policy. Natural England has responded that this raises no issues for them.

## **Conservation of Wild Birds**

- 4.11 The Birds Directive (more formally known as European Council Directive 2009/147/EC on the conservation of wild birds) is an EU directive adopted in 2009. It replaces Council Directive 79/409/EEC of 2 April 1979 on the conservation of wild birds. The Directive recognises that habitat loss and degradation are the most serious threats to the conservation of wild birds. It therefore places great emphasis on the protection of habitats for endangered as well as migratory species, especially through the establishment of a coherent network of Special Protection Areas comprising all the most

suitable territories for these species. Since 1994 all Special Protection Areas form an integral part of the NATURA 2000 ecological network. There are no Special Protection Areas of this kind in Westminster.

## **5 Assessment Findings**

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

### **IIA Detailed Assessments**

- 5.2 Appendix 5 of this report contains the detailed assessments and associated considerations for the Special Policy Areas and Policies Map Revision to Westminster's City Plan for Harley Street, Saville Row, St. James's, East Marylebone, Portland Place and Mayfair SPAs. An IIA has not been completed for the Policies Map, and accompanying amendments to text in Westminster's City Plan, as this is a spatial expression of the policies and assessment of this document at this stage would be an unnecessary duplication of work. An IIA assessment, however, of new Proposals Sites in Flood Zone 3 has been included to demonstrate account of sustainability in the sequential test. A summary of the assessments are as follows:

#### **Policy S2 Special Policy Areas**

- 5.3 This policy aims to protect and promote specialist uses and functions in five designated areas, and is neutral overall. It has positive scores for objectives 13 and 17 regarding protecting heritage and supporting a diverse and strong economy. The SPAs are all located in conservation areas with a number of listed buildings, and aim to sustain strategically important clusters of use, which also have strong historic links. There is a long term positive impact on the UK economy and Westminster's role in London's world city status. Whilst the policy proposes deletion of the East Marylebone SPA, this has been in response to the declining number of wholesale showrooms in the area, and its reduced role as a centre for fashion wholesaling.

#### **Policy CM2.1 Harley Street Special Policy Area**

- 5.4 This policy aims to support the function of Harley Street as a world renowned centre for medical excellence. It ensures the on-going availability of these uses and therefore the continued importance of the area as a centre for medical excellence in London and the UK. This policy is predominantly neutral. Provision of accommodation for patients and families may affect housing delivery (Objective 3), but this is balanced against the support for the area's international role in medical excellence. It receives a positive score for one sub-criterion in Objective 4. Although it is recognised that these private medical facilities are not readily available for large sectors of the community, the



research work that is carried out and improved medical knowledge can in the long run benefit all and potentially improve death dates.

- 5.5 The policy receives positive scores for sub-criteria in Objective 17, including a very positive score for improving business resilience and economy and promoting business in key sectors. The uses in Harley Street and associated uses elsewhere in the Central Activities Zone such as hotels add to the economic diversity of Westminster and help maintain economic sustainability. This policy like other policies for SPAs has been given a neutral score for Environmental Objectives 5, 6, 7, 8, 9. This is because these policies primarily deal with the protection of use. Other City Plan policies will deal with sustainable development matters.

### **Policy CM2.2 Portland Place Special Policy Area**

- 5.6 This policy seeks to encourage and protect institutional uses within Portland Place. Like other SPAs overall this policy is predominantly neutral and receives the most positive scores for Objective 17. The Institutions are not in themselves commercial ventures but the expertise and prestige they embed can have a direct positive impact on businesses and services in key sectors and improve business development and resilience. By their nature these institutions provide specialist training and education for professions. It is however noted that access to this is limited to members of that profession and unlikely to have a significant impact on Westminster's population. The positive score for this sub-criteria in Objective 16 is therefore on balance. There may be an indirect and more cumulative positive impact which benefits the wider community.
- 5.7 It receives a positive score for one sub-criterion in Objective 4, as the research carried out by medical institutions may in the long run have a positive benefit for all. Institutional uses are particularly suited to listed buildings and add to the character of this part of the Harley Street Conservation area and scores positively against this sub-criteria in Objective 13.

### **Policy CM2.3 Savile Row Special Policy Area**

- 5.8 Savile Row is synonymous with bespoke tailoring, with an international reputation. The aim of this policy is to enhance its role as an international centre of excellence for bespoke tailoring, in particular through protection and enhancement of these specialist uses. Overall this policy is positive. It receives a positive score in Objective 13 given the policy seeks to protect and enhance the historic character and function of the area by protecting existing tailors and encouraging new ones. Given there is an important

tradition in the bespoke tailoring industry for apprenticeships there is a very positive score for this sub-criterion in Objective 16. This policy is most positive for Objective 17 receiving very positive scores for promoting businesses in key sectors, improving business resilience and the economy and for business development and environment. Savile Row is world renowned, and visitors help generate income in other sectors of the economy including entertainment, retail and hotels. The positive benefits are considered both short and long term.

- 5.9 The policy has a negative score regarding housing delivery (Objective 3), as it priorities commercial uses, this approach however, takes into account the need to support the strategically important and internationally recognised cluster.

#### **Policy CM2.4 St James's Special Policy Area**

- 5.10 This policy seeks to complement and enhance the area's unique character, in particular through maintaining the existing strong presence of galleries and private members' clubs which are integral to its character and function. As with the other SPA policies the policy approach for St. James's is likely to have a positive impact on economic sustainability criteria. The policy receives very positive scores for sub-criteria in Objective 17. The art galleries are a key ingredient of this area providing both exhibition and retail functions. Visitors may also stay in the luxury hotels in the area, eat at the high end restaurants and visit other retailers in the area. This diversity maintains economic diversity and supports sustainable economic growth. Given the policy seeks to protect and enhance the historic character and function of the area and that the art galleries tend to occupy smaller and more traditional shop type premises, many of which are listed, this policy has a positive score in Objective 13.
- 5.11 This policy has also been given a positive score in terms of improving cultural wellbeing (Objective 4) It is recognised that the protection of art galleries can have a positive impact on those who visit. However, it is considered that private galleries may only be of interest to a fairly limited sector of the population, although access to these premises are normally free. Like the other SPA policies this receives neutral scores for other social and environmental sustainability objectives.

#### **Policy CM2.5 Mayfair Special Policy Area**

- 5.12 This policy aims to support and enhance the Mayfair SPA's international reputation as a centre for the art trade, complemented primarily by other commercial uses. The policy seeks to protect art galleries and antiques traders in this SPA and encourage new art galleries to be secured through legal agreement. As with the other SPA policies the

policy approach for Mayfair is likely to have a positive impact on economic sustainability criteria. The policy receives very positive scores for sub-criteria in Objective 17. The art galleries are a key part of this area providing both exhibition and retail functions. Visitors may also stay in the luxury hotels in the area, eat at the high end restaurants and visit other retailers in Bond Street and Savile Row for example. This maintains economic diversity and supports sustainable economic growth. Given the policy seeks to protect and enhance the historic character and function of the area and that the art galleries tend to occupy smaller and more traditional shop type premises, many of which are listed, this policy (as for the St James's SPA) has a positive scores in Objective 13.

- 5.13 This policy has also been given a positive score in terms of improving cultural wellbeing (Objective 4) It is recognised that the protection of art galleries can have a positive impact on those who visit. However, it is considered that private galleries may only be of interest to a fairly limited sector of the population, although access to these premises are normally free. The policy has a negative score regarding housing delivery (Objective 3), as it priorities commercial uses, this approach however, takes into account the need to support the strategically important and internationally recognised cluster. Like the other SPA polices this receives neutral scores for other social and environmental sustainability objectives.

### **New Proposals Sites in Flood Zone 3**

- 5.14 The sites include preferred use for residential which is positive for objective 3 in increasing housing provision. While sites are located in Flood Zone 3, Westminster's SFRA concluded that the scarcity of sites meant that development needs cannot be met by sites in Flood Zones 1 and 2 alone, and that sites (both identified sites and windfall sites) in Flood Zone 3 need to be considered suitable for development, subject to the requirements of the Exception Test. Provisions for the exceptions test and to reduce the risk of flooding from development is taken into account by policy S30 when implementation of sites occurs

### **Reasonable Alternatives**

- 5.15 The IIA process has run alongside the development of the Special Policy Areas and Policies Map Revision to Westminster's City Plan and reasonable alternatives have been informed by previous informal consultation stages in policy development as follows:

- [City Management Plan Policy Options January 2011](#)

- [City Management Plan Consultation Draft November 2011](#)
- [Mayfair and St. James's Consultation Booklet No. 4 November 2013](#)
- [Westminster's Economy Consultation Booklet No. 6 February 2014](#)
- [Social and Community Uses Consultation Booklet No. 7 February 2014](#)

Alternatives include those suggested in the process of informal consultation set out above. Where topics have not been through this process reasonable alternatives have been derived by setting out other scenarios (indicated in the table and below by AO). The assessment tables and a full key to the reasonable alternatives are set out in Appendix 6.

## **Reasonable Alternatives Assessment**

### **Policy S2 Special Policy Areas**

- 5.16 Westminster City Plan: Strategic Policies, adopted Policy S2 Special Policy Areas designates the Special Policy Areas to protect and promote specialist uses and functions in those areas. This contributes to the diversity of uses in Westminster to help maintain sustainable economic growth (Objective 17). **Reg 19** has taken the relevance of individual SPAs into account, and proposed deletion of the East Marylebone SPA because of its reduced role as a centre for fashion wholesaling, and introduction of the Mayfair SPA to recognise the area's importance to the art and antiques trade. **AO1** fail to protect specialist uses in the Special Policy Areas (SPA) and would not promote overall economic diversity by ensuring specialist clusters of uses are not eroded by other commercial uses.

### **Policy CM2.1 Harley Street Special Policy Area**

- 5.17 Westminster City Plan: Strategic Policies, Policy S2 Special Policy Areas designates the Harley Street Special Policy Area to protect and promote medical facilities in this area. On balance all alternatives, with the exception of **PO24.1**, have been given a positive score for Objective 4. It is recognised that these medical facilities may only be available to a small sector of the community, however the research and practice that is carried out here may cascade out to the wider medical community.
- 5.18 **PO 24.1** is the alternative for not having a detailed policy for Harley Street. It could be argued sustainable economic development would be less certain without detailed policy advice and therefore this alternative has a negative score for Objective 17, and in

addition these uses add to the diversity of Westminster's economy. **PO 24.2-4** are simplified versions of **CMP 1.21** and therefore IIA considerations are similar. **PO 24.3** specifies residential as the alternative use for medical use and therefore receives a positive score for Objective 3. However, in this area residential use may be the default policy position in any case. **NP CM 2.1** is a more recent iteration of **CMP 1.21**, and seeks to both encourage and protect (with a 12 month marketing period) and ensures that all development proposals do not have a negative impact on the character of the SPA and for this reason it receives a positive score for Objective 17. **Reg 19** strengthens support for uses which support the priorities for the area, and has very positive scores for Objective 17.

### **Portland Place Special Policy Area**

- 5.19 Westminster City Plan: Strategic Policies, Policy S2 Special Policy Areas designates the Portland Place Special Policy Area to protect and promote institutional uses in this area. **PO's 37.3 and 37.6** fail to provide protection for the Institutional uses in this SPA and therefore do not meet the objective of adopted Policy S2 or maintain diversity (Objective 17). Although **PO37.4** is positive for Objective 13, the city council already supports the careful restoration of all listed buildings in Westminster (indeed this is a statutory requirements) and this alternative only provides a partial policy for Institutional uses. **CMP 1.19** and **NP CM2.2** are very similar and both receive positive scores for objectives 13 and 17. The positive scores are on the basis that these are learned professional and cultural institutions (Objective 17), which contribute to economic diversity and make a valuable contribution to Westminster's role in London as a world class sustainable city, and such uses are well suited to the historic character of buildings in the area (objective 13). **Reg 19** makes more specific reference to this. As with other assessments in this section for the 'no policy approach' **PO 37.1** receives a negative score for Objective 17, and in this instance Objective 13.

### **Savile Row Special Policy Area**

- 5.20 Westminster's City Plan Strategic Policies, Policy S2 Special Policy Areas designates the Savile Row Special Policy Area to protect and promote tailoring in this area in this area. **PO 46.1** is the alternative for not having a detailed policy for Savile Row and It could be argued that sustainable development would be less certain without such detailed policy advice and for this reason this alternative gets a negative score for Objective 17. Other **PO46**, **CMP1.22** and **NP CM2.6** provide support for tailoring and score positively for economic diversity, **Reg19** provides greater support for the commercial function of the

area in lifting the requirement for residential and scores very highly for this objective (17).

#### **St. James's Special Policy Area**

- 5.21 Westminster's City Plan Strategic Policies, Policy S2 Special Policy Areas designates the St James's Special Policy Area to protect private members' clubs, art galleries and niche retail in this area in this area. It could be argued that sustainable economic growth would be less certain without detailed policy advice (**PO 50.1**) and that the protection of these uses helps with economic diversity. All other alternatives are positive for IIA Objective 17 and given the specific detail set out in **NP CMP 2.5** making implementation more effective. **PO 50.3**, **CMP 1.23** and **NP CMP 2.5** also on balance receive a positive score for Objective 13. **Reg 19** includes the overarching priority for the area which further support Objectives 13 and 17.

#### **Mayfair Special Policy Area**

- 5.22 Like the assessments for other Special Policy Areas, it is considered that the lack of policy for this area would make the specialist uses in Mayfair more vulnerable to competition from other commercial uses and therefore reduce economic diversity (**AO1**). **AO 2** aims to protect the niche uses have an overall positive score for Objective 17. This is not only because this alternative increases the diversity of uses but there are links between the 'luxury quarter' and associated benefits in other parts of Westminster economy including hotels, tourism and entertainment. **NP CMP 2.4** is a fully formed policy approach seeking to protect art galleries and antiques traders in this area and receives very positive scores for objectives 13 and 17. **Reg19** provides greater support for the commercial function of the area, setting the overarching priority for the area, and in lifting the requirement for residential, to scores highly for Objective 17.

#### **New Proposals Sites in Flood Zone 3**

- 5.23 Proposals sites are identified in Appendix 1 of Westminster's City Plan, including housing sites located in Flood Zone 3 which contribute to housing delivery and meeting housing targets. **A01** does not allocate any new sites, and **A02** allocates sites for non-residential development, neither of which make contribution to housing delivery..

#### **Changes to the Special Policy Areas and Policies Map Revision to Westminster's City Plan as a Result of the IIA**

- 5.24 No changes have been identified.

## 6. Mitigation and Monitoring

### Mitigation

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

### Monitoring

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

**Table 4 Proposed Monitoring data**

Indicators
Permissions for gains in specialist uses in the SPAs: medical facilities in Harley Street; institutional uses in Portland Place; tailoring uses in Savile Row, galleries and retail in St James's, galleries and retail in Mayfair
Permissions for the loss of specialist uses in the SPAs, and reasons for loss
Number of legal agreements to secure specialist uses in Savile Row, St James's and Mayfair SPAs (tailoring, galleries, niche retail)
Delivery of commercial and residential floorspace in Savile Row and Mayfair SPAs

## **7. Next Steps**

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



## 8. End Notes

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<sup>i</sup> London Plan (2015) Mayor of London

<sup>ii</sup> Institutional Uses Study (2012) Westminster City Council

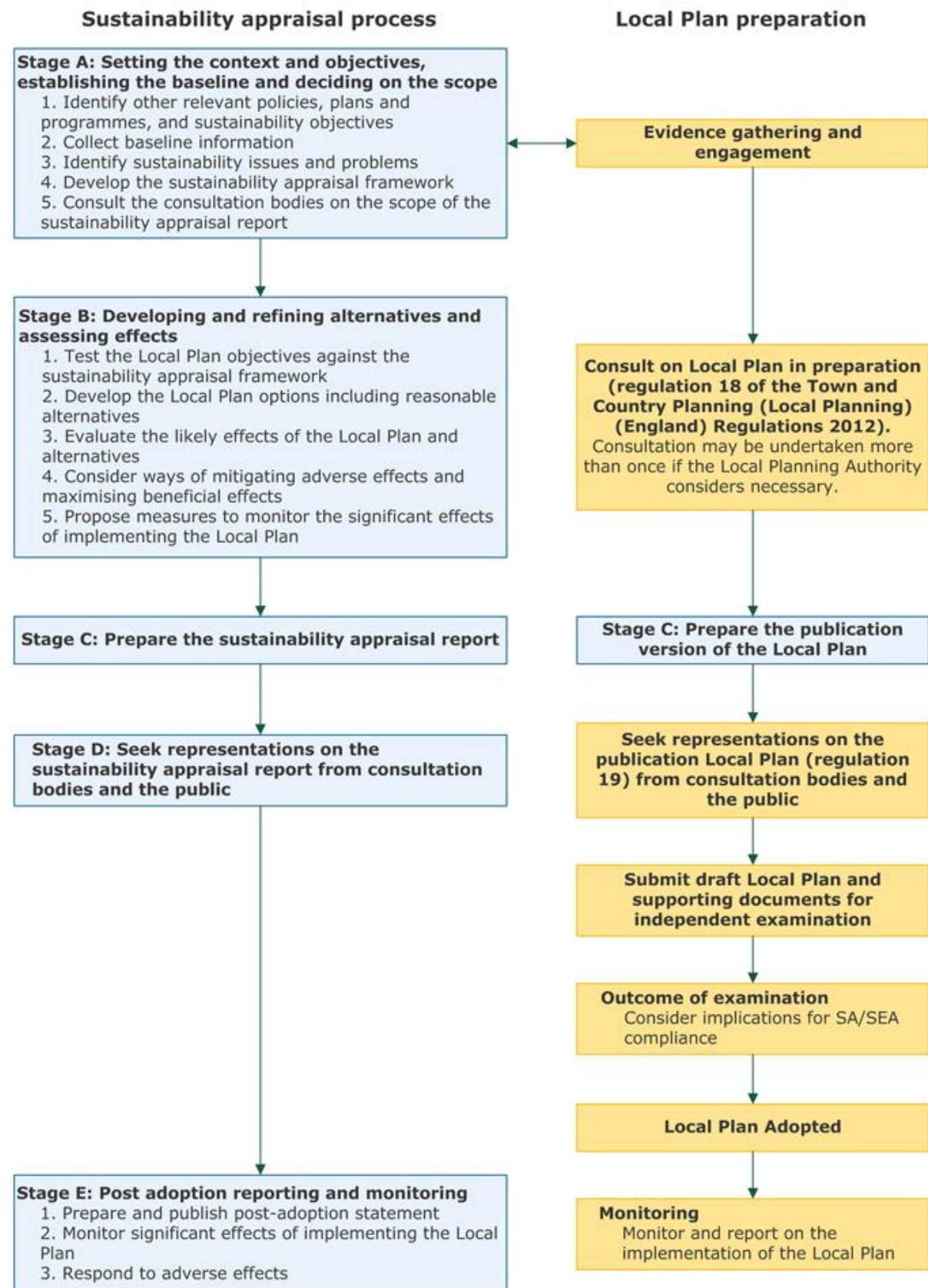
<sup>iii</sup> Bespoke Tailoring in Westminster (2006) Westminster City Council

<sup>iv</sup> Shopping Centre Health Checks (2008/9, 2014) Westminster City Council

<sup>v</sup> Art Galleries in St James's (2012) Westminster City Council

<sup>vi</sup> Wholesale Showroom Uses in Westminster (2009) Westminster City Council

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



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

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

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

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

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

Summary of Comments	How comments have been taken on board
<b>Natural England</b>	
There should be a priority for the creation of SUDs within any redevelopment which takes place in Westminster. This can have health benefits as identified in the scoping report and objective 7 mentions that the provision is most likely to happen as part of creation within built structures where green roofs and walls or rain gardens can be implemented.	Objective 7 promotes the use of SUDs.
The protection of the 30 Sites of Importance for Nature Conservation (SINCS) should be a key consideration throughout the City Plan process as given the amount of open space deficiency identified within the borough and the benefits both for human health and that of biodiversity loss of any sites would be detrimental and almost impossible to replace.	Objective 8 in the Sustainability Framework considers whether any policy in the local plan will preserve SINCs.  Westminster City Plan Strategic Policy S36 states that Sites of Importance for Nature Conservation (SINCS) will be protected and enhanced.
Objectives 13 and 14 should both be used to help ensure that the plan overall has policies in it that will bring forward improvements in the open spaces in Westminster and also to improve the public realm through some potential greening measures to create a better environment for the public to want to walk through.	Objective 15 is the primary policy for open space. It seeks <i>to protect, enhance and seek opportunities to increase open space</i> . This objective in combination with objectives 11, 13 and 14 will be used to assess draft policies in terms of creating a better environment for the public to walk through.
<b>Environment Agency</b>	
No specific comments on the IIA but provided a factsheet containing suggested guidance on the scope and level of information to be included in the SA report.	Noted – See below.
Climate change should be considered as part of the evidence base for the SA, as a key sustainability issue and as SA objective against which your plan will be appraised.	Climate change is considered in paragraphs 3.114 to 3.119 in the baseline information and as a key sustainability issue (paragraph 5.6). It is also set out as Objective 5 in the Sustainability Framework.
Flood Risk should be included in the baseline	Flood risk is considered in the baseline

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

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

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



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

### **International**

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

EU Directive 2008/50/EC

EU Water Directive Framework 2000

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

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

### **National**

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

Air Quality Regulations 2010

Climate Change Act 2008

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

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

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

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

Environment Act 1995

Equality Act 2010

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

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

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

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

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

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

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

Planning Act 2008

Planning and Compulsory Purchase Act (2004)

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

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

Planning Practice Guidance (2014)

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

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

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

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

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

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

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

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

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

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

## **Regional**

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

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

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

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

Draft Housing Strategy (2013) *Mayor of London*

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

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

London Office Policy Review (2012) *Ramidus*

London Plan (2011) *Mayor of London*

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

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

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

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

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

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

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

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

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

London Development Report (2012) *Knight Frank*

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

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

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

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

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

Transport Strategy (2010) *Mayor of London*

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

Waste Management Strategies (2011) *Mayor of London*

### **Neighbouring Authorities**

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

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

London Borough of Camden – Core Strategy and Development 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 January 2015)

### **Local**

A City for All (2015) *Westminster City Council*

Art Galleries in Westminster (2012) *Westminster City Council*

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

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

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

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

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

Biodiversity Action Plan (2007) *Westminster City Council*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Housing Renewal Strategy (2010) *Westminster City Council*

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

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

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

Local Development Scheme (2012) *Westminster City Council*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Westminster Housing Market Analysis (2014) *Wessex Economics*

Waste Sites Assessment (2009) *Westminster City Council*

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

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

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

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

Westminster City Council Equality Objectives 2012-2016

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

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

Westminster Noise Strategy (2010) *Westminster City Council*

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

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

Westminster Profile (2013) *Westminster City Council*

Westminster Way (2011) *Westminster City Council*

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





**APPENDIX 5 IIA Detailed Appraisal for the Policy S2 Special Policy Areas, CM2.1 Harley Street Special Policy Area, CM2.2 Portland Place Special Policy Area, CM2.3 Savile Row Special Policy Area, CM2.4 St.James's Special Policy Area, CM2.5 Mayfair Special Policy Area, new Proposals Sites in Flood Zone 3**

Integrated Impact Assessment: For Policy No. S2 Special Policy Areas			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it foster an inclusive Westminster community	0	
	• Will it encourage engagement in community activity	0	
2. To reduce crime and fear of crime	• Will it reduce the levels of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce fear of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce other behaviour adversely affecting the local environment? **	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable	• Will it reduce homelessness? *	0	
	• Will it increase a range of affordable housing? *	0	
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes? **	0	
	• Will it provide housing that can help people stay	0	

housing and family sized units	independent for longer?		
4. To promote and improve health and wellbeing	• Will it help health and equalities?*	0	This strategic policy has the potential to improve health outcomes and increase cultural wellbeing given it supports specialist uses which include medical facilities and art galleries. However, benefits to health may be indirect to the wider population, as a consequence of development in medical excellence. Cultural benefits of support for galleries may be limited to certain groups. On balance, the policy has been given a neutral score
	• Will it reduce death rates?	0	
	• Will it improve access/movement?	0	
	• Will it encourage healthy lifestyles?	0	
	• Will it improve cultural wellbeing?	0	
	• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?	0	
	• Will it provide access to a healthy diet and encourage healthy lifestyles?	0	
	• Will it encourage a physically active lifestyle (helping to reduce obesity)?	0	
	• Will it create healthy workplaces?	0	
5. To reduce greenhouse gas emissions and support climate change adaption	• Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*	0	
	• Will it reduce ozone depleting emissions?	0	
	• Will it reduce emissions through retrofitting new technology?	0	
	• Will it reduce heat island effects on people and property?	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood	• Will it reduce water consumption and improve water efficiency?	0	
	• Will it reduce consumption of fossil fuels?*	0	

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

encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using modes other than a car?</li> </ul>	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> <li>Will lead to reduced consumption of materials and resources?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce household waste?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will increase recovery recycling and re-use?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>Will it conserve the significance of heritage sites and cultural value?</li> </ul>	+	All the special policy areas are located in conservations areas, contain a number of listed buildings, and in most SPAs seek to protect and enhance the historic character and function of the area.
	<ul style="list-style-type: none"> <li>Will it protect strategic views?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve listed buildings and their settings?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it help conserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands?*</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> <li>Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> <li>Will it improve qualifications, skills and training?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce unemployment?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will provide jobs for most in need?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it support young people, adults and</li> </ul>	0	

	vulnerable parents into employment, education and training?		
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	+	This policy adds to the economic diversity of Westminster in maintaining key important clusters. A number of the SPAs are centres of excellence recognised at an international scale, and contribute to Westminster’s economy.  Whilst the policy proposes deletion of the East Marylebone SPA, this has been in response to the declining number of wholesale showrooms in the area, and its reduced role as a centre for fashion wholesaling.
	• Will improve business resilience and economy?	+	
	• Will it encourage new business start ups, small businesses and opportunities for local people?*	0	
	• Will it promote business in key sectors?	+	
	• Will it promote regeneration, reducing disparity?**	0	
For the EIA the following protected characteristics were considered: Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation			
Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration			
IIA Assessment			
Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –			
Overall Summary This policy is neutral overall. It has positive scores for objectives 13 and 17 regarding protecting heritage and supporting a diverse and strong economy. The SPAs are all located in conservation areas with a number of listed buildings, and aim to sustain strategically important clusters of use, which also have strong historic links. There is a long term positive impact on the UK economy and Westminster’s role in London’s world city status. Whilst the policy proposes deletion of the East Marylebone SPA, this has been in response to the declining number of wholesale showrooms in the area, and its reduced role as a centre for fashion wholesaling.			
Long Term positive effect – Economic diversity in Westminster and helps retain London as an important World City. Short term – as above Long term negative effects – No significant effects Mitigation/Change to plan – None Cumulative effects – None Uncertainties/risks – the economy Monitoring significant effects – AMR			

Integrated Impact Assessment: For Policy No. CM2.1 Harley Street Special Policy Area			
1. Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it foster an inclusive Westminster community	0	
	• Will it encourage engagement in community activity	0	
2. To reduce crime and fear of crime	• Will it reduce the levels of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce fear of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce other behaviour adversely affecting the local environment? **	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it reduce homelessness? *	0	This policy has the potential to increase the number of residential units in Westminster because in 'exceptional circumstances' the council will allow a loss of private, medical use to residential. Provision of accommodation for patients and families may reduce housing delivery, but this is balanced against the
	• Will it increase a range of affordable housing? *	0	
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes? **	-	
	• Will it provide housing that can help people stay independent for longer?	0	

			support for the area's international role in medical excellence.
4. To promote and improve health and wellbeing	<ul style="list-style-type: none"> <li>Will it help health and equalities?*</li> </ul>	0	Private medical facilities in Harley Street could be viewed as not improving health inequalities, given that they will not be accessible to a significant proportion of the population, particularly those with lower health outcomes. However, in the long run the research carried out in these private facilities may result in improved medical knowledge which can be for the benefit of all and improve death rate. The impact of this policy however is overall neutral, with the above considerations balancing each other out.
	<ul style="list-style-type: none"> <li>Will it reduce death rates?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it improve access/movement?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve cultural wellbeing?</li> </ul>		
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it create healthy workplaces?</li> </ul>	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce ozone depleting emissions?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce heat island effects on people and property?</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood	<ul style="list-style-type: none"> <li>Will it reduce water consumption and improve water efficiency?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce consumption of fossil fuels?*</li> </ul>	0	

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



encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using modes other than a car?</li> </ul>	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> <li>Will lead to reduced consumption of materials and resources?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce household waste?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will increase recovery recycling and re-use?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>Will it conserve the significance of heritage sites and cultural value?</li> </ul>	0	Small private consulting practices can be complementary to the listed buildings. However this is not the case for the larger consultancies requiring large high tech machinery. Overall neutral.
	<ul style="list-style-type: none"> <li>Will it protect strategic views?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve listed buildings and their settings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it help conserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands?*</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> <li>Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> <li>Will it improve qualifications, skills and training?*</li> </ul>	0	It is possible this policy may have some impact on this objective. But this is considered to be minimal as the majority of jobs in this sector are professional requiring specialist training and higher education. Overall neutral.
	<ul style="list-style-type: none"> <li>Will reduce unemployment?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will provide jobs for most in need?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it support young people, adults and vulnerable parents into employment, education</li> </ul>	0	

	and training?		
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	• Will improve business development and environment?	+	These internationally important medical uses in Harley Street add to the economic diversity of Westminster and London. Related uses such as laboratories also add to diversity. The area is also well served by complementary uses in the CAZ such as hotels.
	• Will improve business resilience and economy?	++	
	• Will it encourage new business start ups, small businesses and opportunities for local people?*	0	
	• Will it promote business in key sectors?	++	
	• Will it promote regeneration, reducing disparity?***	0	
<b>For the EIA the following protected characteristics were considered:</b> <b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b>			
<b>Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration</b>			
<b>IIA Assessment</b>			
<b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b>			
<b>Overall Summary</b> This policy aims to support the function of Harley Street as a world renowned centre for medical excellence. It ensures the on-going availability of these uses and therefore the continued importance of the area as a centre for medical excellence in London and the UK. This policy is predominantly neutral. Provision of accommodation for patients and families may affect housing delivery, but this is balanced against the support for the area’s international role in medical excellence. It receives a positive score for one sub-criterion in Objective 4. Although it is recognised that these private medical facilities are not readily available for large sectors of the community, the research work that is carried out and improved medical knowledge can in the long run benefit all and potentially improve death dates. The policy receives positive scores for sub-criteria in Objective 17. Including very positive score for improving business resilience and economy and promoting business in key sectors. The uses in Harley Street and associated uses elsewhere in the Central Activities Zone such as hotels add to the economic diversity of Westminster and help maintain economic sustainability This policy like other policies for SPAs has been given a neutral score for Environmental Objectives 5, 6, 7, 8, 9. This is because these policies primarily deal with the protection of use. Other City Plan policies will deal with sustainable development matters.			
<b>Long Term positive effect –</b> Research carried out in these facilities may have a beneficial impact on overall medical research and information for all (cumulative and long term).			
<b>Short term –</b> Economic diversity in Westminster and helps retain London as an important World City.			
<b>Long term negative effects –</b> No significant effects			
<b>Mitigation/Change to plan –</b> None			
<b>Cumulative effects –</b> None			
<b>Uncertainties/risks –</b> There needs to be a market demand for private medical facilities.			
<b>Monitoring significant effects –</b> AMR			

Integrated Impact Assessment: For Policy No. CM2.2 Portland Place Special Policy Area			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it foster an inclusive Westminster community?	0	
	• Will it encourage engagement in community activity	0	
2. To reduce crime and fear of crime	• Will it reduce the levels of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce fear of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce other behaviour adversely affecting the local environment? **	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it reduce homelessness? *	0	
	• Will it increase a range of affordable housing? *	0	
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes? **	0	
	• Will it provide housing that can help people stay independent for longer?	0	
4. To promote and improve	• Will it help health and equalities? **	0	Portland Place SPA contains a long

health and wellbeing	<ul style="list-style-type: none"> <li>Will it reduce death rates?</li> </ul>	+	established concentration of institutional uses including the Royal College of Midwives and the Institute of Physics as well as cultural and learned institutions. Research carried out by these institutions may in the long run have a positive benefit for all.
	<ul style="list-style-type: none"> <li>Will it improve access/movement?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve cultural wellbeing?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it create healthy workplaces?</li> </ul>	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce ozone depleting emissions?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce heat island effects on people and property?</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood.	<ul style="list-style-type: none"> <li>Will it reduce water consumption and improve water efficiency?</li> <li>Will it reduce consumption of fossil fuels?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will use of other natural resources (e.g. quarried materials) be minimised?</li> <li>Will use of renewable resources (e.g. sustainably sourced timber) be prioritised over non-renewable resources?</li> </ul>	0	

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

	<ul style="list-style-type: none"> <li>Will increase recovery recycling and re-use?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>Will it conserve the significance of heritage sites and cultural value?</li> </ul>	0	These uses are considered particularly suited to listed buildings and add to the character of the area.
	<ul style="list-style-type: none"> <li>Will it protect strategic views?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve listed buildings and their settings?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it help conserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands?*</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> <li>Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> <li>Will it improve qualifications, skills and training?*</li> </ul>	+	By their nature these institutions provide specialist training and education for professions. It is however noted that access to this is limited to members of that profession and unlikely to have a significant impact on Westminster's population. This positive score is therefore on balance. But there may be an indirect and more cumulative positive impact which benefits the wider community.
	<ul style="list-style-type: none"> <li>Will reduce unemployment?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will provide jobs for most in need?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support	<ul style="list-style-type: none"> <li>Will improve business development and environment?</li> </ul>	++	The Institutions themselves are not commercial ventures but the expertise and prestige they embed have a
	<ul style="list-style-type: none"> <li>Will improve business resilience and economy?</li> </ul>	+	

sustainable economic growth.	<ul style="list-style-type: none"> <li>Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	0	direct impact which helps promote business in key sectors and improve business resilience and economy.
	<ul style="list-style-type: none"> <li>Will it promote business in key sectors?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it promote regeneration, reducing disparity?*</li> </ul>	0	

For the **EIA** the following protected characteristics were considered:

Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation

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

## IIA Assessment

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

### Overall Summary

This policy seeks to encourage and protect institutional uses within Portland Place. Like other SPAs overall this policy is predominantly neutral and receives the most positive scores for Objective 17. The Institutions are not in themselves commercial ventures but the expertise and prestige they embed can have a direct positive impact on businesses and services in key sectors and improve business development and resilience. By their nature these institutions provide specialist training and education for professions. It is however noted that access to this is limited to members of that profession and unlikely to have a significant impact on Westminster's population. The positive score for this sub-criteria in Objective 16 is therefore on balance. There may be an indirect and more cumulative positive impact which benefits the wider community. It receives a positive score for one sub-criterion in Objective 4, as the research carried out by medical institutions may in the long run have a positive benefit for all. Institutional uses are particularly suited to listed buildings and add to the character of this part of the Harley Street Conservation area and scores positively against this sub-criteria in Objective 13.

**Long and Short Term positive effect** – Research can have benefits for the health and wellbeing of all (long term and cumulative), Direct impact helping to promote businesses in key specialist sectors. Can help preserve listed buildings.

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

**Mitigation/Change to plan** – None

**Cumulative effects** – None

**Uncertainties/risks** – Will depend on the on-going demand for premises required for these specialist uses.

**Monitoring significant effects** – AMR

Integrated Impact Assessment: For Policy No. CM2.3 Savile Row Special Policy Area			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it foster an inclusive Westminster community?	0	
	• Will it encourage engagement in community activity	0	
2. To reduce crime and fear of crime	Will it reduce the levels of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce fear of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce other behaviour adversely affecting the local environment? **	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it reduce homelessness? *	0	The policy gives greater priority to commercial uses over residential, which may limit housing delivery. However, the SPA area is small, and commercial uses are considered complementary in supporting the tailoring uses, which are recognised as strategically important and internationally recognised cluster.
	• Will it increase a range of affordable housing? *	0	
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes? **	-	
	• Will it provide housing that can help people stay independent for longer?	0	
4. To promote and improve	• Will it help health and equalities? **	0	



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

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

	<ul style="list-style-type: none"> <li>Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>Will it conserve the significance of heritage sites and cultural value?</li> </ul>	+	The policy seeks to protect and enhance the historic character and function of the area by protecting existing tailors and encouraging new ones.
	<ul style="list-style-type: none"> <li>Will it protect strategic views?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve listed buildings and their settings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it help preserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands?*</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> <li>Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> <li>Will it improve qualifications, skills and training? **</li> </ul>	++	There is an important tradition of on-site apprenticeships, skills and training in bespoke tailoring in Savile Row.
	<ul style="list-style-type: none"> <li>Will reduce unemployment?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will provide jobs for most in need? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>Will improve business development and environment?</li> </ul>	++	This policy is very positive for this objective. The use adds to the economic diversity of Westminster and helps improve business development and resilience. Savile Row is world renowned and people visiting to get suits made or to shop
	<ul style="list-style-type: none"> <li>Will improve business resilience and economy?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it promote business in key sectors?</li> </ul>	++	

	<ul style="list-style-type: none"> <li>Will it promote regeneration, reducing disparity?*</li> </ul>	0	help add to other sectors of Westminster's economy including entertainment, shopping and hotels.
<p><b>For the EIA the following protected characteristics were considered:</b>  <b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p> <p><b>Coloured asterisks **show SA sub-criteria also relevant to EIA and HA consideration</b></p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b>  Savile Row is synonymous with bespoke tailoring, with an international reputation. The aim of this policy is to enhance its role as an international centre of excellence for bespoke tailoring, in particular through protection and enhancement of these specialist uses. Overall this policy is positive. It receives a positive score in Objective 13 given the policy seeks to protect and enhance the historic character and function of the area by protecting existing tailors and encouraging new ones. Given there is an important tradition in the bespoke tailoring industry for apprenticeships there is a very positive score for this sub-criterion in Objective 16. This policy is most positive for Objective 17 receiving very positive scores for promoting businesses in key sectors, improving business resilience and the economy and for business development and environment. Savile Row is world renowned, and visitors help generate income in other sectors of the economy including entertainment, retail and hotels. The positive benefits are considered both short and long term. The policy has a negative score regarding housing delivery (Objective 3), as it prioritises commercial uses, this approach however, takes into account the need to support the strategically important and internationally recognised cluster.</p>			
<p><b>Short and Long Term positive effect –</b> Commercial diversity is a key for economic sustainability and stability.</p> <p><b>Long term negative effects –</b> No major effects</p> <p><b>Mitigation/Change to plan –</b> None</p> <p><b>Cumulative effects –</b> None</p> <p><b>Uncertainties/risks –</b> Demand for bespoke tailoring may depend on wider economic factors</p> <p><b>Monitoring significant effects –</b> AMR</p>			

Integrated Impact Assessment: For Policy No. CM2.4 St James's Special Policy Area			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	
	• Community facilities?	0	
	• Will it increase ability to influence decision making (neighbourhoods)?	0	
	• Will it foster an inclusive Westminster community?	0	
	• Will it encourage engagement in community activity	0	
2. To reduce crime and fear of crime	Will it reduce the levels of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce fear of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce other behaviour adversely affecting the local environment? **	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it reduce homelessness? *	0	
	• Will it increase a range of affordable housing? *	0	
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes? **	0	
	• Will it provide housing that can help people stay independent for longer?	0	
4. To promote and improve	• Will it help health and equalities? **	0	This policy has been given a positive

health and wellbeing	• Will it reduce death rates?	0	score in terms of improving cultural wellbeing. It is recognised that the protection of art galleries can have a positive impact on those who visit. However, it is recognised that private galleries may only be of interest to a fairly limited sector of the population although access to these premises are normally free, and the sector has actively promoted public engagement.
	• Will it improve access/movement?	0	
	• Will it encourage healthy lifestyles?	0	
	• Will it improve cultural wellbeing?	+	
	• Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?	0	
	• Will it provide access to a healthy diet and encourage healthy lifestyles?	0	
	• Will it encourage a physically active lifestyle (helping to reduce obesity)?	0	
	• Will it create healthy workplaces?	0	
5. To reduce greenhouse gas emissions and support climate change adaption	• Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*	0 0	
	• Will it reduce ozone depleting emissions?	0	
	• Will it reduce emissions through retrofitting new technology?	0	
	• Will it reduce heat island effects on people and property?	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood?	• Will it reduce water consumption?	0	
	• Will it reduce energy consumption?*	0	
7. To a) reduce flood risk, promote sustainable urban drainage and b) 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?*		
	• 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?	0	
	• Will it improve water quality?		
9. To improve air quality	• Will it improve air quality? *	0	
	• Will it reduce emissions of key pollutants?	0	
10. To reduce noise and impact of noise	• Will it reduce noise levels*	0	
	• Will it reduce noise concerns and complaints?	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	• Will it reduce traffic volumes?	0	
	• Will it encourage walking and cycling?*	0	
	• Will it increase proportion of journeys using modes other than a car?	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	• Will lead to reduced consumption of materials and resources?	0	
	• Will reduce household waste?	0	
	• Will increase recovery recycling and re-use?	0	
	• Will reduce construction waste?	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	• Will it conserve the significance of heritage sites and cultural value?	0	The policy seeks to protect and enhance the historic character and function of the area by seeking the re-provision of existing gallery space by
	• Will it protect strategic views?	0	
	• Will it conserve listed buildings and their settings?	+	

	<ul style="list-style-type: none"> <li>Will it help conserve, enhance and record archaeological features and their settings?</li> </ul>	0 0	legal agreement.  The art galleries of St. James's also tend to occupy smaller and more traditional shop type premises in this area, many of which are listed
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands?*</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> <li>Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> <li>Will it improve qualifications, skills and training? **</li> </ul>	0	It is possible this policy may have some impact on this objective, in retaining employment uses and the sector has actively promoted public engagement/education. Overall neutral.
	<ul style="list-style-type: none"> <li>Will reduce unemployment?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will provide jobs for most in need? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>Will improve business development and environment?</li> </ul>	+	The art galleries are a key ingredient of this area, providing a retail and exhibition service to collectors, residents and visitors, who may be staying in the luxury hotels in the area, eating at the high end restaurants, using the private members clubs and visiting other retailers in the area. These are used by both foreign and domestic visitors and complement each other. This diversity serves to underpin the
	<ul style="list-style-type: none"> <li>Will improve business resilience and economy?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it promote business in key sectors?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it promote regeneration, reducing disparity? **</li> </ul>	0	



			success of the area as part of London's leading world city status.
<p>For the <b>EIA</b> the following protected characteristics were considered:  <b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p> <p>Coloured asterisks **show SA sub-criteria also relevant to <b>EIA</b> and <b>HA</b> consideration</p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b></p> <p>This policy seeks to complement and enhance the area's unique character, in particular through maintaining the existing strong presence of galleries and private members' clubs which are integral to its character and function. As with the other SPA policies the policy approach for St. James's is likely to have a positive impact on economic sustainability criteria. The policy receives very positive scores for sub-criteria in Objective 17. The art galleries are a key ingredient of this area providing both exhibition and retail functions. Visitors may also stay in the luxury hotels in the area, eat at the high end restaurants and visit other retailers in the area. This diversity maintains economic diversity and supports sustainable economic growth. Given the policy seeks to protect and enhance the historic character and function of the area and that the art galleries tend to occupy smaller and more traditional shop type premises, many of which are listed, this policy has a positive score in Objective 13. This policy has also been given a positive score in terms of improving cultural wellbeing (Objective 4) It is recognised that the protection of art galleries can have a positive impact on those who visit. However, it is considered that private galleries may only be of interest to a fairly limited sector of the population, although access to these premises are normally free. Like the other SPA policies this receives neutral scores for other social and environmental sustainability objectives.</p> <p><b>Long Term positive effect –</b> Commercial diversity is a key for economic sustainability and stability.  <b>Short term –</b> As above  <b>Long term negative effects –</b>No major impacts  <b>Mitigation/Change to plan –</b> No major impacts  <b>Cumulative effects –</b> No major impacts  <b>Uncertainties/risks –</b> Demand for these niche uses will depend on the wider economy  <b>Monitoring significant effects –</b> AMR</p>			

Integrated Impact Assessment: For Policy No. CM2.5 Mayfair SPA			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	
	• Shopping?	0	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it foster an inclusive Westminster community?	0	
	• Will it encourage engagement in community activity	0	
2. To reduce crime and fear of crime	Will it reduce the levels of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce fear of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce other behaviour adversely affecting the local environment? **	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it reduce homelessness? *	0	The policy gives greater priority to commercial uses over residential, which may limit housing delivery. Commercial uses are considered more complementary in supporting, which are recognised as strategically important and internationally recognised cluster.
	• Will it increase a range of affordable housing? *	0	
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes? **	-	
	• Will it provide housing that can help people stay independent for longer?	0	
4. To promote and improve	• Will it help health and equalities? **	0	This policy has been given a positive

health and wellbeing	<ul style="list-style-type: none"> <li>Will it reduce death rates?</li> </ul>	0	score in terms of improving cultural wellbeing. This is very much on balance, given private galleries may only be of interest to a fairly limited sector of the population although access to these premises are normally free, and the sector has actively promoted public engagement.
	<ul style="list-style-type: none"> <li>Will it improve access/movement?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve cultural wellbeing?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> <li></li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it create healthy workplaces?</li> </ul>	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce ozone depleting emissions?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce heat island effects on people and property?</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood?	<ul style="list-style-type: none"> <li>Will it reduce water consumption?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce energy consumption?*</li> </ul>	0	
7. To a) reduce flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> <li>Will it minimise flood risk from all sources of flooding?*</li> <li>Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?*</li> </ul>	0	

	<ul style="list-style-type: none"> <li>Will it reduce combined sewer overflow events?</li> </ul>	0	
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to and promote educational value of sites of biodiversity interest?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve and enhance species?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve water quality?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions of key pollutants?</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>Will it reduce noise levels*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce noise concerns and complaints?</li> </ul>	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> <li>Will it reduce traffic volumes?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage walking and cycling?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using modes other than a car?</li> </ul>	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> <li>Will lead to reduced consumption of materials and resources?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce household waste?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will increase recovery recycling and re-use?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce construction waste?</li> </ul>	0	
13. To conserve and enhance the historic environment and architectural, archaeological and cultural heritage	<ul style="list-style-type: none"> <li>Will it conserve the significance of heritage sites and cultural value?</li> </ul>	0	The policy seeks to protect and enhance the historic character and function of the area by seeking the re-provision of existing gallery or antique
	<ul style="list-style-type: none"> <li>Will it protect strategic views?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve listed buildings and their settings?</li> </ul>	+	

	<ul style="list-style-type: none"> <li>Will it help preserve, enhance and record archaeological features and their settings?</li> </ul>	0	trader space by legal agreement. Many retail premises occupy listed buildings.
	<ul style="list-style-type: none"> <li>Will it help preserve, enhance and record archaeological features and their settings?</li> </ul>	0	
14. To enhance public realm and street improvements	<ul style="list-style-type: none"> <li>Will reduce litter?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it enhance the quality of public realm?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve access and mobility for all equality group strands?*</li> </ul>	0	
15. To protect, enhance and seek opportunities to increase open space throughout the borough	<ul style="list-style-type: none"> <li>Will it improve open space?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve landscape and character of open space?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to open space? **</li> </ul>	0	
16. To ensure equality of opportunity and improve local opportunities for education, training and employment and support sustainable growth	<ul style="list-style-type: none"> <li>Will it improve qualifications, skills and training? **</li> </ul>	0	It is possible this policy may have some impact on this objective, in retaining employment uses, and the sector has actively promoted public engagement/education. Overall neutral.
	<ul style="list-style-type: none"> <li>Will reduce unemployment?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will provide jobs for most in need? **</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will improve earnings?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it support young people, adults and vulnerable parents into employment, education and training?</li> </ul>	0	
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth.	<ul style="list-style-type: none"> <li>Will improve business development and environment?</li> </ul>	+	The art galleries and antique traders are key to this area, providing a retail and exhibition service to collectors, residents and visitors, who may be staying in the luxury hotels in the area, eating at the high end restaurants, using the private members clubs and visiting other retailers in Bond Street and Savile Row. These are used by both foreign and domestic visitors and complement each other. This diversity serves to underpin the success of the
	<ul style="list-style-type: none"> <li>Will improve business resilience and economy?</li> </ul>	+	
	<ul style="list-style-type: none"> <li>Will it encourage new business start ups, small businesses and opportunities for local people?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it promote business in key sectors?</li> </ul>	++	
	<ul style="list-style-type: none"> <li>Will it promote regeneration, reducing disparity? **</li> </ul>	0	

			area as part of London's leading world city status.
<p>For the <b>EIA</b> the following protected characteristics were considered:  <b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p> <p>Coloured asterisks **show SA sub-criteria also relevant to <b>EIA</b> and <b>HA</b> consideration</p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b>  This policy aims to support and enhance the Mayfair SPA's international reputation as a centre for the art trade, complemented primarily by other commercial uses. The policy seeks to protect art galleries and antiques traders in this SPA and encourage new art galleries to be secured through legal agreement. As with the other SPA policies the policy approach for Mayfair is likely to have a positive impact on economic sustainability criteria. The policy receives very positive scores for sub-criteria in Objective 17. The art galleries are a key part of this area providing both exhibition and retail functions. Visitors may also stay in the luxury hotels in the area, eat at the high end restaurants and visit other retailers in Bond Street and Savile Row. This maintains economic diversity and supports sustainable economic growth. Given the policy seeks to protect and enhance the historic character and function of the area and that the art galleries tend to occupy smaller and more traditional shop type premises, many of which are listed, this policy (as for the St James's SPA) has a positive scores in Objective 13. This policy has also been given a positive score in terms of improving cultural wellbeing (Objective 4) It is recognised that the protection of art galleries can have a positive impact on those who visit. However, it is considered that private galleries may only be of interest to a fairly limited sector of the population, although access to these premises are normally free. The policy has a negative score regarding housing delivery (Objective 3), as it priorities commercial uses, this approach however, takes into account the need to support the strategically important and internationally recognised cluster. Like the other SPA polices this receives neutral scores for other social and environmental sustainability objectives.</p>			
<p><b>Short and Long Term positive effect –</b> Economic diversity is more likely to result in a sustainable economic base.  <b>Long term negative effects –</b> No significant impacts  <b>Mitigation/Change to plan –</b> None  <b>Cumulative effects –</b> None  <b>Uncertainties/risks –</b> The demand for this cluster of uses is particularly dependent on the international market  <b>Monitoring significant effects –</b> AMR.</p>			

Integrated Impact Assessment: For new Proposals Sites in Flood Zone 3, sites C, E, F and G			
Sustainability, Equality and Health Objectives	Detailed decision making sub-criteria including EIA and HIA	Score	Comments
1. To create cohesive, inclusive and safe communities	• Will improve access to local services?	0	Three proposals sites include preferred use for retail, and one retains an existing refuelling station which will provide services to support local communities
	• Shopping?	+	
	• Community facilities?	0	
	• Will in increase ability to influence decision making (neighbourhoods)?	0	
	• Will it foster an inclusive Westminster community?	0	
	• Will it encourage engagement in community activity	0	
2. To reduce crime and fear of crime	Will it reduce the levels of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce fear of crime, disorder and anti-social behaviour? **	0	
	• Will it reduce other behaviour adversely affecting the local environment? **	0	
3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family sized units	• Will it reduce homelessness? *	0	All sites include preferred uses for residential. Revised housing targets set in the London Plan has identified a capacity of 1,068 residential units per year for Westminster, equating to a target of 21,360 units between 2016/17 and 2036/37. Delivery will principally be met by sites on the <a href="#">5-15 year housing supply schedule</a> ,
	• Will it increase a range of affordable housing? *	0	
	• Will it reduce the number of unfit homes?	0	
	• Will it result in high quality homes? **	+	
	• Will it provide housing that can help people stay independent for longer?	0	
4. To promote and improve	• Will it help health and equalities? **	0	

health and wellbeing	<ul style="list-style-type: none"> <li>Will it reduce death rates?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access/movement?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve cultural wellbeing?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it foster an inclusive Westminster community, specifically through an active engagement in sport and physical activity opportunities?</li> <li></li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it provide access to a healthy diet and encourage healthy lifestyles?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage a physically active lifestyle (helping to reduce obesity)?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it create healthy workplaces?</li> </ul>	0	
5. To reduce greenhouse gas emissions and support climate change adaption	<ul style="list-style-type: none"> <li>Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce ozone depleting emissions?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions through retrofitting new technology?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce heat island effects on people and property?</li> </ul>	0	
6. To reduce the use of natural resources e.g. water, fossil fuels, quarried materials, wood?	<ul style="list-style-type: none"> <li>Will it reduce water consumption?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce energy consumption?*</li> </ul>	0	
7. To a) reduce flood risk, promote sustainable urban drainage and b) protect, surface and ground water quality	<ul style="list-style-type: none"> <li>Will it minimise flood risk from all sources of flooding?*</li> <li>Will it reduce property damage due to storm events/ heavy rainfall by improving flood resistance and flood resilience?*</li> </ul>	0	Westminster's Strategic Flood Risk Assessment applied the sequential test, and concluded that the scarcity of sites meant that development needs cannot be met by sites in Flood



	<ul style="list-style-type: none"> <li>Will it reduce combined sewer overflow events?</li> </ul>	0	Zones 1 and 2 alone, and that sites (both identified sites and windfall sites) in Flood Zone 3 need to be considered suitable for development, subject to the requirements of the Exception Test. Policy S30 also requires consideration of flood risk reduction.
8. To protect, enhance and create environments that encourage and support biodiversity	<ul style="list-style-type: none"> <li>Will it protect, enhance and increase biodiversity and protect habitats?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it preserve SINCs?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve access to and promote educational value of sites of biodiversity interest?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it conserve and enhance species?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it improve water quality?</li> </ul>		
9. To improve air quality	<ul style="list-style-type: none"> <li>Will it improve air quality? *</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce emissions of key pollutants?</li> </ul>	0	
10. To reduce noise and impact of noise	<ul style="list-style-type: none"> <li>Will it reduce noise levels*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it reduce noise concerns and complaints?</li> </ul>	0	
11. To reduce the need to travel; the use of private motorised vehicular transport as well as encourage walking, cycling and the use of public transport	<ul style="list-style-type: none"> <li>Will it reduce traffic volumes?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it encourage walking and cycling?*</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will it increase proportion of journeys using modes other than a car?</li> </ul>	0	
12. To reduce waste production and increase recycling, recovery and use of all waste	<ul style="list-style-type: none"> <li>Will lead to reduced consumption of materials and resources?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will reduce household waste?</li> </ul>	0	
	<ul style="list-style-type: none"> <li>Will increase recovery recycling and re-use?</li> </ul>	0	

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

	businesses and opportunities for local people?*		
	<ul style="list-style-type: none"><li>Will it promote business in key sectors?</li></ul>	0	
	<ul style="list-style-type: none"><li>Will it promote regeneration, reducing disparity?***</li></ul>	0	
<p>For the <b>EIA</b> the following protected characteristics were considered: <b>Age, Disability, Gender (including gender reassignment, Pregnancy and Maternity, Race, Religion or Belief (including lack of) and Sexual Orientation</b></p> <p>Coloured asterisks ***show SA sub-criteria also relevant to <b>EIA</b> and <b>HA</b> consideration</p>			
<p><b>IIA Assessment</b></p> <p><b>Major positive ++ , Minor positive + Neutral 0, Minor negative – Major negative – –</b></p> <p><b>Overall Summary</b> Designation of Proposals sites is positive for objective 3 in the provision of housing sites. While sites are located in Flood Zone 3, the SFRA has concluded that the scarcity of sites meant that development needs cannot be met by sites in Flood Zones 1 and 2 alone, and that sites (both identified sites and windfall sites) in Flood Zone 3 need to be considered suitable for development, subject to the requirements of the Exception Test. Provisions for the exceptions test and to reduce the risk of flooding from development is taken into account by policy S30 when implementation of sites occurs</p>			
<p><b>Short and Long Term positive effect –.</b> Increase in housing sites to increase housing provision <b>Long term negative effects –</b> Additional pressure on infrastructure. <b>Mitigation/Change to plan –</b> Adopted policies S34 seek community infrastructure provision, Policy S30 requires exception test and consideration of flood risk reduction. <b>Cumulative effects –</b> None <b>Uncertainties/risks –</b> Depends on developers bringing forward schemes <b>Monitoring significant effects –</b> AMR.</p>			

## Appendix 6 Reasonable Alternatives

**For the following Special Policy Areas (SPAs): Harley Street, Savile Row, St.James's, East Marylebone, Portland Place, Mayfair, new Proposals Sites in Flood Zone 3**

(Key to alternatives set out below the tables)

### Policy S2

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

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

17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.		
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### AO1 – No Policy for Special Policy Areas

## Westminster's City Plan: Strategic Policies

### POLICY S2 SPECIAL POLICY AREAS

Special Policy Areas are designated to protect and promote specialist uses and functions as follows:

Harley Street: Medical facilities

Portland Place: Institutional uses

East Marylebone: Wholesale showrooms

Savile Row: Tailoring

St James's: Private members' clubs, art galleries, niche retail

## Harley Street SPA

IIA Objectives	PO24.1	PO24.2	PO24.3	PO 24.4	CMP1.21	NP CM2.1
1.To create cohesive, inclusive and safe communities						
2. To reduce crime and fear of crime						

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

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

#### PO 24.1 (City Management Plan Policy Options)

No City Management Plan policy.

#### PO 24.2 (City Management Plan Policy Options)

Private and public medical facilities, particularly consultation rooms and related professional and support services, will be protected and new facilities will be encouraged.

#### PO 24.3 (City Management Plan Policy Options)

New private and public medical facilities will be allowed where the use does not significantly alter the balance of medical and residential uses in the area.



The loss of private and public medical facilities will not generally be appropriate except where:

- the loss of the medical use will not significantly affect the demand for that particular specialism and
- the proposed use is for residential

Land use swaps between medical use and residential use will be allowed provided the balance and mix of uses in the Harley Street Special Policy Area is maintained.

#### PO 24.4 (City Management Plan Policy Options)

In the Harley Street Special Policy Area complementary and ancillary functions to support the medical uses in the area will generally be acceptable

#### CMP 1.21 (City Management Plan Consultation Draft)

##### A) In the Harley Street Special Policy Area:

1. Private and public medical facilities, particularly consultation rooms and related professional and support services, will be protected.
2. New private and public medical facilities will be encouraged within the Harley Street SPA.

##### B) The loss of medical facilities within the Harley Street SPA will only be allowed in exceptional circumstances where:

1. The relocation to an alternative site in the vicinity of the SPA is required in order to accommodate larger medical facilities; and
2. The loss does not significantly alter the balance of medical and residential uses in the SPA

#### NP CM2.1 (Social and Community Uses Consultation Booklet)

New medical and complementary facilities will be encouraged.

Existing medical facilities, including consultation rooms and related professional and support services, will be protected and their loss of will only be allowed in exceptional circumstances where:

1. the council is satisfied that the premises have been vacant and actively marketed for medical use for at least 12 months at a reasonable market value and attempts to find an occupier have been unsuccessful; and

2. the change of use is to residential.

The council will consider land use swaps within the Special Policy Area where it can be demonstrated that:

1. there will be no net loss of medical and associated floorspace; and

2. the accommodation offered provides higher quality medical space.

All development proposals will need to demonstrate that they do not have a negative impact on the character and function of the Special Policy Area.

### Portland Place SPA

IIA Objective and sub-criteria	PO 37.1	PO 37.2	PO 37.3	PO 37.4	PO 37.5	PO 37.6	CMP 1.19	NP CM2.2
1.To create cohesive, inclusive and safe communities								
2. To reduce crime and fear of crime								
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units								
4.To promote and improve health and well being								

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

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

PO 37.1: (City Management Plan Policy Options)

No City Management Plan policy

PO 37.2: (City Management Plan Policy Options)

Within the Portland Place Special Policy Area new institutional uses will be encouraged and existing institutional uses will be protected except where the council is satisfied that the premises have been vacant and actively marketed for at least 12 months and attempts to find an occupier have been unsuccessful. Where the council accepts the loss of the institutional use, diplomatic and allied uses or residential accommodation would be required.

New diplomatic and allied uses will not result in the loss of institutional uses.

PO 37.3: (City Management Plan Policy Options)

Within the Portland Place Special Policy Area planning permission will be granted for the loss of an institutional use where the premises become vacant.

PO 37. 4: (City Management Plan Policy Options)

The city council will support the restoration of listed buildings in the Portland Place Special Policy Area

PO 37. 5: (City Management Plan Policy Options)

Within the Portland Place Special Policy Area, proposals for the redevelopment, extension or change of use for diplomatic and allied uses will not result in the displacement of institutional uses provided:

1 there is no displacement of local services or other local uses which characterise the immediate area

2 a positive approach is taken towards the use and restoration of an important or listed building.

PO 37. 6: (City Management Plan Policy Options)

Planning permission for development which would result in the loss of an Institutional use will only be granted where the proposed use is for diplomatic and allied use.

CMP 1.19: (City Management Plan Consultation Draft)

A. In the Portland Place Special Policy Area:

1.New institutional uses will be encouraged and existing institutional uses will be protected except where the council is satisfied that the premises have been vacant and actively marketed for institutional use for at least 12 months at a reasonable market rent and attempts to find an occupier have been unsuccessful.

2. New diplomatic and allied uses will not result in the loss of institutional uses in the Portland Place SPA.

B. Applications for extensions to existing lawful Institutional uses inside the Portland Place SPA will generally be acceptable, and outside the Portland Place SPA may be acceptable.

## NP CM2.2: (Westminster's Economy Consultation Booklet)

New institutional uses will be encouraged and existing Institutional uses will be protected except where the council is satisfied that the premises have been vacant and actively marketed for institutional use for at least 12 months at a reasonable market price/rent and attempts to find an institutional occupier have been unsuccessful.

Applications for extensions to existing lawful Institutional uses to improve the functioning of the establishment will generally be allowed in the Special Policy Area and elsewhere in the Central Activities Zone.

### Savile Row SPA

IIA Objective	PO.46.1	PO.46.2	PO46.3	PO 46.4	CMP1.22	NP CMP 2.6
1.To create cohesive, inclusive and safe communities						
2. To reduce crime and fear of crime						
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units						
4.To promote and improve health and well being						
5.To reduce green house emissions and support climate change adaption						
6.To reduce use of natural resources e.g. water,						

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

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

PO 46.1: (City Management Plan Policy Options)

No City Management Plan policy

PO 46.2: (City Management Plan Policy Options)

In the Savile Row Special Policy Area:

- There will be no loss of existing bespoke tailoring uses;
- New bespoke tailoring will be allowed across the Special Policy Area, especially at basement and ground floor levels and, where necessary will be secured by legal agreements;
- Land use swaps will only be acceptable if:
  - o There is no net loss of bespoke tailoring floorspace within the Special Policy Area,
  - o The accommodation offered provides higher quality bespoke tailoring space,
  - o Bespoke tailoring uses are encouraged at the basement and ground floor premises within the Special Policy Area, and



o The character and function of Savile Row is maintained and there is no harm to bespoke tailoring uses.

- The City Council will work with landowners to ensure that retail units are occupied by bespoke, niche and luxury retailing shops, which are complementary to the Savile Row Special Policy Area.
- All development proposals will need to demonstrate that they do not have a negative impact on the character and function of the Savile Row Special Policy Area and should contribute to public realm improvements.

#### PO 46.3: (City Management Plan Policy Options)

In the Savile Row Special Policy Area the requirement for residential floorspace as part of new commercial development in accordance with Policy CS1 of the Core Strategy may be applied more flexibly where the council considers this to be necessary in order to contribute to the future aspirations of the Special Policy Area.

#### PO 46.4:

In the Savile Row Special Policy Area complementary and ancillary functions to support bespoke tailoring uses in the area will generally be acceptable.

#### CMP 1.22: (City Management Plan Consultation Draft)

##### A) In the Savile Row Special Policy Area:

1. There will be no loss of existing bespoke tailoring uses;
2. New bespoke tailoring will be allowed across the Special Policy Area, especially at basement and ground floor levels and, these will be secured by legal agreements;

3. Land use swaps will only be acceptable within the Special Policy Area if:

- (i) there is no net loss of bespoke tailoring floorspace;
- (ii) the accommodation offered provides higher quality bespoke tailoring space;
- (iii) bespoke tailoring uses are encouraged at the basement and ground floor level;
- (iv) the character and function of Savile Row is maintained and there is no harm to bespoke tailoring uses; and
- (v) the uses are secured by legal agreement.

4. The council will work with landowners to encourage retail units to be occupied by bespoke, niche and luxury retail shops, which are complementary to the Savile Row Special Policy Area.

5. All development proposals will need to demonstrate that they do not have a negative impact on the character and function of the Savile Row Special Policy Area and should contribute to public realm improvements.

B) Where proposals increase the amount of bespoke tailoring floorspace by 400 sqm or more, the provision of an equivalent amount of residential floorspace will be required on-site, where the council considers this to be appropriate and practical.

NP CMP 2.6 (Mayfair and St James's Consultation Booklet)

Existing bespoke tailoring uses will be protected.

New bespoke tailoring will be allowed, particularly at basement and ground floor levels, and will be secured by legal agreements.

A1 Retail will only be permitted at ground, lower ground floor and first floor levels, subject to the following criteria, to be secured by legal agreement where appropriate:

- no bespoke tailoring uses being lost;
- each retail unit being no larger than 300 sqm gross;
- the retail use should sell bespoke, unique, limited edition or one of a kind products.
- the retail function should be complementary to the character and function of the SPA.

Land use swaps will only be acceptable within the Special Policy Area where the other criteria within this policy are met, and where:

1. there is no net loss of bespoke tailoring floorspace, outside of necessary minor alterations to facilitate the land use swap;
2. the accommodation offered provides higher quality or larger bespoke tailoring space;

All development proposals will need to demonstrate that they do not have a negative impact on the character and function of the Special Policy Area.

Proposals to increase the amount of bespoke tailoring floor space will be exempt from the mixed use policy and associated mixed use cascade. The requirements for residential floor space as part of proposals increasing the amount of other commercial floor space by 200 sqm or more may be applied more flexibly where the council considers this to be necessary to deliver public realm improvements in Savile Row.

### St.James's SPA

IIA Objective and sub-criteria	PO.50.1	PO50.2	PO50.3	PO 50.4	CMP1.23	NP CMP 2.5
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1.To create cohesive, inclusive and safe communities						
2. To reduce crime and fear of crime						
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units						
4.To promote and improve health and well being						
5.To reduce green house emissions and support climate change adaption						
6.To reduce use of natural resources e.g. water, energy						
7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality						
8.To protect, enhance and create environments that encourage and support biodiversity						
9.To improve Air Quality						
10.To reduce noise and the impact of noise						
11.To reduce the need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public						

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

PO 50.1: (City Management Plan Policy Options)

No City Management Plan policy

PO 50.2: (City Management Plan Policy Options)

In the St James's Special Policy Area, existing private members' clubs (sui generis uses) and art galleries (D1 Uses) will be protected. The City Council will work with landowners to protect the existing niche retail floorspace (A1 uses) at ground floor level and encourage new retail development.

PO 50.3: (City Management Plan Policy Options)

Existing buildings in St James's Special Policy Area will be protected, except in cases where the council has identified the building as a poor quality building that detracts from the special character of the area.

These buildings are detailed in the areas Conservation Area Audit and are classed as 'negative features'.

Where the council accepts that such buildings can be lost, redevelopment of the site will include carefully designed shop fronts and signage to maintain the character of streets.

PO 50.4: (City Management Plan Policy Options)

In the St James Special Policy Area complementary and ancillary functions to support private member clubs, art galleries and niche retail uses in the area will generally be acceptable.

CMP 1.23: (City Management Plan Consultation Draft)

In the St James's Special Policy Area:

A)

Existing private members' clubs (sui generis uses) and art galleries (D1 Uses) will be protected. The council will work with landowners to protect the existing niche luxury and specialist retail floorspace (A1 uses) at basement, ground and first floor level and encourage new niche luxury and specialist retail development.

B)

Where proposals increase the amount of private members clubs by 400 sqm or more the provision of an equivalent amount of residential floor space will be required on-site, where the council considers this to be appropriate and practical

#### NP CMP 2.5: (Mayfair and St James's Consultation Booklet)

Existing private members' clubs (sui generis uses) and art galleries (D1 Uses and A1 Gallery Uses) will be protected.

The council will work with landowners to protect the existing niche luxury and specialist retail floorspace (A1 uses) at basement, ground and first floor level and encourage new niche luxury and specialist retail development, particularly those selling good that fall into the following categories:

- Bespoke
- Unique or one of a kind
- Antique
- Limited edition

Proposals should maintain and enhance the character and function of the area.

The Council may seek the re-provision of existing gallery space as part of development proposals, to be secured by legal agreement.

#### Mayfair SPA

IIA Objective and sub-criteria	AO1	AO2	NP CMP 2.4
1.To create cohesive, inclusive and safe communities			
2. To reduce crime and fear of crime			
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units			

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



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

AO1 – No Policy for Mayfair SPA

AO2- More protective policy for Mayfair SPA to include specified periods of vacancy

NP CMP 2.4 ((Mayfair and St James’s Consultation Booklet)

Existing art galleries (class A1 Retail and D1 Non-residential Institutions) and antiques traders (class A1 retail) will be protected.

New art galleries are to be encouraged and will be secured by legal agreement. New retail uses should be in fitting with the character and function of the street or area in which they are located (e.g. Art Galleries on Cork Street, Jewellery or International fashion on Bond Street), and where appropriate should sell items or offer services falling in the following categories:

- Bespoke
- Unique or one of a kind
- Antique
- Limited edition

The city council will work with landowners to protect and promote clusters of specialist retailers in Mayfair.

All development proposals should maintain and enhance the character and function of the area.

## East Marylebone SPA

[illegible]

[illegible]

17.To maintain economic diversity, increase local opportunity and support sustainable economic growth.													
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PO 19.1: (City Management Plan Policy Options)

No City Management Plan policy.

PO 19.2: (City Management Plan Policy Options)

In the East Marylebone Special Policy Area:

New wholesale showroom use at basement and ground floor will generally be acceptable.

Where sites that include a wholesale showroom use at basement and ground floor levels are redeveloped, the wholesale showroom floorspace will be replaced, with the same amount of floorspace at both basement and ground floor levels.

There will be no loss of wholesale showrooms at basement and ground floor except where these floors have been vacant and actively marketed for at least 18 months and the council is satisfied that attempts to occupy the space with another wholesale showroom use have been unsuccessful.

Where the council accepts the loss of a wholesale showroom use at basement and ground floor, alternative uses which positively contribute to street vitality and the character and function of the area and which do not cause harm to residential amenity will be required.

A change of use from wholesale showroom use to 'dual' wholesale showroom use/office use above ground floor level will generally be acceptable where this does not jeopardise the long term use of the lower floors for wholesale showroom purposes.

PO 19.3: (City Management Plan Policy Options)

In the East Marylebone Special Policy Area, a change of use which results in the loss of wholesale showrooms at basement and ground floor will generally be acceptable where the basement and ground floor have been vacant and actively marketed for at least 6 months and the council is satisfied that attempts to occupy the space with another wholesale showroom use have been unsuccessful.

PO 19.4: (City Management Plan Policy Options)

As for Policy Option 19.3 above, but marketing for a period of 9 months.

PO 19.5: (City Management Plan Policy Options)

In the East Marylebone Special Policy Area, 'dual' wholesale showroom/ retail or creative use at ground floors will generally be acceptable.

PO 19.6: (City Management Plan Policy Options)

In the East Marylebone Special Policy Area, the change of use of a wholesale showroom use for A3 use, media uses or specialist shopping at basement and ground floor will generally be acceptable.

The city council will work with land owners to ensure the retail units are only occupied by 'independent' retailers and not chain stores.

PO 19.7: (City Management Plan Policy Options)

In the East Marylebone Special Policy Area there will be no loss of wholesale showrooms at basement and ground floor except where these are less than 139 sqm

PO 19.8: (City Management Plan Policy Options)

In the East Marylebone Special Policy Area, where sites that include a wholesale showroom use of 139sqm or more at basement and ground floor levels are redeveloped, the wholesale showroom floorspace will be replaced, with the same amount of floorspace at both basement and ground floor levels.

PO 19.9: (City Management Plan Policy Options)

In the East Marylebone Special Policy Area, a change of use from wholesale showroom to office use on the upper floors of buildings will generally be acceptable except where this would jeopardise the long term use of the lower floors for wholesale showroom purposes

PO 19.10: (City Management Plan Policy Options)

In the East Marylebone Special Policy Area complementary and ancillary functions to support the wholesale showroom uses in the area will generally be acceptable.

CMP 1.17: (City Management Plan Consultation Draft)

In the East Marylebone Special Policy Area:

1. New wholesale showroom uses will be encouraged and existing wholesale showroom uses will be protected at basement and ground floor except where the council is satisfied that the premises have been vacant and actively marketed for wholesale showroom purposes for at least 12 months at a reasonable market rent and attempts to find an occupier have been unsuccessful.
2. In redevelopment schemes existing basement and ground floor wholesale showroom floorspace will be replaced with the same amount of wholesale floorspace at basement and ground floor level

NP CMP 2.3: (Westminster's Economy Consultation Booklet)

New wholesale showroom uses will be encouraged.

Existing wholesale showroom uses will be protected at basement and ground floor, except where the council is satisfied that the premises have been vacant and actively marketed for wholesale showroom purposes for at least 12 months at a reasonable market price/rent and attempts to find an occupier have been unsuccessful. Where the loss of the wholesale showroom use is accepted retail (Class A1) use would be an appropriate replacement at basement and ground floor.

In redevelopment schemes, existing basement and ground floor wholesale showroom floorspace will be replaced with the same amount of wholesale floorspace at basement and ground floor level.

### New Proposals Sites in Flood Zone 3

IIA Objective and sub-criteria	AO1	AO2
1.To create cohesive, inclusive and safe communities		
2. To reduce crime and fear of crime		
3.To ensure provision of appropriate housing types to reduce overcrowded households and meet the demand for affordable housing and family sized units		
4.To promote and improve health and well being		
5.To reduce green house emissions and support climate change adaption		
6.To reduce use of natural resources e.g. water, energy		
7.To reduce flood risk, promote SUDs, protect surface water and groundwater quality		
8.To protect, enhance and create environments that encourage and support biodiversity		
9.To improve Air Quality		
10.To reduce noise and the impact of noise		
11.To reduce the need to travel, the use of private motorised vehicular transport as well as encourage walking, cycling and use of public transport		

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

A01 – No new proposals sites in Flood zone 3

A02 – Proposals sites in Flood Zone 3 for non-residential schemes



## APPENDIX 7 Schedule of Proposed Changes to the Policies Map

Map No.	Proposed Change	Reason for change	Assessment
	Minor realignment of Core CAZ boundary at:	Realignment of Core CAZ boundary for use on larger scale map	<i>Minor amendment - no new buildings introduced, or existing buildings excluded, boundary amended to follow building lines where the boundary was cutting through buildings</i>
1	<ul style="list-style-type: none"> <li>65 Horseferry Road</li> </ul>	Follows building line of 65 Horseferry Road	
2	<ul style="list-style-type: none"> <li>5-9 Old Pye Street</li> <li>10 Abbey Orchard Street</li> </ul>	Follows Abbey Orchard Street centre line	
3	<ul style="list-style-type: none"> <li>79, 83, 85 and 95 Victoria Street</li> <li>1-47 Artillery Mansions</li> </ul>	Follows rear building line fronting Victoria Street	
4	<ul style="list-style-type: none"> <li>3, 32 and 34 Grosvenor Gardens Mews North</li> </ul>	Follows rear building line of 3, 32 and 34 Grosvenor Gardens Mews North	
5	<ul style="list-style-type: none"> <li>17-22 Trevor Square</li> </ul>	Follows rear building line of 17-22 Trevor Square	
6	<ul style="list-style-type: none"> <li>199 Knightsbridge</li> <li>8 and 9 Raphael Street</li> <li>7 and 9 Raphael Street</li> <li>163-169 Knightsbridge</li> </ul>	<p>Follows rear building line of 199 Knightsbridge</p> <p>Follows gap between 163-169 and 199 Knightsbridge</p>	
7	Crossrail 2 Safeguarding amendment	The Secretary of State issued the Safeguarding Directions for Crossrail 2, which came into effect on 24 March 2015. The new Directions revoke the Safeguarding Directions issued in 2008 for the Chelsea Hackney Line.	<p>Factual update to reflect Secretary of State safeguarding direction</p> <p>Strategic policy S43 Major Transport Infrastructure assessed in sustainability appraisal for adoption (Core Strategy and Westminster's City Plan: Strategic Policies)</p>
	New London Squares added:	Factual update, incorrectly omitted from	Not introducing new designation, but

Map No.	Proposed Change	Reason for change	Assessment
8	▪ Alma Square	previous Policies Map	correcting omission from previous map
9	▪ Clarence Terrace		
10	▪ Craven Hill Gardens North (Hempel Garden Square)		
11	▪ Dean's Yard		
12	▪ Lancaster Gate		
13	▪ Lancaster Gate (Rear of Nos 75-89)		
14	▪ Palace Court		
15	▪ Park Square		
16	Prince's Gate (Front of Nos 1-11)		
17	New Mayfair Special Policy Area	Amendment arising from SPA Revisions	IIA assessment of Policy CM2.5 Mayfair Special Policy Area
18	Deleted East Marylebone Special Policy Area	Amendment arising from SPA Revisions	IIA assessment of Policy S1 Special Policy Areas proposing deletion of East Marylebone Special Policy Area
	Update of Proposals Sites:		Factual updates to reflect implementation.  NB: The Environment Agency responded at Regulation 19 to confirm that new proposals sites in Flood Zone 3 had met
19	New Proposals Site A:1 Merchant Square - preferred uses Residential, hotel	Planning permission granted, site considered appropriate for proposals site	
20	New Proposals Site B: 6 Merchant Square - preferred	Planning permission granted, identified on 5-	

Map No.	Proposed Change	Reason for change	Assessment
	uses Residential, retail, social and community	15 year Housing Supply Schedule, site considered appropriate for proposals site	the sequential test. An explanatory note is included in Appendix 8, also IIA assessment of new Proposal Sites in Flood Zone 3.
21	Deleted Proposals Site 7: Site bounded by Victoria Street, Buckingham Palace Road and Bressenden Place, SW1	Delete as under construction / implemented	
22	New Proposals Site C: Portland House – preferred uses residential, retail	Planning permission granted, identified on 5-15 year Housing Supply Schedule, site considered appropriate for proposals site	
23	Deleted Proposals Site 13: 35-50 Rathbone Place, Royal Mail West End Delivery / Sorting Office and car park	Delete as under construction / implemented	
24	Deleted Proposals Site 14: 354-358 Oxford Street, W1	Delete as under construction / implemented	
25	New Proposals Site D: Land at 291 Harrow Road and 1 and 2 Elmfield Way – preferred uses residential, amenity and play space	Planning permission granted, identified on 5-15 year Housing Supply Schedule, site considered appropriate for proposals site	
26	Deleted Proposals Site 26: Chelsea Barracks, Chelsea Bridge Road, SW1	Delete as under construction / implemented	
27	New Proposals Site E: 33 Horseferry Road – preferred use residential, retail.	Planning permission granted, identified on 5-15 year Housing Supply Schedule, site considered appropriate for proposals site	
28	New Proposals Site F: Development Site At Ergon House Horseferry Road And 9 Millbank – preferred use	Planning permission granted, identified on 5-15 year Housing Supply Schedule, site considered	

Map No.	Proposed Change	Reason for change	Assessment
	residential, retail.	appropriate for proposals site	
29	Deleted Proposals Site 31: Arundel Great Court, Strand, WC2	Delete as under construction / implemented	
30	Deleted Proposals Site 32: 38-44 Lodge Road NW8	Delete as under construction / implemented	
31	New Proposals Site G: 48-56 Ebury Bridge Road, SW1	Vacant garage site considered appropriate for proposals site	
32	New Proposals Site I: Area of Surface Interest (Crossrail 2) Ebury Gate and Belgrave House	Proposed Crossrail 2 works sites, subject to Secretary of State decision	Factual update to reflect Secretary of State safeguarding.  Strategic policy S43 Major Transport Infrastructure assessed in sustainability appraisal for adoption (Core Strategy and Westminster's City Plan: Strategic Policies)
33	New Proposals Site II: Area of Surface Interest (Crossrail 2) Lower Grosvenor Gardens	Proposed Crossrail 2 works sites, subject to Secretary of State decision	
34	New Proposals Site III: Area of Surface Interest (Crossrail 2) Chelsea Barracks	Proposed Crossrail 2 works sites, subject to Secretary of State decision	
35	New Proposals Site IV: Area of Surface Interest (Crossrail 2) Rathbone Place / Evelyn Yard	Proposed Crossrail 2 works sites, subject to Secretary of State decision	
36	New Proposals Site V: Area of Surface Interest (Crossrail 2) Shaftsbury Avenue (Cinema)	Proposed Crossrail 2 works sites, subject to Secretary of State decision	
37	New Proposals Site VI: Area of Surface Interest (Crossrail 2) Victoria Coach Station – Departures Terminal	Proposed Crossrail 2 works sites, subject to Secretary of State decision	

Map No.	Proposed Change	Reason for change	Assessment
38	New Proposals Site VII: Area of Surface Interest (Crossrail 2) Terminal House, Buckingham Palace Road	Proposed Crossrail 2 works sites, subject to Secretary of State decision	
39	New Proposals Site VII: Area of Surface Interest (Crossrail 2) Highway around Soho Square	Proposed Crossrail 2 works sites, subject to Secretary of State decision	

## **APPENDIX 8 Explanatory note for Sequential Test and New Proposals Sites in Flood Zone 3**

1. The NPPF states that Local Plans should be supported by Strategic Flood Risk Assessment. The city council undertook a Strategic Flood Risk Assessment (SFRA) in 2009 which set out how the council had applied the Sequential Test in Westminster for the Submission Draft Core Strategy (March 2010). The Core Strategy was subsequently adopted in 2011. The NPPF revision to the Core Strategy, Westminster's City Plan Strategic Policies was adopted in 2013. A revised SFRA for Westminster is anticipated to be completed for the Full Revision which will include policies on flooding.
2. The aim of the Sequential Test is to steer new development to the areas of lowest probability of flooding (NPPF paragraph 101). Planning Practice Guidance (paragraph 19) sets out the Sequential Test - that preference be given to locating new development in Flood Zone 1. If there are no reasonably available sites available in Flood Zone 1, then Flood Zone 2 should be considered. If no reasonably available sites are available in Flood Zone 2 then Flood Zone 3 should be considered.
3. The SFRA applied the Sequential Test to Westminster, and concluded that the scarcity of sites meant that development needs cannot be met by sites in Flood Zones 1 and 2 alone, and that sites (both identified sites and windfall sites) in Flood Zone 3 need to be considered suitable for development, subject to the requirements of the Exception Test.
4. The adopted plan, Westminster's City Plan: Strategic Policies notes that:

“5.26 ... To bring forward an adequate supply of housing, given the highly complex nature of the built environment and the general lack of available land in Westminster, the provision of residential accommodation is required in almost all schemes in Westminster. 5.27 To support residents and achieve sustainable communities, social and community uses also need to be located in areas where they serve the local population. Therefore, the identified sites within Flood Zone 3 and other sites that may come forward from windfall development are considered to have passed the Sequential Test set out in the NPPF.”

5. The Special Policy Areas and Policies Map Revision proposes removing two sites located in Flood Zone 3 from the list of Proposals Sites in Westminster's City Plan, due to development starting on site, and proposing the addition of four new sites in Flood Zone 3 which propose introduction of residential to those sites classified as a 'more vulnerable use' (see Table 1). Three sites have been granted planning permission for residential, having been considered to have met the Sequential Test as identified in the SFRA and paragraphs 5.26 and 5.27 of Westminster's City Plan: Strategic Policies, and the Exceptions Test at planning application stage. A fourth site, current lawful use petrol filling station, is identified to retain a refuelling station use and for residential, as a windfall site considered to have met the Sequential Test as identified in the SFRA and paragraphs 5.26 and 5.27 of Westminster's City Plan: Strategic Policies.

6. Since undertaking the SFRA in 2009, the revised housing targets set in the London Plan has identified a capacity of 1,068 residential units per year for Westminster, equating to a target of 21,360 units between 2016/17 and 2036/37. Delivery will principally be met by sites on the [5-15 year housing supply schedule](#), including the Proposals Sites. The table below sets out where the key delivery of residential units is anticipated (from the 5-15 year Housing Supply Schedule) within Flood Zones 1, 2 and 3.

#### **Housing sites contributing to the supply of residential units**

Sites within Flood Zone	Nbr sites	Net units	% net units	Affordable units expected	% affordable units expected
Flood Zone 1 (85% of city)	107	5920	69.7%	1166	68%
Flood Zone 2 (1% of city)	1	42	0.5%	0	0
Flood Zone 3 (14% of city)	36	2528	29.8%	556	32%
Total	144	8490	100%	1722	100%

Source: 5-15 Year Housing Supply Schedule

7. The number of deliverable housing units identified above for Flood Zones 1 and 2 is 5,962, which accounts for 28% of the London Plan target. The city council considers that housing sites are needed in Flood Zone 3 as all reasonable sites in Flood Zones 1 and 2 have been identified and these sites alone are insufficient to meet housing targets. Whilst there will also be contributions from other sources of housing delivery, which include small scales schemes (under 10 units), windfall sites, vacant units being brought back into use and provision of new non self-contained units, it is not considered that this would be sufficient to meet housing targets. Given the nature of delivery, it is not possible to identify the location of these other sources of delivery, but much of the provision is anticipated outside of the Core Central Activities Zone, in the north and south of the borough.
8. It is considered that the approach taken on applying the Sequential Test to Westminster in 2009 still applies, that it is necessary to identify housing sites in Flood Zone 3 in order to ensure delivery of housing to meet housing targets. The Exception Test will need to be applied at application stage in line with the NPPF and Westminster City Plan: Strategic Policy S30. The forthcoming revised SFRA will be used to inform the revision of policy for flood risk, to provide guidance for development proposals to reduce and manage the risk of flooding, thereby enabling the Exceptions Test to be passed.

**Table 1 Proposals Sites with residential and/or social and community uses in Flood Zone 3**

REF No.	SITE	PREFERRED USES	VICTORIA OPPORTUNITY AREA	RAPID INUNDATION ZONE	PROPOSALS SITE IN ADOPTED CITY PLAN	PROPOSALS SITE IN REVISION CITY PLAN
7	Site bounded by Victoria Street, Buckingham Palace Road and Bressenden Place, SW1	Office, retail, theatre, café, restaurant, public house, hotel, residential and social and community	Yes	No	Yes	No
C	Portland House	Residential, retail	Yes	No	<b>No</b>	Yes *
26	Chelsea Barracks, Chelsea Bridge Road, SW1	Residential, community and local services including shops and green open space for play. Hotel use is likely to be acceptable in principal as part of the mix of uses.	No	No	Yes	No
27	Queen Alexandra Military Hospital, John Islip Street, SW1	Residential, cultural and office use, green open play space.	No	Yes	Yes - RIZ	Yes – RIZ
28	Ebury Bridge	Residential, social/ community floorspace, refurbished retail and improved public realm	No	No	Yes	Yes
29	Southern Westminster	Residential including sheltered care, retail and social/ community including refurbishment of school.	No	Yes	Yes – RIZ	Yes – RIZ
E	33 Horseferry Road	Residential, retail	No	Yes	<b>No</b>	Yes – RIZ *
F	Development Site At Ergon House Horseferry Road And 9 Millbank	Residential, retail	No	No	<b>No</b>	Yes *
G	48-56 Ebury Bridge Road, SW1	Refuelling station, residential	No	No	<b>No</b>	Yes
					<b>5 sites (including 2 in RIZ)</b>	<b>7 sites (including 1 additional site in RIZ)</b>

\*Planning permission granted for residential development







# City of Westminster

Westminster City Hall, 64 Victoria Street, London SW1E 6QP  
Planning policy helpline: 020 7641 2503  
[www.westminster.gov.uk/revision-westminsters-city-plan](http://www.westminster.gov.uk/revision-westminsters-city-plan)