



City of Westminster

Committee Agenda

Title: **Cabinet**

Meeting Date: **Monday 10th July, 2023**

Time: **6.30 pm**

Venue: **Rooms 18.01 & 18.02 - 18th Floor, 64 Victoria Street, London, SW1E 6QP**

Members: **Councillors:**

Adam Hug (Chair)	David Boothroyd
Tim Roca	Paul Dimoldenberg
Aicha Less	Liza Begum
Nafsika Butler-Thalassis	Matt Noble
Geoff Barraclough	Cara Sanquest

This will be an in-person meeting and members of the public and press are welcome to follow the meeting and listen to discussion to Part 1 of the Agenda.

This meeting will be live streamed and recorded. To access the recording after the meeting please revisit the link.



An Induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter. If you require any further information, please contact the Committee Officer, Daniella Bonfanti, Cabinet Manager.

**Email: dbonfanti@westminster.gov.uk
Corporate Website: www.westminster.gov.uk**

Note for Members: Members are reminded that Officer contacts are shown at the end of each report and Members are welcome to raise questions in advance of the meeting. With regard to item 2, guidance on declarations of interests is included in the Code of Governance; if Members and Officers have any particular questions, they should contact the Director of Law and Governance in advance of the meeting.

AGENDA

PART 1 (IN PUBLIC)

1. WELCOME

2. DECLARATIONS OF INTEREST

To receive declarations by Members and Officers of the existence and nature of any pecuniary interests or any other significant interest in matters on this agenda.

3. MINUTES

To approve the minutes of the meeting held on the 15th of May 2023.

(Pages 3 - 6)

4. COUNCIL RESPONSE TO THE FUTURE OF WESTMINSTER COMMISSION RECOMMENDATIONS

Report of the Chief Executive

(Pages 7 - 82)

5. CHURCH STREET REGENERATION - SITE A COMPULSORY PURCHASE ORDER RESOLUTION

Report of the Executive Director of Growth, Planning and Housing

(Pages 83 - 252)

6. MEDIUM TERM FINANCIAL PLANNING (2024/25 TO 2026/27)

Report of the Executive Director of Finance and Resources

(Pages 253 - 266)

7. OUTTURN REPORT

Report of the Executive Director of Finance and Resources

(Pages 267 - 300)

**Stuart Love
Chief Executive
30 June 2023**



CITY OF WESTMINSTER

MINUTES

Cabinet

MINUTES OF PROCEEDINGS

Minutes of a meeting of the **Cabinet** held on **Monday 15th May, 2023**, Room 18.01-18.03, 18th Floor, 64 Victoria Street, London, SW1E 6QP.

Minutes of a meeting of the Cabinet held on Monday 15th May 2023, Westminster City Hall.

Members Present: Councillors Adam Hug (Chair), Tim Roca (virtually), Aicha Less, Nafsika Butler-Thalassis, David Boothroyd, Paul Dimoldenberg (virtually), Liza Begum and Matt Noble

Apologies: Councillor Geoff Barraclough

Also Present: Stuart Love, Chief Executive, Parveen Akhtar, Director of Law and Governance (Monitoring Officer), Debbie Jackson, Executive Director for Growth, Planning and Housing, Gerald Almeroth, Executive Director for Finance and Resource, Steve Hilditch, Chair of the Housing Review, Future of Westminster Commission

1 MEMBERSHIP

There were no changes to the membership of Cabinet.

2 DECLARATIONS OF INTEREST

There were no declarations of interest received.

3 MINUTES

RESOLVED: Councillor Adam Hug, with the consent of the Members present, agreed that the minutes of the meeting held on 27th March were a true and correct record of the proceedings.

4 DISSOLUTION OF WESTMINSTER PROCUREMENT SERVICES

Councillor Hug introduced the report explaining that the Westminster Procurement Service had not traded since 2018 and that the Shareholder Committee recommends to Cabinet that the company is wound up.

RESOLVED: Cabinet approved the following recommendations set out on page 7 of the Cabinet report pack:

- That Westminster Procurement Services Limited be dissolved with any share capital remaining after legal and professional fees being returned to the Council.
- That the Council, as sole shareholder, passes a resolution to formally close Westminster Procurement Services Limited by way of an application to strike off the company from the Companies Register

[You can view the full Shareholder Committee Report here.](#)

5 WESTMINSTER BUILDS REGISTERED PROVIDER STATUS

Councillor Hug invited Councillor Matt Noble, Cabinet Member for Climate Action, Regeneration and Renters to comment on the proposed incorporation of a new company into Westminster Builds to act as Registered Provider.

Councillor Noble commented that it seems prudent to take this action to maximise the amount of intermediate housing the council can provide. The benefit of the decision being that it enables the council to capture GLA grant to deliver affordable housing.

RESOLVED: Cabinet approved the following recommendation set out on page 9 of the Cabinet report pack:

- The incorporation of new company within Westminster Builds structure which will apply to become a Registered Provider and, subject to approval of the Regulator of Social Housing, hold Westminster Builds' affordable housing.

[You can view the report to Shareholder Committee here](#)

6 COUNCIL RESPONSE TO FUTURE OF WESTMINSTER COMMISSION HOUSING REVIEW

Councillor Hug introduced the report and thanked all those who contributed to the review, including the tenants and leaseholder who participated through the Resident's Panel.

Councillor Hug invited Steve Hilditch, Future of Westminster Commission and Chair of the Housing Review to speak to the Housing Review report.

Cabinet heard that the Housing Review had, amongst other things, supported work to increase the number of social homes, considered the acquisition of temporary accommodation, contributed to the City Plan review and helped to convene the Resident's Panel.

Councillor Hug asked for any further comments on the Housing Review's report from Cabinet or officers in attendance.

Councillor Begum thanked Steve Hilditch for the work of the Housing Review and said that she would work with officers to look at how best to incorporate those recommendations into the work of Housing Services.

Councillor Noble thanked the Housing Review for their work and explained that many of the recommendations set out in the report were already being delivered thanks to working with the Commission in real time.

Debbie Jackson, Executive Director of Growth, Planning and Housing thanked the Commission on behalf of officers for their collaborative approach, commenting that the opportunity for external input by experienced housing practitioners and residents via the Residents Panel had been welcomed.

Councillor Hug asked Debbie Jackson, Executive Director of Growth, Planning and Housing to introduce the council's response to the recommendations set out in the Housing Review's report.

Cabinet heard that many of the recommendations put forward would be incorporated into the Cooperate Housing Improvement Programme (CHIP) in order to deliver the best possible housing service for residents.

Other recommendations would be built into future strategy and business planning which would consider the prioritising of resources as well as procurement issues as Housing Services is reliant on a number of procured services.

RESOLVED: Cabinet approved the following recommendation set out in section 2, p12 of the Cabinet report pack.

- Cabinet is asked to approve the proposed responses to the Commission's Housing Review headline recommendations (Appendix 1) and instruct officers to integrate the resulting actions within the Housing Service and other relevant services' work programmes.

Councillor Hug concluded the meeting at 7.00 pm

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City of Westminster

Cabinet

Meeting:	Cabinet
Date:	19 June 2023
Classification:	General Release
Title:	Council Response to the Future of Westminster Commission Report and Recommendations
Wards Affected:	All
Fairer Westminster:	A Fairer Westminster begins with a Fairer Council
Key Decision:	Non-key
Financial Summary:	There are no direct financial implications arising from the recommendations in this report. The recommendations in Appendix A will be subject to the standard financial planning and budget setting process.
Report of:	Stuart Love, Chief Executive

1. Executive Summary

- 1.1 In July 2022, Cabinet agreed to establish the Future of Westminster Commission (“the Commission”) to review and make recommendations on key council services to help deliver a Fairer Westminster for residents.
- 1.2 The Future of Westminster Commission convened a core group and established four workstreams with additional Commission members (Housing, Economy & Employment, Energy & Green Transition, Fairness & Equality).
- 1.3 For full details on the establishment of the Commission, including the membership of individual review groups please see the [Future of Westminster Commission Cabinet Report](#) first published in July 2022 and listed in the background papers to this report.
- 1.4 This report provides a response to three workstreams of the Commission, Economy and Employment, Energy and Green Transition and Fairness and Equality and represents a conclusion of the Commission’s work.
- 1.5 The Council response to the Housing Review was considered at a previous [meeting of Cabinet in May 2023](#).
- 1.6 **Appendix A** sets out the recommendations proposed by the Commission and outlines the Council’s responses to those recommendations.

2. Recommendations

- 2.1 Cabinet is asked to note the initial responses to the Commission’s recommendations across the three remaining reviews (**Appendix A**) and to agree that all recommendations brought forward for implementation will be subject to further financial and legal consideration and where necessary, individual Cabinet or Cabinet Member decisions will be undertaken.

3. Reasons for the Decision

- 3.1 The Future of Westminster Commission was established to advise the Council on areas of policy that are critical to the future success of the City and central to the delivery of a Fairer Westminster. The Commission has now delivered its final report and recommendations, please see **Appendix B** of this report.

All recommendations have been considered individually (as outlined in **Appendix A**), with a view to accepting, rejecting, or otherwise considering each. The proposed responses are put forward with due regard to the strategic priorities of the council and with the recognition that, where required, further financial and legal consideration will have to be undertaken before implementation.

4.1 Background, including Policy Context

4.1 Bringing together experts from a wide range of private and voluntary sector organisations to review the existing work of the council, the Future of Westminster Commission examined some of Westminster's biggest challenges: the delivery of truly affordable housing, responding to the climate emergency, delivering economic opportunities for all, and supporting our most vulnerable residents.

4.2 The Commission was led by Neale Coleman CBE (*Member, National Infrastructure Commission; former GLA Director of London 2012; former Board member London 2012 Bid Company, Olympic Delivery Authority, London Legacy Development Corporation*) as Chair with four co-chairs each supporting their own review. These reviews were:

Fairness and Equality: Advise on policy approaches and initiatives that will enable and deliver a fairer, more equal, and inclusive city.

Economy and Employment: Advise on how the Council can enable more Westminster residents to share in the economic successes of the city.

Energy and Green Transition: Advise on ways to enhance and accelerate climate action supported and delivered by the Council to achieve the objective of achieving net zero Westminster by 2040.

Housing: Advise on increasing the supply of genuinely affordable housing to meet housing need in the city. As a priority, advise on options for improving the way the Council responds to homelessness and housing need, and the quality of services provided to the Council's own tenants and leaseholders.

4.3 In addition, the main Commission considered several cross-cutting issues such as the impact of the most recent Census on the council's future funding prospects.

4.4 As mentioned above, the Housing Review has delivered its recommendations separately and will not be considered as part of this report.

4.5 The Future of Westminster Commission

4.6 The Commission first met in public in July 2022 with a commitment to holding further meetings in public throughout Westminster. Three further meetings were held with the last taking place in March 2023.

4.7 At each of these meetings the Commission heard updates from the review Chairs and discussed current issues with a view to advising on the approach currently being pursued by the council. These issues ranged from the development of a cost-of-living strategy, the census and early results, the

development of a community investment strategy and changing the approach to consultation.

4.8 Fairness and Equality

4.9 The Fairness and Equality review sought to work with the council to advise on approaches and initiatives that would enable and deliver a fairer, more equal and inclusive city. The five areas prioritised by the review group were:

- The cost-of-living crisis, including food and fuel poverty, access to advice and advocacy and food support for families and children.
- Early years provision and access to affordable childcare.
- Young people and access to early help, including support for vulnerable families, youth services and addressing gangs and serious youth violence.
- Improving the quality of life in the most disadvantaged neighbourhoods of our city, including addressing anti-social behaviour and crime, access to sport and leisure and improving the local environment.
- Building healthy communities and addressing health inequalities, including improving the physical and mental well-being of older residents, and tackling loneliness and isolation.

4.10 The review group held a series of evidence-based panel sessions on each subject. They heard from the council about current service delivery and engaged with service users and external organisations to understand what more could be done to support the most disadvantaged communities in the city.

4.11 Economy and Employment

4.12 The core focus of the Economy and Employment Review was to advise on how the council can enable more Westminster residents to share in the economic successes of the city.

4.13 The review group agreed several priority areas to examine, namely:

- High Streets – explored initiatives to support local high streets allied to promoting economic and other opportunities for neighbouring residents with an initial focus on Harrow Road.
- Skills and Employment – considered the best strategic approach to skills and employment and how economic opportunities could be opened up for the city’s residents, particularly those with the highest needs and those from disadvantaged communities.
- Social Value – working with pro bono consultancy, Bloomberg Associates, the review group examined how the Council’s social value and business community partnership approach could be strengthened to increase residents’ share of economic success.

- Business Support – considered what could be done to support Westminster’s businesses at a time when they are facing unparalleled challenges.

4.14 Half-day ‘Deep Dives’ were organised for each theme with a meeting of a sub-group held beforehand to look in detail at data provided primarily by council officers and to help guide the discussion at the deep dives.

4.15 Energy and Green Transition

4.16 The Energy and Green Transition Review had a core focus on examining the routes to reduce emissions from buildings in Westminster, given that 86% of the city’s emissions are produced from the energy used in homes, hospitals, shops, offices, hotels, and other buildings. The topics considered by the review group were:

- Domestic Buildings Retrofit
- Non-domestic Buildings Retrofit
- Energy Advice and Fuel Poverty
- Decarbonisation of Heating and Heat Networks
- Energy Data and Smart Energy
- Green Finance

4.17 The review group met on a monthly basis and in addition to the input of the review group members, industry specialists also volunteered their time on specific areas being examined by the review group.

5. Review of Recommendations

5.1 The Future of Westminster Commission has provided the council with the opportunity to work with a wide range of industry professionals, gaining their insight and expert opinion on both the challenges and opportunities that are faced by Westminster. These conversations and the advice that has followed has acted as a catalyst to deliver on Fairer Westminster ambitions.

5.2 The Commission’s report (delivered during June 2023) has been well received, with the majority of the recommendations being agreed. The Council’s response to the headline recommendations is set out in **Appendix A**.

5.3 It is anticipated that many of the resulting actions will now be taken forward by Cabinet Members and senior officers as part of existing and planned programmes of work, which will in turn be monitored and reported to Policy and Scrutiny and other committees as appropriate. Where there are initiatives requiring statutory consultation or formal decision making, these will require separate reporting to Cabinet, the relevant Cabinet Member or senior officer for approval.

6. Advising in real time - Delivering the Fairer Westminster Strategy

6.1 Many of the Commission's recommendations were delivered in "real time" meaning that many of the recommendations suggested have already been incorporated into existing programmes of work or have helped to shape the delivery of key strategies.

6.2 Key programmes of work already underway or set to begin are outlined below. The Commission's recommendations were delivered before the creation of the new Housing and Commercial Partnerships Directorate. Work to disaggregate those recommendations currently assigned to the previous directorate of Growth, Planning and Housing is on-going.

6.3 The Future of Westminster Commission

6.4 Anchor Institutions

With the support of Bloomberg Associates, whose help the Commission secured, the council is working to develop an Anchor Institutions policy which will deploy collective resource to benefit local communities.

6.5 Economy and Employment

6.6 The Fairer Economy Plan

The Economy and Employment review group has helped to shape the Fairer Economy Plan, which launched on 20 June 2023. The plan sets out clear priorities and commits to the principles of building a strong, diverse, and growing economy that benefits all residents and businesses.

6.7 North Paddington Programme

The Economy and Employment review group elected to conduct a deep dive into local issues and challenges in the North Paddington area. Their findings and feedback supported the development of the North Paddington Programme which was approved by Cabinet in February 2023. The programme aims to reduce the socio-economic and health inequalities across the wards of Westbourne, Harrow Road and Queen's Park (North Paddington).

6.10 Fairness and Equality

6.11 #2035

Looking at how to drive down inequalities, especially those related to health and wellbeing, was a core objective of the Fairness and Equality Review. The conversations had between the review group and officers and the resulting recommendations have helped to further embed the work of the #2035 programme across the council.

6.12 Poverty Reduction Strategy

The focus given by the Fairness and Equality Review to the cost-of-living crisis, building healthy communities and tackling inequalities has helped to shape a holistic and proactive approach to tackling poverty in Westminster. Work is underway to identify ongoing need and gaps in current service provision with a view to potentially developing a Poverty Reduction Strategy.

6.13 Energy and Green Transition

6.14 North Paddington Net Zero

The Commission recommendations are currently being built into the design and development of the net zero North Paddington programme of work. This Programme will be underpinned by comprehensive community led engagement and insights, which will inform the vision, strategy, and priority implementation activities to support achievement of net zero at local level. A joint community and council project team is being established and Carbon Offset Funding is being considered to support the programme.

7. Monitoring and Evaluation

- 7.1 For recommendations that have been incorporated into existing programmes, progress will be monitored and managed through existing reporting mechanisms. Recommendations that are agreed but sit outside the scope of an existing programme will be taken forward through the respective services' business plans and through future iterations of the Council's Fairer Westminster Delivery Plan as well as other corporate delivery and reporting mechanisms.
- 7.2 In adopting the council response to the recommendations, the Cabinet has committed to undertake a one-year review of the recommendations put forward by the commission with a view to monitoring their progress.

8. Financial Implications

- 8.1 There are no direct financial implications arising from the recommendations in this report. Recommendations incorporated into existing programmes will be delivered from the programmes agreed budget. Recommendations that are agreed but sit outside the scope of existing work streams or programmes will be subject to further financial scrutiny and if pursued taken through the budget setting process.

9. Legal and Equality Implications

- 9.1 **Appendix A** contains a number of initiatives Cabinet is asked to approve, some of which will require adherence to statutory provisions in order to implement, to include statutory consultation.
- 9.2 Consideration will also be given to the requirement to undertake consultation and Equality Impact Assessments (EQIAs) to ensure the Council considers its Public Sector Equality Duty on an ongoing basis for each initiative.
- 9.3 Legal Services and other corporate services will be engaged at an early stage, as appropriate, as recommendations are taken forward. Where necessary decisions will be taken to Cabinet or individual Cabinet Members and follow the agreed governance process that all decisions are subject to.

10. Carbon Impact

- 10.1 There are no direct carbon implications arising from the recommendations in this report. Individual carbon assessments will be carried out as needed on a case-by-case basis as recommendations are adopted through new or existing programmes of work, in line with current organisational practices.

11. Consultation

- 11.1 Resident and Member consultation will be undertaken through the adoption of new and existing programmes of work in line with current organisational practices.

If you have any queries about this Report or wish to inspect any of the Background Papers, please contact: Daniella Bonfanti, Cabinet Manager, dbonfanti@westminster.gov.uk

APPENDICES

- Appendix A – Council Response to the Future of Westminster Commission Report Recommendations
- Appendix B – Future of Westminster Commission Report

BACKGROUND PAPERS

- [Future of Westminster Commission – report to Cabinet – 11 July 2022](#)

- [Council response to the Future of Westminster Housing Review Recommendations.](#)

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Appendix A - Future of Westminster Commission Housing Review – Council Response to Recommendations

Future of Westminster Commission – overarching recommendations

	Recommendation	Recommended response (Work in progress/agree/consider in more detail/note/reject)	Comments/outline response	Lead Directorate	Supporting Directorate
Supporting Communities					
1.	The Council should identify a clear programme of service reconfiguration and other initiatives that it will commit to in order to contribute to the #2035 objective recognising that overall the programme is a joint effort by the Council and Imperial Health Trust in collaboration with the voluntary and community sector and driven by local communities. It is important for the Council to commit the necessary resources for its part in the programme and this should be seen as a central element in the budget process this year and in future years. We suggest that for this year the Council incorporate an element of external challenge in doing this within a formal process overseen by the Cabinet Member for Public Health and the Voluntary Sector and the Cabinet Member for Finance.	Work in progress	<p>The communities team are working to deliver training around #2035, which includes embedding this into the Westminster Way corporate training programme. The team will engage with voluntary and community organisations, and other public sector partners in developing and progressing this work. The training programme is intended to support all parts of the Council to implement this approach into their work, and to communicate and celebrate their successes. A quarterly success report can be provided to Members. The aspiration is that #2035 will underpin work across the council to truly improve outcomes for all communities. This piece of work is still in its infancy in terms of service design and delivery.</p> <p>Strategy & Intelligence and Public Health are collaborating with Imperial to bid for a grant from the National Institute for Health and Care Research of £5million over 5 years to set up a Health Determinants Research Centre within the Council, to address health inequalities within Westminster. This programme of research will support #2035 by helping to understand how key determinants of health impact at a local level across disadvantaged groups and all communities across Westminster. As a result the council can strategically target intervention through its policies and services for lasting change.</p>	I&C	All directorates
2.	The establishment of an early intervention data team, drawn from existing data and intelligence functions, to be based in a community facing setting in one of the more deprived areas of the City North Paddington, Pimlico South and/or Church Street with appropriate resources and with a remit to work jointly with VCS organisations, health services and schools that serve those diverse communities.	Consider in more detail	<p>The first step will be to strengthen the existing relationships between this function and frontline services who hold local knowledge at a granular level by establishing virtual teams based around geographically specific issues e.g. barriers to work in North Paddington.</p> <p>We will look at how we work with other agencies and VCS organisations, beyond gathering and sharing data and intelligence, and look to embed a system-based approach where the Council plays an enabling role in bringing together the various agencies and individuals needed to work on a common purpose. This could be done through the existing work on adopting place-based working and through existing streams of work on, for example, anchor institutions, community hubs and community participation, with the potential outcome contributing to a more integrated and inclusive decision-making process that addresses local needs and challenges.</p> <p>In considering this the council will engage with the UK Prevention Research Partnership and/or Act Early (actearly.org) for prevention/early intervention data good practice. Both organisations already work with local authorities on early intervention activities.</p>	I&C	GPH

Appendix A - Future of Westminster Commission Housing Review – Council Response to Recommendations

3	<p>The Council should engage with local communities to work out which are the most important areas for locally based face to face service delivery and agree an affordable strategy for neighbourhood services that includes collaboration with other service providers such as the Police, local GPs, RSLs, employment services and VCS organisations. This should include mechanisms to ensure that the needs of families and individuals are considered and addressed in the round and should be a central part of the budget and delivery plan process for future years identifying a clear resourced timetable for delivering new local hubs and offices.</p>	Agree	<p>The Fairer Westminster Delivery Plan gives a clear commitment towards building and nurturing strong community foundations and actively working with our communities to improve people's health and wellbeing, particularly for our most disadvantaged residents. This approach to shaping services is already being incorporated into local task groups in Edgware Road and Queensway, place-based programmes in North Paddington, Community Hubs, and the roll out of housing estate offices.</p> <p>In terms of a clear programme of delivery, Queens Park Housing Service centre was opened 5th of June and a further Estate Office at Lillington & Longmore is scheduled to open in September 2023. We are working across the Council to bring forward plans for Community Hubs where appropriate services will have a presence.</p> <p>The Safer Westminster Partnership has now approved the development of a Safer Neighbourhood Board, to be led by the police and supported by the council. Police and council have now agreed to institute these meetings and the first was held in April 2023.</p>	I&C	All Directorates
Organisational Development, Budget and Delivery Review					
4	<p>The development and roll-out of training for all the Council's staff, starting from the top, in effective community engagement and consultation, alongside further support for the central team with direct responsibility for delivering this agenda.</p>	Agree	<p>Work is already underway on the delivery of training courses on consultation and engagement which will be open to all council employees. Communities also currently deliver a series of "Masterclasses" on community engagement. Looking beyond the delivery of training thought should be given as to how best to share the intelligence that we gather about our local communities within the organisation to support future engagement and provide an evidence base to inform the prioritisation of resources.</p>	I&C	People Services
5	<p>Agree and identify the priorities and the methodology, timetable and resources required for these reviews over the next two years as soon as possible.</p> <p><i>(CONTEXT FOR RECOMMENDATION) We therefore welcome Council's plans for a more fundamental review of Council priorities and resource allocation during 2023. This should involve deeper examination of resource allocation, Council capacity, capability and overall effectiveness within service areas identified by the Cabinet as priorities for review and for delivery of the Council's Fairer Westminster Delivery Plan)</i></p>	Work in progress	<p>The financial planning timetable ensures that Fairer Westminster is embedded throughout the process. The budget is therefore underpinned by the Fairer Westminster Delivery Plan</p> <p>This year's planning process is supported by a zero-based budgeting (ZBB) review, allowing members to review existing resource allocation and assess whether these resources can be reprioritised elsewhere across the council to support Fairer Westminster.</p> <p>The financial plan is a multi-year review (2024/25 to 2026/27), using ZBB, to implement priorities over a phased period that will allow the council to deliver on its priorities in a financially sustainable manner.</p> <p>Furthermore, a review of Scrutiny's involvement in financial planning provides more public transparency in the process</p>	F&R	
6	<p>The budget and delivery planning process should be based on the Cabinet's priorities for the administration and its Fairer Westminster Strategy, and all funding decisions should be driven by that process. This would include Council Tax decisions, revenue and capital budget allocations, the strategy for allocating CIL revenues, and the use of all</p>	Agree	<p>The Council's current processes to develop the budget and medium-term financial plans ensure resources are applied in a way that most effectively and efficiently achieves the Council's Fairer Westminster ambitions while also taking into account those budgetary considerations that lie outside of Fairer Westminster priorities.</p>	F&R	All Directorates

Appendix A - Future of Westminster Commission Housing Review – Council Response to Recommendations

	reserves and balances – in particular, examining the scope to repurpose any earmarked reserves towards the priorities set out in the Strategy and Delivery Plan and the #2035 programme.				
7.	The Council should establish clear requirements for all staff to spend a proportion of their time outside City Hall, including being seconded or based in community based organisations, to be exposed to the challenges of front-line service delivery and to strengthen their understanding of and engagement with the City's residents and communities, as part of developing a wider culture focused on tackling inequalities, responding to community priorities, and addressing the needs of people with protected characteristics.	Consider in more detail	All council staff are encouraged to make use of touchdown spaces located in council buildings throughout Westminster and there is an established Employee Supported Volunteering scheme "Give16" which supports officers to contribute to communities either in Westminster or their local area, the scheme is supported by Westminster Connects. In addition to this early scoping work has begun to determine the feasibility of a secondment programme as part of the VCS Investment Strategy as well as looking to develop a mentoring scheme between council staff and VCS organisations. Any large scale secondment programme or compulsory requirement would have to be balanced against the need to continue to deliver key council services.	People Services	All Directorates
Cost of Living					
8.	The Council should continue to use every vehicle it can to support those affected by the cost of living crisis including by providing further targeted support to tackle fuel poverty.	Work in progress	We agree that supporting residents during the cost of living crisis is a priority. The current COL working group will continue to review the evidence and the level of funding across all Cost of Living Support programmes and work out where further investment is needed. In response to fuel poverty in particular, additional funding has already been invested in Green Doctors service and £50k invested in Energy Vouchers, this will be kept under review, especially in preparation for winter 2023.	I&C	
9.	There should be joint work across the Climate, Housing and Public Health teams to scale up significantly a targeted programme of energy efficiency advice and works in preparation for next winter drawing on support from the Council's Carbon Offset funds.	Consider in more detail	We agree that joint working across departments is very important, and we will be reviewing our ways of working specifically around further scaling up of energy efficiency advice. Currently, our Housing teams are engaging with the residents in our lowest EPC homes and offering retrofit works. They are sharing their experiences through a demonstrator home and presentations at think tanks and the Heritage retrofit taskforce. Further engagement is required with housing associations and private households, which is being picked up as a cross-departmental piece of work through the North Paddington Programme. Further discussion will also be had as to how best utilise the Carbon Offset Fund to support energy efficiency programmes. Housing Services currently manage the Rent Support Fund and target it specifically towards Council tenants who are either on partial benefits or receiving no benefits.	I&C	GPH, ASCH, ECM
Voluntary and Community Organisations					
10.	The Council should as soon as possible introduce a core funding programme for the voluntary and community sector of similar scale to its neighbouring boroughs.	Work in progress	A Core Grants Programme is being developed and it is hoped that this will go live later in 2023. We also have existing funding programmes directed towards supporting local projects which VCS organisations can bid for, i.e. Community Grants Programme and Ward Budget Programme as well as providing funding to VCS to deliver half term activities and food.	I&C	
11.	The Council should work with the sector to develop a local Compact on relationships and processes, identify opportunities for community asset transfers and community ownership, and consider longer-term mechanisms to embed community engagement at	Agree	-	I&C	

Appendix A - Future of Westminster Commission Housing Review – Council Response to Recommendations

	the core of its strategy, such as participatory budgeting or citizen's assemblies.				
Community Engagement					
12.	We recommend that based on this work the Council should re-examine and formalise its requirements for consultation and establish a central team responsible for ensuring that all consultation exercises comply with them.	Agree	Consultations are now listed on the Council's website and there is a dedicated resource within the communities team to ensure that this information is kept up to date and that services are aware of the need to publish details of all consultations on the website. The Communities Team is also working on consistent standards for consultation and engagement and have establish a QI Board to review planned consultation activity to ensure all meet high standards.	I&C	
13.	The Council should ensure that its approach to community engagement is planned and delivered in genuine partnership with local voluntary and community sector organisations and not seen as its sole preserve. Voluntary and community organisations often have links into communities that are stronger than the Council's and should be resourced through funding or secondments to deliver community engagement in area based programmes such as that for North Paddington.	Agree	The Director of Communities chairs the London Councils Community Engagement Network across London and so will benefit from the best practice across local government and beyond on engagement.	I&C	
Making Change Stick					
14.	Following Council decisions on which Commission recommendations should be accepted a clear plan for this overall monitoring approach should be agreed as part of their implementation.	Agree	This will be built into business-as-usual performance and programme management reporting. Consideration will be given to a "one year on" implementation reporting approach to set out how those recommendations given by the Commission and agreed by the Council have been progressed and their impact. This report will be shared with the Chair of the Commission and the individual review Chairs as well as Scrutiny Committees.	I&C	
15.	The Council should invite the Chair of the Commission, together with the convenors of the four sub-groups, to review and report on progress.	Note	As above	I&C	

Appendix A - Future of Westminster Commission Housing Review – Council Response to Recommendations

Energy and Green Transition Review – Recommendations

	Recommendation	Recommended response (Work in progress/agree/consider in more detail/note/reject)	Comments/outline response	Lead Directorate	Supporting Directorate
Strategic					
1.	Every major decision should embed the CEAP's goals into the work of all other departments across the council and strategies, such as the planned new Infrastructure Delivery Plan for Westminster.	Agree	The council will only achieve its climate goals if carbon impacts are considered in everything the council does. The Climate Emergency team is working to ensure climate change impacts are considered in all council decisions. This includes through the introduction of the Carbon Impact Evaluation Toolkit to provide a standardised assessment of the carbon impact of all the council's capital projects. We are looking to build upon and strengthen this as part of creating a clear vision and plan for net zero 2040, which will include reviewing all decision-making across the council and better ensuring climate change is a key consideration within our activities, plans and processes. Other avenues include reviewing new tools to assist with decisions and assessing their carbon impact (e.g. Climaxcommunity or Slingshot) and exploring the opportunity of introducing Climate or Green Budgeting as part of our financial management.	ECM	All directorates
2.	As a revised CEAP is developed, Westminster City Council's political leaders should take a lead role in highlighting to the Government how the UK's Net Zero target cannot be achieved without the consent and action of communities and councils.	Consider in more detail	We agree on the need for greater central government support for our climate emergency action and will work with Cabinet Members to agree any lobbying activity. We should seek to build on our involvement in the London Councils Climate Programme which is lobbying government to better recognise LAs role in climate delivery on behalf of the London LA collective.	I&C	ECM
Citizen Engagement and Communication					
3.	The forthcoming Westminster Citizens' Climate Assembly should therefore ensure that WCC reaches out to all voices not always involved in the climate debate – from residents, businesses and community organisations across the city to help inform the revised CEAP.	Agree	It is essential that our approach to climate change reflects the broad needs, ideas and opinions of our diverse communities. As part of this commitment, a representative group of residents from all parts of Westminster are being empowered to make recommendations as participants in our first Climate Change Assembly. They have been selected at random following a stratified sampling approach to ensure we reflect the local demographic. Businesses and community organisations have been engaged through Partner Engagement Workshops prior to the Assembly to gain buy-in and perspectives to inform assembly design. A range of local stakeholders will be engaged again when Assembly recommendations are published. Assembly recommendations will be presented at Westminster's Climate Leaders Group and will then inform revision of the Climate Emergency Action Plan. We continue to support this with wider engagement activities across our climate work, including a dedicated communication plan.	ECM	I&C
4.	WCC should set out clearly how it will maintain a continued dialogue, consultation and feedback mechanism with stakeholders and residents on the progress of the revised CEAP. As part of this, it is recommended that a	Consider in more detail	We are committed to building upon the relationships, networks and engagement we have established so far through our Climate Emergency work to date. This includes businesses, cultural organisations, school children and communities. We are ensuring through Westminster's Climate Change Assembly that resident voices are central to our climate action going forward. We are considering the	ECM	I&C

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	Citizens' Climate Panel should be established to coordinate, feedback and advise on the progress of the CEAP		best approach to secure an ongoing community engagement and dialogue following the Assembly, including scoping a Climate Champions network and enhancing the developing Sustainable City Charter network of businesses.		
5.	The recommendations from the House of Lords inquiry (and the 'withdrawn' report), though targeted at national Government, include a number of areas that could be explored by WCC as part of a Westminster Behaviour Change workstream (working with a Citizens Climate Panel) which would help inform residents and businesses how to reduce their climate impact as well as supporting the rollout of CEAP programmes.	Consider in more detail	<p>Most recommendations set out in the reports mentioned in the recommendation are aimed at national government- some we can consider at the local level:</p> <ul style="list-style-type: none"> • A public engagement strategy, both to communicate a national narrative and build support for getting to net zero, is urgently required. • Need to provide a positive vision and clear narrative on how the public can help achieve climate and environment goals, and to lead by example. • Should provide clarity to individuals about the changes we need to make, in how we travel, what we eat and buy, and how we use energy at home, and should articulate the many co-benefits to health and wellbeing of taking those steps. • Fairness is key to effective behaviour change. Must tailor behaviour change interventions to avoid placing a burden on those who can least afford it • Learn from examples of where it has effectively enabled behaviour change, including during the COVID-19 pandemic, as well as from past failures. Should push the message that it is following the science, as it has in the Covid-19 pandemic, and it calls for close cooperation with experts. 	ECM	I&C
6.	Westminster must ensure by the time it has finalised a revised CEAP in 2023 that it has a new climate and environment communications programme in place, learning from other borough examples, and using existing print and digital routes but also new social media routes to 'shout out' the work it is doing to make the city a cleaner and greener place to live, and to ensure this is frequent and progress on engagement is adequately monitored.	Agree	There is cross-council recognition of the importance of regularly communicating the council's activities and achievements with regards to our net zero ambitions, but this must always be linked to supporting delivery of agreed project objectives. For communications, this will include raising awareness, helping to drive behaviour change or supporting front line engagement. Within the communications team there are officers supporting the Climate Emergency programme who work with the delivery teams to create a forward plan for future climate communications, based on project delivery milestones and objectives. This work forms the basis of a proactive and forward-looking communications plan.	ECM	I&C
7.	Communication on the Council's action on climate should be made a communications priority for the council communications team.	Agree	As above	ECM	I&C
Resourcing Climate Emergency					
8.	As part of updating the 2023 CEAP a review of the necessary posts and resource needed to ensure commitments can be delivered effectively should be undertaken.	Work in progress	<p>The Climate Emergency Programme has recently expanded to reflect the increasing size and scope of the programme. This is a priority for the Council and resource requirements will continue to be monitored and adjusted in response to any further changes in scope. Embedding climate across the council is essential to draw on all the council's resources and levers, and to highlight any other areas where additional resource is required for climate mitigation or resilience activities.</p> <p>The March 2023 budget approved £1.5m ongoing climate investment growth to support Westminster climate priorities which will provide the resource to take this work forward.</p>	ECM	F&R
9.	Westminster's Carbon Offset Fund should be managed by the Climate Emergency team, with	Work in progress	While we do not fully agree with the recommendation there is a recognition that management of the offset fund should be reviewed together with its branding,	I&C	ECM

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	appropriate governance arrangements in place.		guidance, allocation and governance to ensure that it can be distributed more effectively to support climate action.		
10.	A Climate Community Engagement post should be created.	Consider in more detail	We recognise that we need a clearer approach to community engagement on climate change as well as wider sustainability challenges such as improving air quality, greening and biodiversity. We need to ensure the engagement routes are streamlined to discourage duplication for recipients, including schools in particular. Whilst the CE Team does have two engagement roles now in post, we are still reviewing further engagement requirements across a broad set of sustainability activities. We are working closely with Communities Team and other services to consider opportunities for support or for streamlining council engagement activity through better coordination around existing channels, networks and partnerships.	ECM /I&C	
11.	The forthcoming Green Economy Strategy should establish an updated baseline for the green economy in Westminster	Agree	The council's Green Economy Programme is specifically outlined in the recently launched Fairer Economy Plan 2023-26. The recommendation is welcomed, as something we are already doing and work is underway with the economist function based in I&C to build out the baseline, however this baseline will focus specifically on the Low Carbon sectors in Westminster.	GPH & IC	ECM, F&R
12.	A new Green Finance post should be created with the WCC to take forward a new Green Finance vision and work plan for Westminster, including within this work plan all areas listed above.	Consider in more detail	We fully recognise the need to have a clear overall financing strategy for the climate programme based on a clearer understanding of the costs of action versus inaction. We also need support to fully embed climate impact assessments and the costs of mitigation into our financial processes, any green finance role created would be responsible for pursuing grant funding that supports the council's work around the climate emergency. Any requirements to fund additional posts will be considered as part of the annual Financial Planning cycle which aligns financial resourcing with our Fairer Westminster commitments	F&R	ECM
Data and Smart Energy					
13.	WCC should set out a plan in their CEAP for how they will take adopt a more data-led approach to identify and target interventions, working more collaboratively with WCC's Smart Cities team and sharing (and learning) best practice with other London councils, many of whom have also commissioned their own LAEPs.	Agree	We recognise the importance of a data-driven approach to delivering a robust and credible Climate Emergency Action Plan. GHG baselining analysis and modelling was undertaken to underpin the plan development; to ensure action was targeted at key emissions sources in Westminster, that we understood what was needed to achieve net zero 2040 and that we had a clear baseline to monitoring our performance against. We are continually working to improve our understanding and evidence base, including through projects such as the LAEP, information sharing with external partners and stakeholders, and learning from the activities of other London Boroughs among others. There has already been progress with WCC emissions data being incorporated into the Smart Cities Operating System and we will continue to work with Smart Cities and Strategy and Intelligence teams to identify opportunities for storing and interrogating the data. We aim to take a more data driven approach to identify and target interventions, including through our recently developed Environmental Justice Measure mapping. Our most recent work has involved identifying new and additional data sources that could provide us with a much more granular understanding of emissions in Westminster.	ECM	I&C
14.	Westminster's work around energy data should be informed by the five recommendations of the Energy Data taskforce as set out in the Modern, Digitalised Energy System	Agree	We agree with the recommendation that that energy data should be informed by the five recommendations by the Energy Data Taskforce and continue to work closely with our strategy and intelligence team to improve our data quality and understanding. Progress has already been made in certain areas to meet these	ECM	I&C

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			<p>recommendations:</p> <ul style="list-style-type: none"> • We are in the process of incorporating the WCC energy data into the Smart Cities Operating System allowing the data to be more easily accessible by officers and to streamline the data gathering process. • There has also been work done to improve the reliability of WCC energy data with the aim to gather data directly from smart meters. • Where possible, we will also aim to be transparent with data and are currently in the process of developing an interactive emissions dashboard which will be published on the WCC website. • Officers are working with the Smart City team on a long-term project to create a digital portal for the Sustainable City Charter that will feed building level energy data from Charter signatories through to a Smart City data platform. However this will take time to be fully realised. 		
15.	Westminster should therefore look to develop a Smart Energy City Collaboration, working with stakeholders across the borough, including UK Power Networks, neighbouring boroughs and the GLA to better understand the demand side challenges as we move to a more active, smarter electricity distribution network in the city.	Consider in more detail	Work is underway to develop a Local Area Energy Plan (LEAP) for Westminster which will, amongst other things, help inform the energy systems used in future council-led developments and the feasibility of creating new and/or expanded low-carbon heat networks and communal heating systems in Westminster, for our commercial stakeholders and investors. How we implement this will be informed by the findings of that study but we are confident that there will need to be some means of ongoing coordination of relevant 'Smart Energy' stakeholders for the city to ensure ongoing partnership working. We will need to consider the resourcing implications as well as the detail of the recommendations before determining what this might look like or be focused on.	ECM	GPH, I&C
16.	As part of the Smart Energy City Collaboration Westminster should also out ambitions for the growth of rooftop solar PV projects and the increased use of electricity storage across the city	Consider in more detail	The work to develop a LAEP will help to identify rooftop solar PV opportunities which can be pursued - we agree that the council should use the outputs of this to support ongoing collaborative working with 'Smart Energy' partners to drive implementation. Within the council's own estate, the corporate property decarbonisation programme has identified suitable buildings for the installation of Solar PV and installed arrays for example, on our leisure centre buildings.	ECM	GPH
Net Zero North Paddington and Community Energy					
17.	As a priority WCC should map out what provisions it needs to make to ensure its revised CEAP programmes can be delivered early on – and effectively – in the North Paddington area of the city.	Agree	Area-based implementation will be key to demonstrating what a net zero 2040 Westminster could look like and to realising the wider benefits that come with it. It will also be important to informing our understanding of the barriers and solutions to implementation, including driving behaviour change at local level. As such, reviews are already under way with the CPMO Programme and Communities team to identify how we can embed climate initiatives into the year one delivery of the North Paddington programme and target opportunities to deliver CEAP actions at a local level through a holistic programme-wide approach working with the community. The Environmental Justice Measure will support this targeting.	GPH	I&C / ECM
18.	A community-led Net Zero North Paddington study should be commissioned by WCC to set out a shared vision on how to achieve net zero for the area.			GPH	I&C / ECM
19.	Similar to other boroughs in London, part of Westminster's carbon offset funds should be directed to a new Westminster Community Energy Fund, with a dedicated Westminster Community Energy Officer supporting	Agree	Plans are already in place for a Community Fund to speed up delivery of the local benefits of Carbon Offset funding as well as to review the guidance and approach, in order to make it easier for community groups to access this funding. Further planning around the resourcing to support this is underway.	I&C	I&C / ECM

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	applications from community groups across the city.				
Retrofitting					
20	A comprehensive <i>Homes Retrofit Action Plan</i> for the city is needed to give a clearer idea to <i>all residents</i> of a route for them to support their pathway to a net zero home.	Consider in more detail	The Council agrees that retrofitting is a top priority and critical to our ability to achieving our climate emergency goals. To amplify our retrofitting work, the Council agrees to undertake a resource review of the current programme of work, to create a framework for a retrofitting programme that meets the ambition and challenge set by the EGT Review (including the points made on Retrofit Taskforce and Major Energy Users workstream) and the possible additional resource required to deliver it. This will then be taken forward as part of our budget setting process. The Council also agrees to publishing a Housing Retrofit Action Plan for both the city and the Council. Work is currently underway with data mapping of the energy consumption of buildings, a successful bid of £300,000 for the Retrofit Task Force to increase resource and the continuation of our retrofit assessments on all voids to bring homes up to an EPC B or as close as practical.	GPH	ECM, F&R, I&C
21	WCC should publish a <i>Housing Retrofit Action Plan for Westminster</i> by summer 2024	Consider in more detail		GPH	ECM, F&R, I&C
22	Westminster's net zero ambitions simply cannot be achieved without a step change in its approach to retrofitting buildings in the city. This will require a comprehensive programme of work that will require a significant boost in resource by the council	Consider in more detail		GPH	ECM, F&R, I&C
23	The EGT recommends increased resource deployed to the Retrofit Task Group as soon as possible with the appointment of a Retrofit Programme Manger and team to expand the scope of the Taskforce's work, research and outputs.	Consider in more detail		GPH	F&R
24	Establish a Major Energy Users workstream to identify those buildings with the highest energy consumption and set out best practice for reducing their carbon impact	Consider in more detail	GPH	F&R, I&C	
Fuel Poverty					
25	WCC should build on the MEES+ scheme, to provides the output from these programmes to the GLA and other London councils, as well as informing a wider MEES+ scheme in Westminster	Consider in more detail	In principle we recognise the need to expand on the current MEES+ scheme but are still currently delivering the pilot - this is set to be completed by the end of the 2023/2024 financial year. Upon completion, the council will then be able to review the success of the MEES+ grants to help inform an ongoing strategy. It should also be recognised that the MEES+ pilot is being delivered alongside ongoing MEES enforcement, both of which will need to be included in an overarching long-term strategy.	ECM	I&C
Decarbonisation of Heating and Heat Networks					
26	Demand reduction is the first and most important element in relation to reducing Westminster's reliance on gas heating – and hence the EGT's recommendations around energy efficiency in homes and businesses (earlier on in this report) must always be considered as a necessary first step in any initiative in relation to the provision of clean heat.	Note	This will be reflected in Housing and Development service delivery.	GPH	ECM, F&R
27	As a priority, WCC should reach out to residents to identify a mix of household types in the city that would welcome the installation of a heat pump as an alternative to their existing gas boiler, and look to provide some 'hand holding'	Consider in more detail	"In order to meet our net zero 2040 target we need to better support households to implement energy efficiency measures. Both recommendations put forward a number of useful initiatives however further consideration and resource planning would be required before we could commit to delivering these suggestions. There is already activity underway to better support households - the revised	I&C	ECM

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	to these households in securing BUS grants and through the heat pump installation process.		Environmental Supplementary Planning Document will provide more guidance on the installation of heat pumps but there are no current plans to go beyond this in terms of directly supporting residents with installation. Given that the BUS grants do not cover the full cost of heat pumps the advice is likely to only benefit owner-occupiers or landlords who can afford the investment.		
28	To help support the deployment of heat pumps in Westminster, the council must go beyond simply signposting households to the MCS Approved Suppliers list and instead take a more active approach in helping households identify suitable suppliers, fast track applications that require planning, provide information on energy efficiency grants/support ahead of a heat pump install, monitor data on heat pump installs including changes to EPC banding issues, and cost information as a guide for residents, update the ASHP guide with revised information by surveying residents who have had a heat pump installed and so on.	Consider in more detail	The Retrofit Taskforce will look to create a 'Procurement club', which will enable building owners to aggregate retrofit demand for appropriate retrofit interventions (including heat pumps), to access a quality supply chain of services and products to carry out retrofit works. There are risks associated with directly pointing households towards specific suppliers, as demonstrated with the recent challenges with Solar Together suppliers. "	I&C	GPH
29	The Housing Team should be provided with more resource and support as a priority in order to secure these significant funds from Government in order to not only improve the consumer experience of heat networks – but also drive down energy bills for residents the as soon as possible.	Agree	Reviews are already underway to identify where greater support is needed - the key resourcing need identified within the Housing department is to join together the sustainability, assets strategy and M&E team, so that current heating systems can be more effectively assessed in order to apply for further government funding. The could be supported by other officers across the council, including any Green Finance role which could look at overall climate funding priorities and opportunities.	GPH	
30	Bringing together major heat (and cooling) heat users (hospitals, universities, housing providers, government and commercial offices) to explore how their anchor loads could form the cornerstones of future heat network zones across the city	Work in progress	Through major projects like our Local Area Energy Plan and PDHU Decarbonisation and wider South Westminster Area Network opportunities, we are working to understand heat network zone opportunities across the borough. As part of our local energy assessment process we are engaging a broad range of stakeholders and will continue to look for opportunities to build wider partnership networks with key energy users around this work as it develops. We are also aware of and connecting into external work being carried out by DESNZ reviewing the feasibility of heat network zoning in Westminster. We will continue to liaise with the teams and suppliers responsible for carrying out this assessment in order collaborate effectively and reduce duplication of efforts.	GPH, F&R	ASCH / CS
31	As a borough with the most significant district heating scheme operating in London, Westminster should approach London Councils to take forward a new heat network work strand – potentially liaising with the GLA to get technical support for this work from the Local Energy Accelerator programme	Work in progress	The council is already a part of the London Councils 'Renewable Power 4 London' workstream, which has a Decentralised Energy sub-group - however this group has been dormant for several months now. We agree there is a need to continue collaborating with organisations like London Council's and the GLA, and council support for any further initiatives will be dependent on resource availability amongst the other major workstreams being delivered.	GPH/ ECM	

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Economy and Employment Review – recommendations

	Recommendation	Recommended response (Work in progress/agree/consider in more detail/note/reject)	Comments/outline response	Lead Directorate	Supporting Directorate
Headline Recommendations					
1	The council's proposed economic development strategy should set out very clear priorities and targets for council activity.	Agree	Working with the Economy and Employment review group in real time has meant that advice and recommendations coming forward from the group have helped to shape the Fairer Economy Plan, which launched on 20 June 2023. The plan sets out clear priorities and commits to the principles of building a strong, diverse and growing economy that benefits all residents and businesses and is the first step towards identifying and progressing towards our priorities. From here we need to work with partners and develop the evidence base, good practice, collaborative approach to building a long-term strategy.	GPH/ I&C	
2	The initial area of focus for the Council should be the North Paddington area, but that the lessons from taking a targeted and place-based approach should subsequently be applied to other disadvantaged areas of the city.	Agree	The Council is committed to delivering a Fairer Westminster, bringing better outcomes and opportunities across the borough. The North Paddington Programme aims to improve both service delivery and outcomes in the three wards of Westbourne, Harrow Road and Queens Park which consistently reports lower socio-economic indicators compared to other parts of the borough. The North Paddington Programme is being supported by CPMO (Corporate Programme Management Office) and progress of the North Paddington Programme will be periodically reviewed with a view to rolling out learning to other projects in the future, this is also the case with the Local High Streets Programme and the Queensway Strategic Group.	GPH	I&C, ECM
3	To work with anchor institutions and private sector employers to facilitate improved access to economic opportunities by other, less prosperous parts of the City	Agree	Work is currently underway to establish an Anchor Alliance comprised of major employers and BIDs to support community wellbeing and wealth. We need to examine all our levers with private sector employers, including procurement, s106 and CIL to ensure our residents are getting maximum opportunities from these relationships.	GPH	
4	To develop a new shared vision for skills and employment through a Westminster Skills and Employment Board	Agree	We will soon be launching an Education, Employment & Skills Board to convene our key players and adapt the offer on all sides to maximise the opportunities for our residents. The Partnership will review the recommendations made by the Westminster Commission with its members, and also take account of partnerships under the existing Education Partnership Board.	GPH	
5	To increase its support for micro, small and medium sized enterprises (SMEs) and Creative Industries	Agree	The Fairer Westminster Delivery Plan commits to a targeted programme of support to enable access to affordable, inclusive workspaces for underrepresented artists and creatives, providing them with routes into creative industries We also have a dedicated Cultural Principal Policy Officer who runs a cultural grants programme and cultural network which is a regular and well attended meeting which supports creative and cultural partners.	GPH	
6	To focus on the right ways to support the economy of the CAZ alongside its resident population	Agree	This work is currently being captured as part of the Fairer Westminster Delivery Plan	GPH	I&C

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			Also via 'Vibrant West End' objective under the Fairer Economy Plan, where focus is on balancing the needs and priorities of businesses, workers, visitors and residents to ensure the economy of the West End and wider CAZ develops in a way that is sustainable, resilient and fairer.		
7	To improve monitoring and evaluation of the impact of Interventions	Agree	The council needs to be absolutely clear about the impact interventions are having. Effective evaluation of services is normally completed by a third party to ensure it's absolutely impartial. This will be dependent on funding.	I&C	GPH
Working with anchor institutions and private sector					
8	Encourage and, where possible, require anchor institutions especially those in the private sector to increase levels of procurement from Westminster-based SMEs, encourage the take up of existing initiatives such as the Mayor of London's Good Work Charter, target apprenticeship and employment opportunities at underserved communities in the city, support skills provision, and strengthen their presence in schools and colleges	Agree	While there is broad agreement with this recommendation there needs to be further consideration as to how best deliver this, which will include the consideration of signing up to the Mayor's Good Work Charter and advocating for its adoption by businesses in the city. We are establishing our Anchor Alliance which we hope will drive forward the aspirations around procurement. Meanwhile our Responsible Commissioning and Procurement Strategy, Fairer Economy Plan and the Employment and Skills Partnership Board address different components of the overall recommendation.	FR /I&C	CS / GPH
9	Explore ways to develop place-based partnerships between anchor institutions/major employers and specific neighbourhoods	Agree	The Council is currently involved in a wide range of place-based activity bringing together anchor institutions and local communities. We are trialling a new area-based approach through our North Paddington Programme and will look to replicate this and other ways of working across our High Streets Programme.	GPH/I&C	
10	Develop a menu of social value offers, based on identified community needs, can inform the work of the Anchor Institutions Network and inform the council's procurement approach to social value	Agree	See above response to recommendation 9	GPH	
11	Facilitate mentoring and peer support relationships through pairing firms and senior individuals in the CAZ with young people and SMEs from disadvantaged neighbourhoods within the city	To be considered	There is some good practice through the City Lions mentoring programme of how this can work. There have been 150 mentoring pairs between businesses and Westminster young people over the last 3 years. City Lions have produced a good practice mentoring handbook, mentoring training and the plan is to continue mentoring. Subject to the allocation of resources this is something that could be upscaled. This could be further explored as a long-term aspiration of the Fairer Economy Plan, together with the recommendations around increasing opportunities for CAZ based businesses to deliver social value locally. https://citylions.org/city-lions-mentoring/city-lions-mentoring-programme/	I&C /GPH	
12	Maximise connections between CAZ-based employers and underserved communities in the city, for example through promoting school governorships, board memberships of community organisations, volunteering, schools outreach, and other routes	Agree	Our Responsible Business Network is made up mostly of CAZ employers and we promote opportunities to get involved with the community through a regular bulletin. We have plans to develop a platform to sit alongside the bulletin which goes out. The bulletin is co-ordinated with One Westminster, who help pull together needs from community orgs which are incorporated.	GPH	
13	Ensure that planning decisions for commercial space in the CAZ promote the provision of affordable workspace, with priority access	To be considered	Our current Enterprise Spaces Programme delivers accessible workspace to businesses and residents. Around 107,000 sq. ft. has been delivered in the CAZ, with more in development and secured through the planning system. Adopted planning policy is in place to support this.	GPH	IC

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	reserved for residents and SMEs from the city's underserved communities				
14	Encourage and, where possible, require anchor institutions especially those in the private sector to increase levels of procurement from Westminster-based SMEs, encourage the take up of existing initiatives such as the Mayor of London's Good Work Charter, target apprenticeship and employment opportunities at underserved communities in the city, support skills provision, and strengthen their presence in schools and colleges	Agree	While there is broad agreement with this recommendation there needs to be further consideration as to how best deliver this, which will include the consideration of signing up to the Mayor's Good Work Charter and advocating for its adoption by businesses in the city. We are establishing our Anchor Alliance which we hope will drive forward the aspirations around procurement. Meanwhile our Responsible Commissioning and Procurement Strategy, Fairer Economy Plan and the Employment and Skills Partnership Board address different components of the overall recommendation.	FR /I&C	CS / GPH
Skills and Employment					
15	The council should bring these partners and leading experts together to agree a clear vision for skills and employment for the city, measures of success, and a shared plan to deliver the vision. This should be done by establishing a Westminster Employment and Skills Board.	Agree	We will soon be launching the Education, Employment & Skills Board to convene our key players and adapt the offer on all sides to maximise the opportunities for our residents. The Partnership will review the recommendations made by the Westminster Commission with its members, and also take account of partnerships under the existing Education Partnership Board.	GPH	I&C Children's
16	The council and its partners should aim to ensure that 90% of residents have essential digital, literacy, numeracy skills by 2030.	Note	The Fairer Economy Plan 2023 aims to increase the range of courses available through WAES, such as digital and sector-specific courses. Expand on the current successes of the community-friendly curriculum pathways to ensure that learners living in our most disadvantaged areas have access to learning. Ensure residents have sufficient access to the foundations of digital and technology, enabling them to become more digitally included.	GPH	
SME Support					
17	The council should support development of a strong network of community business advisers, based in Westminster's underserved neighbourhoods, who can identify micro and SMEs that would benefit from support and provide signposting and facilitation to ensure that they are able to access the most suitable provision.	To be considered in more detail	We will consider this alongside our area-based programme work (such as through our Community Hubs work) and review resources.	GPH	
18	The council should identify opportunities to expand its enterprise spaces programme.	Agree	The Fairer Westminster Delivery Plan 23/24 sets out a commitment to creating more inclusive and affordable workspaces – such as at 300 Harrow Road and Lisson Arches. Further opportunities, including through the planning system and Affordable Workspace guidance policy, will be sought.	GPH	
19	The council and its partners should work to jointly identify and market these opportunities.	Agree		GPH	
20	The Council should review its own practices, and work with major employers and anchor institutions across the city, to maximise procurement spend with Westminster-based micro businesses and SMEs (particularly those from disadvantaged parts of the city).	Agree	The Responsible Procurement and Commissioning Strategy 22/23 sets out how SMEs will be encouraged and supported to bid for council contracts.	F&R	GPH

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Support for the CAZ					
21	The council should continue to work with Central London Forward, as part of its cross-borough programme on the future of London's Central Activities Zone, and with BIDs, industry bodies, landowners, employers and community groups.	Note	Business as Usual Activity. All these partners will also be involved in post-publication engagement around the Fairer Economy Plan.	GPH	
22	The Council should consider reprioritising funding towards supporting the safe and well-managed activation of the West End, and mitigating its potential negative impacts, to ensure it continues to offer an attractive 24-hour environment for residents, workers and visitors of all ages and backgrounds and remains a world-leading destination	Work in progress	The Fairer Westminster Delivery Plan sets out the council's commitment to delivering long-term investment and improvement to the West End (including Oxford Street). Work is currently underway to bring forward a dedicated approach to the Evening and Night Time Economy along with a Cumulative Impact Strategy as (managing impacts while supporting businesses) and the on-going Meanwhile Uses Programme (pop ups) helps to reactivate vacant spaces for retail or cultural uses, incubation of local talent and entrepreneurs	ECM / GPH / ASCH / FR	I&C
Monitoring and Evaluation					
23	The council should establish a more systemic approach to performance management, evaluation and reporting should be established.	Work in progress	<p>We have already implemented practices to monitor and assess our performance and will continue to refine these.</p> <p>Summary of our actions:</p> <ul style="list-style-type: none"> • We have established a systemic approach to performance management that includes regular reporting, monitoring, and evaluation. We have the following corporate boards that address strategic concerns, risks, and opportunities: 1) Performance Board (quarterly) reviews strategic and operational performance, and the achievement of targets and key FW and council priorities. 2) Change Board (monthly) oversees the progress and performance of major projects and programmes. • We are reviewing all the corporate KPIs and targets for 23/24 to check their relevance and appropriateness in line with our corporate priorities. Our 23/24 corporate performance framework and the quarterly reporting of key indicators monitor performance challenges in our operational service areas. These quarterly performance reports are shared with the ELT, Audit and Performance Committee and published on our website. • From July 2023, we will produce a quarterly progress tracking report for the Leader, ELT and Cabinet to monitor the delivery of the new 23/24 delivery plan and other corporate priorities. These updates will include progress on deliverables and a new suite of delivery success measures for regular evaluation and impact assessment. • At Year End we will conduct a comprehensive annual evaluation of our completed actions and KPI targets to assess our impact on achieving the Fairer Westminster outcomes. This evaluation will include benchmarking, stakeholder feedback and if appropriate cost-benefit analysis. • Strategy and Intelligence (S&I) will continue to provide strategic oversight and support to corporate teams and directorates. The team have supported: <ul style="list-style-type: none"> • Directorates with business planning, strategy development and alignment of their work to FW outcomes • The CPMO to integrate FW outcomes into a framework for projects with clearly defined benefits that align with the delivery of FW outcomes. The CPMO has a benefits manager who tracks project and programme benefit realisation, 	I&C	

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			<p>working with finance business partners for financial benefits.</p> <ul style="list-style-type: none">• Will work closely with the Finance team to align the medium-term financial plan with achieving FW outcomes by evaluating savings and growth bids as part of the budget review process.		
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Fairness and Equality Review – Recommendations

	Recommendation	Recommended response (Work in progress/agree/consider in more detail/note/reject)	Comments/outline response	Lead Directorate	Supporting Directorate
Supporting Communities					
1	Ensure adequate and sustained investment in partner/umbrella organisations and bring them fully into planning for neighbourhood services.	Work in progress	Our recently published Voluntary and Community Sector Investment Strategy (2023-28) commits to developing a core funding approach that helps to build sustainability and resilience in the local VCS, and that supports capacity in small and Global Majority led organisations, this goes beyond the specific organisations mentioned in the recommendation.		
2	Accept that Westminster has much to learn from community experiences and voices. Whilst resources are inevitably limited, and both councillors and officers have responsibilities to manage finances and determine priorities, everyone can benefit from a collaborative, open spirit of engagement.	Agree	The Fairer Westminster Delivery Plan 22/2023 recognises the need to build and nurture strong community foundations through engaging and listening to our residents, voluntary organisations and community groups. Since publication of the Delivery Plan last year huge progress has been made in engaging with our communities, from the Lived Experience project as part of the Changing Future Programmes, to introducing public participation to Council meetings (to launch in June 2023) and the ongoing work to reform the council's consultation process and deliver participatory budgeting.		
3	Develop local infrastructure, with an asset base, to reduce the vulnerability of these organisations to short term variations in support.	Consider in more detail	Through the new Communities team, the council is working to introduce longer term core funding to reduce vulnerability from shorter term support.	I&C	
4	Review on a regular basis access to space, facilities and workforce development (alongside core funding) for local and voluntary groups as patterns of need and services change	Consider in more detail	The Community Hubs programme is considering the offer more widely of community space. The VCS rental policy provides a way to balance social value produced and rental payment for VCS occupiers of council premises. The VCS policy is in place and enables groups in designated VCS buildings to apply for discounts against market rent. This Policy provides credit for community and social value and evaluates the needs of the applying organisation in making application for the benefit. Meanwhile use is welcomed and will be explored for all buildings awaiting a new future.	F&R /I&C	
5	Embed an approach to reducing social, economic, and geographical inequalities across the work of the council and champion this in dealing with statutory agency partners, including the NHS, police, DWP and others. Whilst supporting individuals in need can be a vital part of this, it must also be based on a recognition that inequalities are structural not personal.	Work in progress	In scoping the delivery of a poverty reduction strategy thought will be given as to how best incorporate this recommendation. The Council will embed a whole council approach in addressing the wider determinant of health through existing programmes like #2035 as well as working with other services to ensure that public health outcomes are considered across the council. Officers will ensure the Health Inequalities JSNA recommendations are embedded across the Council's work to help tackle health inequalities which will include an enhanced investment in the voluntary and community sector to reach those with the greatest needs. One of the key objectives in our organisational Anti-racism commitments is the establishment of a Westminster Creating equity (Tackling inequalities taskforce/action group) terms of reference are currently being scoped. thinking is with an intersectional lens this could support this recommendation complementing and pulling other streams together Individual departments are also doing much to tackle inequalities e.g. the Fairer	I&C	GPH ECM

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			6Economy Plan highlights reducing economic inequality in the City as a top priority and the recently established Safer Neighbourhood Board, led my MPS and supported by the council help to address local policing priorities.		
6	Look for ways to ensure social value is secured across commissioning and procurement and supporting community objectives with an employment policy which prioritises local people into apprenticeships and jobs, especially where this offers career/skills progression	Work in progress	Our Responsible Procurement and Commissioning strategy (RPC) sets a clear framework to guide our work with suppliers on community wealth building to deliver responsible business and sustainable development.	F&R	GPH
7	Encourage co-production with the community as a means of engagement to create joint solutions.	Work in progress	Work is underway to develop a Charter for Community Participation which will set out the councils commitment to collaboration and coproduction with Westminster's communities. A consultation on the Charter has recently closed, the information gathered through the consultation will be used to produce a draft charter and a committee, including residents and community leaders, will be established to develop what happens next.	I&C	
Community, Family and Youth Hubs					
8	Capitalise on the opportunity to deliver new family and community hub at Third Avenue in Queen's Park and delivering this project should be accelerated together with looking at potential meanwhile uses that show the way for the final project.	Work in progress	For clarity the hub at Third Avenue is a Family Hub and work is underway to deliver it.	I&C	F&R
Poverty, Hardship and the Cost-of-living crisis					
9	Follow up its work so far on the cost-of-living crisis with a more detailed poverty reduction strategy including an annual report to the Council on poverty and low income in the borough. This report should also cover debt and debt management, enforcement in respect of rent and Council Tax (policies and practice, numbers) and applications to/assistance provided by discretionary council funds	Consider in more detail	Some early scoping work has been undertaken around a poverty reduction strategy and the Commission's recommendations regarding an annual report to full Council will be considered in more detail. The council is working with UCL to undertake a comprehensive review of poverty in Westminster. This is to establish the need for a poverty reduction strategy. The next stage is to be agreed but is likely to include an analysis of poverty related statistics, followed by a qualitative evaluation of existing programmes and projects delivered by the council.	I&C	
10	Adopt a proactive data-based approach to targeting its hardship schemes and other types of support to families and households in the greatest need	Work in progress	The COL Working Group already uses data to recommend how best to direct COL support but will look at options on how best to embed a targeted approach. The Rent Support Fund, managed by Housing Services already works on a targeted basis, engaging with council tenant who are either on partial benefits or receiving no benefits.	IC / GPH	
11	Review the operation of credit providers in the borough to ensure that bad credit providers are dissuaded from operating locally, and to consider the feasibility of supporting credit unions	Consider in more detail	The council support the work of the London Mutual Credit Union. More consideration would have to be given as to how any review would work in practice however there is a complimentary piece of work being undertaken currently on how the council can promote access to financial advice including advice on responsible lending.	I&C	
12	Review its policy approach to promoting the London Living Wage with employers in the city to make it as effective as possible.	Agree	The Fairer Economy Plan 2023 sets out how it will work with the Living Wage Foundation and local employers to design and deliver a programme of events and activities aimed at promoting London Living Wage careers in Westminster. ASCH pays the London Living Wage in all of its homecare contracts with this	GPH	

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			commitment further cemented through the Ethical Care Charter, which will be central to how ASCH will ensure staff are compensated fairly.		
13	Ensure that the support available on its cost-of-living hub is communicated in a wide range of languages and also that front line staff in the Council and partner voluntary and statutory organisations are made fully aware of the available support.	Work in progress	<p>To date the Communications team at Westminster has created translated options of Winter in the City Maps, cost of living postcards and posters that signpost people to available help.</p> <p>Work is ongoing to develop a more systematic approach to translations across council communications, to ensure that we are confident we are reaching all audiences. This will involve ongoing close working with communities' colleagues to ensure we are sharing info with local partners.</p>	I&C	
14	Carry out a more comprehensive audit of services across the sign-posting, advice, advocacy and representation sectors and how they serve local communities. This should include examining the need for open access services on the Advice Shop model, tribunal and appeal representation and looking at the potential for Refernet or other platforms to offer a more seamless service. The audit should also examine variations in need, take up, and outcomes across different communities to identify those who are finding it difficult access advice and measures to address this	Work in progress	<p>An audit of advice services provided in Westminster is currently underway, with a report due shortly. The Council runs advice shops in multiple community locations at community centres, libraries and foodbanks. Further support is being developed through the expansion of the Westminster CAB contract. Thought needs to be given to how the council audits people who need advice services but don't attend.</p> <p>ASCH is also reviewing its Information and Advice service, which includes customers' feedback about their experiences using the service.</p>	I&C	Communities
15	Approach DWP at a senior level to agree a collaborative work programme on managing the Universal Credit migration process and ensuring that the move between benefits does not trigger arrears/enforcement action where this can be avoided	Agree	<p>The move to Universal Credit (UC) for existing housing benefit recipients is due to start in April 2024. DWP is yet to decide how this will be implemented. For example, they could adopt a regional approach or start with defined client groups. We do know that individuals receiving Employment and Support Allowance (ESA) will not move to UC until 2028/29 giving reassurance lessons will have been learned before DWP approaches the most vulnerable group. Move to UC is a fixed agenda item on regular consultation meetings DWP holds with the local government associations including London Councils. The associations continue to lobby for a role in the process that will help safeguard our most vulnerable residents.</p>	F&R	
16	Improve support for workforce development in the advice sector, including developing an apprenticeship scheme with its partners for local residents to gain the skills they need to fulfil advice sector roles in future and more support for volunteers including pathways into employment for them	Agree	<p>This recommendation will be considered as part of the ongoing review into advice services. To date the council has funded several pilots focusing on traineeships, apprenticeships and volunteer development to create more workforce development for advice services. A proposal for how we develop this and what funding might be needed will be included as part of the review.</p>	I&C	
17	Explore to identify levels of need and what support could best be provided for young people from school age into young adulthood. Young people are less likely to access formal advice services but face specific challenges, like mobile phone debts, and these can impact negatively on mental health	Work in progress	<p>ASC is working with key partners in children's services, health and education to ensure all young people who will need adult social care support are identified early to enable a smooth transition from children's into adult's services. The provision of information and advice to young people and their families is an essential part of this process. The 'Preparing for Adulthood' standard operation protocol is currently being reviewed and updated to further strengthen pathways between agencies.</p>	ASCH	Childrens

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			The establishment of the Transitional Safeguarding Steering Group aims to look at multi agency approaches to transitional safeguarding and aims to further develop good practice within children’s and adults services and key stakeholders across the bi-borough.		
Early years provision					
18	Conduct and maintain a full audit of provision across all early years sectors- public, private and voluntary, as information is patchy. We need a better understanding of who is using which provision, where and at what cost. This audit should also cover pre-natal services from conception to the end of year one, to establish how to improve the coordination of services, especially those delivered by GPs, Midwives, Health Visitors and the Council	Agree	<p>We conduct an annual survey for all early years providers and schools across different sectors. This collects information on cost, availability and accessibility. The responses from the survey inform our annual childcare sufficiency assessment and is publicised on the Family Information Service. Our survey response rate, at 60%, is higher than the London average and has improved in recent years. We will work with the sector to increase the response rate and ensure a range of channels are available to support this.</p> <p>We have also conducted a detailed audit of services across the 0-5 pathway. This enabled us to identify opportunities to strengthen the links across services within maternity, health visiting and beyond. Ongoing coordination of our partnership offer is overseen by the Pre-birth to five board chaired jointly by Children's Services, Public Health and CLCH. We will work with partners to explore opportunities to create a Best Start Local Offer which will provide a clearer digital overview of services available locally.</p>	CS	
19	Work with key voluntary sector partners to carry out research into the barriers to take up of the existing offer for working parents, returners and low income families not in work, across different communities, and develop appropriate targeted promotional activity to increase take up, including the use of ‘Childcare Champions’	Work in progress	We have a well established outreach offer for our Family Hubs delivered by Family Lives, this is supplemented by additional outreach capacity through our Family Navigators and Community Champions. The Family Information Service and Funding Teams also carry out outreach work to promote the offers amongst professionals and families. This network of community resource has a key focus on supporting families to navigate and take up early years provision. The network meets regularly to share feedback on parental concerns and identify actions to improve take up, for example we have developed childcare videos in community languages. This will continue to be a priority area and further consideration will be given to channels of targeted promotional activity.	CS	
20	Set a target for increasing participation by parents not in work for health or similar reasons, to ensure the children of economically inactive parents are not excluded and report on this annually	Consider in more detail	We do not currently have the data available to enable us to cross-match take up of childcare places with data on economically inactive parents. The Digital & Innovation team and Strategy & Intelligence are collaborating on a wider data governance project, to establish the right data gateways, infrastructure and permissions for data matching, and will pursue this topic as part of the product pipeline.	CS	S&I, D&I
21	Publish an assessment of needs and provision for SEND children in each early years age cohort so as to design a future service model, accessible in both the north and south of the borough	Work in progress	Our annual sufficiency assessment collects information on the SEND offer and take up locally. We will continue to gather this information to inform strategic planning. Through this process we have identified a gap in provision in the South of the borough and plans are being developed to increase the range of provision through new nursery and school partnerships.	CS	
22	Support early years providers with the delivery of part time places, including for parents who want full day provision but only for part of the week	Work in progress	The Early Years service offers a range of support to providers to develop childcare models which are financially viable and are matched to local need. This includes individual advisory sessions and forums to support business planning and review service delivery models. These will continue and will be particularly important to support the transition linked to childcare reforms.	CS	
23	Identify pressure points arising from the extended childcare offer in the budget, to	Consider in more detail	Whilst the Local Authority has no powers to enforce childcare ratios beyond those set out in statute we recognise the commissions concerns and will	CS	

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	ensure that children of poorer households are not in care settings with a lower ratio of staff per child than 1 to 4 (or as is age appropriate)		continue to closely monitor the impact of the government's extended childcare offer as part of our sufficiency planning.		
24	Work with London Early Years Foundation on the development of the Early Years apprentice model for the next 10 years.	Agree	We agree that the development of an apprenticeship model could be beneficial in supporting recruitment challenges in the sector and the DfE is similarly proposing developments in this area. We note that the recommendation suggests working with LEYF but would recommend that this needs to be extended across the sector.	CS	
Wraparound and Holiday Services					
25	Support the Young Westminster Foundation in maintaining a comprehensive, up to date directory of wraparound and holiday schemes, with numbers, prices, and access/eligibility	Work in progress	<p>The Family Information (FIS) team maintains an up to date list of wraparound and holiday provision.</p> <p>Schools complete an annual survey to share this data with the LA, but the response rate is not 100%, so data is only partial. The information is included in the childcare sufficiency assessment.</p> <p>Information regarding wraparound care and holiday provision is advertised on the FIS website (under individual schools' pages). To compliment this the FIS also links to the Young Westminster Foundation 'Our City' pages which the Council updates with Holiday Activity Fund programmes, working in partnership with the Young Westminster Foundation.</p>	CS	
26	Carry out an assessment by ward of the numbers and circumstances of children who would benefit, so consideration can be given to supporting schools willing but unable to offer such a service.	Work in progress	Whilst we have data regarding pupils who are eligible for FSM/Pupil Premium, we do not have a clear understanding of families' needs in relation to wraparound care and holiday provision. Surveys have been sent out to families regarding this aspect as part of the 'Out of school Provision Hubs' work we have been doing with schools and parents' answers will be analysed. This will inform our next steps/model of delivery.	CS	
Provision for children and young people					
27	Provide long-term confidence for voluntary youth service providers to enable them to plan evening and holiday provision with sufficient lead in time	Work in progress	The DfE have approved the establishment of annual commitments for the Holiday Activity Fund, this has allowed multi-year SLAs which are now in place. The Council has an established budget for youth services and SLAs in place to provide confidence around funding sustainability. The youth sector have also received additional £536k funding through the recent Fairer Westminster budget setting process.	CS	
28	Liaise with providers over the provision of transport where necessary, so young people at risk/fearing street violence can participate and ensure that youth hub provision is accessible across all areas of the city	Work in progress	Some youth clubs already have their own minibuses or share minibuses. Clubs may choose to extend this offer through the additional Council funding they are now receiving. The Council is also working with youth clubs to ensure that young people at contingency hotels are able to access provision safely as part of HAF.	CS	
29	Ensure sufficient capacity to deliver a comprehensive youth offer across the city, with particular emphasis on the most disadvantaged wards, with an immediate priority being to meet needs in Westbourne	Work in progress	<p>The Council has also agreed an additional £536K per year for youth services. The Holiday Activity and Food is intended for families in receipt of Free School Meals and take place in areas of high deprivation. This is targeted to most disadvantaged wards. The Council will continue to work with the Young Westminster Foundation and wider youth sector to ensure that the offer meets the needs of children across the city, particularly those from most disadvantaged wards.</p> <p>City Lions also focuses provision on most disadvantaged wards, particularly working with schools in the most disadvantaged wards.</p>	CS	

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30	Investigate more ways for the voice and views of young people to be taken into account in commissioning youth services but also in decision-making across the Council.	Work in progress	The Council has increased the youth services budget from £500K to just over £1M, part of which has increased the capacity of the Youth Council and also established, in partnership with Young Westminster Foundation, a youth ambassadors programme; both of which will ensure the voice of young people is heard in decision making. In running grant programmes and procurements, the Council will continue to explore ways of ensuring that young people are able to participate in engagement and co-production processes; evaluation of bids as well as monitoring of projects and services.	CS	I&C
31	Working with Young Westminster Foundation, PDT and others, aim to build parental confidence in the youth service while looking to develop alternative models of your provision for example in schools.	Work in progress	The Council has partnered with the Young Westminster Foundation, wider youth sector and VCS providers to deliver the Holiday Activity and Food (HAF) programme. Through the targeted communications campaign linked to the Holiday Activity Fund (HAF) offer we have seen a rise in the numbers attending youth settings to access this. Our recent parental satisfaction survey linked to the HAF reinforces the high satisfaction with the programme. The Council's Early Help and the Young Westminster Foundation have a strong strategic relationship and have developed navigation and outreach capacity (e.g. securing outreach for families in contingency hotels via a local charity). A number of the existing youth hubs already offer an estate based outreach offer. We will continue to explore ways to increase confidence with parents in accessing youth services.	CS	
32	Audit the delivery of, and issues facing, supplementary schools in Westminster, building on the work by YWF and John Lyons Trust with a view to providing further support to them.	Work in progress	The DfE supported a previous pilot focussing on Supplementary Schools and identification of unregistered schools. A key partner is the well-established NRCSE (National Resource Centre for Supplementary Education). We will explore ways to map current Supplementary School provision linking with the NRCSE, YWF and John Lyons Trust to promote ongoing access to advice /guidance /support regarding a code of safe practice and quality assurance	CS	
33	Address the needs of the cohort of young adults over the age for youth services but at particular risk from gang involvement/serious youth violence, identifying barriers to employability, skills, training, and enterprise for 18-25s. This would include continuing support for programmes such as Helping Hands Serious Youth Violence programme, and responding to insights from young people gained from the 18-25 study	Work in progress	<p>The Fairer Westminster Delivery Plan 23/24 commits to tackling youth violence and offending by providing change programmes that support our young people and their families together with our communities and partners. Public Health will also soon launch a Children's and Young People Drugs Strategy outlining how best to support this cohort.</p> <p>The Helping Hands project continues to deliver across the North of the Borough and is in the process of delivering a youth steering group, supported by our partners in the Young Westminster Foundation. Discussions are now taking place with the Violence Reduction Unit (VRU) to extend funding for a further year and to replicate the project in the Church Street area. A Community Capacity Building application was submitted to the Violence Reduction Unit (VRU) and was successful, the funding will support the Helping Hands Project expand into the Church Street area and will be carried out over a 12 month period.</p>	ECM / CS	GPH
34	Facilitate additional capacity around consultation with/involvement by young people in service design, utilising the YWF needs analysis due to launch in autumn 2023	Work in progress	As part of service design, improvement and evaluation, Children's Services are continue to involve children through engagement and co-design. The Council has recently invested further in support and funding for the Youth Council and YWF's Youth Voice coordinator to amplify the voice of young people. Engagement and co-design is a core principle in the Children and Young People's Plan (a document co-produced with children) and the Council will continue to ensure that the voice of the child is central. There is always more	CS	

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			that can be done to engage with children and young people, the Council will continue to work with the YWF and partners on this.		
Increasing access to and participation in sports and leisure					
35	Prior to the negotiation of the leisure services relet undertake a community consultation programme with different user groups (schools, faith communities, parents, young people, women, older users) into access to sports and leisure, so as to better understand the issues regarding costs, booking systems, how community hours are utilised, the demand for different activities and the balance between organised activities and individual recreation	Agree	A review of community groups access to spaces is already underway, which aims to audit current spaces, current provision, gaps and provide recommendations to improve access	I&C	GPH
36	Ensure maximising social value is given due weight in strategic leisure plans and procurement processes	Agree	Delivering social value is a key focus of the responsible Commissioning and Procurement Strategy, which supports community need through increasing contractor collaboration on tackling poverty and inequality in Westminster, increasing supply chain equality, diversity and inclusion and increasing partnership with contractors to strengthen local communities. The council will continue to look at how delivering social value can be better supported and will take on board best practice from external organisations such as the London Responsible Procurement Network (LRPN).	I&C	F&R
37	Conduct a regular audit of community sports provision and build relationships with community sports providers, to learn from their experiences with accessing affordable appropriate facilities. This should include an annual event with providers	Agree	Through ActiveWestminster Partnership meetings, ActiveWestminster Network Meetings (North, Central and South) and ActiveWestminster Mark, clubs development support feedback from community sports providers will be gathered to continue inform service delivery. There is also an opportunity in line with our review of the leisure contract to look at specific borough wide engagement with current users of our services as well as those who do not.	I&C	
38	Publish and keep up to date a directory of local providers, services and contact details, and hold an annual community sports conference supported by councillors	Agree	There is already a Directory in place. We will consider with Providers in terms of GDPR.	I&C	
39	Review regularly all leisure service S106 agreements to ensure full compliance	Agree	Reviews already take place as BAU.	I&C	GPH
40	Maintain focus on the project looking at designing and supporting spaces where girls can feel safe using outdoor spaces for activity and leisure.	Agree	Scoping of project on Westbourne Green Open Space has begun with female focused group aim to be delivered in 2023, to support with design.	I&C	GPH
Safety					
41	Continue to press for more neighbourhood police officers to be deployed throughout the city	Work in progress	We continue to engage with the MPS on the importance of neighbourhood policing.	I&C	ECM
42	Identify resources and a plan for improvements to the public realm, playgrounds and street furniture focused on disadvantaged wards which have not previously seen much of this type of investment and review environmental	Work in progress	Work is already underway to bring forward improvements, including the roll out outdoor games areas across the city and the delivery of additional hire bike schemes in the north of the borough where availability is poor. The council is also developing proposals to roll out a school superzone with Edward Wilson school in Westbourne this would be delivered in partnership with school staff, pupils, parents, community groups, businesses, Council officers and local councillors.	I&C	ECM

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	contracts to ensure there is equity in delivery across the city		A Schools Superzone is an area around a school that enables children in the most deprived areas to grow up in a healthy and safe neighbourhood where they can play safely, breathe clean air, be active, enjoy a healthy diet and thrive.		
43	Monitor the impact of initiatives which increase the council's presence on estates and in the most deprived neighbourhoods, and report on whether this increases a) ASB reporting b) take up of mediation and c) how these council initiatives are viewed by residents of different demographics (such as age and ethnicity), to ensure they are increasing a sense of security and agency for all residents and not inadvertently re-enforcing existing inequities or biases	Work in progress	Housing have established a range of Housing surgeries across the borough and are attending CAB Advice+ sessions. Housing is increasing the number of Housing Officers working directly with Council residents. Housing is increasing the number of Housing Service Centres/Estate offices to make our services more accessible to residents. Housing is running an Estate Security Patrol pilot focussed on four estates over a period of 12 months. Housing is seeking feedback from relevant Residents Associations about the pilot. Mediation is a service that the Housing ASB team can refer residents to. The Housing ASB team monitor take up and effectiveness of the service.		GPH
44	Examine ways to improve and speed up the resolution of disputes which involve properties in different tenures/operated by different landlords	Work in progress	<p>ECM: (Public Health funded) Work to improve housing conditions for our most vulnerable across the private rental sector and houses of multiple occupation - The Private Sector Housing team continues to regulate conditions in the sector responding to complaints from residents concerning poor housing conditions, and through operating a licensing scheme for houses in multiple occupation across the borough.</p> <p>Enforcement work has ramped up significantly in 22/23 with 30 Financial Penalties issues to non-compliance landlords and 5 prosecutions. The service has responded to 1011 service requests concerning poor conditions from renters this financial year, while the Additional Licensing scheme for HMOs launched in 2021 continues to show a positive response and higher number of applications than predicted with 1844 live licences and 280 being processed. 381 inspections of high risk HMO's have been conducted. Quarterly PRS Stakeholder Meetings held to discuss current issues, trends and concerns within the sector.</p> <p>ASB Strategy: Agreement secured to form a RSL working group with the 13 largest RSLs in borough including Westminster Housing, to run in parallel to the ASB Strategic Group who will identify and deliver the WCC ASB Strategy action plan. To be launched in Summer 2023. The focus of the group will be to develop tenure neutral best practice responses across ASB investigation and case management, prevention and early intervention; Victim support and advocacy offers; identification and capture of core data sets, supported through the SWP action plan.</p> <p>Housing: We are putting in place a strategic approach to Housing Associations and RPs that will better facilitate the ability to discuss areas of concern and issues, more broadly than specific case by case issues. Meanwhile, our Community Hubs, with their area-based focus on improve local services to residents, will be a key way for us to have issues reported and will facilitate a partnership way of working with Housing Associations. We will be also be the different processes we can use, such as potentially revitalising a Sublet Protocol with Housing Associations/RPs that sets out a stronger mechanism for escalating issues such as ASB and repairs.</p>	ECM	GPH

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45	Set a timetable to report on the equalities impact assessment of the Anti-Social Behaviour strategy, to include a breakdown by age cohort, so it is possible to monitor the different experiences of those affected by area, age, gender, and ethnicity. This requires improved and standardised data which the Council aims to provide but is not currently available	Consider in more detail	Work is underway to deliver Safer Westminster Partnership's action plan workshop for 2023/24, and recommendations will filter through to the WCC ASB strategy action plan with a dedicated data rolling action across the 5 year duration.	I&C	GPH / ECM
46	Deliver the promised improved management of Maida Hill square, identify lessons which may be applicable to other neighbourhoods	Agree	The North Paddington Programme focuses on reducing borough wide social-economic and health inequalities, in collaboration with community stakeholders.	GPH	
Closing the life and health expectancy gap					
47	Using the framework of #2035 monitor and evaluate inequalities in health status and life limiting conditions as well as life expectancy, geographically and with reference to ethnicity, gender, and LGBTQIA+. Reducing inequalities in life expectancy can only be achieved via reducing inequalities in health status and disability first	Work in progress	To improve the health and wellbeing of our residents we must embed a whole council approach, to address the wider determinant of health. Based on a shared understanding of local need, and agreed set of priorities, we will work across the council and with key partners to promote and protect health, to get the right services and activities for our residents, with a specific focus on prevention and early intervention. The Council's Health and Wellbeing Strategy is currently out for consultation and has as a core focus reducing health inequalities. #2035 will start to be rolled out formally over the next few months, we expect the outcomes of this to support a more strategic approach to this work, embedding the principles of collaboration, co-production learning and evaluating as we go forward.	I&C	Communities
48	Ensure that the principles behind #2035 are reflected in the level of funding and support given to the voluntary and community sector	Work in progress	Following the publications of the JSNA on health inequalities in autumn 2023, embed the recommendations which will include an enhanced investment in the voluntary and community sector to reach residents and neighbourhoods with the greatest needs. The community investment strategy also is underpinned by #2035	I&C	Communities
49	Ensure that community research into barriers to health addresses lower levels of involvement by men and makes recommendations to increase men's participation	Work in progress	To ensure more robust data capture, we will engage with these resident groups to capture knowledge and community insight to develop a dynamic understanding of the barriers and their experiences, to shape services and initiatives.	ASCH	
50	Consider ways of reporting the findings of the Joint Strategic Needs Assessment on health inequalities for global majority communities to ensure awareness amongst councillors and in the community	Work in progress	The JSNA has been adapted into a 'Borough Story' format so that it is easy to access, understand and update in the future.	I&C/ ASCH	Communities
51	Make tackling loneliness a priority for the council, with a strand of activity aimed specifically at reducing loneliness amongst young people	Work in progress	Penfold older people's hub is being expanded to increase reach and availability including the dementia choir; also utilising learning from the PH funded mental health youth workers initiative to develop a model for supporting young people's mental health.	ASCH	
52	Ensure there is a specific strand of health and wellbeing work focused on homeless households and those at risk of homelessness	Work in progress	Public Health is using its grant to fund a case worker nurse for clients on the homelessness pathway. There is also a wider commitment to improving the service experience and outcomes for the most disadvantaged people who	GPH	

Appendix A - Future of Westminster Commission Housing Review – Council Response to Recommendations

	with strengthened requirements for signposting and referring homeless households to support services		present to our services by connecting services up and making sure all policies, services and decisions are geared towards improving the best outcomes for our clients and customers.		
53	As part of its preventative and targeted approach, identify and focus on some small areas with a substantial private rented sector serving lower income households to identify needs- examples include the Bell Street area of Church Street and Fernhead/Ashmore/Portnall/Bravington roads in Queen's Park.	Work in progress	<p>Public Health funding has been used to target the improvement of housing conditions for our most vulnerable across the private rental sector and houses of multiple occupation. The service continues to respond to concerns concerning poor conditions from renters, the Additional Licensing scheme for HMOs, launched in 2021 continues to perform well and there is continuing engagement with PRS Stakeholders to discuss current issues, trends and concerns within the sector.</p> <p>The Private Rented Sector Charter which is currently under development will outline required standards for, amongst other things, PRS housing and landlord responsibilities and aims to inform and empower tenants to know their rights and signpost towards advice and support to secure resolution when standards not met.</p>	I&C	ECM

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FUTURE OF **WESTMINSTER** **COMMISSION**



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Chair's introduction

When the Future of Westminster Commission started its work last July the immediate challenge was the very wide scope of the policy and service areas the Council wanted us to review: increasing the supply of affordable housing, improving housing management and maintenance, tackling homelessness, addressing inequality and poverty, employment and the city's economy and meeting the net zero challenge.

We tackled this in a number of ways that have shaped the work methods and programme we have carried out over the eight months since then. First, we established four separate strands of inquiry and recruited four convenors to lead separate review groups on each strand – Karen Buck MP on fairness and equality, Steve Hilditch on housing, Claudette Forbes on economy and employment and Syed Ahmed on energy and the green transition. The Housing Review was significantly the largest undertaking with, in practice, three different reviews on housing supply, housing management and homelessness and housing need, each with their own sub groups and workstreams.

We also agreed purpose statements and priorities for each of the groups endorsed by the Cabinet, for example that the Economy and Employment Group should focus on how the Council enables more Westminster residents to share in the economic success of the City. With the help of the convenors and their extensive networks we were able to recruit more than 70 people with a great mix of expertise and experience including a new Residents' Panel on management of Council

housing to support the main Commission and its review groups on a voluntary basis. I am grateful to them all for the energy and effort of their contributions to the Commission's work.

Secondly, we agreed that we would work in tandem with Council officers and Cabinet Members in tackling the new administration's priorities and would use its commitment to a Fairer Westminster as the frame and context for our reviews and advice.

We often called this working 'in real time' which meant providing advice, support and recommendations as new proposals were worked up for decision by the Council – clear always that our role was advisory with decision making sitting with the Council and its Cabinet. A good example of this – and one of the earliest – was the joint work on changes to the Council's housing development programme which culminated in an officer report to the Cabinet in October supported by a Commission note which has enabled the Council to deliver more than 300 extra social homes.

This approach meant that a fair amount of the Commission's work was focused on immediate policy decisions facing the Council and also on providing input and advice to officers and Cabinet Members on issues that arose day to day as they tackled the Council's new priorities. Examples include advice from the Housing Review Group on prospective changes to the City Plan including a formal consultation response and on the Housing Revenue Account Business Plan and advice from the Fairness and Equality Group as the Council rolled out a new Cost of Living strategy including introducing free school meals for all primary school pupils in Westminster and then extending that policy to nurseries and Key Stage 3.

But the Commission has also worked and advised on longer term policy and service development in priority areas. So, on housing supply besides the initial work on the Council's own development programme the Housing Review Group has advised on a longer-term review by the Council on maximising the supply of truly affordable housing supported by external consultants. There are forward looking proposals on engaging the Council's tenants and leaseholders around the housing management service based on five

meetings with a Residents Panel convened through the Commission and important recommendations for the future on homelessness and housing need.

The Commission has also worked up some initial proposals that could help inform a future Transport Strategy for the Council supported by some pro bono work by Arup. And there are two other important areas which emerged from the Commission's work cutting across the different review groups.

First, the Commission has supported the development of proposals for a North Paddington Programme to address inequalities identified in the 2019 City Plan produced by the last administration which described North Paddington as "an area requiring co-ordinated intervention to tackle persistent levels of inequality." Following initial advice from the Economy and Employment Review Group the Commission has worked with Council officers to advise on a new place-based approach to improve outcomes for local people with detailed proposals reported together with Commission advice to the Cabinet in February. This approach has now advanced into delivery with the Commission supporting further stages of work including the creation of a new North Paddington Partnership Board.

Secondly, the Economy and Employment Review Group has worked with Council officers to advise on the Council's potential role in leading and enabling a network of anchor institutions to work together on common priorities including the North Paddington Programme. A series of meetings with partners is planned, focusing first on cost-of-living issues, then on inclusive recruitment and procurement moving on to tackling wider structural inequalities.

On both these important initiatives the Commission helped in securing additional support for the Council from Bloomberg Associates, Michael Bloomberg's pro bono consultancy which works in cities across the world developing and supporting best practice. Bloomberg Associates have worked extensively on London wide issues with the GLA, in particular on anchor institution networks. On the Council side this is being steered by the Chief Executive with the support continuing beyond the life of the Commission.

Much of the value of the Commission has come from this advice and support "in real time", and our report gives details of where the Commission or its review groups have provided advice on issues and support in developing Council initiatives such as the North Paddington programme, the cost-of-living strategy and free schools' meal policy.

But we agreed that it was important to produce a final Commission report which gave more details of the Commission and Review Groups' work and included key recommendations for the future. We decided to provide the Council first with a final report on the Housing Review as this was a substantial body of work on three separate reviews which deserved separate and detailed consideration. This was made public together with the Council's response at the May Cabinet meeting.

We agreed it was right to conclude the Commission's work after a year and believe it has shown the value of enabling external expert advice to the Council, including from the experience of Westminster's communities. The Council should consider how to retain the benefits of this both through community structures such as the North Paddington Partnership Board and the Council Residents Panel that the Commission helped establish and through expert panels/advisors in specialist policy areas such as housing supply and the path to Net Zero.

Finally, I would like to give particular thanks to Daniella Bonfanti, who has organised administrative and other support to the Commission's work, and to the four convenors who have led the work of the Review Groups. The convenors have played an essential and central role in our work, leading liaison and discussion with officers, agreeing work programmes and priorities, chairing meetings of the full group and sub-groups and preparing progress reports, advice notes and other outputs.

Neale Coleman CBE
Commission Chair,
Member National Infrastructure Commission,
former GLA Director London 2012.

Health

Health Inequalities

Health by Tenure



Westminster housing tenants are in **poorer health** than the wider population.



They are also more likely to report having **fair health** (16.3%) than the Westminster average (9.7%).

Age and Unpaid Care

50-64 years old



Over 4,000 residents

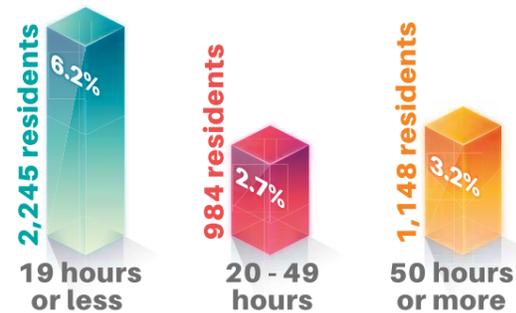
The age group most common to provide unpaid care is between **50-64 years old**. Over **4,000 residents** provide some unpaid care.



Westminster Housing tenants are more likely to report having **bad or very bad health** (11.8%) than the Westminster average (5.1%).



By contrast, they are significantly less likely to report having **good or very good health** (71.9%) than the Westminster average (85.2%).



(2,245 residents in this age bracket provide **19 hours** or less unpaid care in a week (6.2%), 984 provide between **20-49 hours** of unpaid care (2.7%) and 1,148 residents provide **50 hours or more** unpaid care (3.2%).

Housing

Overcrowding

FUTURE OF WESTMINSTER

38.6%

10.2%

9,711 households overcrowded

36,629 households under-occupied

Bedrooms

10.2% (9,711) of households had fewer bedrooms than required (overcrowded) and **38.6% (36,629)** had more bedrooms than required (under-occupied).

More than **8%** of households are one bedroom short and **2.2%** have 2 or less bedrooms needed.

The majority of households that are overcrowded are concentrated in **Church Street** (21.6%), **Westbourne** (20.9%) and **Queen's Park** (19.7%).



Overall number of rooms

Westminster Housing tenants are more than **twice as likely to be overcrowded** compared to rest of the borough's residents.



More than **43%** of Westminster housing tenants are living in **overcrowded households**, which is more than double to the Westminster average (**20.1%**).



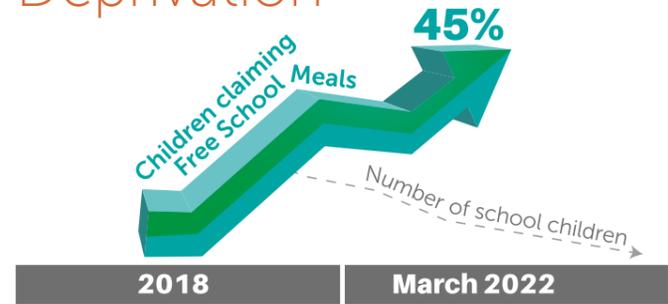
Residents from **black ethnic groups** are almost **twice as likely** to live in overcrowded household as the Westminster average (38.3%).

Overcrowded households

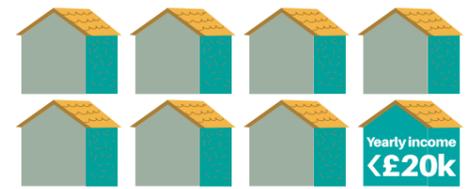
Communities

Deprivation

(Note here that published data for the 2021 Census does not yet cover deprivation dimensions with other dimensions e.g. tenure, ethnicity etc)

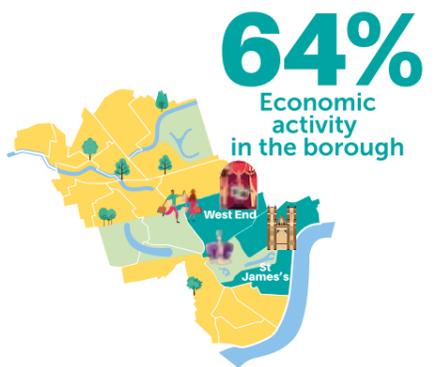


45% more children in Westminster were claiming Free School Meals at the end of **March 2022** compared with 2018 – despite a fall in the number of overall children. (School pupils and their characteristics, DfE June 2022)



One in 8 households earn less (including all benefits, and earned income) less than **£20k** per year. (Pymcheck, CACI 2022).

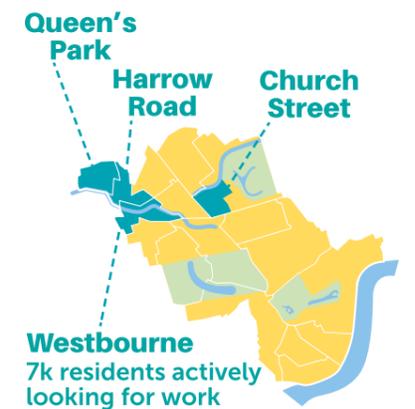
Ward Level Economic Activity



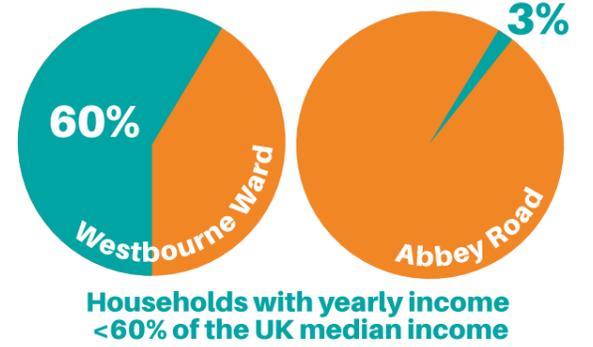
The vast majority of economic activity in the borough is located in the **West End** and **St. James'** (**64%**), these areas are home to a large proportion of commercial activity, retail, theatres and tourist attractions.



Of the 18 wards in Westminster, **9** produce **95.5%** of the GVA in the borough. (WCC estimates based on 2020 employee distribution and industry). (Estimated GVA for Westminster in 2020 was £72.1bn).



The Census 2021 suggested that there were 7k residents actively looking for work but unemployed – biggest concentrations in **Queen's Park, Westbourne, Church Street** and **Harrow Road**.



In **Westbourne Ward** almost a quarter of households have an income that is less than **60%** of the UK median income, compared to **3%** in **Abbey Road**.

Environment

Energy and Green Transition Review

Total emissions by source based on 2019 data from Anthesis which covers Scopes 1, 2 and 3 emissions from both CO2 and non-CO2 greenhouse gases.

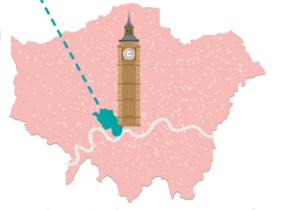
The three **biggest emissions sources** in Westminster in 2019 were (in descending order):



This includes Scopes 1, 2 and 3 emissions and CO2 and non-CO2 emissions.



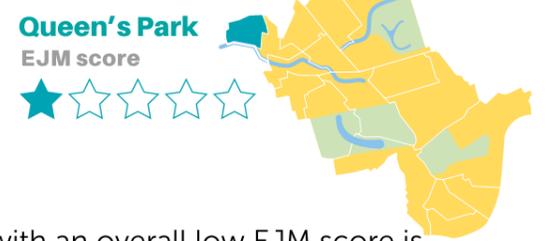
Second highest emissions of all London boroughs



Westminster had the **second highest emissions** in 2020 out of all London boroughs.

The emissions ranking is based on 2020 LEGGI data which includes scopes 1 and 2 emissions only.

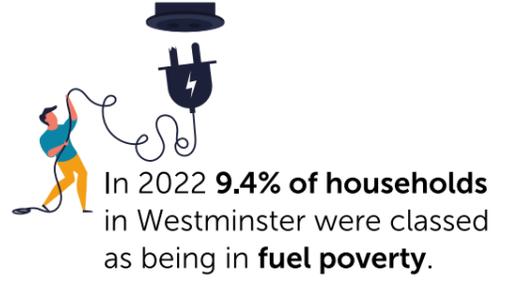
Environmental justice measure



The ward with an overall low EJM score is **Queen's Park**, where the entirety of the ward is scored 1 (there are 5 levels, with 1 being the worst). That low score means that the area is likely to have a higher environmental impact in comparison to the rest of Westminster. **Church Street** and **Westbourne** wards also seem to be scoring low overall.



The estimated cost of **retrofitting** the councils corporate portfolio is approximately **£58 million**.



Households dependent on heat networks

Westminster is the **4th local authority** with most households being **dependent only on district or communal heat networks**.

More than **8%** of households rely on that type of **central heating**, following City of London (18.6%), Southwark (10.6%) and Camden (9.4%).

Most of those households are concentrated in **Pimlico**, where the Pimlico District Heating Undertaking is operating.

The commission's work programme

The Commission's role and terms of reference were agreed by the Council's Cabinet in July 2022. This provided for four review groups to be established to carry out the following strands of enquiry:

- **Housing:** Advise on increasing the supply of genuinely affordable housing to meet housing need in the city. As a priority advise on options for improving the way the Council responds to homelessness and housing need and the quality of services provided to the Council's own tenants and leaseholders.
- **Fairness and Equality:** Advise on policy approaches and initiatives that will enable and deliver a fairer, more equal and inclusive city.
- **Economy and Employment:** Advise on how the Council enables more Westminster residents to share in the economic successes of the city.
- **Energy and Green Transition:** Advise on ways to enhance and accelerate climate action supported and delivered by the Council to achieve the objective of achieving net zero Westminster by 2040.

In addition, it was agreed there would be a core Commission to provide expert external input and challenge the thinking emerging in each workstream to improve outcomes, introduce new ideas, and maximise opportunities by joining up thinking across the range of the Commission's responsibilities.

This final report provides details of the work of the four review groups, their membership and their conclusions and recommendations to the Council. During the course of their work the core Commission held four meetings in different parts of the city with an invited community audience to hear and consider progress with the review groups' work and invite feedback and then a series of meetings as the groups were preparing their final reports to look at links and common themes across the groups as well as two areas specifically included in the core Commission's terms of reference: the Council's approach to consultation on policies and service delivery and the Council's relationship with and support for the voluntary and community sector.

The members of the core Commission were

- Neale Coleman** CBE Commission Chair, Member National Infrastructure Commission, former GLA Director London 2012
- Steve Hilditch** Convenor Housing Review, Former Director of Policy Shelter;
- Karen Buck** MP Convenor Fairness and Equality Review.
- Claudette Forbes** Convenor Economy and Employment Review, Board Member Connected Places Catapult, Future of London, Independent Advisory Panel on Grenfell for UK Government.
- Syed Ahmed** Convenor Energy and Green Transition Review Director, Energy for London, Board member National Energy Action, Director Parliamentary and Sustainable Energy Group
- Professor Tony Travers** Director, London School of Economics
- Dr Naomi Katz** Clinical Director, Grand Union Health Centre, former Children's Lead West London CCG.
- Ben Commins** Executive Head, Queen's Park Primary School.
- Jackie Rosenberg** CEO, One Westminster, Deputy CEO, Paddington Development Trust.
- Phil Graham** Executive Director Good Growth, GLA.
- Andrew Travers** Former CEO, LB Lambeth.

Inequality in Westminster

In addition to the review group recommendations set out in the next chapters this report also sets out some important Commission recommendations that are really council wide and draw on the work carried out by the separate reviews together with discussion among Commission members. These principally address the severe problems of inequality affecting residents in the city. The most striking single fact we found about Westminster was the gap in male life expectancy of 18 years between the poorest wards in the north of the City and the most prosperous wards. This is by some way the largest such gap - and to that extent Westminster is the most unequal borough - in the country. So, despite the wealth in the city the 14th most deprived Super Output Area out of 4,835 in London is in the Church Street ward with 60% of residents in that ward on benefits against 10% in neighbouring Marylebone and Regents Park. Median incomes in Church Street are £34,000 compared with £75,000 in Knightsbridge and Belgravia.

Besides the spatial basis and concentration of inequality in the north of the city and also in the Pimlico South ward there are significant pockets of relative deprivation across the whole city mainly affecting tenants in social housing and the poorest parts of the private rented sectors but also groups with protected characteristics including global majority communities. Council housing tenants are more likely to report having bad or very bad health (11.8%) than the Westminster average (5.1%). Council housing tenants are more than twice as likely to live in overcrowded households compared to the rest of the city's residents with over 60% of overcrowded households concentrated in three wards, Church Street, Westbourne and Queen's Park.

The impact of these inequalities on residents and communities has been very much exacerbated by the cost-of-living crisis and its effects. The Council's annual City Survey in 2022 showed that compared with 2021 the proportion of residents who felt they were financially comfortable had decreased in the Harrow Road ward from 51% to just 19% more than 50 percentage points lower than the 77% recorded in the Marylebone ward.

Tackling the health and other inequalities that underlie these statistics had already been recognised to an extent by the previous administration in the City Plan which identified the north-west wards of Westbourne, Harrow Road and Queen's Park as an "area requiring coordinated intervention to tackle persistent levels of inequality." This has rightly been given much sharper focus and priority now with the Council's city-wide Fairer Westminster strategy. Our cross-Council recommendations in this area reflect the need to support that approach with further changes to how the Council delivers that strategy including through its budget, review and delivery planning processes and organisational development. At the heart of these should be commitments to community engagement and co-production, much more focus on prevention and early intervention and with its partners developing appropriate neighbourhood service delivery.





Prevention, early intervention and local working

The council is already emphasising preventative approaches and early intervention as part of its strategic approach to address inequalities as a key element in the #2035 collaborative programme with Imperial Health Trust that aims to cut in half the eighteen-year gap in male life expectancy between the richest and most deprived areas of Westminster. Similar mechanisms and tools will be needed to mitigate the negative impacts of climate change on the City's vulnerable communities and residents. The council needs to build on this work to embed prevention and early intervention at the core of its approach.

There have been some encouraging projects and initiatives, some of which sprang up to meet the pandemic crisis. The Community Health Workers scheme on Churchill Gardens has also broken new ground and is due to be extended to other areas of the city and there has been strong early progress with the proposed North Paddington Programme. But we felt there needed to be a more comprehensive and better-defined programme of activity in support of this critical and very stretching objective.

We recommend that the Council should identify a clear programme of service reconfiguration and other initiatives that it will commit to in order to contribute to the #2035 objective recognising that overall the programme is a joint effort by the Council and Imperial Health Trust in collaboration with the voluntary and community sector and driven by local communities. It is important for the Council to commit the necessary resources for its part in the programme and this should be seen as a central element in

the budget process this year and in future years. We suggest that for this year the Council incorporate an element of external challenge in doing this within a formal process overseen by the Cabinet Member for Public Health and the Voluntary Sector and the Cabinet Member for Finance.

As part of its #2035 work the Council should target its data and intelligence work on understanding at a granular level those individuals and families which are at the highest risk of not being able to live a 'good life' in Westminster and those localities where investment in the public realm and community services has been disproportionately low. The staff undertaking this work will need to develop detailed, first-hand knowledge of those communities, the challenges they face and the resources available to support them. We therefore recommend the establishment of an early intervention data team, drawn from existing data and intelligence functions, to be based in a community facing setting in one of the more deprived areas of the City North Paddington, Pimlico South and/or Church Street with appropriate resources and with a remit to work jointly with VCS organisations, health services and schools that serve those diverse communities.

Over recent years the Council and other important public services have withdrawn staff from front line contact with residents and service users. So in the north west of the City, despite being prioritised in the City Plan, the only substantial Council presence has been the two libraries in Queen's Park and Maida Vale. Both the Council's One Stop Shop and the local Police Station have closed

as have nearly all the local estate offices run by the Council and RSLs with significant numbers of tenants. It had left the Council's tenants on the Mozart estate, one of the most deprived in the City, with an inaccessible estate office a difficult public transport trip away in Westbourne Terrace. This all makes effective preventative working with individuals, families and communities very difficult and leaves many residents without digital skills or English as a first language isolated and struggling to access services.

Not only does this place Council services at a distance from the people and communities they are intended to support, but it also acts as a barrier to early intervention and addressing need in an integrated manner, as it tends to mean interaction with the Council is more likely to take place in silos via individual services or departments. The Council has made a good start in addressing this with the new North Paddington programme and a Council base established at Maida Hill Market, there are further plans for a new Mozart Estate office in Bruckner Street and for a substantial new family hub in Third Avenue in Queen's Park as well as identifying potential sites for community hubs across the city.

The Council has also included substantial funds for investing in community hubs across the City as well as for further local estate offices and presence in its budget for future years. In developing these programmes, the Council should engage with local

communities to work out which are the most important areas for locally based face to face service delivery and agree an affordable strategy for neighbourhood services that includes collaboration with other service providers such as the Police, local GPs, RSLs, employment services and VCS organisations. This should include mechanisms to ensure that the needs of families and individuals are considered and addressed in the round and should be a central part of the budget and delivery plan process for future years – on which we say more below - identifying a clear resourced timetable for delivering new local hubs and offices.





Organisational Development, Budget and Delivery Review

The new administration in Westminster has articulated a set of priorities that mark a clear break from those of its predecessors. If the Council is to deliver the desired change, it will not be enough simply to develop new policies and programmes. These new priorities need also to be reflected in how it is structured, and the Executive Leadership Team needs to take steps to embed an organisational culture which supports their achievement – in particular, placing the voices of the City’s most disadvantaged and underrepresented communities at the heart of the Council’s approach to its work.

In order to progress this the Council also needs to look closely at how its staff and financial resources are deployed and whether and how they might be reoriented to support a stronger focus on the City’s most deprived communities and a preventative approach to service design and delivery.

Building a new relationship with all the city’s communities through effective, ongoing engagement is at the heart of the new administration’s approach. This will not happen only through goodwill, however, and Council staff will need the tools and skills to achieve this. We therefore also recommend the development and roll-out of training for all the Council’s staff, starting from the top, in effective community engagement and consultation, alongside further support for the central team with direct responsibility for delivering this agenda.

We received a detailed presentation of the Council’s financial position, associated risks and opportunities from the Director of Finance. We were pleased to see that the

Commission’s approach of working alongside the Council has already resulted in significant investment in response to the Commission’s work, for example in the Council’s housing development programme, its cost-of-living strategy and the budget provision for North Paddington. Looking forward, it is critical that decisions on the use of resources continue to reflect the wider priorities of the council around decent and affordable housing, prevention and early intervention tackling the cost-of-living crisis and achieving net zero.

We therefore welcome Council’s plans for a more fundamental review of Council priorities and resource allocation during 2023. This should involve deeper examination of resource allocation, Council capacity, capability and overall effectiveness within service areas identified by the Cabinet as priorities for review and for delivery of the Council’s Fairer Westminster Delivery Plan. We recommend that the priorities and the methodology, timetable and resources required for these reviews over the next two years should be identified and agreed as soon as possible.

Overall, the budget and delivery planning process should be based on the Cabinet’s priorities for the administration and its Fairer Westminster Strategy, and all funding decisions should be driven by that process. This would include Council Tax decisions, revenue and capital budget allocations, the strategy for allocating CIL revenues, and the use of all reserves and balances – in particular, examining the scope to repurpose any earmarked reserves towards the priorities set out in the Strategy and Delivery Plan and the #2035 programme.

The Council should also consider mechanisms to embed its strategic priorities in the approach to financial planning on a more long-term basis – in particular, considering the scope to introduce climate budgeting and the use of participatory or deliberative mechanisms to involve residents and communities more fully in this work.

We have recommended above the establishment of local hubs and offices in the City’s disadvantaged neighbourhoods, through which front-line staff might identify opportunities for early intervention and joined-up delivery. Such direct engagement with communities should not, however, be restricted to front-line staff: everyone in the Council, and particularly its most senior managers, should see it as a core part of their job, with firm expectations set around training in effective consultation and engagement. In support of this, we recommend that the Council establishes clear requirements for all staff to spend a proportion of their time in Westminster but outside City Hall, including being seconded or based in community based organisations, to be exposed to the challenges of front-line service delivery and to strengthen their understanding of and engagement with the City’s residents and communities, as part of developing a wider culture focused on tackling inequalities, responding to community priorities, and addressing the needs of people with protected characteristics.

Cost of living

The Council has done impressive work on supporting residents affected by the current cost of living crisis, but we heard much evidence of how seriously vulnerable households were being affected and their health put at risk by the crisis. We recommend that the Council should continue to use every vehicle it can to support those affected by the cost-of-living crisis including by providing further targeted support to tackle fuel poverty.

Recent research by Sir Michael Marmot has warned of epidemic levels of fuel poverty in the UK that will cause “a significant humanitarian crisis with millions of children’s development blighted.” The Council does support a modest programme of fuel poverty interventions through a “Green Doctors” programme with support from the GLA’s Warm Homes Advice Service. There should be joint work across the Climate, Housing and Public Health teams to scale up significantly a targeted programme of energy efficiency advice and works in preparation for next winter drawing on support from the Council’s Carbon Offset funds. This could naturally be an integral part of the Council’s developing North Paddington programme and other place-based initiatives across the City such as the community health work in Church Street and on the Churchill Gardens estate.





Voluntary and Community Organisations

In their work the Review Groups found much evidence of the important contribution voluntary and community organisations were making to the quality of life of Westminster residents, particularly in deprived communities. There were many examples of innovation and reach into communities that the council could not readily achieve. This had been particularly important during the pandemic when schemes such as local food banks and the Community Champions had supported residents, promoted vaccination and tackled isolation. It continues to be important in addressing the cost-of-living crisis, where again the sector had stepped up in addressing holiday hunger for young people and providing vital advice and guardianship support to struggling individuals and families and will be critical also in dealing with the unavoidable impacts of climate change.

However, we also found that the sector was nothing like so well supported by the Council as in the neighbouring boroughs of Kensington and Chelsea and Camden. A major difference is the lack of core funding support to voluntary and community organisations; adequate core funding is strongly supported in good practice guidance to funders. Kensington and Chelsea's Voluntary Sector Support Fund provides £2.8 million in core funding over an 18-month period to local voluntary and community organisations; Camden provides £3.7 million/year in core funding through four grant programmes.

The new administration's election manifesto recognised that the voluntary sector in Westminster had been underfunded for decades and committed to tackling this and

restoring a permanent central grants scheme offering longer term grants. This had not been addressed at the time of writing our report. We recommend that the Council should as soon as possible introduce a core funding programme for the voluntary and community sector of similar scale to its neighbouring boroughs. As in both Kensington and Chelsea and Camden this programme should recognise the need for funding to smaller and emerging organisations and for those that provide capacity building and infrastructural support.

In addition, the Council should treat the sector with respect and as a more equal partner and should seek opportunities to strengthen its capacity and involvement on a more permanent basis. We recommend that the Council should work with the sector to develop a local Compact on relationships and processes, identify opportunities for community asset transfers and community ownership, and consider longer-term mechanisms to embed community engagement at the core of its strategy, such as participatory budgeting or citizen's assemblies. As a first step the council should meet regularly at Chief Executive/ELT level with key voluntary and community organisations in the City.

Community engagement and consultation

The Council has made strong commitments to giving residents a greater say in how it operates and ensuring consultation is meaningful and genuine. We have already noted the importance of founding new approaches to service delivery on effective and inclusive engagement with communities.

Good work had been done led by the Deputy Cabinet member responsible on quality assuring significant consultation exercises. This had revealed very uneven quality across all the consultation exercises being run by the Council often with staff leading them not having relevant and necessary guidance, experience and training. We recommend that based on this work the council should re-examine and formalise its requirements for consultation and establish a central team responsible for ensuring that all consultation exercises comply with them.

The Council has also begun a number of area based initiatives aimed at more proactive and inclusive engagement with communities, in particular the North Paddington programme and new Steering Groups for Queensway and Edgware Road. These naturally supplement other existing and important arrangements for engagement with Amenity Societies and local forums and the Council should evaluate and extend them as appropriate identifying good practice but also recognising that different parts of the City may need different approaches.

The Council should ensure that its approach to community engagement is planned and delivered in genuine partnership with local voluntary and community sector organisations and not seen as its sole preserve. Voluntary and community organisations often have links into communities that are stronger than the Council's and should be resourced through funding or secondments to deliver community engagement in area based programmes.





Making Change Stick

Broadly we think that the right way for the Council to monitor progress with the Commission's recommendations that it accepts is to embed them within its own service strategies and corporate and programme monitoring processes. So the fairness and equality review recommends an annual Council report on progress with its poverty reduction strategy, key recommendations on energy and green transition should feed into the review of the Climate Action Plan with the housing recommendations taken on board and monitored through the new housing strategy and the proposed Corporate Housing Improvement Programme. Some of the Council's corporate monitoring is structured around the Commission review group topics and that should facilitate corporate monitoring of key Commission recommendations. We recommend that following Council decisions on which Commission recommendations should be accepted a clear plan for this overall monitoring approach should be agreed as part of their implementation.

The Commission has also made a wide-ranging set of recommendations to reorient the Council's programmes, operating model and culture towards addressing inequality and supporting those communities which have historically been excluded from the wider growth and prosperity of the City. The extent of change that is achieved will depend strongly on the pace and ambition with which those recommendations are implemented and on the willingness of the Council to stick to the course that has been set.

Many of the Commission's recommendations are designed to embed different elements of these new priorities and ways of working – whether through culture change, training and development, governance and leadership,

consultation and engagement mechanisms or the reallocation of resources. Alongside this, however, in order to ensure continuing progress across the breadth of this programme of change, and that action is not reduced to specific recommendations in isolation, broader oversight and monitoring is needed.

In support of this, the Council should also consider what central programme resources are needed to support and manage the delivery of this programme, and ensure they are provided. These recommendations have the potential to drive significant improvements in the Council's relationship with the full range of its communities and citizens and in the quality of their lives, but to do so the right capacity needs to be provided and a long-term commitment made to the work that is required.

We did consider whether the Council should establish a steering group with some outside and independent representation to review its implementation plans, agree measurable objectives and monitor progress – holding the Council's feet to the fire for the delivery of the new priorities that it has set. But we think this is fundamentally a task for the Council's Cabinet advised by the Chief Executive and Executive Leadership Team and for them to consider whether any additional structures, processes or outside independent support would be useful. However, as one additional measure specific to the Commission's recommendations accepted by the Council we recommend that next year the Council should invite the Chair of the Commission, together with the convenors of the four sub-groups, to review and report on progress.





Fairness and equality review

Introduction

At the start of the Commission’s work the purpose of the Fairness and Equality review was defined as to ‘identify policy approaches and initiatives that will enable and deliver a fairer, more equal and inclusive city’. Between August and March 2022/3, the review group held seven meetings to hear evidence, see presentations and discuss options, around six broad priority themes:

- the cost of living crisis
- improving opportunities and the quality of life in the city’s most disadvantaged neighbourhoods
- ensuring residents have access to advice, advocacy and representation
- early years provision
- early help and support for older children and young people (including those most at risk from serious youth violence) and
- tackling health inequalities.

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The members of the review group were

- Karen Buck** MP (Convenor)
- Helen Keenan** Managing Director, Project Hart, Grosvenor Estate
- Karen Barker** Head of Policy and Research, abrdn Financial Fairness Trust and London School of Economics
- June O’Sullivan** CEO, London Early Years Foundation, representatives from the Young Westminster Foundation
- Anela Anwar** Director, Z2K (Zacchaeus 2000 Trust)
- Imran Hussein** Director of Policy and Campaigns, Action for Children
- Filsan Ali** Director, Midaye Somali Development Network

The evidence received and considered by the review group included:

- highlights of 2021 Census detailing demographic and deprivation data
- information on local impact of cost of living crisis and Westminster’s response
- presentation on the extent to which poorer neighbourhoods are disproportionately affected by fear of crime, ASB and neighbour nuisance, and on responses to these to
- presentations on early HELP, mental health services provided to young people, serious youth violence
- presentation on the Council’s Community Investment Strategy
- presentation on the Council’s advice services review and impact of the cost of living crisis on the advice sector
- evidence video from residents in relation to the impact of the cost of living crisis from Young Westminster Foundation and London Mutual Credit Union
- presentations by Citizens Advice, North Paddington Food Bank, Birmingham University, Young Westminster Foundation, London Early Years Foundation, One Westminster, Mosaic and the BME Forum

The review group proceeded by starting from the evidence base and examining the effectiveness of existing Council policy and programmes that seek to meet the needs of more disadvantaged communities. In doing so it drew in particular on evidence of service users’ experience from the voluntary and community sector.





Findings and recommendations

There is great strength in our own communities - but they must be supported.

Westminster has an extraordinary, rich, and complex history of voluntary activity and organisation. This in turn reflects a wider history as the heart of the capital as a place of arrival for so many communities from across the UK and the world. Here to work, here to seek refuge, here to seize opportunities. It is a place of extraordinary diversity and of constant change. Communities gather, support each other, and celebrate their faiths, their cultures, their arts, and then often move on and out. This brings a massive energy to the city. But because there is often real struggle, especially when times are hard generally, needs are also great, and because costs are high and the population change so rapid, the organisations we depend on to reach into neighbourhoods and win the confidence of residents need more help, not less. This also must be a strategy with built in futureproofing to provide security and protection against the funding droughts which come around too often.

To address these needs we recommend that the Council should:

- ensure adequate and sustained investment in partner/umbrella organisations and bring them fully into planning for neighbourhood services.
- accept that Westminster has much to learn from community experiences and voices. Whilst resources are inevitably limited, and both councillors and officers have responsibilities to manage finances and determine priorities, everyone can benefit from a collaborative, open spirit of engagement.
- develop local infrastructure, with an asset base, to reduce the vulnerability of these organisations to short term variations in support.
- review on a regular basis access to space, facilities and workforce development (alongside core funding) for local and voluntary groups as patterns of need and services change
- embed an approach to reducing social, economic, and geographical inequalities across the work of the council and champion this in dealing with statutory agency partners, including the NHS, police, DWP and others. Whilst supporting individuals in need can be a vital part of this, it must also be based on a recognition that inequalities are structural not personal
- look for ways to ensure social value is secured across commissioning and procurement and supporting community objectives with an employment policy which prioritises local people into apprenticeships and jobs, especially where this offers career/skills progression
- encourage co-production with the community as a means of engagement to create joint solutions.

Community, Family and Youth Hubs

A common thread linking so many strands of activity relating to well-being, health and quality of life is getting connected. Westminster may be physically compact, but it is a highly diverse, highly mobile city and far too many residents, especially those in the greatest need, clearly struggle to find out what is going on, or how to access it. For some there are major confidence barriers to getting involved - a lack of confidence which can be rooted in language, problems with digital access, fear or anxiety about expectations, in a negative view of the state or one of many other factors. Services which rotate between different venues and times can be particularly hard to negotiate.

Community and Family Hubs can play a vital role in overcoming these barriers, especially when there is certainty and predictability about where and when they can be accessed. Where these are also a base for community organisations to work and outreach from, they can be transformative - a lesson learned from Sure Start centres. Multi-generational activities can also be especially valuable in helping to break down barriers in areas where high mobility means people are less likely to know their neighbours than in the past.

A youth hub model has been heavily supported by WCC Early Help in partnership with the Young Westminster Foundation and the Avenues, St Andrews, Fourth Feathers, Churchill Gardens and Amberley. These work closely with the Family Hubs and specialist community services. Although this gives good coverage across the city, given some of the concerns, such as where young people feel confident about going, it would be useful to understand how well provision is taken up in areas such as north Maida Vale, the Warwick estate and Bayswater/Lancaster Gate.

The Council's commitment to developing hub networks is extremely welcome and will hopefully also help improve accessibility for NHS and other service outreach. Crucially, such hubs must be visible within and accessible to, residents in the most disadvantaged neighbourhoods as well as the more deprived wards. Above all, delivery must be in full partnership, as promised, with the community and voluntary sector.





Poverty, hardship and the cost-of-living crisis

The review group's work began just as the full impact of the cost-of-living crisis began to be felt. Besides the overall rise in inflation energy and food prices rose even further with a devastating impact on household budgets. Private sector rents are prohibitively expensive in Westminster and, whilst the Government did address this to some extent by increasing Local Housing Allowances from April 2020 to assist during the pandemic, rates are significantly below average market values and have remained unchanged for the last two years. Many people on Universal Credit, in and out of work, have seen their incomes cut as a result of sanctions or restrictions, reducing their disposable income well below the notional level of entitlement. Some groups, including those with communal heating systems, or on pre-payment meters, have been particularly badly affected by energy costs due to the increased price of wholesale gas and electricity. Even before the impact of the COVID-19 pandemic and the increase in inflation people were already struggling. The main rates of working age benefits and tax credits were frozen for 4 years from April 2016. Westminster has a large number of households on pre-Universal Credit 'legacy benefits', mostly benefits for long term sick and disabled people, with mental health issues being a significant factor. Those people did not receive the temporary uplift given to Universal Credit recipients during the pandemic, and incomes fell substantially in real terms. The effects - for them and other groups, such as those whose incomes are restricted by the Benefit Cap and Two Child limit - limit their ability to heat their homes, eat well and participate in activities outside the home. Hardship and discretionary funds can play a vital role at a time of crisis, as we are seeing. It is vital that the delivery of assistance is monitored to ensure take up is inclusive with information freely available to all

Westminster's different communities. The review group strongly supported the measures taken by Westminster Council to assist the most vulnerable households during the crisis. This has included providing free school meals, first to primary age children, then extended to resident children in nurseries and into secondary school at Key Stage 3 from September 2023. The Council has also added to hardship funds and offered a tailored fund to assist renters whose incomes are too high to entitle them to means-tested help from Central Government but who are particularly severely affected by rising rents. The Council cannot itself set benefit rates nor determine eligibility. It cannot alone raise the incomes of the tens of thousands of low-income households, although the companion section of employment in the Commission report covers ways of increasing opportunities for residents to develop skills and find good jobs. Working with local employers, Westminster can also continue to promote the London Living Wage. What the Council can do is ensure that its services are, as far as possible, tailored to offset the disadvantages which flow from living on a low income and/or in a deprived neighbourhood. The review group identified some of the key areas as being access to advice and representation, early years and family support, youth services, access to leisure, safer neighbourhoods and the removal barriers to greater health. We also recognised that housing was one of the most serious challenges facing lower-income households - from homelessness to overcrowding and from affordability and insecurity in the private sector to disrepair and damp in any sector. This issue deserves, and so gets, its own chapter in this report, but we are in no doubt that tackling these problems would be one of the most important ways many of those in greatest need can be supported.

We recommend that the Council should:

- Follow up its work so far on the cost-of-living crisis with a more detailed poverty reduction strategy including an annual report to the Council on poverty and low income in the borough. This report should also cover debt and debt management, enforcement in respect of rent and Council Tax (policies and practice, numbers) and applications to/assistance provided by discretionary council funds.
- Adopt a proactive data-based approach to targeting its hardship schemes and other types of support to families and households in the greatest need.
- Review the operation of credit providers in the borough to ensure that bad credit providers are dissuaded from operating locally, and to consider the feasibility of supporting credit unions.
- Review its policy approach to promoting the London Living Wage with employers in the city to make it as effective as possible.
- Ensure that the support available on its cost-of-living hub is communicated in a wide range of languages and also that front line staff in the Council and partner voluntary and statutory organisations are made fully aware of the available support.





A word of advice...

Without a well-functioning advice, advocacy and representation sector, the effective delivery of so many other services are seriously undermined. From consumer rights to tax and social security, from immigration to Utility Company debts, most people need advice some time in navigating an increasingly complex, often impenetrable, environment. As always, some people face additional barriers because of disability, literacy issues, lack of digital access, not having English as first language. And some people live under far greater pressure - private renters facing eviction, benefit recipients facing sanctions and deductions. Yet research shows that every £1 invested in early help pays back up to £7 in increased income and/or reduced costs, like court costs. Although Westminster has historically been reasonably well served in terms of level of provision, evidence now suggests that needs are escalating, whilst high costs also make it increasingly hard to recruit staff.

Partners

Figures provided by Westminster Citizens Advice Bureau show a worsening situation as the cost-of-living crisis intensifies. Over the two quarters Winter 21 to Winter 22, there was a 135% rise in the number of people seeking emergency support, including help from foodbanks, a 95% rise in those seeking help with energy costs and a 340% rise in the number requiring debt assessments. There has been a sharp rise in the number of sanctions applied to claimants, and homelessness is increasing, as measured both by rough sleeping, section 21 ends of private tenancies and homelessness applications to local authorities.

Local providers do a superb job in often complementary ways - from early help to support at Tribunals or court, but all services are overstretched. At the same time, it is always apparent, sometimes too late, how many people remain unaware of where and how they can get help. Neither does the Council have a complete picture of who is providing what service for who.

We recommend that the Council should:

- Carry out a more comprehensive audit of services across the sign-posting, advice, advocacy and representation sectors and how they serve local communities. This should include examining the need for open access services on the Advice Shop model, tribunal and appeal representation and looking at the potential for Refernet or other platforms to offer a more seamless service. The audit should also examine variations in need, take up, and outcomes across different communities to identify those who are finding it difficult access advice and measures to address this.
- Approach DWP at a senior level to agree a collaborative work programme on managing the Universal Credit migration process and ensuring that the move between benefits does not trigger arrears/enforcement action where this can be avoided.
- Improve support for workforce development in the advice sector, including developing create an apprenticeship scheme with its partners for local residents to gain the skills they need to fulfil advice sector roles in future and more support for volunteers including pathways into employment for them.
- Explore to identify levels of need and what support could best be provided for young people from school age into young adulthood. Young people are less likely to access formal advice services but face specific challenges, like mobile phone debts, and these can impact negatively on mental health.





Getting off on the right foot - A quality early years' experience for all Westminster children

Good quality, affordable childcare is in the interests of both children - where it is of disproportionately greater benefit to the most disadvantaged - and working parents. Research by the Sutton Trust suggests that disadvantaged children are already eleven months behind their more affluent peers by the time they start school. Westminster has excellent nursery schools and not for profit providers but also some of the most expensive provision anywhere. And in common with other areas, childcare providers are struggling to recruit and retain staff. According to London Early Years Foundation there has been a decline in the

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the early years sector with the pandemic having had a big impact on staff retention. Staff also want to work more flexibly which does not suit the needs of nurseries and staff are less qualified.

Westminster specific concerns include the low take up of places for 2-year-olds, especially in the most deprived wards, the implications for providers and the maintenance of spaces in the context of the decline in the child population, and the high costs of early years SEND provision.

Take up of existing provision for 2-year-olds is lowest in the wards in the northwest of the borough, and in the poorest neighbourhoods generally. Currently 43% of 2-year-olds are not accessing available services, with some communities, including Turkish and Eritrean communities, particularly poorly represented. Additionally, children in many of the most disadvantaged households are least likely to be able to access early years provision for children because they are not working. This will include families where a single parent, or both parents, may have disabilities or long-term sickness, and a single parent is otherwise not in a position to work 16 hours. Even working families have changing requirements for childcare, with a high demand for part time places which does not fit comfortably with the way nurseries and providers are funded.

Whilst there is no definitive factor explaining differential take up, it is highly likely that confidence is a key component.

The outstanding work done by community projects like Family Lives Parent-Child Plus, and the Pre-Birth to Five programme helps break down barriers and build confidence, utilising peer-to-peer messaging. Although excellent, these initiatives tend to be small and time limited, and it should be easier to map them geographically and analyse them by demography.

The national Government Budget announcements in March 2023 included a welcome commitment to expand provision for children aged between nine months and two years, as well as additional free hours for children up to school age. There has also been a significant increase in the amount working parents on Universal Credit can claim for childcare. On balance, according to the Resolution Foundation, the way the new investment is structured will particularly benefit middle-and higher income earners, however. There is also no question that delivering the offer will also present major challenges to providers in all sectors, since the financial support for providers is only 10% of the estimated need, which may increase the incentive for some providers to increase the number of children per staff members, as the government has permitted.

It is not yet clear what the impact of the extended offer will be on the need for physical infrastructure (several nurseries have closed in Westminster in recent years, particularly in the poorer wards, but at least two higher cost private nurseries have opened in Queen's Park), for early years staff and for childminder and other home-based provision. There has been a marked decline in the number of childminders here, as elsewhere.

We recommend that the Council should:

- Conduct and maintain a full audit of provision across all early year's sectors- public, private and voluntary, as information is patchy. We need a better understanding of who is using which provision, where and at what cost. This audit should also cover pre-natal services from conception to the end of year one, to establish how to improve the coordination of services, especially those delivered by GPs, Midwives, Health Visitors and the Council.
- Work with key voluntary sector partners to carry out research into the barriers to take up of the existing offer for working parents, returners and low income families not in work, across different communities, and develop appropriate targeted promotional activity to increase take up, including the use of 'Childcare Champions'.
- Set a target for increasing participation by parents not in work for health or similar reasons, to ensure the children of economically inactive parents are not excluded and report on this annually.
- Publish an assessment of needs and provision for SEND children in each early years age cohort so as to design a future service model, accessible in both the north and south of the borough.
- Support early years providers with the delivery of part time places, including for parents who want full day provision but only for part of the week.
- Identify pressure points arising from the extended childcare offer in the budget, to ensure that children of poorer households are not in care settings with a lower ratio of staff per child than 1 to 4 (or as is age appropriate).
- Work with London Early Years Foundation and other interested providers on the development of the Early Years apprentice model for the next 10 years.





Wraparound and holiday services

We know from pupil premium/FSM data that a high percentage of Westminster's school students are from more economically disadvantaged backgrounds. Schools also face challenges from high pupil turnover and now the falling child population seen across inner London. Whether wraparound or holiday schemes are aimed at enabling parents to work or at enriching and improving the lives of children (they should do both), in practice they are hard to provide under these circumstances. The drastic decrease in participation as the Council's play service was run down, then replaced by relatively expensive private provision, cannot be entirely explained by an overall drop in the number of children - only a little over a decade ago well over 1000 children were using the council's own Play Service. It became both too expensive and less convenient. So, we ended up with too little provision for those who need it most, including children without gardens, children in larger families and children of parents unable to work, amongst others. This in turn impacts on child health and family wellbeing.

The government's generally welcome commitment to expand childcare nonetheless still assumes a 38-year week, and, whilst encouraging wraparound care in schools and other settings, assumes this will be funded by charges. Yet charging is least viable where schools do not have a large cohort of parents able and willing to pay.

We recommend that the Council should:

- Support the Young Westminster Foundation in maintaining a comprehensive, up to date directory of wraparound and holiday schemes, with numbers, prices, and access/eligibility.
- Carry out an assessment by ward of the numbers and circumstances of children who would benefit, so consideration can be given to supporting schools willing but unable to offer such a service.



Provision for children and young people

After hitting a low in 2015/16, when the Council removed funding from the youth service (as well as the play service and much of the out-of-school programme), there has been some significant rebuilding. The Young Westminster Foundation has played a vital role in fund-raising, promotion and co-ordination, and the staff and volunteers at centres across the city have done magnificently in holding the service together, even though a great deal of damage was done in the interim, compounded by the effects of Covid. The new administration invested quickly to ensure a summer programme in 2022 and aims to continue supporting projects working with young people across the city. A key issue is continuity with the short-term, stop-start nature of so much of the funding over recent years making it hard to retain staff or to plan for the future.

There is some evidence of parental reluctance to use youth services because of anxiety about negative peer pressure, thus potentially leaving those children isolated and without the opportunities participation can bring. Community youth services need to have capacity for outreach and confidence building with parents, via schools, faith groups, etc.

Paddington Development Trust is among those who have also identified a particular need amongst young people aged between 18-25, often not in employment, education, or training, and at risk of becoming victims of, or involved in, serious youth violence. This issue has been specifically highlighted by the violence on and around Lisson Green in the winter of 2022 but has wider applicability.

We recommend that the Council should:

- provide long-term confidence for voluntary youth service providers to enable them to plan evening and holiday provision with sufficient lead in time.
- liaise with providers over the provision of transport where necessary, so young people at risk/fearing street violence can participate and ensure that youth hub provision is accessible across all areas of the city.
- ensure sufficient capacity to deliver a comprehensive youth offer across the city, with particular emphasis on the most disadvantaged wards, with an immediate priority being to meet needs in Westbourne.
- investigate more ways for the voice and views of young people to be taken into account in commissioning youth services but also in decision-making across the Council.
- working with Young Westminster Foundation, PDT and others, aim to build parental confidence in the youth service while looking to develop alternative models of your provision for example in schools.
- audit the delivery of, and issues facing, supplementary schools in Westminster, building on the work by YWF and John Lyons Trust with a view to providing further support to them.
- address the needs of the cohort of young adults over the age for youth services but at particular risk from gang involvement/serious youth violence, identifying barriers to employability, skills, training, and enterprise for 18-25s. This would include continuing support for programmes such as Helping Hands Serious Youth Violence programme, and responding to insights from young people gained from the 18-25 study.
- facilitate additional capacity around consultation with/involvement by young people in service design, utilising the YWF needs analysis due to launch in autumn 2023.



Increasing access to and participation in sports and leisure

Westminster is well served by leisure facilities and residents have access to world class parks and open spaces. However, access to a number of these facilities is limited because of cost and other factors, including, in some cases, booking procedures. It is, for example, often difficult for young people to access pitches for informal/self-organised games. Childhood obesity levels are very high, with 40% of children deemed to be overweight by the last year of primary school - double the level at reception. Inequalities in life expectancy, life limiting health conditions and mental health reflect patterns of income and housing inequality. And reflecting the experience elsewhere, women and girls are

particularly likely to stop participating in physical activity after school. Safety can be an issue for women and girls but serious youth violence - perceived and actual - also limits how and where boys and young men can go to play sports.

There are numerous community projects either based in or operating in Westminster, and the reach many of these have into more disadvantaged communities is significant. Many of them are organised and led by volunteers. Yet a common thread for them too is that they find the affordable provision quite restrictive, with commercial bookings taking precedence. There has, for example, been disappointment over access to the new Church Street leisure hub, and the Jubilee Hall which replaced the former Jubilee sports centre after the construction of the Moberly, and there are complaints about access to Paddington Rec and Academy Sports. Whilst there will inevitably be a balance to be struck between the need for commercial income, including that generated by Westminster's non-resident visitor population, the contribution being made by community/voluntary groups needs to be more fully recognised. Whilst community champions are recognised for their contribution at celebratory events, this does not always feed through into day-to-day problem solving.

We recommend that the Council should:

- prior to the negotiation of the leisure services relet undertake a community consultation programme with different user groups (schools, faith communities, parents, young people, women, older users) into access to sports and leisure, so as to better understand the issues regarding costs, booking systems, how community hours are utilised, the demand for different activities and the balance between organised activities and individual recreation
- ensure maximising social value is given due weight in strategic leisure plans and procurement processes
- conduct a regular audit of community sports provision and build relationships with community sports providers, to learn from their experiences with accessing affordable appropriate facilities. This should include an annual event with providers
- publish and keep up to date a directory of local providers, services and contact details, and hold an annual community sports conference supported by councillors
- review regularly all leisure service S106 agreements to ensure full compliance
- maintain focus on the project looking at designing and supporting spaces where girls can feel safe using outdoor spaces for activity and leisure.





Loving where you live starts with feeling safe.

Everyone wants to have a home where they feel safe and positive about their local environment. In building a fairer Westminster, councillors for some of the most disadvantaged wards and estates have rightly been championing improvements in the built environment and in landscaping to bring the environment in poorer areas up to the standard of the best. There is no fundamental reason why standards of maintenance, street furniture, planting and so on should be worse in one place than another, any more than there should be variations in street cleaning, rubbish collection or lighting. Alongside this, attention must similarly be paid to people's sense of safety and comfort, at home and in their local streets.

Although levels of recorded crime in residential areas are not high – Westminster crime statistics are heavily skewed by the size of the day and night-time visitor populations – crime, the fear of crime and the experience of anti-social behaviour have profoundly life-restricting consequences. They impact on physical and mental health, reduce activity levels, especially after dark. And the impact is disproportionately (though not exclusively, of course) felt in the poorer neighbourhoods, including estates, by women and girls, young people and by global majority residents.

The decline in Safer Neighbourhood policing teams over the last 12 years has been profound, and in addition to reducing the visibility of on-the-ground police presence, will not have helped with the crisis of confidence in policing now being experienced across London and beyond. The council leadership has been and will continue to press for neighbourhood police teams to be rebuilt as much as possible, but we also know that community safety cannot rest with the police alone. Furthermore, writing in the immediate aftermath of the publication of the Casey Report into the Metropolitan Police, we know there is a major job to do in restoring public confidence in policing, especially amongst black/global majority communities, women, young people, and LGBTQ+.

The investment made by the Council in youth and children's services can contribute to a prevention agenda, but this can also go wider. There are areas within the residential areas of the city, for example, which feel unmanaged and unsafe, which in turn makes people less likely to pass through them, especially at night. The renewed focus on the redesign and improved management of the Maida Hill square could offer a model for improving some of these spaces, so they feel safer and more attractive places for people to meet and engage.

We also know from international research that the fear of crime is strongly influenced by levels of familiarity within someone's neighbourhood - the more people you recognise, the more likely it is you will feel safe. High levels of population churn in cities can work against this objective, but community activities, and visible services, such as community and family hubs, can help offset that.

It is not only in the street where crime, ASB and the fear of crime can have a profound effect. Neighbour disputes, whether over noise, shared spaces, or other factors, cause huge amounts of distress and unhappiness to many residents, and often prove extremely hard to resolve. Westminster has one of the highest proportion of residents living in flats anywhere in the country, and inevitably properties with poor sound insulation, confined communal areas or poor design (such as lighting at the entrance) cause more problems. The loss of localised housing offices (Council and Housing Association) has not helped by reducing local knowledge and locally based officers to help resolve issues. The review group heard that take up of mediation is low, which may reflect a lack of trust and confidence in the system, although the development of an app for reporting noise issues could assist those comfortable with digital reporting.

Finally, community based mental health services are significantly overstretched and the threshold is set too high to be accessible to many people with poor mental health but who are not in crisis. The Council has identified that there is a significant gap in support for this group.

We recommend that the Council should:

- Continue to press for more neighbourhood police officers to be deployed throughout the city.
- Identify resources and a plan for improvements to the public realm, playgrounds and street furniture focused on disadvantaged wards which have not previously seen much of this type of investment and review environmental contracts to ensure there is equity in delivery across the city.
- Monitor the impact of initiatives which increase the council's presence on estates and in the most deprived neighbourhoods, and report on whether this increases a) ASB reporting b) take up of mediation and c) how these council initiatives are viewed by residents of different demographics (such as age and ethnicity), to ensure they are increasing a sense of security and agency for all residents and not inadvertently reinforcing existing inequities or biases.
- Examine ways to improve and speed up the resolution of disputes which involve properties in different tenures/operated by different landlords.
- Set a timetable to report on the equalities impact assessment of the Anti-Social Behaviour strategy, to include a breakdown by age cohort, so it is possible to monitor the different experiences of those affected by area, age, gender, and ethnicity. This requires improved and standardised data which the Council aims to provide but is not currently available.
- Deliver the promised improved management of Maida Hill square, identify lessons which may be applicable to other neighbourhoods.





Mind the gap - closing the life and health expectancy gap

Men can expect to live 18 years longer in Knightsbridge and Belgravia ward than in Westbourne. Women in Knightsbridge and Belgravia ward live 9 years longer than those in Westbourne. It's like losing a year or two of life for every bus stop going north on the 36 bus. The review group heard that, in addition, older people can expect to experience some 20 years in poor health, and more than 25,000 Westminster residents are living more than one illness or chronic condition. Over 10,000 older residents need help with self-care and more than 1,000 people are providing high levels of informal care, often at considerable cost to themselves.

Through the public health partnerships, there is a wealth of information about the factors driving inequalities in both health and life expectancy, with granular detail about the extent to which different factors impact on particular groups. Whilst some strategies potentially work across the board (smoking cessation, promoting exercise), others are highly specific, and the partnership work being undertaken through the Community Priorities

fund should be invaluable in helping to build up a detailed picture of need. What we already know, most recently from the experience of the vaccination programme, is that alongside high profile, multi-media messaging, there must be grassroots community involvement, support for peer-to-peer engagement with a particular focus on the impact on people with protected characteristics.

The #2035 programme objectives, which aim to halve the gap in life expectancy for people living in Westminster in 12 years, provide a welcome recognition of this principle, including in its objectives 'putting residents at the centre and working together on the challenges they prioritise'; 'creating proper partnerships...to solve problems and adapting solutions to local conditions' and 'mobilising a movement for change where we all teach one another and learn from one another' with a commitment to 'listen, connect, amplify and accelerate'. Under this umbrella, Westminster provides funding to some vital projects, alone and alongside the NHS, but there is far more to be done if

these important goals are to be achieved. The evidence from Community Health and Wellbeing workers in Churchill Gardens, for example, revealed the extent to which residents are unaware of many of the services which currently exist.

Alongside the more familiar patterns of ill health and disability, we are also becoming increasingly aware of the impact of poor mental health and the interaction with physical illness. We are also becoming more aware of the risks associated with loneliness, exacerbated for many by the pandemic. Whilst often associated with later life, when family and friendship networks can diminish, we also now know that this is a real issue of many young people. Westminster does, of course, face real challenges in this area, not least the exceptionally high population turnover, consequent upon the size of the local private rented housing sector. This makes tracking the impact of policies on the population base exceptionally difficult, and is, of course, itself potentially quite disruptive for organisations involved in community building. Overall, it is as easy to map poor health outcomes and reduced life expectancy as it is to map poverty. The greatest concentrations of need are in and around Pimlico in the south of the city, in the corridor stretching from Queen's Park to Church Street along Harrow Road, and on Council and Housing Association estates. These areas require levels of attention and investment they have not benefited from since the end of government funding streams like Sure Start, the Children Fund and the SRB over a decade ago. However, whilst this geographical framing is helpful, half of those in the lowest income groups do not live in the poorest wards and there is a substantial population in need in the cheaper end of the private rented sector. It is important not to miss out on identifying and targeting people in need across the city.

We recommend that the Council should:

- Using the framework of #2035 monitor and evaluate inequalities in health status and life limiting conditions as well as life expectancy, geographically and with reference to ethnicity, gender, and LGBTQ. Reducing inequalities in life expectancy can only be achieved via reducing inequalities in health status and disability first.
- Ensure that the principles behind #2035 are reflected in the level of funding and support given to the voluntary and community sector.
- Ensure that community research into barriers to health addresses lower levels of involvement by men and makes recommendations to increase men's participation.
- Consider ways of reporting the findings of the Joint Strategic Needs Assessment on health inequalities for global majority communities to ensure awareness amongst councillors and in the community.
- Make tackling loneliness a priority for the council, with a strand of activity aimed specifically at reducing loneliness amongst young people.
- Ensure there is a specific strand of health and wellbeing work focused on homeless households and those at risk of homelessness with strengthened requirements for signposting and referring homeless households to support services as part of its preventative and targeted approach, identify and focus on some small areas with a substantial private rented sector serving lower income households to identify needs- examples include the Bell Street area of Church Street and Fernhead/Ashmore/Portnall/Bravington roads in Queen's Park.



Mission & Objectives: A Fairer Economy

The purpose of the review agreed by the council at the start of the Commission's work was to advise on how the council can enable more Westminster residents to share in the economic successes of the city. Westminster, and London as a whole, is filled with economic opportunities, but not all residents share in these. The gap between affluence and deprivation in the city is stark.

The members of the review group were

Claudette Forbes (Convenor)

Simon Harding-Roots London Managing Director, Crown Estate

Neil Johnston CEO Paddington Development Trust

Phil Graham Executive Director Good Growth, GLA

Diana Spiegelberg Deputy Director, Somerset House Studios

Stella Brade Chair Waltherton and Elgin Community Homes

Stephen Evans CEO Learning and Work Institute

Matthew Jaffa Senior External Affairs Manager Federation of Small Businesses

Ruth Duston MD Primera London, CEO Victoria and North Bank BIDs

Andrew Travers Former CEO LB Lambeth, Florian Bosch Head of HR, Vodafone UK,

Jim Collins Director London Strategy and Planning King's College London.

The review group agreed a number of priority areas to examine:

● **High Streets.** Here we explored initiatives to support local high streets allied to promoting economic and other opportunities for neighbouring residents with an initial focus on Harrow Road.

● **Skills & Employment.** We considered the best strategic approach to skills and employment and how economic opportunities could be opened up for the city's residents, particularly those with the highest needs and those from disadvantaged communities. We recognised that addressing this would serve to boost the city's economy.

● **Social Value.** Working with pro bono consultancy, Bloomberg Associates, we examined how the Council's social value and business community partnership approach could be strengthened to increase residents' share of economic success. Sarah Longlands, Chief Executive of the Centre for Local Economic Strategies provided helpful insights drawing on experience from other parts of the UK. Georgia Bowker from WCC supplier, RMG, highlighted their experience on this agenda from a procurement perspective.

● **Business Support.** We looked at what could be done to support Westminster's businesses at a time when they are facing unparalleled challenges.

Half day 'Deep Dives' were convened for each theme and those were preceded by a meeting of a sub-group to look in detail at data provided primarily by WCC officers and to help guide the discussion at the deep dives. Advisory notes were produced following each session setting out recommendations to the Council.

Conclusions and recommendations

The review group convened a final session to review its recommendations. We considered how best the Council and its partners can make an impact in respect of the city's economy. There is the well recognised challenge of securing the continued success of the West End and St James, which is the engine room of the economy - 64% of the city's jobs and 63% of its businesses are located here - whilst simultaneously addressing economic inequality elsewhere and promoting inclusive growth.

The review group considered that, whilst the council has some important tools at its disposal to intervene in the former on which we say more below, global forces, national and regional policies and other factors beyond the council's control will be greater influences on this part of the economy.

The review group concluded that the most pressing issue for the council and its partners should be to address the needs of those constituents who are currently not benefiting from the city's prosperity. So we recommend that the council working with its partners move swiftly to prioritise efforts to provide support and channel resources to these underserved communities. This reflects both the council's greater ability to affect change and improvement for those residents and small businesses and the

need to address long-standing disparities in economic and social outcomes between different areas and neighbourhoods of Westminster.

We also agreed that the council should still take steps where feasible to support the broader vitality of the city's economy, but in doing so should ensure that it is widening access to economic opportunity and not entrenching disadvantage. Its resources and staff time should remain focused overall on areas of economic disadvantage while still supporting measures the council could take itself to support the broader economy and to use its convening power with London-wide and national authorities and local employers and community groups. In doing so it could both increase opportunity and widen access to it.



With this in mind our work led us to seven strategic recommendations for the council:

1. To be clear about its priorities in terms of target and specific groups

Addressing economic inequalities requires a targeted approach whether that be geographical areas of need, such as North Paddington and Pimlico South, or specific groups. So micro and small businesses have been disproportionately affected by the current challenges facing businesses. Similarly, only one in ten out-of-work 50 - 64 year olds and disabled people get employment support each year. The council's proposed economic development strategy should set out very clear priorities and targets for council activity.

2. To adopt a place based approach with community engagement at its heart

We recognised that focusing on geographical areas of need provides a powerful way to integrate a range of activities for maximum benefit. On the basis of our analysis of Westminster's wards and neighbourhoods, our recommendation was that the initial area of focus for the Council should be the North Paddington area, but that the lessons from taking a targeted and place-based approach should subsequently be applied to other disadvantaged areas of the city.

The latest data in the 2022 Ward Profiles for Westminster show continuing very high levels of deprivation in the three North West Westminster wards of Westbourne, Harrow Road and Queen's Park, with 50% of residents dependent on means tested benefits and amongst these over 80% economically inactive and over 40% classified as disabled.

The work of the review group built on two major policy initiatives going back to the previous Council administration: the policies on the North Westminster Economic Development Area (now referred to as North Paddington) in the City Plan and the #2035 programme initiated by the Council together with Imperial College Healthcare and community partners.

The City Plan's policy in relation to North Paddington calls for 'coordinated intervention to tackle persistent levels of inequality'. The #2035 initiative aims to improve health and halve by 2035 the 18-year gap in male life expectancy between communities in North Paddington and those living in the most affluent wards in the borough. It aims to do this by addressing the wider determinants of health such as housing, employment and the environment and emphasises community engagement and

3. To work with anchor institutions and private sector employers to facilitate improved access to economic opportunities by other, less prosperous parts of the City

The Westminster Wards: Socio-Economic Profiles document, produced by the Council's Strategy & Intelligence team in 2022 recommended that the council should work to connect smaller areas of activity with the more established commercial centres as a strategy for achieving inclusive and diversified growth within the borough. One of our early recommendations was that the council should lead development of a strong Westminster Anchor Institutions Network building on work by the GLA and elsewhere in London. This was agreed by the council who with the Chief Executive in the lead are now working with Bloomberg Associates to develop such a network.

We recommend that the Council should:

- Encourage and, where possible, require anchor institutions especially those in the private sector to increase levels of procurement from Westminster-based SMEs, encourage the take up of existing initiatives such as the Mayor of London's Good Work Charter, target apprenticeship and employment opportunities at underserved communities in the city, support skills provision, and strengthen their presence in schools and colleges.
- Explore ways to develop place-based partnerships between anchor institutions/major employers and specific neighbourhoods.
- Develop a menu of social value offers, based on identified community needs, that can inform the work of the Anchor Institutions Network and the development of the council's procurement approach to social value.
- Facilitate mentoring and peer support relationships through pairing firms and senior individuals in the CAZ with young people and SMEs from disadvantaged neighbourhoods within the city.
- Maximise connections between CAZ-based employers and underserved communities in the city, for example through promoting school governorships, board memberships of community organisations, volunteering, schools outreach, and other routes.
- Ensure that planning decisions for commercial space in the CAZ promote the provision of affordable workspace, with priority access reserved for residents and SMEs from the city's underserved communities.

While some of these recommendations may be resource-intensive for the Council, they do not all need to be delivered directly. By funding and working in partnership with voluntary and community sector providers, the council could achieve the dual goal of supporting its disadvantaged residents and promoting the long-term health of the VCS and civil society in Westminster, as seen already for example in the relationships between private sector organisations and the Young Westminster Foundation.



4. To develop a new shared vision for skills and employment through a Westminster Skills and Employment Board

Around 67% of Westminster residents aged 16–64 are in work, down from 72% in the year to June 2021. For context, the current UK figure is 75% and a year ago it was 74%. There are pockets of high worklessness with growth in the number of over 50s and disabled people who are outside the labour market. Most young people leave education with good qualifications and London has a high proportion of graduates in the workforce, but around one in four adults has low literacy, numeracy or digital skills – skills essential for life and work. Learning is also good for health and wellbeing and promotes civic participation. Productivity is high in London compared to the UK as a whole, but too many people are low paid and get little help to get on in their career or opportunities to progress. All of this can make it difficult for employers to meet their workforce needs and for people to meet their ambitions for life and work. We need to change this and provide more help for people to get in to work and get on,

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linked to action to work with employers to create good jobs and action more broadly to promote lifelong learning. In addition, the group recognised that many people commute in and out of the borough for work: Westminster residents have potential access to a wide array of employment opportunities and employers in Westminster can recruit from across London, the UK and to an extent, the world.

There is a wide range of partners that play a role in increasing and widening access to learning, skills and employment opportunities. These include the council, employers, colleges, adult education providers, training providers, employment support providers, central Government, the Mayor and Central London Forward. A key challenge is that there is a complex array of schemes that can be confusing for residents and employers, yet some groups, such as those who are economically inactive, are barely reached by these at all.

We recommend that the council should bring these partners and leading experts together to agree a clear vision for skills and employment for the city, measures of success, and a shared plan to deliver the vision. This should be done by establishing a Westminster Employment and Skills Board. Metrics could include 2030 ambitions for Westminster’s employment rate, proportion of people with at least level 2 qualifications, increased numbers improving their literacy and numeracy, and the proportion of people earning at least the London Living Wage. Progress against these metrics should be published on an annual basis along with an updated action plan to address any shortfalls. A first task for this board would be to map support for residents and employers, to identify and resolve overlaps and gaps.

We also recommend that the council and its partners should aim to ensure that 90% of residents have essential digital, literacy, numeracy skills by 2030. A plan to increase take-up of essential skills learning should be a core part of the shared vision and action plan – these skills are central to life and work and it is a great concern that one in five residents lack them and that adult literacy and numeracy learning has fallen 63% across London in the last decade.

Finally, it is important that the council take an evidence-based approach to policy and delivery. This should include ensuring independent evaluation of key employment and skills programmes to understand their impact. The council should disseminate local, national and international best practice on helping people into work and improving their skills, including through the new Westminster Employment & Skills Board.





5. To increase its support for micro, small and medium sized enterprises (SMEs) and Creative Industries

The council has developed a number of programmes to support the city's enterprises, and a broad range of wider support is available through the GLA-led London Business Hub. The majority of the city's micro businesses are located outside the centre. We recommend that the council should support development of a strong network of community business advisers, based in Westminster's underserved neighbourhoods, who can identify micro and SMEs that would benefit from support and provide signposting and facilitation to ensure that they are able to access the most suitable provision. This could be delivered directly by the council or through partnership with the voluntary and community sector. The Council's support for the Rebel Business School in North Paddington is a great first step towards this. The council's direct allocation through the Support Business pillar of the UK Shared Prosperity Fund would provide initial funding, which could be increased from council resources as appropriate.

Micro businesses, including freelancers and creatives, find it difficult to transition to SMEs. It is important to nurture early-stage businesses so that the city's self-employed are able to achieve their entrepreneurial goals. One of the main inhibitors to the self-employed transitioning is the difficulty in securing affordable workspace. We recommend that the council should identify opportunities to expand its enterprise spaces programme.

In addition, the Anchor Institutions Network can lead by example by making use of underutilised or vacant property within their estates. Anchor institutions such as the Crown Estate have valuable networks that can be leveraged on this agenda. A knock-on effect of the pandemic is higher vacancy rates in central London, meaning there has never been a better time to secure relatively affordable premises in prime locations. Organisations like the Crown Estate have small, serviced offices which are not well known about. We recommend that the council and its partners should work to jointly identify and market these opportunities.

The council should also consider working with industry bodies, businesses and Business Improvement Districts (BIDs) to create business clusters such as Green Tech or cultural business hubs to attract inward investment and create a circular economy in these areas.

Alongside this, we recommend that the Council should continue to review its own practices, and work with major employers and anchor institutions across the city, to maximise procurement spend with Westminster-based micro businesses and SMEs (particularly those from disadvantaged parts of the city). The council's policy approach on procurement and its new Responsible Procurement and Commissioning Strategy are very strong. Its roll out across council departments should be made a priority. The approach includes a focus on specific measures to ensure that smaller businesses are winning contracts. This includes targeting underrepresented groups. Measures aimed at increasing spend with smaller businesses are under consideration. These included setting more proportionate insurance requirements and financial thresholds for smaller, low risk contracts. The review group suggested additional metrics:

- Targets around the percentage of contracts awarded to small businesses, and within that to set targets and monitor performance in relation to ethnicity, gender, sexual orientation and disability.
- Percentage of spend or value of contracts awarded to local small businesses.

These should be developed as part of the monitoring of the Fairer Communities pillar of the Council's Responsible Procurement and Commissioning Strategy.





6. To focus on the right ways to support the economy of the CAZ alongside its resident population

Westminster's prosperity is clearly dependent on the continued success of London's Central Activities Zone, in particular the West End and city's other high-growth areas, but external factors beyond the council's control – global, national and regional events and policies – will inevitably be the dominant factor here. That is why we have recommended that the council's staff time and financial resources are targeted principally towards its underserved communities and neighbourhoods, where they can have the most tangible impact.

Nonetheless, it will still be important that the council continues to engage proactively with Government and London's Mayor to ensure that the wider policy context supports a strong recovery for Westminster's economy following a string of external shocks, such as Brexit, the pandemic, and a stalled national economy. And it will also be important that the council supports the continuing success of the West End, given its critical role in the local economy as an employer, a broader economic engine and a significant contributor of business rates to the treasury (the great majority of business rates income that Westminster collects is redistributed by central Government).

There are also interventions that the council can make to maintain and strengthen the attractiveness of the centre as a destination for both business and entertainment. These include funding enhanced service delivery and enforcement to address issues such as noise, street cleaning and anti-social behaviour (particularly in locations where these are recognised issues for residents and visitors), supporting new retail and hospitality opportunities that maintain the diversity and quality of the West End's offer, and

facilitating the activation of key night-time and cultural locations (recognising the need to work with and protect local residents) while safeguarding areas of comparative calm within the centre. As part of this, we recommend that the council should continue to work with Central London Forward, as part of its cross-borough programme on the future of London's Central Activities Zone, and with BIDs, industry bodies, landowners, employers and community groups.

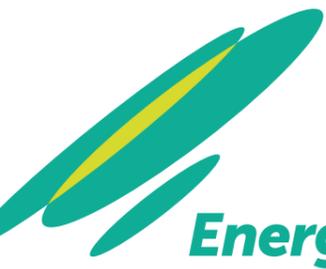
An important issue will be the relative prioritisation of funding towards ongoing service delivery and enforcement versus capital investment in the public realm. The most significant interventions over recent years have tended to be in major capital projects (for example, on the Strand Aldwych). We recommend that the Council should consider reprioritising funding towards supporting the safe and well-managed activation of the West End, and mitigating its potential negative impacts, to ensure it continues to offer an attractive 24-hour environment for residents, workers and visitors of all ages and backgrounds and remains a world-leading destination. This may present challenges around flexibility between capital and revenue funds, but should be considered carefully by the council including maximising all opportunities to use Section 106, CIL and other external funding for this purpose.

While the right balance needs to be found between the needs of workers, consumers and visitors and those of local residents, maintaining the vibrancy of central Westminster as a cultural, tourist, retail, hospitality and business hub will be vital to the continuing prosperity of the city and to the breadth of economic opportunities available to many of its residents, particularly its young people.

7. To improve monitoring and evaluation of the impact of Interventions

We set out to examine the effectiveness of key programmes and projects. However, this was made more difficult by a comparative lack of performance data. We recommend that the council establish a more systemic approach to performance management, evaluation and reporting should be established. This should include independent evaluation of key programmes and an open data approach to measure the impact of key programmes and to guide future investment in its economic development programmes.





Energy and Green Transition Review

Background

Cities are critical to help achieve deep emissions reductions and it is positive to see that nearly all of London's boroughs have now declared a climate emergency and published climate actions plans to reduce their greenhouse gas emissions¹. In September 2019 Westminster City Council (WCC) declared a climate emergency and committed to achieving net zero emissions target for the council and its operation by 2030 and for the whole of the city by 2040 (ten years ahead of the UK-wide net zero target of 2050). A Climate Emergency Action Plan (CEAP) for Westminster was published in November 2021, highlighting that the city has some of the highest carbon emissions by local authority area in the UK. The CEAP set out nearly 70 actions across five themes of Efficient Buildings, Clean and Affordable Energy, Sustainable Travel & Transport, Reducing Consumption & Waste and Green & Resilient City. The council has stated that the 2040 target will be especially challenging given that the council only has direct control over about 2% of city-wide emissions and that this target can only be achieved through close collaboration with key partners in the borough such as businesses, landowners, community groups and residents.

The new administration took office in May 2022 and to monitor progress against the CEAP's targets, the following governance structure has been established:

- **Climate Leadership Group (CLG):** This was established to provide the overall strategic direction of the climate programme, as well as holding it accountable for delivery. It includes all Cabinet Members and meets quarterly.
- **Named Cabinet Member for Climate Action:** Monthly briefing with Cllr Noble, Cabinet Member for Climate Action, Renters, and Regeneration, to update on climate programme progress and key projects – the first named cabinet member for Climate Action in Westminster City Council
- **Climate Emergency Delivery Board (CEDB):** This board meets monthly and is chaired by the Executive Director for Environment and City Management. The CEDB provides operational oversight of the climate programme and holds action owners responsible for reporting back on progress against their KPIs. The CEDB feeds challenges and recommendations up to the CLG.

An update to the CEAP is planned in summer 2023, the outputs of which will be informed by a number of programmes currently underway – as well as a new Citizen's Climate Assembly and this output from the Future of Westminster Commission's Energy and Green Transition Group's work.

The Energy and Green Transition Group

The Energy and Green Transition (EGT) workstream of the Future of Westminster Commission met for the first time in August 2022 and was tasked to examine the key emission mitigation challenges for Westminster, review relevant council action, and explore future actions to help set the city on a pathway to support a green transition and achieve net zero by 2040. The EGT was chaired and convened by Syed Ahmed (Energy for London/Community Energy London) and included a mix of policy experts and practitioners, including those especially knowledgeable around the built environment, some with a more national focus – and others who had extensive experience of working specifically in Westminster. Members of the EGT were as follows:

- Lucy Yu** (Centre for Net Zero)
- Louise Hutchins** (UK Green Building Council)
- Jill Rutter** (Institute for Government – but attending in a personal capacity)
- Cllr Ryan Jude** (Deputy Cabinet Member - Climate Action and Biodiversity)
- Lily Frencham** (Association of Decentralised Energy)
- Pancho Lewis** (Lancaster University)
- Tor Burrows** (Grosvenor Property)
- Anna Swaithe** (Crown Estate)

The group met on an approximately monthly basis from August 2022 to March 2023 and were supported by WCC officers Dr Amy Jones, Director of Environment and Damian Hemmings, Head of Climate Emergency. In addition to EGT members input, industry specialists on specific areas being examined participated during the process.

We are very grateful for the expertise and knowledge our group members have brought to this process and their willingness to make significant contributions often at short notice.



1. Borough Climate Action Plans and Targets, London Councils



The initial August 2022 meeting of the EGT focused on identifying priority issues to examine in relation to the remit of the group and reflecting on the policies and programmes set out in Westminster’s 2021 Climate Emergency Action Plan. A wide range of high-level issues were raised during this meeting which included:

- Identifying where the most significant opportunities for major carbon reductions.
- The need for the Council to ‘lead by example’.
- Recognising existing emission-commitments made by organisations present in the borough.
- The central importance of behaviour change and ‘citizen action’ as an ‘enabler’ for change.
- Understanding co-benefits of emissions reduction in areas such as improving health, employment, reducing air and noise pollution.
- Be inspiring when designing public-facing programmes.
- Responding to climate adaptation was also raised – and costing in issues such as the impact of flooding on property prices.
- Whilst acknowledging the Council’s ‘Vision for 2040’ – a need to establish nearer term goals.
- The provision of information to residents and businesses on key areas such as retrofit as well as effective communication of work underway.
- The need to explore new routes of funding climate action work in the city – tapping into new Green Finance initiatives.
- A community-focused study into how the Net Zero journey could be shaped, delivered and what impact it would have on residents in the borough.
- Crossover issues between the EGT and the other three Future of Westminster Commission working groups on Housing, Economy and Employment, and Fairness and Equality.
- And critically – increasing council resources around this agenda if the net zero goal is to be achieved.

However, with 86% of Westminster’s emissions produced from the energy used in the city’s homes, hospitals, shops, offices, hotels and other buildings the clear priority was to target the EGT’s focus on routes to reduce emissions from buildings. Moreover, as policies to drive carbon reductions in new development are advanced in London, with a zero-carbon requirement already in place for all major development, the EGT therefore concentrated on the retrofit of existing buildings rather than the impact of new build. Most importantly it must be noted that the vast majority of buildings in place at the present time in Westminster will still be here in 2040. Hence the deep retrofit of these buildings is an absolute prerequisite if Westminster is to achieve its Net Zero goal.

Further consultation across the EGT narrowed down an initial ‘long list’ of issues to six areas of priority to help support the greater decarbonisation of existing buildings:

- Domestic Buildings Retrofit
- Non domestic Buildings Retrofit
- Energy Advice and Fuel Poverty
- Decarbonisation of Heating and Heat Networks
- Energy Data and Smart Energy
- Green Finance

In addition to these areas some parallel discussions between the Chair and EGT members were organised around a ‘Net Zero North Paddington’ project, the potential for supporting the uptake of community energy in the city, and also examining routes for the council to communicate its climate programmes more effectively to residents and businesses.

A number of further topics raised by members of the EGT could not be accommodated within the timescale that the EGT was to operate. These included some significant issues for Westminster such as decarbonising transport and promoting active travel, improving air quality, supporting green skills and green jobs, climate adaptation/resilience, enhancing green spaces in the city and also waste minimisation and recycling. These are important areas for consideration for Westminster and the EGT hope that they can be examined by any potential future iteration of the group and its work, as well as WCC’s forthcoming Citizens’ Climate Assembly.





The timing of the EGT’s review must also be viewed in the context of the following:

Local authorities have no statutory duty around climate change or instruments to compel others to act. The Committee on Climate Change state that “Local authorities have a range of existing levers that can be used to deliver local action that reduces emissions and prepares local areas to a changing climate. However these levers alone are unlikely to be sufficient to deliver local authorities’ Net Zero ambitions, due to gaps in powers, policy and funding barriers, and a lack of capacity and skills at a local level. Additionally, without some level of coordination from Government, the UK risks pursuing a fragmented strategy towards Net Zero².”

Though the Government amended the Climate Change Act in 2019 to introduce a UK Net Zero target, there remains no core funding for councils or reporting requirements around emissions reduction and councils continue to have limited to no ability in helping shape Government energy or climate policy³. The recent Mission Zero report⁴ by former Energy Minister Chris Skidmore MP, amongst many other organisations, have highlighted that national government need to do more to unlock the full potential of local government to support the achievement of Net Zero. In fact, WCC was directly cited in the report highlighting: “The absence of a legal duty or requirement for organisations to act on climate change and the decarbonisation agenda is a significant barrier to delivering on decarbonisation... the lack of any legal duty and associated powers for local authorities

to compel organisations to act on climate change means that much of our work is focused on facilitating change with local communities and stakeholders, rather than having the powers to require stakeholders to act...”⁵

However, the Government’s March 2023 major ‘Green Day’ series of energy and climate announcements did nothing to reverse this situation: whilst stating that “Local areas play an integral role in supporting the transition to net zero”⁶ no new policy announcements or programmes were introduced to support local authority action on climate, energy or energy security. This was highlighted by EGT member Cllr Ryan Jude who, in response to the Green Finance Strategy 2023, launched as part of the Green Day package, stated that “...it falls short of providing the commitments that local authorities need to accelerate action today.”⁷

At the same time Government has made funding available to local authorities to accelerate building retrofit through a number of schemes that were introduced in 2020/21. These present a key opportunity for WCC but the funding landscape is highly complex (a number of schemes all operational at the same time, but with different delivery timetables and reporting requirements and criteria for qualifying households), the funding is provided over short-time frames, and money can only be secured by competitive bids.

Over 400 councils across the UK have responded to concerns to act on the climate emergency and have set out ambitious climate action programmes. Targets have been set, and councils are active in areas where they have control. But without greater action from Government on issues such as devolving regulation and funding around energy and climate down to councils no local authority can create a fully viable plan to achieve Net Zero locally. Hence the EGT’s work and recommendations below hence do not set out a ‘guaranteed’ pathway for WCC to achieve Net Zero. That would simply not be possible. They do however look to enhance and support the existing work that is in place, set out proposals for new areas of activity and will help place WCC in a stronger position to bid for future funding pots from Government as well as influencing other actors in the local area to help move the city towards Net Zero.

The EGT’s work also commenced at a time when the UK is experiencing unprecedented increases in the cost of energy as a result of Russia’s invasion of Ukraine⁸. Households and businesses across the city are having to consider their use of energy as never before and are looking for support and advice to help reduce their consumption and manage their bills. This cost-of-living crisis has also come at the same time as further evidence has been released on the impacts of our energy use on the climate, which clearly points to the fact that the pace and scale of action currently being

undertaken is insufficient to tackle climate change⁹. Extreme weather incidents are now becoming more widespread and pronounced with every increment of warming and are particularly intensifying in cities. Last summer saw this country experience its highest ever recorded temperatures, with urban areas feeling the full impact of the heat as evidenced by Westminster City Council having to initiate a Severe Weather Emergency Protocol (SWEP) to protect the most vulnerable during the hot weather in the city¹⁰ as well as opening shelters to cope with flash floods¹¹.

In addition to the recommendations that we set out below, the EGT provided ‘real time’ support to WCC officers, providing links to existing work programmes, contacts and data sources, which helped advance programmes already underway. It should also be noted that, though the work of the EGT was principally around activities concerned with the reduction of energy and carbon emissions, the proposals put forward also provide significant co-benefits in number of a other priority areas for WCC from improving citizen health to attracting inward investment to the provision new employment opportunities for local people and more.

2. Local Authorities and the Sixth Carbon Budget, Committee on Climate Change, December 2020

3. Government point to the establishment in 2022 of a new Local Net Zero Forum as a key route for local authorities to engage on national policy. However, there is little information to date to point the effectiveness of the Forum’s work.

4. <https://www.gov.uk/government/news/net-zero-review-uk-could-do-more-to-reap-economic-benefits-of-green-growth>

5. Mission Zero: Independent Review of Net Zero Rt Hon Chris Skidmore, January 2023

6. Powering Up Britain – the Net Zero Growth Plan, DESNZ, 30 March 2023

7. Green Finance Strategy ‘falls short’ of detail needed to accelerate net zero, Room 151, 30 March 2023

8. Energy crisis stemming from Ukraine war ‘cost £1k for every UK adult’ The Guardian, 21 February 2023

9. Urgent climate action can secure a liveable future for all, IPCC, 20 March 2023

10. Extra support available for rough sleepers to keep cool during extreme heat, WCC, 18 July 2022

11. <https://www.westminster.gov.uk/residents/floods/preparing-floods>



Overarching Recommendations

Strategic

The scale of action needed to achieve net zero at the local level is immense and will connect into - and affect - all layers of council day-to-day activities. This is a huge challenge, however it also provides significant co-benefit opportunities to help improve council services – from housing and transport to health and waste - by investing to modernise and increase the efficiency of these services, whilst also decarbonising these services. Work initiated in 2023 to establish a Local Area Energy Plan (LAEP) for Westminster will support and inform how the city can achieve its 2040 net zero carbon target as well as help accelerate the deployment of clean energy programmes in place, from retrofit to district heating. Hence, there is a need to use this research, alongside outputs from other initiatives now in play, to produce an updated and more wide-ranging Westminster Climate Emergency Action Plan (CEAP) that is ‘bigger and bolder’ and sets out a greater sense of urgency to act than its 2021 predecessor. The recommendations in this report detail what we believe ‘bigger and bolder’ should look like.

Alongside a revised CEAP, delivering the manifesto pledge to introduce a “Net Zero Test” for every major decision should embed the CEAP’s goals into the work of all other departments across the council and strategies, such as the planned new Infrastructure Delivery Plan for Westminster¹². The council should also look to introduce new Green Budgeting practices to support decision-making processes, as recently set out by the ACCA.

National government highlights time and again the key role that councils will need to play to help achieve the UK’s Net Zero target but constrain the ability of local leaders to act to improve the energy efficiency of buildings, to accelerating the deployment of renewable energy. As a revised CEAP is developed, Westminster City Council’s political leaders should take a lead role in highlighting to the Government how the UK’s Net Zero target cannot be achieved without the consent and action of communities and councils. All national programmes, from the roll out of EVs to heat pumps to heat networks, retrofit to solar PV and more, all require the coordination of local authorities to succeed. WCC should work closely with cross-party council groups such as London Councils, UK100 and the LGA to help shape future national energy and climate policy.



Citizen Engagement & Communications

Citizens are not simply ‘consumers’ who need better information to make the ‘right’ choices. They are agents of change who have ideas of their own about how to achieve climate policy objectives. They should, therefore, be treated as partners who can make change happen. This is a two-way process: WCC can learn by listening to citizens; and citizens can learn by listening to the Council. Crucially, however, involving citizens can also help accelerate change – this is needed given the ambition of WCC’s net zero target, which is well ahead of national government targets. The forthcoming Westminster Citizens’ Climate Assembly should therefore ensure that WCC reaches out to all voices not always involved in the climate debate – from residents, businesses and community organisations across the city to help inform the revised CEAP.

Following this year’s Citizens’ Climate Assembly, WCC should set out clearly how it will maintain a continued dialogue, consultation and feedback mechanism with stakeholders and residents on the progress of the revised CEAP. As part of this, it is recommended that a Citizens’ Climate Panel should be established to coordinate, feedback and advise on the progress of the CEAP. A number of councils have already introduced such panels, including LB Camden, who recently recruited for a second phase of their Panel up to 2025¹³.

Achieving net zero will involve changes in people’s everyday behaviour (including transport choices, home heating, and even health and diets), hence a deeper understanding about the rationale for citizen involvement beyond more conventional community engagement work is needed. A paper produced at the time of the 2021 Net Zero Strategy considering emissions reduction and successful behaviour change initiatives was published and withdrawn by Government¹⁴. The recent Government’s ‘Green Day’ series of policy papers were all but silent on ‘behaviour change’. Hence it is not surprising a recent House of Lords committee inquiry found that “the Government’s current approach to enabling behaviour change is seriously inadequate and will result in the UK failing to meet its net zero and environment targets”¹⁵. As has often been the case on climate change, local government needs to step in where national Government fails to do so. The recommendations from the House of Lords inquiry (and the ‘withdrawn’ report¹⁶), though targeted at national Government, include a number areas that could explored by WCC as part of a Westminster Behaviour Change workstream (working with a Citizens Climate Panel) which would help inform residents and businesses how to reduce their climate impact as well as supporting the rollout of CEAP programmes.

13. See <https://www.camden.gov.uk/citizen-panel>

14. UK meat tax and frequent-flyer levy proposals briefly published then deleted, The Guardian, 20 October 2021

15. In our hands: behaviour change for climate and environmental goals, HoL Environment and Climate Change Committee, 12 October 2022

16. Net Zero: principles for successful behaviour change initiatives, BEIS Research Paper, October 2021

12. See <https://bidstats.uk/tenders/2023/W16/796983474>



Finally, the EGT were informed through the process of their work of the many excellent programmes around climate and energy in play across the council. This included departments ranging from planning to housing, community engagement to smart cities and of course the climate emergency team. However, for Westminster residents and businesses it is challenging to understand 'what work is going on' in relation to delivering the climate emergency pledge, who to contact, what progress is being made, where excellence is being delivered (the recent PSDS and social housing retrofits being an example). Failing to 'shout out' about the good work that is being done will undermine efforts by officers and councillors alike. Westminster must ensure by the time it has finalised a revised CEAP in 2023 that it has a new climate and environment communications programme in place, learning from other borough examples¹⁷, and using existing print and digital routes but also new social media routes to 'shout out' the work it is doing to make the city a cleaner and greener place to live, and to ensure this is frequent and progress on engagement is adequately monitored. WCC programmes providing support to residents and businesses (especially SMEs) around energy and climate issues should be clearly identified, ideally with a named individual down as a point of contact. As a priority for this administration, and a crucial issue of our time, communication on the Council's action on climate should be made a communications priority for the council communications team.

Resourcing Climate Emergency

The Climate Emergency Team and associated delivery teams for the CEAP's work programmes needs to be better resourced as soon as possible: without doing so undermines any chance of achieving the council's net zero ambition. The EGT welcome the fact that a number of new positions have been created within the team over the period of our work and recommend a review of the necessary posts and resource is undertaken throughout the process of updating the 2023 CEAP in order to ensure commitments can be delivered effectively. It should be noted that 'Energy and Green Transition' is a critical area for councils where significant amounts of funding – both private and public sector - are and will continue to come forward: WCC cannot take advantage of such funding without officers in place to apply, secure and manage this funding.

One immediate route to achieving this is to ensure WCC's Carbon Offset Fund is deployed more quickly and utilised more effectively – both in terms of allocating funding to projects but also appointing project management staff to support the delivery of projects. The latest GLA Carbon Funds Monitoring Report¹⁸ indicates that as at 2022 WCC had collected close to £5m in funds and had secured a further £3.2m by legal agreement (but not yet collected). The report also highlights that "91 per cent of LPAs reported an increase in the amount collected or secured for collection since 2020" and with the 2021 London Plan extending the requirement for carbon offset payments for all developments in London (going beyond the original requirement for payments to apply to only new residential schemes), the scope of developments contributing payments will increase. On top of this, WCC is reviewing the level Westminster's carbon offset price is set at. Even with developers and planners correctly working to reduce the carbon impact of new development through the use on onsite measures, WCC's carbon

offset fund is likely to grow significantly over the period to 2025. Westminster should be deploying these funds to projects in the borough more efficiently than it has done so to date. In order to do this, the EGT recommends that Westminster's Carbon Offset Fund should be managed by the Climate Emergency team, with appropriate governance arrangements in place. The GLA's offset guidance¹⁹ suggests that if "...additional funds are needed to pay for staff to develop and manage identified offsetting projects, we recommend a maximum of 10 per cent of the fund is allocated to this". If additional staff are required to 'develop and manage' projects, funds should be deployed to help with this. Part of their role could be explicitly about community engagement – to help promote the funds to communities and walk applicants through the process of applying for funding, as we know residents and others face barriers in both knowing about the existence of the fund as well as knowing how to apply for and secure funding. The EGT recommends that a Climate Community Engagement post being created.



18. <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/carbon-offset-funds-report-2021>

19. Carbon Offset Funds, GLA, July 2022

17. See Newham Climate Now and BarNET ZERO



The EGT were briefed on WCC's Green Economy Programme, which is carrying out scoping and engagement work with partners to develop a Green Economy Strategy for Westminster. The Strategy will have three areas of focus from supporting businesses to lower emissions attracting; retaining net zero businesses in Westminster; and working with industry to understand current and future net zero skills requirements. Research undertaken for London Councils estimates that in 2020, there were approximately 234,300 green jobs in London, representing 4.4 per cent of total employment in the capital, and that Westminster is one of the main boroughs where these jobs are concentrated. This work²⁰ also projects that "this decade, green jobs could increase by 8 per cent per year, which is double the annual rate of growth in the technology sector during the last decade". The EGT would like to see the forthcoming Green Economy Strategy establish an updated baseline for the green economy in Westminster including identifying where there are gaps to achieving the city's net zero target; assessing the potential to increase educational and training opportunities²¹ for residents in the skills and services to achieve net zero; supporting residents in understanding what a 'green job is' and ensuring that opportunities are available for all and non-exclusionary; developing employment opportunities by continuing to build links with employers in the city as well as ensuring that when the council procure services such as retrofitting

homes to developing heat networks or EV charging infrastructure, that opportunities for local businesses and residents are to be included in contracts wherever possible. The EGT also notes the work that London Councils has recently undertaken in producing their report Building the Green Economy Action Plan²² and supports greater input by WCC in taking this Plan forward through its implementation phase as Westminster's own Green Economy Strategy develops.

WCC has as yet not fully evaluated the level of investment needed to achieve its net zero target, but an estimate of £3.33 billion has been made by London Councils with respect to retrofitting just the city's residential sector (see below). As residential buildings contribute 15% of Westminster's citywide emissions, a 'guesstimate' would suggest something like £20 billion+ to achieve net zero across all areas including buildings, transport, tackling waste and introducing climate adaptation measures. Westminster has recently commissioned a Local Area Energy Plan (LAEP) (see below), the output of which will include a breakdown of the costs of decarbonisation, which will provide further input to help evaluate the likely scale of investment required. Whatever the final number is – it will be beyond anything seen to date in terms funding initiatives to 'green' the city. Hence, a step change in activity is required in terms of WCC's efforts to secure new investment.

This will range from:

- Examining the scope for WCC to use its own core resources to drive action and leverage in new funding;
- Continuing to apply to the plethora of poorly coordinated Government grant schemes currently in place (LAD, HUG, SHDF, PSDS and so on);
- Effective management and use of the council's carbon offset policy and funds;
- Build on the recent successful launch of Westminster's £1m Green Investment²³, which will direct funds to a series of areas from energy to transport to adaptation²⁴, by continuing to explore routes for increasing the scope for crowdfunding green finance.
- Interaction with new routes targeted at local authority climate finance, including London Councils 3ci initiative²⁵, the UK Infrastructure Bank (UKIB)²⁶ and the Mayor of London's Financing Facility and Green Bond²⁷ and
- Most importantly, developing Westminster's pipeline of 'green projects' to attract private sector investors actively wanting to invest in this sector.

The EGT recommend that a new Green Finance post be created with the WCC to take forward a new Green Finance vision and work plan for Westminster, including within this work plan all areas listed above.

20. Green Jobs and Skills in London, London Councils, December 2021

21. See Green Skills Adult Education Provision in London, GLA, January 2022

22. <https://www.londoncouncils.gov.uk/our-key-themes/climate-change>

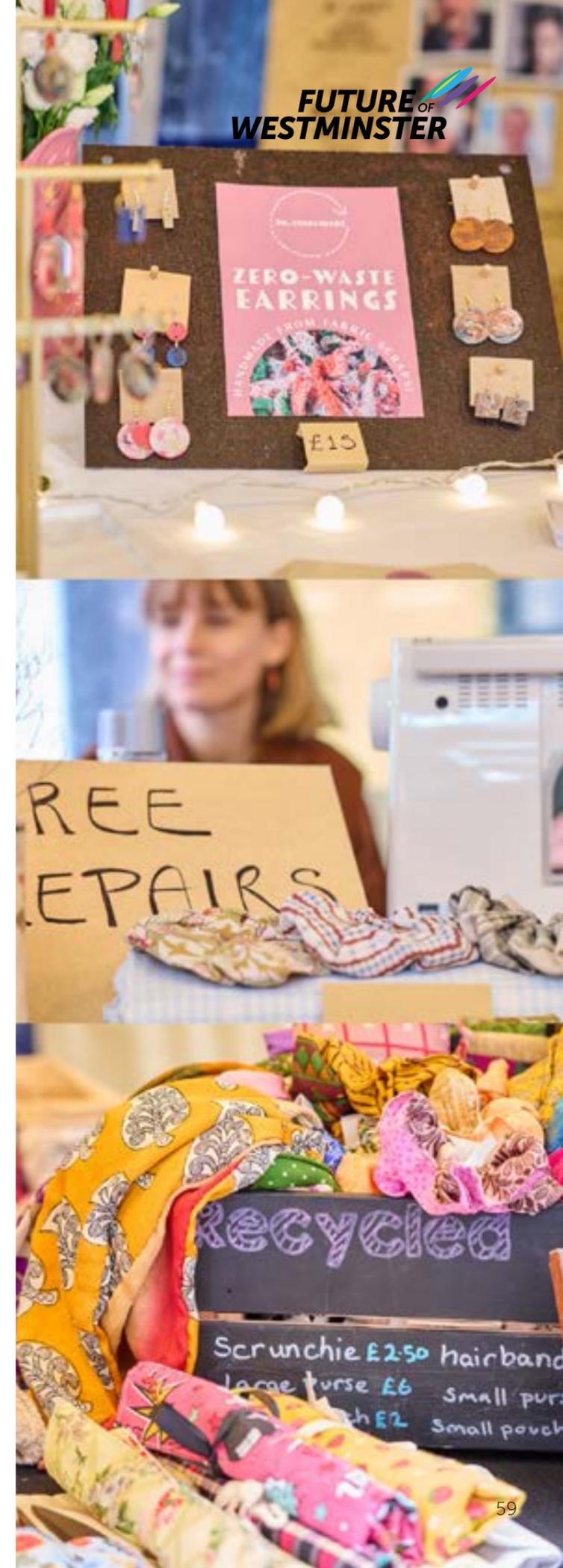
23. New green investment scheme launched in Westminster to support local green projects and tackle climate change, 13 March 2023, WCC

24. See list of qualifying project types in WCC Green Finance Framework, 13 March 2023

25. <https://www.londoncouncils.gov.uk/our-key-themes/climate-change/3ci-formerly-ukccic>

26. UKIB's new Local Authority Advisory Service is to start shortly

27. See 'The Mayor's Financing Facility and London Councils' work on the Cities Climate Investment Commission (3Ci, formerly UK CCIC) A Joint Position Statement' – August 2022





Data and Smart Energy

The Energy Systems Catapult highlights that “Data is the single biggest enabler of a decarbonised, decentralised and digitised energy future. It’s the tool that will bridge the gap between where we are now vs. where we need to be to achieve Net Zero carbon emissions by 2050”²⁸. Critical to the delivery of all of the EGT’s recommendations is the need for improved energy data collection and management. Energy consumption data from larger point sources within the city down to understanding the age and efficiency of residential boilers will all be critical for the council to develop robust business plans when seeking external sources of funding. Some excellent work has been commissioned earlier this year to help map Westminster’s pathway to net zero through a Local Area Energy Plan. The LAEP is a data-led exercise, seeking the most granular level possible for each data type, and providing a systematic catalogue of each data type. This is an excellent first step and WCC should set out a plan in their CEAP for how they will take adopt a more data-led approach to identify and target interventions, working more collaboratively with WCC’s Smart Cities team and sharing (and learning) best practice with other London councils, many of whom have also commissioned their own LAEPs.

Westminster’s work around energy data should be informed by the five recommendations of the Energy Data taskforce as set out in the Modern, Digitalised Energy System study which – though aimed at national Government – have a number of important parallels for local government:

- Digitalisation of the Energy System
- Maximising the Value of Data
- Visibility of Data
- Coordination of Asset Registration
- Visibility of Infrastructure and Assets



Westminster’s net zero journey will involve introducing greater levels of decentralised energy generation, such as solar PV, heat pumps and energy storage, EVs, and even ‘smart white goods’ all connected to the local distribution network. This will lead to inevitable constraints on the network, as is already being seen in many parts of the UK. This will risk delaying connection of new generation capacity to the network, but also new demand load, such as new developments (offices, homes etc.), who already are experiencing significant wait-times for connection to electricity supplies in some parts of London²⁹. The electricity network will also need to be more active – responding to times when excess power is available at times when there is low demand, but also to times when solar panels and wind turbines will generate less power. To address this, we can build more physical infrastructure, but we can also create a smart and flexible electricity system where we are able to match electricity supply and

demand efficiently. This can be done through “demand-side response” (DSR) action, with such tariffs are already being introduced to domestic customers³⁰. Westminster should therefore look to develop a Smart Energy City Collaboration, working with stakeholders across the borough, including UK Power Networks, neighbouring boroughs and the GLA to better understand the demand side challenges as we move to a more active, smarter electricity distribution network in the city. Rooftop solar PV is already seeing significant increases in installation³¹ in response to energy bill increases, and alongside this, the Government has announced a huge increase in its ambitions for solar PV – a fivefold increase to 70GW of solar by 2035. Hence as part of the Smart Energy City Collaboration Westminster should also set out ambitions for the growth of rooftop solar PV projects and the increased use of electricity storage across the city, working with homes and businesses to accelerate the use of their deployment.

28. <https://es.catapult.org.uk/report/modernising-energy-data-access/>

29. London mayor ‘very concerned’ capacity of electricity grid is delaying development, Building, 29 July 2022

30. See Octopus Energy <https://octopus.energy/blog/intelligent-demand/>

31. Number of UK homes installing rooftop solar panels highest in over seven years, The Guardian, 26 April 2023



Net Zero North Paddington and Community Energy

The Energy and Green Transition must also be a just transition. WCC should ensure that those who are most in need benefit first from the major new investments that will result from the delivery of the council's climate emergency initiatives. Recent work by WCC through its Environmental Justice Measure tool³² clearly shows that a number of wards across Westminster, but most notably the north west of the city, specifically the wards of Queen's Park, Harrow Road and Westbourne – also referred to collectively as North Paddington - represent the most deprived areas of the city. The EGT recommend that as a priority WCC maps out what provisions it needs to make to ensure its revised CEAP programmes can be delivered early on – and effectively – in the North Paddington area of the city. These plans should be set out as a distinct section of the CEAP 2023.

The journey that communities will have to take to achieve net zero is poorly understood, and each community will have its own specific challenges reflecting not only the state of its local infrastructure, such as the fabric of its homes and the use of transport, but also the make up of the families living there, their income, health status, employment opportunities and so on. Key questions such as what precise interventions for retrofit will be required in what households; the timescales involved; what technologies are most appropriate or are most wanted by the community as well as which homes and buildings should be

tackled first – all of these issues need to be consulted on and tested with the input and consent of the community if net zero plans are to succeed in the ambitious timelines set out by the council. These are all fundamental issues that need to be understood by policy makers as the pace of retrofit increases. In order to do this WCC must get communities involved in helping shape the pace and roll out of programmes in their neighbourhoods and hence the EGT recommend that a community-led Net Zero North Paddington study should be commissioned by WCC to set out a shared vision on how to achieve net zero for the area. This study will build awareness of net zero and identify and prioritise areas for action through crowd sourced input from local community and youth associations, health forums and youth centres, and local business associations across issues such as building improvements, nature, food, travel, waste and so on. The study will also identify what aspects of their neighbourhood they would like changed as part of the journey to net zero and inspire confidence by setting out a plan for project development and delivery.

Community energy action is growing at pace across the capital with increasing numbers of groups identifying, developing and then funding projects through community share offers. The Mayor's London Community Energy Fund (LCEF) has been a major boost to support such initiatives – and is a critical to the sector as national Government has no policies in place at the

present time to support community-led energy projects. A number of boroughs are now helping drive local action by establishing their own borough-wide community energy fund – including Islington, Camden, Hounslow, Haringey and Southwark – with more anticipated this year³³. The EGT recommends that similar to other boroughs in London, part of Westminster's carbon offset funds are directed to a new Westminster Community Energy Fund, with a dedicated Westminster Community Energy Officer supporting applications from community groups across the city. In addition, WCC should support identifying locations for community groups to develop projects, and use Community Energy London's new 'Community Energy Potential

Map' to broker conversations between groups and community building owners to help deploy projects. Finally, community groups input to support the delivery of WCC CEAP must be valued; budgets should be allocated in order for groups to be paid for their time and involvement in helping promote programmes and projects.

In addition to the above, recommendations on specific areas for action in the following three areas are set out below:

- i. Domestic Buildings Retrofit,
- ii. Non-Domestic Buildings Retrofit and
- iii. Energy Advice and Fuel Poverty and
- iv. Decarbonisation of Heating and Heat Networks.



32. <https://www.westminster.gov.uk/about-council/data/environmental-justice-measure>

33. See 'Setting up a Local Authority Community Energy Fund' Community Energy London, January 2023



1. Domestic Buildings Retrofit

Residential buildings contribute 15% of citywide emissions across some 121,000 residential properties. Approximately half the homes in the city are built pre 1900 and there are 56 different conservation areas covering 78% of Westminster. The city also has the largest private rented sector (PRS) in England with an estimated 52,700 properties, the largest tenure type, making up 43% of all housing. Improving the energy efficiency of homes has never been more urgent as a result of the dramatic increase in energy bills we have all experienced over the past 18 months.

A number of activities are already in place to support residents lower their energy bills through a series of home energy efficiency retrofit programmes. The EGT was provided a briefing on these initiatives by the council's Head of Sustainability in the Housing Team and they include:

Westminster was successful under the Government's Social Housing Decarbonisation Fund (SHDF)³⁴ Waves 1 and 2.1 (March 2023) securing £3.3m and £4.8m respectively. WCC is also part of the Green Homes Grant Local Authority Delivery (LAD) and Home Upgrade Grant (HUG) GLA consortium bids^{35 36}. A recent announcement of SHDF spend highlighted retrofit to 560 council houses over the next two years which measures being installed including Internal Wall insulation, secondary Glazing/Double Glazing, floor, loft and cavity insulation, storage heaters, Solar PV panels and wastewater heat recovery systems and external doors³⁷.

Improving the energy efficiency of Westminster's of the PRS is a high priority and is a key component of Westminster's Private Rented Sector Strategy 2021 – 2025³⁸.

Establishing a retrofit taskforce which is a group of experts and local stakeholders to develop solutions to the challenges of retrofitting Westminster's historic built environment.

Retrofitting a one-bedroom terraced flat in Queen's Park to serve as an Energy Saving Show Home which was awarded "Best Net Zero Carbon Initiative" at the 2023 National Housing Maintenance Awards. The deep retrofit undertaken showed how raising the energy efficiency of a dwelling, alongside the integration of a air source heat pump, solar panels and energy storage, raised the EPC from band D to B, but also reduced energy bills to almost zero³⁹.

Recently publishing for residents a series of retrofit guides – the first of which as on how to make windows more energy efficient and a second on installing Air Source Heat Pumps (ASHP), which was released in January 2023.

Actively engaging with London Councils 'Retrofit London Housing Action Plan'⁴⁰.

The challenge of retrofitting homes has been more difficult for councils as a result of the failure by central Government to set out any national plan for improving the energy efficiency of homes. Despite calls from a wide number of organisations⁴¹ for a national retrofit strategy, including the Mayor of London⁴², Government have continued to adopt a piecemeal approach to the issue. In addition, budgetary cuts to programmes have dramatically slowed down the rate of

energy efficiency work, with recent research highlighting that a 'decision in 2013 to cut government support for home insulation means that 10 million homes have missed out on upgrades that could have saved taxpayers up to £9 billion a year under the Energy Price Guarantee scheme⁴³. A setback to driving energy efficiency work in the private housing/ owner-occupier sector was the collapse of the Government's 2021 £1.5 billion Green Homes Grant programme where bad programme design meant that "homeowners and installers had a poor experience using the scheme. There were delays issuing vouchers to homeowners and paying installers, causing frustration. Homeowners also found it challenging completing applications, and were often asked for more information, which took time"⁴⁴. Less than one quarter of the budget of this grants programme was spent.

Whilst WCC has been successful in securing funding from the various pots of funding currently available from Government to drive retrofit, they have found the funds challenging to use as a result of the requirements set out which include:

- Significant challenges in the bidding process
- Tight restrictions on eligible properties that qualify for funding
- More stringent retrofit standards being required (PAS2035)
- Restrictive delivery windows placed on local authorities
- The level of detail required in funding application process.

Hence, Westminster's ambition around retrofitting homes has to operate against a challenging backdrop of not having a national strategy in place; having to secure funding through competitive bids into short term/start-stop and complex Government funding programmes; and trying to engage with households when major Government schemes on home energy efficiency have been announced and then suddenly closed down.

One positive issue to note is that though the Government's Green Homes Grant, and its predecessor project, the Green Deal⁴⁵, failed - data from both of these programmes at the time showed that households were interested in making their home more energy efficient. The dramatic increase in energy bills over the past year has further increased households desire to act on reducing their consumption of energy. Westminster's Climate Emergency Action Plan reported that during summer 2021, more than 350 people provided feedback to the draft recommendations in a series of face-to-face and online engagement events and an online survey and set a priorities 2 and 3 that WCC should "Support residents to improve the energy efficiency of their homes and reduce energy use" and that "Westminster City Council, landlords and homeowners to retrofit buildings to improve their energy performance and increase renewable energy". And feedback from visitors to WCC's Energy Saving Show Home stated that there was high demand for additional advice and support, including the provision of trusted advice around home surveys and bespoke retrofit, and links to trusted suppliers as well as financial support.

34. The SHDF provides funding to social housing stock to improve homes to Energy Performance Certificate (EPC) C standard.

35. The LAD scheme aims to raise the energy efficiency of low income and low energy performance homes with a focus on energy performance certificate (EPC) ratings of E, F or G.

36. The HUG is solely aimed at residents in off-gas heated homes; these are properties that are not heated via a gas boiler (ie in London these homes are typically electrically-heated with storage heaters).

37. £10m investment in retrofitting council homes to save residents more than £160 a year on energy bills, 29 March 2023

38. Private Rented Sector Strategy, 2021 to 2025, January 2021, WCC

39. See case study <https://www.westminster.gov.uk/tackling-climate-change-westminster/changes-at-home/energy-saving-show-home>

40. See <https://www.londoncouncils.gov.uk/our-key-themes/climate-change/retrofit-london-programme>

41. See the Construction Leadership Council

42. See MQ to the Mayor on National Retrofit Strategy 19 January 2023

43. Taxpayers facing £18 billion bill for failure to insulate UK homes, ECIU, 20 September 2022

44. Green Homes Grant Voucher Scheme, National Audit Office (NAO) 8 September 2021

45. See Green Deal and ECO, National Audit Office (NAO) 14 April 2016



EGT Recommendations

During the EGT meetings WCC have stated that they will be creating a 'Clean & Affordable Energy Strategy for Social Housing' which will include a decarbonisation pathway for every Council home⁴⁶. The EGT welcome this initiative but recommend it should form part of a more strategic homes retrofit offer for the city, rather than a piecemeal approach, and not limited by the funding cycles of Government retrofit programmes. A comprehensive Homes Retrofit Action Plan for the city is needed to give a clearer idea to all residents of a route for them to support their pathway to a net zero home. This would need take into account all tenures of building, setting out the scale of the challenge to improve the energy efficiency of homes from mansion blocks to terraced housing to tower blocks to the considerable number of homes across the borough connected to the communal heating schemes and also homes in conservation areas.

The EGT recommends that:

- WCC should publish a Housing Retrofit Action Plan for Westminster by summer 2024 with a central focus of:

- A 'retrofit offer' for all income groups and all homes across the city

- Speeding up delivery of retrofit programmes across the city for the residential sector

- This Action Plan should be informed – and also feed into – the work that London Councils is already taking forward through its Retrofit London⁴⁷ workstream – specifically its Retrofit London Housing Action Plan and 2022 Retrofit Implementation Plan

- The Action Plan should identify pilot areas of the city to trial area-wide retrofit projects. One of these should be North Paddington (see earlier section 'Net Zero North Paddington') with the pilot bringing together major housing associations, tenants group representatives, and local business groups to help shape the roll out. This should also look to routes to decarbonise terraced housing – which make up a considerable number of the homes in the city.

- The Action Plan must provide a clearer estimate on the total cost of retrofitting all housing in Westminster's to help inform future funding plans for retrofit (analysis⁴⁸ undertaken for London Councils suggested this total for Westminster to be £3.33 billion with an average investment per property of £23,570 to achieve an EPC rating of B for each home).



- As part of the 'retrofit offer' the Action Plan should provide tailored support for households, across a range of retrofit interventions, from fabric measures, to improvements in heating systems to the use of solar PV (building on the council's work through the Mayor's Solar Together programme⁴⁹) and also extending to technologies such as heat pumps and energy storage. As part of this work, WCC should also take a more active role in the London Councils' workstream on 'Renewable Power for London'⁵⁰
- The issue of retrofit in conservation areas is particularly challenging – with such areas covering 78% of Westminster there needs to be planning guidance for energy efficiency projects in conservation areas. Westminster should continue to develop its guidance for households on the scope for retrofit in conservation areas, supported by new research such as the recently launched 'Climate Emergency Conservation Area Toolkit'⁵¹ by Architects Climate Action Network.

- The Action Plan must be cross departmental and also include support from the council's economy, jobs and partnerships teams to engage with the local labour market of installers and builders to link up their needs with local education and skills providers.
- The council should ensure it has sufficient resource in place to secure maximum funding from the numerous Government retrofit programmes in play. This includes SHDF, Home Upgrade Grant (HUG) and Green Homes Grant Local Authority Delivery (LAD) and - working with energy suppliers – the Energy Company Obligation (ECO4) and new ECO+/Great British Insulation. Suitable support must also be put in place to ensure that funding secured converts to measures delivered within the challenging timescales set by Government for all of these programmes.
- And once again – communication with residents is vital. Even after funds have been secured, WCC has sometimes found residents' reluctance to engage without dedicated council resources to communicate the benefits.

46. Examples already exist such as LB Haringey who launched a Haringey Council Housing Energy Action Plan 2023-2028 in January 2023 and LB Lewisham's Final report of the Housing Retrofit Task and Finish Group, February 2022

47. <https://www.londoncouncils.gov.uk/our-key-themes/climate-change/retrofit-london-programme>

48. Table 9 London Councils Pathway Report, v1.6, Parity Projects, 21 July 2021

49. At the moment, only Westminster residents who own their own home (or have permission from the landlord) can register for the Solar Together group-buying scheme.

50. See Renewable Power for London Action Plan, London Councils

51. <https://www.architectscan.org/conservation-area-toolkit-retrofit-homes> 3 February 2023



2. Non-domestic Buildings Retrofit

Commercial and institutional buildings contribute about 70% – by far the largest proportion– of the city’s greenhouse gas emissions. They represent some 55,000 businesses, ranging from large multi-national organisations to small and micro businesses. WCC report that 92% of its non-domestic properties have an EPC rating of C or below, which means that they will require deep retrofit interventions in order to reduce their energy and carbon impacts.

Westminster City Council currently owns or operates over 400 buildings and assets – split between operational buildings and a wider investment portfolio operated on a commercial basis. These buildings have a more ambitious target in the CEAP of decarbonising to net zero by 2030.

WCC works closely with the Westminster Property Association (WPA) which represents over 240 organisations with interests in Westminster’s built environment, including landowners, contractors, architects, and investors. In 2020 the WPA published Zero Carbon Westminster, a White Paper⁵², which included recommendations to both WPA members (which included capturing and report building energy data use, switching to renewable energy supplies, green leases and considering the embodied energy of materials uses) and the WCC (which ranged from introducing climate first’ planning policies, greater collaboration between building operators and planning around the retrofit of heritage buildings and wider uptake of Display Energy Certificates (DECs)).

To support businesses, reduce their energy consumption, over the past year WCC has:

- Launched a Business Energy Saving Scheme, which provides free energy audits and bespoke energy saving action plans for up to 1,000 SMEs across Westminster by 2024.
- Launched a pilot scheme for up to 100 SMEs to receive a free one-year licence and one-to-one support from award-winning Climate Essentials programme (a digital carbon monitoring and action planning platform).
- Launched a Sustainable City Charter⁵³ in partnership with the Westminster Property Association. This is a business-led climate action pledge for organisations containing eight commitments for reducing carbon emissions from non-domestic buildings and committing to net zero buildings by 2040 or earlier.
- Established a Retrofit Task force, focused on the specific challenges of retrofitting Westminster’s exceptional historic built environment.

National Government has committed to reducing energy demand in commercial buildings, but much of the policy in this area is either on hold or delayed. The recent ‘Green Day’ announcements from Government included:

- A pause to the rollout of the operational energy rating pilot scheme for offices stating, “prior to committing to a pilot the government is reviewing how this scheme would function within the policy landscape for commercial and industrial buildings”.
- That the minimum standards for EPC in owner-occupied commercial buildings are still being finalised⁵⁴.

In terms of SMEs Government has, however, announced that it will establish by the end of 2023:

- A dedicated energy advice offering for smaller businesses to provide trusted advice to help them reduce their energy use, costs and decarbonise
- Look to deliver a pilot energy advice service (one-stop-shop) for SME businesses that offers subsidised energy audits and potential grant funding to support improvements in awareness of energy management and take up of energy efficiency investments

In terms of its own building stock, WCC has set an ambition to decarbonise its own operations to Net Zero by 2030 (this is ahead of the Government’s target for a 75% reduction in greenhouse gas emissions of the public sector estate, from a 2021 baseline, by 2037⁵⁵). Westminster has been successful over the past two years in securing a total of £13m and £3.8m in grant funding through the Government’s Public Sector Decarbonisation Scheme (PSDS) working closely with the Mayor of London’s Retrofit Accelerator Workplaces (RA-W) programme to develop the business case and tender documents. This work has been challenging – having to deliver complex retrofit projects to tight timetables – as is required by the PSDS – and has involved installing solar PV panels on twelve corporate properties and plans to install PV panels on six blocks of social housing; installation of heat pumps in seven corporate properties, with plans to roll out heat pumps in further properties and social housing estates. WCC have also commissioned a strategic overview of how to best make use of the excess power from solar panels installed on housing communal sites.



52. Zero Carbon Westminster, A white paper on decarbonising the City’s built environment WPA, November 2020

53. Sustainable City Charter | Westminster City Council

54. All three points set out in ‘Responding to the Climate Change Committee’s (CCC) Annual Progress Report 2022 Recommendations’ HMG 30 March 2023

55. Powering up Britain, The Net Zero Growth Plan (page 60) HMG 30 March 2023



EGT Recommendations

EGT members Grosvenor and Crown Estate highlighted the extensive and ambitious retrofit programmes they currently have in place, with some of the most challenging carbon reduction targets in the property industry, which they are working at pace to deliver across hundreds of often listed buildings in the city. Many other businesses and commercial building managers in the city will also have their own emission reduction plans in place, as can be seen through work undertaken by the Better Buildings Partnership (BBP)⁵⁶. The city is also home to large number of institutional buildings, including the Palace of Westminster and the large Whitehall estate, hospitals, universities and so on, all of which are major energy consumers, and all have targets in place ranging from the Government's public sector emissions target, to the NHS Net Zero plan and the Greening Government Commitments.

The February 2023 launch of Westminster's Sustainable City Charter is welcome as it provides new opportunities for increasing collaboration between the WCC and all these organisations. However, the scale of reduction needed across the non-domestic building sector to achieve net zero will require a major step change in action, which will require closer collaboration between WCC and building operators across the city.

The EGT recommends:

- Westminster's net zero ambitions simply cannot be achieved without a step change in its approach to retrofitting buildings in the city. This will require a comprehensive programme of work that will require a significant boost in resource by the council. And the time to act is now! Fortunately the landscape for advancing retrofit is as good as it has ever been in the UK (though admittedly still behind what we have seen in other major economies such as France and Germany) with:
 - Government commitments to funding retrofit to at least 2028⁵⁷ and Labour pledging to invest £6 billion a year between now and 2030 for low carbon heating and retrofit if it were to get into power
 - Gearing up by all local authorities to deliver retrofit
 - Greater coordination by London Councils through their pan-London retrofit work
 - Recent announcements by the London Partnership Board to focus on new routes to finance retrofit action later this year⁵⁸
 - Significant industry action on retrofit steered by organisations such as the UK Green Building Council (UKGBC)⁵⁹
 - New routes to finance retrofit through work by the Green Finance Institute⁶⁰ and others; and
 - And increased interest in making homes more efficient as a result of spiking energy prices⁶¹.

- The EGT recommends increased resource deployed to the Retrofit Task Group as soon as possible with the appointment of a Retrofit Programme Manger and team to expand the scope of the Taskforce's work, research and outputs. In parallel to the earlier recommendation for a Housing Retrofit Action Plan for Westminster – which the Retrofit Task Group should lead on with input from the WCC Housing Team – the Retrofit Task Group should coordinate all retrofit collaboration with Westminster's public and private sector building operators to set out an ambitious vision for decarbonising non domestic sector in the city, linking in current initiatives such as the Sustainable City Charter, the work with SMEs and so on.
 - Key themes for the Retrofit Task Force to address should include how to:
 - Improve the Westminster planning process to better enable retrofit
 - Better communicate the business case for retrofit
 - Make retrofit more appealing to differing stakeholder groups
 - Help accelerate getting projects started
 - Deliver retrofit at the scale and speed necessary
 - Approach retrofit for the most sensitive historic buildings
 - Deliver retrofit on hard to tackle apartment/mansion blocks with multiple tenures, leaseholders etc
- Following the work of the LAEP, the Retrofit Task Group should establish a Major Energy Users workstream to identify those buildings with the highest energy consumption and set out best practice for reducing their carbon impact.

- The Taskforce should also look to support commercial building operators to comply with future MEES targets, and exploring what roles such buildings could contribute as major anchor loads for future heat networks/ heat zones in Westminster (see section below on 'Decarbonising Heat' for further information).
- Similar to an earlier recommendation for domestic buildings, work across planning and energy issues to better understand the opportunities for retrofitting buildings in conservation areas and exploring opportunities for certain measures to be permitted development (such as RBKC has recently done for the installation of solar PV⁶²)
- Expand Westminster's energy advice offer to SMEs, linking into potential new government initiatives to be launched shortly (see above), and most importantly, developed through a partnership programme with a network of SMEs across the city
- Go beyond energy to also address a wider range of issues around climate resilience and adaptation, looking at the impact of climate change on the built environment in Westminster, from increased heat to flooding incidents.
- Co-fund research for new guidance into a wider set of issues for commercial building retrofit such as the embodied carbon of materials for retrofit, planning and retrofit. WCC should liaise with the London Partnership Board on this area of research as soon as possible, as the Board is building on its Retrofit London⁶³ plan this year.

56. The BBP is a collaboration of leading property owners who are working together to improve the sustainability of commercial buildings. <https://www.betterbuildingspartnership.co.uk/>

57. £6 billion between 2025 and 2028 to fund energy efficiency and clean heat in building stock.

58. See Retrofit London paper at London Partnership Board Meeting, 16 March 2023

59. See <https://ukgbc.org/our-work/retrofit/>

60. Green Finance Institute launches new resource to supercharge green home retrofit solutions, GFI, 28 February 2023

61. Kingspan hails record year as insulation sales heat up, 17 February 2023

62. Solar Power for more homes in Kensington and Chelsea, 22 March 2022

63. See Retrofit London paper at London Partnership Board meeting 16 March 2023



3. Energy Advice and Fuel Poverty

The latest Government sub regional fuel poverty data (for 2020) reports that there are 10,737 households in Westminster identified as fuel poor out of a total of 113,697 households in the city – an average 9.4%⁶⁴ with LSOA data showing these households are typically concentrated in a few wards within the city. However, the time lag in reporting this sub regional data also means that these levels will not reflect the real incidence of fuel poverty in the city at the present time, as the significant prices rises that we have experienced came into effect from early 2022. National Energy Action (NEA) has estimated that the total number of households across the UK in fuel poverty increased from around 4 million in summer 2020 to 6.7 million in October 2022 and they expect it to reach 7.5 million households April 2023. This is more than double the official estimate for England. Hence it is likely that the number of households struggling to pay their energy bill in Westminster has more than doubled to over 20,000, with possibly one in three households in some part of the city in fuel poverty.

The typical domestic energy bill in Westminster in 2020 would have been around £1,500 for the annual supply of electricity and gas. This had increased by the beginning of 2022 to over £4,000, but the introduction of the Government’s Energy Price Guarantee (EPG) effectively capped the average energy bill to £2,500. Ofgem’s energy price cap is set for the April to June quarter at £3,280, but the Government’s EPG will provide support to keep this down to £3,000. The latest market data forecasts that energy costs will continue to remain higher than historically observed in the UK for some time to come, something that has also been confirmed by Ofgem. Westminster residents will also see a variation in their energy bill depending on if they are on a dual fuel contract, economy 7 storage heating, or connected to a district heating system, or as a prepayment meter user.

Improving the energy efficiency of Westminster’s largest tenure, the Private Rented Sector (PRS), is a high priority of the council’s PRS Strategy 2021 – 2025. This sets out that 2,500 PRS properties (4.5%) fail the basic Minimum Energy Efficiency Standards (MEES) and a further 13% could benefit from energy efficiency measures, such as insulation and double glazing.

Westminster has launched the following initiatives to help support residents with their energy bills:

- Green Doctors service provides free and impartial energy advice and support to vulnerable Westminster residents covering a range of energy efficiency measures. The scheme applies to residents eligible if household income is under £21,500, or households with people over 65 or with a long-term health condition or disability.
- The CEAP committed to launching this year “an expanded ‘Green Homes’ advice service to provide direct support to residents, prioritising the vulnerable and those in fuel poverty, to help improve the energy efficiency of their homes and cut energy costs”
- The Energy Advice pages of the Westminster website provides information and useful links to support households with their energy bills
- A MEES Plus Grant Policy and Pilot Scheme to deliver energy efficiency improvements and carbon savings in the private rented sector (PRS). The council’s MEES Enforcement Team, using data analysis and engagement with the sector, will identify a list of properties/landlords that are eligible for MEES Plus Grant funding. The Pilot Scheme aims to fund approximately 8 – 10 properties. The Government has proposed to increase the MEES standard in private rented homes from an ‘E’ to a ‘C’ rating for new tenancies from 2025 and for all private rented homes from 2028, however final conclusions on this proposal are still awaited.

The Mayor’s Energy Advice London service was launched in 2022 and signposts a comprehensive list of organisations that have the potential to provide support to households. The Government’s online energy advice support services Help for Households includes a detailed Help with your energy bills section which lists current support mechanisms that households can access. Government is planning to launch a national phoneline service shortly to support those consumers that need more targeted help or who are digitally excluded. In addition, regionalised pilots for in-person energy advice specific to the local areas are to be launched later this year.

EGT Recommendations

- There are good existing resources on WCC’s webpages ‘Help and support with rising energy costs’ and ‘Saving Energy at Home’ providing residents to information on how to reduce their energy costs. Advice to residents should be improved as part of the ‘retrofit offer for all’ (see earlier) through an improved area of the website on retrofit. Also, it is not clear at present if there are dedicated officers working in WCC on domestic energy advice and/or fuel poverty. Higher energy bills and the cost-of-living crisis will be impacting on Westminster residents for sometime to come and there needs to be a clearly identified officers within the climate emergency team to advance work in the area, reaching reach out to all residents, especially those who may not be able to access digital resources easily.
- WCC should build on the MEES+ scheme, to provides the output from these programmes to the GLA and other London councils, as well as informing a wider MEES+ scheme in Westminster.



64. <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2022> - 2021 data will become available at the end of April 2023.



4. Decarbonisation of Heating and Heat Networks

The past 20 years has seen a dramatic reduction in the use of fossil fuels to generate UK electricity, leading to a rapid decarbonisation of our electricity grid. However, the vast majority of our buildings remain heated by fossil gas and decarbonising heat supplies via a shift away from natural gas remains the most pressing challenging to achieving net zero. The Government’s 2021 Heating and Building Strategy (HABS) set out a range of measures to drive alternatives to the use of gas boilers which included an increase in the use of heat pumps, the growth in district heating to displacing the use of fossil gas in the gas grid through use of low carbon and renewable hydrogen. Decisions around the future potential of hydrogen remain highly uncertain and the Government has stated that pilots currently being undertaken will feed into a policy decision on the role of hydrogen in heat decarbonisation in 2026. A review undertaken built environment professionals in 2021 of the potential of hydrogen as a decarbonisation route for heating in buildings concluded “it is unlikely that zero carbon hydrogen supplied via a re-purposed gas mains network will be available for the vast majority of buildings, for the foreseeable future.”⁶⁵.

The ‘electrification of heat’ is to be achieved through the wider use of heat pumps with the recently released Heat Pump Investment Roadmap stating that the Government has a “Long term vision with an aim to grow the market to 600,000 heat pump installations each year by 2028 and up to 1.9 million a year by 2035, underpinned by ambitious policies”⁶⁶. The 2028 target is an approximate 10-fold increase over the current rate. The Mayor’s analysis for London to achieve its Net Zero target for 2030 suggests that 2.2m heat pumps will need to be deployed in the capital by 2030⁶⁷.

There is no definitive guide to the number of heat pumps in the city of Westminster. The most up-to-date source of information is the Microgeneration Certification Scheme (MCS) Installations Database⁶⁸, which is open to use to MCS registered installers (and through a data sharing agreement with Ofgem and Government).



The Government’s support mechanism for supporting the uptake of heat pumps in homes, which operated from 2014 to March 2022 (when it closed), was the Domestic Renewable Heat Incentive (RHI). The latest data⁶⁹ includes information of technologies installed at the local authority level, and reports a total of seven domestic Air Source Heat Pumps (ASHP) were installed in Westminster through the RHI over its period of operation. There is no support mechanism in place for non domestic heat pumps (the BUS only support heat pumps up to 45kW capacity – equivalent to the heat load of approximate three domestic households) with the exception of supporting heat pump installs in public sector buildings, and WCC has succeeded in securing close to £17m which has supported the installation of heat pumps in seven corporate properties.

The Boiler Upgrade Scheme (BUS) succeeded the RHI and was introduced in April 2023 providing a grant of up to £5,000 for the installation of an ASHP. BUS statistics are not available at the local authority level – but data available shows a total of 602 applications were received as at February 2023 across the whole of London (5% of the total for England and Wales). Ofgem’s quarterly BUS statistics report that 274 grants for ASHP were paid in London by end of January 2023⁷⁰. Recently released Government statistics of BUS vouchers issued by Parliamentary constituency⁷¹ show that in Westminster North and Cities of London and Westminster installations were below five installs. WCC has secured funding under the Social Housing Decarbonisation Fund (SHDF) and is exploring routes for the installation of ASHP through this funding.

Heat networks are of particular importance to Westminster, as it is home to the major Pimlico District Heating Undertaking (PDHU), the first heat network in the UK, built in 1950. The 2023 Energy Bill will bring forward new legislation which will provide local authorities with new powers to designate zones where heat networks are preferred. Establishing new ‘heat network zones’ in the city – together with funding through the Government’s Heat Network Efficiency Scheme (HNES)⁷² (directs funding for improving the efficiency of existing networks) and the £288m Green Heat Network Fund (supports the development of new and existing low and zero-carbon heat networks) - has the potential to provide Westminster with a major opportunity to improve and extend existing networks. The most challenging element of this work will be identifying routes to decarbonise the heat sources for these existing networks (all existing communal heat networks use gas boilers as their source of heat). At present, over 60% of all the council’s emissions come from heat networks – that is PDHU and a further 50+ communal heating systems on social housing estates across the city. A decarbonisation strategy for PDHU is currently being assessed, exploring the feasibility of different options including a heat pump to replace one of the main gas boilers. Upgrading these heat networks is not only essential in supporting the council’s goal of net zero, but there is also need to improve the efficiency of the networks to improve reliability of heat supplies to consumers, as well as driving down energy bills.

65. Hydrogen: A decarbonisation route for heat in buildings?, LETI, February 2021

66. Heat pump net zero investment roadmap, 5 April 2023 DESNZ

67. Mayor of London’s office releases new report setting 2030 net zero target for London, 20 January 2022

68. <https://certificate.microgenerationcertification.org/>

69. RHI Deployment Statistics, March 2023, DESNZ – see tab S2.6

70. <https://www.ofgem.gov.uk/publications/boiler-upgrade-scheme-quarterly-report-issue-3-november-2022-january-2023> DESNZ, March 10 2023

71. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1141740/Boiler_Upgrade_Scheme_Vouchers_Issued_By_Parliamentary_Constituency.xlsx

72. <https://www.gov.uk/government/publications/heat-network-efficiency-scheme-hnes>



EGT Recommendations

Decarbonising heat supplies to Westminster’s homes and businesses will be the most significant – and difficult - element of the council’s goal to achieve net zero. Demand reduction is the first and most important element in relation to reducing Westminster’s reliance on gas heating – and hence the EGT’s recommendations around energy efficiency in homes and businesses (earlier on in this report) must always be considered as a necessary first step in any initiative in relation to the provision of clean heat.

The Government’s progress to date on supporting the uptake of heat pumps has been less than successful. A recent inquiry by the House of Lords concluded that “the Government’s Boiler Upgrade Scheme ... is failing to deliver on its objectives, following a disappointingly low take-up of grants⁷³” Despite concerns about the suitability of heat pumps in many urban locations, increasing evidence is pointing to the fact that heat pumps can be installed in nearly all properties⁷⁴. The Government has also recently announced that it will extend funding support for the BUS to 2028, which is a positive action. As a priority, WCC should reach out to residents to identify a mix of household types in the city that would welcome the installation of a heat pump as an alternative to their existing gas boiler, and look to provide some ‘hand holding’ to these households in securing BUS grants and through the heat pump installation process. In return, these homes should agree to take part in monitoring studies,

and ‘open house’ events to provide user experience to Westminster residents about the switch to heat pumps⁷⁵. This latter point is particularly important as there is considerable contradictory information around the heat pump user-experience in the national press.

A shortage of relevant skills is another major barrier to take-up of the BUS. There are far fewer heat pump installers available than gas boiler fitters – estimated at under 2,000 heat pump installers in 2019 compared to 130,000 Gas Safe registered heating engineers – meaning households are more likely to be advised to replace a gas boiler with like-for-like and they must work harder to get a range of quotes for low-carbon heating systems⁷⁶. Finding a suitable installer for a heat pump is a major first stumbling block for most residents who wish to switch from a gas boiler. Westminster’s new ASHP How to Guide⁷⁷ is excellent – but it provides only standard information in there to relation to finding a trusted supplier. To help support the deployment of heat pumps in Westminster, the council must go beyond simply signposting households to the MCS Approved Suppliers list and instead take a more active approach in helping households identify suitable suppliers, fast track applications that require planning, provide information on energy efficiency grants/ support ahead of a heat pump install, monitor data on heat pump installs including changes to EPC banding issues⁷⁸, and cost information as a guide for residents, update the ASHP guide with revised information by surveying residents who have had a heat pump installed and so on.

WCC is currently evaluating the performance of existing heat networks ahead of applying to the Government’s HNES funding. This is welcome – but the Housing Team should be provided with more resource and support as a priority in order to secure these significant funds from Government in order not only to improve the consumer experience of heat networks – but also drive down energy bills for residents the as soon as possible.

Heat network zoning will become a critical tool for Westminster to help shape the future of heat networks in the city. The LAEP work (referenced earlier) will help inform the feasibility of creating new and/or expanded low-carbon heat networks and communal heating systems in Westminster, but WCC can take action now by bringing together major heat (and cooling) heat users (hospitals, universities, housing providers, government and commercial offices) to explore how their anchor loads could form the cornerstones of future heat network zones across the city (the GLA’s Heat Network Manual⁷⁹ may help with this exercise); WCC could also look to LB Southwark who are pre-empting the Heat Network Zone by creating a Local Development Order (LDO) to extend existing networks and connect new loads within a specified location⁸⁰; using the outputs of the LAEP work, create a ‘Heat Map’ for the borough so that planning can ensure it connects new building loads up to existing heat networks – or connect to a nearby development which has an existing or planned onsite heat network.

London Councils has seven workstreams currently in place to support boroughs achieve their climate emergency targets⁸¹. However, there currently is no activity around the decarbonisation of heat. As a borough with the most significant district heating scheme operating in London, Westminster should approach London Councils to take forward a new heat network work strand – potentially liaising with the GLA to get technical support for this work from the Local Energy Accelerator programme⁸². This initiative would help connect the many London boroughs currently examining the potential for heat networks, and support London in securing as much funding as possible from the Green Heat Networks Fund.



73. See HoL Environment and Climate Change Committee report, 22 February 2023

74. All housing types are suitable for heat pumps, finds Electrification of Heat project, Energy Systems Catapult, December 2021 and Heat pump retrofit in London, Greater London Authority, August 2020.

75. This project should be more typical of a switchover to a heat pump - not the deep retrofit (c. £40,000) of the Westminster Energy Saving Show home.

76. From Letter from Baroness Parminter to Rt Hon Lord Callanan, House of Lords Environment and Climate Change Committee, 22 February 2023

77. <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-and-climate-emergency/planning-householder-retrofit-how-guides/air-source-heat-pumps>

78. Under the current EPC methodology and present fuel prices, a better result will tend to be achieved by selecting fossil fuel heating rather than low-carbon heating (such as heat pumps). See Reform of domestic EPC rating metrics to support delivery of Net Zero, Committee on Climate Change, February 2023

79. See <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/energy/london-heat-network-manual-ii>

80. See Local Development Order - District Heating Network, Southwark, February 2023

81. See <https://www.londoncouncils.gov.uk/our-key-themes/climate-change>

82. <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/energy/low-carbon-accelerators/local-energy-accelerator>





Cabinet Report

Meeting:	Cabinet
Date:	10 th July 2023
Classification:	General Release
Title:	Site A – Church Street Regeneration – Compulsory Purchase Order Resolution
Ward Affected:	Church Street
Fairer Westminster:	<p>The proposed comprehensive renewal of Site A, Church Street will meet the Council’s Fairer Westminster outcomes, including:</p> <ul style="list-style-type: none"> • <u>Fairer Communities and Housing</u> – the scheme will provide high quality and affordable homes delivering a range of tenures beneficial to local residents and relieving overcrowding, making Westminster a more equitable place. The condition and energy efficiency of housing stock will be much improved. The scheme will enhance the quantity and quality of public realm in the area, allowing opportunities for physical activity and the library provision provides learning opportunities for children and adults alike; • <u>Fairer Environment</u> – the scheme proposes an ambitious sustainability strategy and will provide access to high quality green spaces and community facilities. The enhanced connectivity ensures that residents, workers and visitors are encouraged to travel through Westminster in more active and sustainable ways; and • <u>Fairer Council</u> – the scheme has been designed with the Church Street community in mind and includes a transparent engagement process with residents at its centre.
Key Decision:	Yes
Financial Summary:	<p>The Council will be responsible for paying all compensation to landowners, whether as a result of voluntary acquisition or through the CPO process. Whilst the Council will meet the costs of acquiring all outstanding interests in the Order Land (and has an approved acquisition budget of £40 million to do so), it proposes to enter into a partnership with a development partner to deliver the CPO Scheme by way of joint venture. The Council and the joint venture delivery partner will enter into a development agreement to secure the delivery of the CPO Scheme.</p>

Report of:

Debbie Jackson, Executive Director, Growth Planning and Housing

1 Executive Summary

- 1.1 The Church Street Estate (the "Estate") (of which the Order Land forms part) is a regeneration priority of the Council. The Estate comprises one of the priority housing estates identified in a Westminster Housing Renewal Strategy (the "Renewal Strategy") as being in need of improvement and significant investment and is part of the Council's drive to address the shortage of affordable housing in the City. In accordance with the Council's Fairer Westminster objective, the overarching objective of regenerating the Estate is to create a comprehensive renewal that brings about physical, economic, and sustainable change; and that creates additional homes and improves the lives of residents, businesses and visitors alike.
- 1.2 The Council's vision is to bring forward a regeneration scheme in respect of the entirety of the Estate to provide a significant boost to housing and affordable housing, improve the street market, providing new affordable and flexible workspace and employment opportunities along with a new cultural quarter. However, use of the Council's compulsory purchase powers is sought in respect of Site A (being that part of the Estate shown edged red on the plan (the "Draft Order Plan") at Appendix 1) (the "Order Land") at the present time.
- 1.3 The Order Land is bounded by Penfold Street to the north-east, Broadley Street to the south-east, the properties at 356-380 Edgware Road to the south-west and Church Street to the north-west. It comprises post-war housing blocks (Ingrebourne House, Lambourne House, Pool House, Cray House and Blackwater House) comprising 145 flats which were constructed in the 1970s.
- 1.4 The Order Land is predominantly residential with the exception of 15 individual commercial spaces and basement car park used for storage. At the centre of the Order Land is a communal courtyard. Basement car parking and market storage is located under the northern portion of the Order Land. A more detailed description of the Order Land (and the surrounding area) is contained in section 2 of draft Statement of Reasons appended to this Report (at Appendix 3).
- 1.5 In general, the Order Land has a low-quality urban character, further reduced by a lack of sufficient public realm (primarily hard landscaping), a lack of play and seating opportunities and insufficient lighting. The area suffers from barriers to accessibility and movement in and out of the area and pedestrians are generally restricted to narrow footpaths. Further the Order Land experiences overcrowding and the current condition of the housing and commercial stock is poor.
- 1.6 The vision for the Order Land is to provide an increased range of affordable and market housing and bring about long-term physical, economic and social sustainability of the neighbourhood. The Council has been working with Church Street residents to create a new high quality neighbourhood that offers an attractive mix of homes (including affordable homes meeting a range of housing needs) public realm and community facilities for a number of years. Comprehensive renewal proposals for the Estate (of which the Order Land forms part) were assessed by the local community and stakeholders between 7 March – 30 April 2019 as part of an options consultation. The decision to proceed with Option 3 (being part refurbishment, part redevelopment) was endorsed by residents and stakeholders in accordance with the requirements of

consultation under Section 105 of the Housing Act 1985 and on 6 June 2019 the Council's Cabinet resolve to accept the officer's recommendation and approve Option 3 as the preferred way forward.

- 1.7 Further consultation in terms of the means of delivery of the proposed regeneration scheme has since been undertaken (20 January – 17 February 2020), in addition to consultation targeted to those living in and near the Order Land in respect of updated designs for the proposed scheme. Following a significant period of pre-planning consultation undertaken in March and June/July 2021 a hybrid planning application (the "Application") was designed for the regeneration of the Estate in response to a detailed analysis of the Estate, the local context, the wishes of local residents and stakeholders and the Council's objective of delivering high-quality development. It was submitted to the local planning authority in November 2021. A ballot of residents conducted at the end of last year supported the regeneration proposals.
- 1.8 The detailed component of the planning application applies to the Order Land and seeks to provide:

"demolition of all buildings on Site A and erection of mixed-use buildings providing ground floor flexible commercial use floorspace (use class E), a library (use class F1), market storage (use class B8), residential units (use class C3), landscaped amenity space, car parking, motorcycle parking, cycling parking, market infrastructure and associated works"
- 1.9 Outline planning permission was sought for the remainder of the Estate (Sites B and C and Church Street Market) for:

"the demolition of buildings and structures. The erection of buildings and works of alteration to existing buildings for the following uses: (a) flexible commercial floorspace (Use Class E); (b) community floorspace (Use Class F1 and F2); (c) public houses, wine bars, or drinking establishments floorspace (Use Class sui generis); (d) market storage (Use Class B8); and (e) residential floorspace (Use Class C3). Ancillary residential facilities; associated infrastructure; streets, open spaces, landscaping and public realm; car, motorcycle and bicycle parking spaces and delivery/servicing spaces; new pedestrian and vehicular access; market infrastructure and ancillary facilities; utilities and other works incidental to the proposed development."
- 1.10 On 13 December 2021 Cabinet gave "in principle" approval to the use of the Council's statutory compulsory purchase powers in respect of the proposed regeneration of the Order Land, should all reasonable attempts to acquire the necessary land and interests fail. This report provides an update on the progress and seeks Cabinet approval to progress to the making of a compulsory purchase order (the "Order") of land and property and new rights required for the redevelopment of the Order Land, whilst continuing to negotiate and complete acquisitions of legal interests.
- 1.11 On 28 March 2023, the local planning authority at a meeting of its Planning Applications Committee resolved to grant planning permission pursuant to the Application subject to the completion of a unilateral undertaking pursuant to section 106 of the Town and Country Planning Act 1990 ("TCPA"). Planning permission is the means by which it is proposed to deliver the regeneration of the Order Land (the "CPO Scheme").

- 1.12 The detailed part of the Application proposes up to 428 Class C3 residential units, 605 sqm (GIA) of Community Floorspace (Use Class F1), 341 sqm (GIA) of Commercial Floorspace (Use Class E), 1,124 sqm of Market Storage Floorspace (Use Class B8), 2,603 sqm of plant and services and 896 sqm of parking. The two buildings comprised within the development will be separated by a new pedestrian and publicly accessible street (known as New Street Gardens) that runs northwest to southeast through the Order Land. It will comprise large areas of soft landscaping and play equipment. In addition, the buildings will be served by communal and podium level gardens. Both blocks include commercial floorspace (Use Class E) at ground floor on the Church Street frontage. Block A1 would also include a new library (Use Class F), to replace the library to be demolished on Site B (within the Estate), at ground and mezzanine level and accessed via Church Street.
- 1.13 The CPO Scheme proposes a net increase of 115 affordable homes (comprising 73 social rented units and 42 intermediate units) at the Order Land, whilst offering the re-provision of existing affordable homes, allowing existing residents the right to return.
- 1.14 Although the Council owns the freehold interest of the Order Land (albeit there is a small parcel of unregistered land where the freeholder cannot be identified), implementation of the CPO Scheme requires the acquisition of leasehold interests and new rights. The Council has endeavoured to acquire the necessary interests by negotiation, but it has not been possible to reach agreement with all of the parties affected. In accordance with The Guidance on Compulsory Purchase Process and The Crichel Down Rules, 2019 (the "Guidance"), the Council will continue (in parallel with the compulsory purchase process) to make attempts to acquire outstanding interests by private treaty with a view to limiting the number of interests that need to be compulsorily acquired.
- 1.15 Investigations indicate that there are a number of parties who may have the benefit of rights, easements and covenants over the Order Land (including the potential for unregistered rights) which may be affected by the CPO Scheme. Should it be necessary (and only where the Order Land (or relevant part) is 'no longer required for the purpose for which it is held' (per section 122 of the Local Government Act 1972)), officers will seek Cabinet approval to appropriate the relevant land for planning purposes, namely the construction of the CPO Scheme. This will engage the provisions of section 203 of the Housing and Planning Act 2016 (the "HPA 2016") which enables certain third party rights and restrictions to be overridden when development is carried out. This overriding reduces the risk to the delivery of the CPO Scheme by allowing the Council to carry out the development even if it interferes with existing rights. It means an affected third party who suffers a relevant loss shall be entitled to claim statutory compensation under section 204 of the HPA 2016, although they will not be entitled to further damages and/or an injunction, which might delay or prevent development. Any proposed appropriation will form part of a separate report to Cabinet in due course and does not fall for consideration now.
- 1.16 Having considered how the redevelopment is to be carried out, in order to ensure delivery, the Council is also seeking to exercise powers under section 13 of the Local Government (Miscellaneous Provisions) Act 1976 (the "1976 Act") for the compulsory purchase of new rights over the Order Land (shown coloured blue on the Draft Order Plan at Appendix 1). Section 13 of the 1976 Act enables local authorities to purchase

compulsorily new rights over land, where the acquisition of the land itself is not required and where such rights are not in existence when the compulsory purchase order is made. In particular, crane oversailing rights and rights of access are sought for the purposes of erecting scaffolding and undertaking and maintaining works. Without these rights, it would not be possible to deliver the CPO Scheme, and therefore the rights have been included in the Order.

- 1.17 Given the time required to complete the compulsory purchase process it is considered sensible to now proceed to make a compulsory purchase order in respect of the Order Land in order to meet the aims of the Church Street regeneration. Accordingly, this report seeks Members' support for a resolution for the making of the Order to assemble the remaining interests in the Order Land which are not owned by the Council and secure the rights necessary to enable the CPO Scheme to be delivered, should attempts to acquire the necessary land and interests by agreement fail.
- 1.18 The extent of the Order Land is identified in the draft Order Plan attached to this report at Appendix 1 (subject to final boundary confirmation). A schedule of interests is currently being prepared.

2 RECOMMENDATIONS

Cabinet is asked to:

- 2.1 Agree, subject to the consideration of the matters set out in this report, to the making of a Compulsory Purchase Order pursuant to Section 226(1)(a) of the TCPA and section 13 of the 1976 Act in respect of the Order Land, to facilitate delivery of the CPO Scheme.
- 2.2 Delegate authority to the Executive Director of Growth, Planning and Housing (subject to any expenditure to be incurred to be within the budget approved for the promotion of the CPO and the acquisition of the property and rights necessary to enable the redevelopment of Site A) to:
- (a) agree amendments to the Draft Order Plan and finalise the CPO schedule of interests before the making of the Order (if required to give effect to any of the matters delegated pursuant to the recommendation);
 - (b) agree the precise scope of rights to be acquired over properties that surround the Order Land (if required to give effect to any of the matters delegated pursuant to the recommendation);
 - (c) agree amendments and approve the final form of the Statement of Reasons before making the Order;
 - (d) agree amendments and approve the Equalities Impact Assessment before making the Order;
 - (e) to agree the terms of and enter into any documentation required to settle any property rights / matters necessary to progress the regeneration of the Order Land;

- (f) take all steps to secure the making, confirmation and implementation of the Order including the publication and service of all notices and the promotion of the Council's case at any public inquiry;
- (g) negotiate, agree terms and enter into agreements with affected parties including agreements for the withdrawal of blight notices and/or the withdrawal of objections to the Order and/or undertakings not to enforce the Order on specified terms, including (but not limited to) where appropriate seeking the exclusion of land from the Order, making provision for the payment of compensation and/or relocation;
- (h) in the event the Order is confirmed by the Secretary of State or an Inspector in the case of delegation, to advertise and give notice of confirmation and thereafter to take all steps to implement the Order including, as applicable, to execute General Vesting Declarations and/or to serve Notices to Treat and Notices of Entry in respect of interests and rights in the Order Land; and
- (i) take all steps in relation to any legal proceedings relating to the Order including defending or settling claims referred to the Upper Tribunal and/or applications to the courts and any appeals.

3 Reasons for Decision

- 3.1 Church Street is one of the five priority estates identified in the Renewal Strategy as needing significant improvement and investment. In line with the Council's strategy for Fairer Westminster 2022 - 2026, the overarching objective of regenerating Church Street is to create a comprehensive renewal that brings about physical, economic and sustainable change that creates additional homes and improves the lives of residents, businesses and visitors alike. The Order Land is a key part of the regeneration area.
- 3.2 Whilst significant progress with property owners has been made in discussing acquisitions that will be necessary to deliver the proposals, land assembly remains a critical issue for the delivery of the CPO Scheme. Clearly the estate renewal cannot be delivered across properties that are not wholly in the ownership or under the control of the Council and without this, certainty cannot be gained to the likely programme for delivery of the complete renewal of the Order Land.
- 3.3 To enable the comprehensive redevelopment of the Order Land all relevant land interests will need to be acquired, in a timely way. The government recognises in the Guidance, that if acquiring authorities wait for negotiations to break down, this can have detrimental impacts on the timing of delivery of projects. Therefore, depending on when the land is required, the Guidance considers it sensible for an acquiring authority to:
 - plan a compulsory purchase as a contingency measure; and
 - initiate formal procedures.

- 3.4 Importantly, the Guidance expressly recognises that such steps "*...help to make the seriousness of the authority's intentions clear from the outset, which in turn might encourage those whose land is affected to enter more readily into meaningful negotiations*".
- 3.5 The Guidance requires acquiring authorities to attempt to acquire land by agreement before embarking on the CPO process, although it is recognised that for schemes involving the acquisition of the number of interests, it is sensible to run the CPO process in parallel with ongoing negotiations.
- 3.6 This report seeks Members' support for a resolution for the making of a compulsory purchase order to assemble the Order Land and rights needed to bring forward the CPO Scheme.
- 3.7 The report for the in-principle resolution acknowledged that before the making of the Order members would need to be satisfied on the following:
- that there was a compelling case in the public interest;
 - that there were no planning, funding or other legal impediments to the Order Land being delivered or where impediments exist there are reasonable prospects for overcoming those within a reasonable timescale;
 - that all reasonable attempts to acquire all interests by agreement have not been successful;
 - that there is justification for any interference with the human rights of those with an interest in the land affected; and
 - that any assessment of the impacts on residents, visitors and employees be measured and evaluated, with special focus on the likely effect of the proposals on those sharing protected characteristic (race, pregnancy, age, disability, gender reassignment, marriage/civil partnerships, religion/belief, sex, sexual orientation (as defined by the Equality Act 2010)) be made, in order for the Council to fully understand those impacts, and to consider measures to mitigate impact, make reasonable adjustment, and foster good relations between those sharing protected characteristics, and those who do not.
- 3.8 The remainder of this report and the draft Statement of Reasons at Appendix 2 set out the justification for the making of the Order under section 226 of the TCPA.
- 3.9 The main benefit of the use of compulsory purchase is the certainty of being able to obtain vacant possession to a planned programme. This is vital in order give the Council confidence that the entirety of the Order Land will be delivered and be reassured of the effective use of public funds deployed in the development of the project. The use of compulsory purchase provides a level of certainty on project programming which in turn would allow the Council to enter into commercially sound construction contracts. This is because, once the Order is confirmed and the legal challenge period has passed, the Order can be implemented and a date for vacant possession fixed in accordance with the project programme which can immediately follow or coincide with the programme for redevelopment.

Proposed Order Land

- 3.10 The extent of the Order Land is identified in the Draft Order Plan at Appendix 1. The potential new rights sought pursuant to the Order are shown coloured blue on the Draft Order Plan.
- 3.11 A description of the Order Land is contained in Section 2 of the draft Statement of Reasons (at Appendix 2 to this Report), which description is subject to confirmation following the completion of the land referencing exercise currently being undertaken.

Land interests to be acquired and negotiations

- 3.12 Part of the justification for obtaining confirmation of the Order will involve demonstrating that compulsory powers are necessary because the land required cannot be acquired by agreement. Compulsory purchase is seen as a last resort and the acquiring authority must be able to show that it has made genuine attempts to acquire the land by negotiation.
- 3.13 The Council has made significant efforts to acquire all interests by voluntary agreement and this can be thoroughly evidenced. The Council will continue these efforts.
- 3.14 The Council has been seeking to acquire the Order Land through private treaty negotiation to enable delivery of the regeneration proposals. At the start of the purchase process there were 47 long residential leasehold interests throughout the Order Land that needed to be acquired by the Council. Of the residential leasehold interests approximately 31 were owned by non-resident lessees.
- 3.15 Since negotiations with residential lessees to acquire those leasehold interests began in 2018, the Council and its agent Westminster Community Homes ("WCH") have purchased 40 properties. Of the remaining 7 residential leasehold interests to be acquired, 4 are currently under offer to the Council and a further 2 in active negotiations. Efforts continue to be made with the final leaseholder yet to enter into negotiations to sell by agreement.
- 3.16 With regard to council tenants, there were a total of 98 secure tenants within the Order Land. All secure tenants have been re-housed.
- 3.17 The CPO Scheme will provide up to 428 new homes across two buildings, and will provide the opportunity for all returning council tenants and resident leaseholders to be re-housed on the regenerated Estate, should they wish.
- 3.18 There are 15 commercial interests comprised in the Order Land, including the unit occupied by the Council's Regeneration Team. 13 are currently occupied. Discounting the unit occupied by the Regeneration Team and a tenant due to vacate in August 2023, of the remaining 11 commercial leasehold interests, 2 have been served with notices pursuant to section 25 of the Landlord and Tenant Act 1954 (the "1954 Act") and 5 are occupying pursuant to unprotected leases such that the Council is able to secure vacant possession of such units. Of the remaining 4, 3 are in active negotiations with the Council. Efforts continue to be made with the final commercial leaseholder yet to enter into negotiations to sell by agreement.

- 3.19 The Council is working with affected businesses to help them to find suitable, available premises to which to re-locate or, to agree on ending their respective lease with the payment of compensation. Presently, two commercial interests occupying under leases protected by the 1954 Act have expressed an interest in moving to an alternative location with the remainder considering ceasing operation. In respect of those interests protected under the 1954 Act, the Council has appointed Savills, a property consultancy with a specialism in compulsory purchase and compensation, to lead negotiations to purchase their interests by agreement.
- 3.20 The Council is developing a more formal Business Relocation Strategy which records and finalises its approach to the acquisition of commercial interests comprised within the Order Land and the engagement, advice and assistance given to occupiers of commercial interests to relocate from the Order Land to a suitable, alternate location. The strategy identifies measures that are/will be put in place to help minimise the impacts of the Order on commercial interests and the community that they serve. The Regeneration Team is working with commercial occupiers to assess their ongoing needs and accommodation requirements and undertake alternative site searches to enable occupiers to consider suitable options for relocation, preferably within proximity to the Order Land.

The need and justification for the use the Council's CPO Powers

- 3.21 Whilst the Council is seeking to acquire the required interests through negotiation, consistent with other schemes of this nature, it is important to have measures in place to manage the risk of any third parties being unwilling to voluntarily agree to sell their interests within the required timescale or at a reasonable cost.
- 3.22 In order to compulsorily acquire land the Council must have a relevant statutory power that authorises such acquisition. In addition the Council must use the most specific and appropriate power available to it. In the case of a CPO in connection with the Order Land, it has been decided that the Council's planning powers under section 226 of the TCPA are the most appropriate, as the proposals would make a major positive contribution to the economic, social and environmental well-being of the area and so meet with the requirements of this statutory power. In addition, as new rights are required over land, the Order will also be made pursuant to section 13 of the 1976 Act. The rights that are sought are concerned with oversailing and facilitating access for construction and subsequent maintenance of the development. Should the Cabinet approve the resolution, authority will be delegated (in accordance with paragraph 2.2 above to agree the precise scope of rights to be acquired over properties that surround the Order Land). In using the enabling powers pursuant to section 226 (1) (a) of the TCPA and Section 13 of the 1976 Act, the Council is using the most specific powers available to it for the purposes of the redevelopment of the Order Land.
- 3.23 Detailed advice to acquiring authorities on the use of compulsory purchase powers is set out in the Guidance. The Guidance provides helpful information on the matters which the Secretary of State will take into account when considering whether or not to confirm a CPO, so should be fully considered by Members now in relation to the making and implementing of the Order. These matters as they relate to the Order Land are considered below and in the appended draft Statement of Reasons.

- 3.24 The Guidance states that in considering whether or not to confirm a CPO, the Secretary of State will have regard to the extent to which the purpose for which the land is being acquired fits with the adopted Local Plan for the area or, where no such up to date Local Plan exists, with the draft Local Plan and National Planning Policy Framework.
- 3.25 The Council adopted the Westminster City Plan 2019 – 2040 on 21 April 2021 (the "City Plan"). It sets out the vision for the City of Westminster up to and beyond 2040, putting in place a policy framework that would deliver this vision. Many of its policies are therefore highly relevant to the CPO Scheme.
- 3.26 Policies 8 and 9 within the City Plan are geared towards encouraging applicants to come forward with more housing, optimising housing delivery sites and finding new innovative ways to deliver more homes. Through this approach, there is an expectation that the London Plan derived target of 20,685 homes across the plan period (2019-2040) will be exceeded.
- 3.27 Policy 6 within the City Plan sets out that the Estate (of which the Order Land forms part) is a spatial development priority with the aim to bring about much needed housing growth, new jobs (by linking further employment opportunities in the CAZ to the local community), enhanced community facilities, new green infrastructure and high-quality design to make the most effective use of land. In accordance with such policy imperatives, the regeneration of the Order Land presents the opportunity to improve quality of life for existing residents, deliver enhanced community uses, improve the public realm and enhance accessibility, connectivity and safety.
- 3.28 The proposed boost to housing supply, improvements to the quality of homes, the provision of enhanced community facilities and improved public realm for residents (as proposed by the CPO Scheme) is strongly supported by adopted national, regional and local policy objectives and by policies within the City Plan, and specifically meets the aims of City Plan policy 6.
- 3.29 In the context of the above, and the very recent resolution to grant planning permission, the Council is satisfied that use of the Council's powers of compulsory purchase for site assembly is justified and that the purpose for which the Order Land is being acquired fits in with the adopted planning framework for the area.
- 3.30 The Guidance states that the Council must demonstrate a 'compelling case in the public interest', and that the public benefits that will arise from the purpose for which the land is to be acquired (i.e. the CPO Scheme) outweigh the impact on those affected. The Council must demonstrate both the need for the CPO Scheme in principle and in general and the need to acquire each and every parcel of land included in the Order. On the basis of the legal advice and the Guidance, officers are of the view that such a compelling case can be demonstrated from the desirability of implementing the CPO Scheme – in particular from the following substantial wider benefits resulting from it:
- **New and improved homes**
Westminster has an acute need for additional homes covering a range of tenures, especially affordable housing, which the Order Land regeneration will help to deliver. The Order Land is currently characterised by high levels of

social and economic exclusion and suffers from overcrowding. The CPO Scheme intensifies the use of land to support additional market, intermediate and social housing all of a high-quality, which is highly accessible. The proposals will significantly increase the amount of affordable housing floor space in line with the Council's adopted policies. A greater proportion of larger units will also better meet the needs of existing residents and the re-balancing of tenures will create a more inclusive and balanced community.

- **Public realm and amenity space**

The existing public realm is sparse and dominated by vehicles and on-street parking. The introduction of new publicly accessible, pedestrianised spaces with natural surveillance will create an attractive and secure area for residents and serves to extend the Order Land to the wider area, drawing in footfall and interest amongst visitors. The areas for children's play provided at ground level ensure that opportunities for play and social interaction will benefit the wider community and will link in with the growing green network in the Church Street Ward. The addition of balconies will provide opportunities for private amenity space.

- **Community uses**

The new library, in qualitative terms is significantly better than the existing offer providing services for children, learning rooms and community space that can flex to changing needs and users. The library garden will also provide opportunities for recreational use that will contribute to the physical and mental well-being of the community. Although it is noted that there will be a loss of commercial floorspace to accommodate this increased library provision, it is still considered that the mix of commercial and community uses on offer will, when taken together, meet residents' day to day needs and support opportunities for community interaction.

3.31 Section 7 of the draft Statement of Reasons (at Appendix 2) more fully sets out the benefits attributable to the CPO Scheme.

3.32 Implementation of the CPO Scheme will ensure that the 5 key objectives of the Renewal Strategy as set out below will be fulfilled:

- to increase the supply and quality of affordable housing to meet a variety of local needs including for families;
- to improve the quality of the local environment with outstanding green and open spaces that promotes low energy consumption and environmental sustainability;
- to promote a high quality of life for people of all ages and backgrounds in safe cohesive and healthy neighbourhoods, supported by a range of high quality housing and excellent community facilities;
- to enable people to maximise economic opportunity with support for training, employment and enterprise, and housing tenures which help those in work to remain in the City;

- to create a more distinct sense of neighbourhood ending the physical divide between Westminster's estates and surrounding streets.
- 3.33 The Council must also demonstrate that there are no other impediments to proceeding with the CPO Scheme, for example the need for planning permission, other consents or physical constraints. As detailed in this Report, a resolution to grant planning permission pursuant to the Application was made on 28 March 2023. Officers are satisfied that, there are no fundamental impediments to the implementation of the CPO Scheme and that it will proceed if the Order is confirmed as explained further in the draft Statement of Reasons.

Funding, resourcing and delivery

- 3.34 The Council also needs to demonstrate that it has, or at least will obtain, the resources necessary not only to pay compensation for the land/interests interfered with but also to implement the CPO Scheme on the Order Land. The reason for this requirement is to avoid a situation in which private land has been acquired compulsorily for a purpose which, in the event, cannot be achieved for lack of funds.
- 3.35 The cost of securing vacant possession of the Order Land will be met from an approved acquisition budget of £40 million. As of April 2023, £27.6 million has been spent on the vacant possession strategy. Whilst the Council will meet the costs of acquiring all outstanding interests in the Order Land, it proposes to enter into a partnership with a development partner to deliver the CPO Scheme by way of joint venture and has obtained a shortlist of bidders who will be invited to tender. This process is ongoing with negotiations to last throughout 2023. However, a number of parties have expressed interest. The Council and its delivery partner will enter into a development agreement to secure the delivery of the CPO Scheme.
- 3.36 A viability appraisal was submitted with the underlying planning application which concludes that, by applying the GLA's sensitivity analysis, the CPO Scheme can be considered deliverable.
- 3.37 In light of the above, funds have been allocated to complete the land acquisition process and the Council is confident that a suitable developer partner with sufficient funding in place will be secured to deliver the CPO Scheme.

Whether the purpose for compulsorily acquiring the land could be achieved by other means

- 3.38 Officers are satisfied that all of the Order Land identified is necessary to deliver the CPO Scheme. The purpose for which land and rights are proposed to be acquired is to enable the comprehensive redevelopment of the Order Land in accordance with the adopted planning policy framework and the preferred option developed with residents. The planning permission (once granted pursuant to the local planning authority's resolution) will secure the comprehensive redevelopment of the Order Land in general accordance with those policies and proposals.
- 3.39 Whilst the Council owns a substantial part of the Order Land, it needs certainty that all land required to deliver the CPO Scheme is within its control. If compulsory purchase is not achieved then the comprehensive development of the Order Land will not come

forward and development will be limited to a significantly reduced (and compromised) scheme, reflecting the smaller area within the Council's ownership. This would thwart or delay much needed redevelopment of the area and the reduced scheme would not achieve a comprehensive redevelopment and result in considerably less benefit to the local community. The additional residential units (including an uplift in affordable housing), public realm and enhanced pedestrian links would be lost.

4 Legal Implications

- 4.1 The Council is empowered under section 226(1)(a) of the TCPA, to acquire any land in its area if it is satisfied that the proposed acquisition will facilitate the carrying out of development, redevelopment or improvement on or in relation to the land. The Council may utilise its compulsory purchase powers under section 226 of the TCPA:
- (a) if it thinks the acquisition will facilitate the carrying out of development, or redevelopment or improvement on, or in relation to the land or
 - (b) which is required for a purpose which is necessary to achieve in the interests of the proper planning of an area in which the land is situated.
- 4.2 In order to make an acquisition under (a), the Council must also consider that the development, redevelopment or improvement will contribute to the promotion or improvement of the economic social or environmental well-being of its area (per section 226(1A) of the TCPA).
- 4.3 In this case the proposal is to seek approval to make a CPO for the purpose of facilitating the comprehensive redevelopment of the Order Land to enable the delivery of the CPO Scheme. Overall, the development is considered to make a major positive contribution to the economic, social and environmental well-being of the area.
- 4.4 The Acquisition of Land Act 1981 governs the procedures which apply to compulsory acquisition. The Compulsory Purchase Act 1965 governs post-confirmation procedures and the Land Compensation Act 1961 governs the amount and assessment of compensation. The 1976 Act governs the granting of new rights.

5 Human Rights

- 5.1 The Human Rights Act 1998 (the "1998 Act") places direct obligations on public bodies such as the Council to demonstrate that the use of compulsory purchase powers is in the public interest and that the use of such powers is proportionate to the ends being pursued.
- 5.2 In reaching their decision, Members should take account of the provisions of the 1998 Act. As a public authority, the Council must not act in a way which is incompatible with a Convention right protected by the 1998 Act. The relevant human rights protected by the 1998 Act which are engaged by the decision to authorise the compulsory purchase are Article 8 (right to a private and family life), Article 1 of the First Protocol of the Convention and Article 6 (1) (right to a fair and impartial public hearing within a reasonable time).

- 5.3 A key provision of the Guidance is the need for there to be a "compelling case in the public interest" for compulsory acquisition. It is necessary in this to consider Convention rights which are engaged by and potentially affected by the making and confirmation of a CPO. In relation to Article 1 of the Convention which provides a right for the peaceful enjoyment of possessions, a fair balance is required to be struck between the public interest and private rights in relation to possessions/property. Article 8 is not an absolute but qualified right, such that any interference with the right to respect for a person's private and family life and home must be proportionate to any legitimate aims, such as promoting regeneration for the well-being of the area. "Proportionate" in this context means that the interference must be no more than is necessary to achieve the identified legitimate aim.
- 5.4 Article 6(1) is engaged because the CPO process involves determinations as to third party rights of individuals, as to which they have the right to a fair hearing. Similarly, to Article 8, the Article 6(1) rights are also qualified and some restrictions may be justified to pursue legitimate aims and provided that they are proportionate. Potentially affected individuals have had the opportunity to date to object to the redevelopment proposals through the planning process. Individuals whose human rights could potentially be interfered with as a result of the Order can object to the validity of the Order and such objections would be considered at an independent public inquiry, which would afford the objectors a fair hearing of their concerns. Failing agreement on the compensation arising from the Order, any affected individuals have the right to pursue a claim for compensation in the Lands Tribunal. It is deemed that the process affords affected individuals sufficient opportunity to a right to a fair hearing.
- 5.5 The proposed development has been a long term objective of the Council and fits within the Council's planning framework for the area. The development will be transformational for the Order Land and the wider area, creating new homes and delivering significant regenerative benefits. Overall, having regard to the potential of the development proposals and the Order enabling it, to deliver significant regeneration benefits and improvements to the social, economic and environmental well-being of the area, it is considered that the potential for some degree of interference with Article 8 and Protocol 1 rights is necessary in the interests of well-being of the area, it is in the general public interest and is deemed proportionate to those legitimate aims. Any interests acquired will carry a right to compensation in accordance with the Compulsory Purchase Code and the opportunity to a fair and impartial hearing in that regard.

6 Equality Implications

- 6.1 Section 149 of the Equalities Act 2010 created the public sector equality duty. Section 149 states:-
- (1) A public authority must, in the exercise of its functions, have due regard to the need to:
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 6.2 In deciding whether to resolve to make a CPO and the related recommendations of this Report, the Council must pay due regard to its Public Sector Equality Duty ("PSED"), as set out in section 149 of the Equalities Act 2010. Consideration must also be given to whether, if the decision is made to go ahead, it will be possible to mitigate any adverse impact on a protected group or to take steps to promote equality of opportunity by, for example, treating an affected group more favourably.
- 6.3 Officers have had regard to the Council's PSED in the assessment of the case for making the recommendations in this Report and Members must be mindful of this duty when considering the recommendations in this Report. Those with an interest in the Order Land will be affected by the implementation of any made CPO, if confirmed. An Equalities Impact Assessment has been undertaken on the potential impact of the CPO and any necessary mitigation strategies, to ensure that due regard has been taken of the Council's PSED.
- 6.4 Equalities Impact Assessments have informed the design, resident-led decisions in respect of the scheme, and the negotiations with those with an interest in the Order Land. The planning application for the development proposal also assessed the potential impact on equalities and social cohesion.
- 6.5 An updated assessment of any equalities impact of the Order has been undertaken to support this Report, a copy of which is at Appendix 3 (the "EQIA"). The EQIA has considered:
 - (a) whether the Order will affect any groups or individuals with protected characteristics and if so what steps can be taken to minimise any impacts;
 - (b) whether there are any long term social and economic benefits to those with protected characteristics arising from the development facilitated by the Order;
 - (c) any other impacts across any protected groups arising from both the construction and operational phases of development
- 6.6 The EQIA considers the potential impacts of the Order on the commercial and residential leaseholders and occupiers who share protected characteristics within the footprint of the Order Land. It also considers the potential equality impacts of the Order for those employees and customers of affected businesses as well as for local residents sharing protected characteristics, together with those impacts realised as a result of the delivery of the CPO Scheme (i.e. construction and operational impacts). The Council has sought to mitigate the impact on those sharing protected characteristics through a range of reasonable and proportionate measures focused on engagement, compensation options and opportunities for relocation (temporary and permanent). The benefits of the redevelopment seek to improve outcomes for the current and future Estate community.
- 6.7 The EQIA acknowledges that the effects on protected characteristics are being managed through engagement and consultation and the mitigation measures set out

in the Policy for Tenants in Housing Renewal Areas, the Policy for Leaseholders in Housing Renewal Areas and the support developed by the Council for businesses included in the Order Land.

- 6.8 The EQIA concludes that the CPO Scheme will contribute to improvement in the area through a net increase in new housing, new employment opportunities, a new library and improvements to the public realm as well as the benefits of the overall regeneration of the wider Estate. Whilst it acknowledges potential direct negative effects associated with the Order and indirect negative impacts that could occur as a result of bringing forward the CPO Scheme the measures taken by the Council to-date (e.g. the respective policies for tenants and leaseholders in Housing Renewal Areas, approach to engagement, appointment of, and work undertaken by, PPCR and the more formal business relocation strategy) together with further planned mitigation measures serve to strengthen, secure or enhance the positive beneficial impacts and mitigate for the potential adverse equality impacts associated with the Order. Accordingly, it is considered that, should the Order be made, the equality risks have been addressed and the potential for negative effects minimised such that there is a case for the Order, if it is required to facilitate the CPO Scheme.
- 6.9 The EQIA is a live document and is subject to further amendment/updating. In particular, the planned and recommended mitigation measures contained within the EQIA will continue to be reviewed and updated (as necessary) as the CPO process progresses.

7 Financial Implications

- 7.1 Under a CPO, property or rights are acquired at open market value but disregarding any increase (or decrease) in value attributable to the scheme for which the land is acquired. Affected parties may also be entitled to other compensation for loss payments and disturbance depending on circumstances. The Council will be responsible for paying all compensation to landowners, whether as a result of voluntary acquisition or through the CPO process.
- 7.2 The Capital Programme, approved by Full Council on 8 March 2023, includes a budget for the development of the Order Land by way of a joint venture partnership. The cost of securing vacant possession, including CPO costs, will be met from a separate approved acquisition budget. Of the £40 million acquisition budget, £27.6 million has been spent as of April 2023.
- 7.3 Whilst the Council will meet the costs of acquiring all outstanding interests in the Order Land, it proposes to enter into a partnership with a development partner to deliver the CPO Scheme by way of joint venture and has a shortlist of interested bidders who are prepared to proceed to the next stage of negotiations. The Council and the joint venture delivery partner will enter into a development agreement to secure the delivery of the CPO Scheme.
- 7.4 A viability appraisal was submitted with the underlying planning application which concludes that, by applying the GLA's sensitivity analysis, the CPO Scheme can be considered viable and therefore deliverable.

7.5 In light of the above, funds have been allocated to complete the land acquisition process and the Council is confident that a suitable developer partner with sufficient funding in place will be secured to deliver the CPO Scheme.

8 Carbon Impact

The Order is required to ensure that the entirety of the Order Land can be acquired and regenerated. Although upfront carbon will be relatively high, the CPO Scheme has demonstrated a series of reductions in whole life carbon and measures to address fuel poverty and resilience.

9 Consultation

9.1 The Regeneration Team have worked with the local community to ensure that all key stakeholders are engaged and aware of the CPO Scheme. The Council has ensured that all residents are fully aware of the support they will receive throughout the renewal process and the details of the relevant policies. Further details on engagement and consultation can be found in section 4 of the draft Statement of Reasons at Appendix 2.

9.2 The Ward Councillors have been consulted and briefed.

If you have any queries about this Report please contact:

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Appendices

Appendix 1: Draft Order Plan

Appendix 2: Draft Statement of Reasons

Appendix 3: Draft Equalities Impact Assessment

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CITY OF WESTMINSTER

**TOWN AND COUNTRY PLANNING ACT 1990,
ACQUISITION OF LAND ACT 1981 AND LOCAL GOVERNMENT
(MISCELLANEOUS PROVISIONS) ACT 1976**

**THE CITY OF WESTMINSTER (SITE A CHURCH STREET)
COMPULSORY PURCHASE ORDER 20[]**

STATEMENT OF REASONS

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1 INTRODUCTION

- 1.1 This is the Statement of Reasons for the making of The City of Westminster (Site A Church Street) Compulsory Purchase Order 20[] (the "Order") under section 226(1)(a) of the Town and Country Planning Act 1990 (as amended)(the "Act"), the Acquisition of Land Act 1981 (the "1981 Act") and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 (the "1976 Act"). This Statement of Reasons is a non-statutory statement provided by the City of Westminster as the Acquiring Authority (the "Council") in compliance with the Ministry of Housing, Communities and Local Government's Guidance on Compulsory purchase process and The Crichel Down Rules 2019 (the "Guidance").
- 1.2 If confirmed by the Secretary of State for Levelling Up, Housing and Communities, the Order will enable the Council to acquire compulsorily the land included in the Order (the "Order Land") as shown within the red-line boundary of the draft Order Plan at Appendix 2 to facilitate its regeneration by the demolition of existing properties and the erection of mixed-use buildings providing residential units, flexible commercial use floorspace, market storage and infrastructure, landscape amenity space and car, motorcycle and cycle parking together with other associated works (the "CPO Scheme") as described in Section 5 below. It will also facilitate the acquisition of new rights necessary for the purposes of constructing the CPO Scheme.
- 1.3 The CPO Scheme forms part of the Council's proposals for the regeneration of the wider estate as shown indicatively edged red on the Estate Plan at Appendix 3 (the "Estate") for residential-led mixed use development comprising new buildings to provide mixed-tenure residential units and ancillary residential facilities, community, commercial, business and service floorspace, market infrastructure and ancillary facilities, new publicly accessible open space, new pedestrian and vehicle routes, accesses and amenity areas, servicing and other associated works (the "Regeneration Scheme").
- 1.4 Although the Order Land forms part of the Estate and the CPO Scheme forms part of the wider Regeneration Scheme, use of the Council's compulsory purchase powers is only sought in respect of the Order Land for the purposes of delivering the CPO Scheme. Whilst the proposals for the Order Land and the wider Estate have been consulted upon and promoted via the planning system as a single scheme, for the reasons more fully set out in this Statement of Reasons, the Council considers that the case for using compulsory purchase powers is justified by reference to the proposed regeneration of the Order Land alone and the benefits that will arise as a result.
- 1.5 The Council has given careful consideration to all relevant issues, and having done so, it is satisfied that there is a compelling case in the public interest for it using its powers of compulsory acquisition to facilitate the regeneration of the Order Land and that the proposed acquisition will:
 - (a) facilitate the carrying out of development, redevelopment and improvement on and in relation to the Order Land; and
 - (b) contribute to the promotion and improvement of the economic, social and environmental wellbeing of the City of Westminster.

The benefits of the CPO Scheme are described in detail in Section 7.

- 1.6 The Regeneration Scheme has been a planning and regenerative objective of the Council for many years. Although the Council owns the freehold interest of the Order Land (albeit there is a small parcel of unregistered land to the rear passageway to 372 Edgware Road where the freeholder cannot be identified), implementation of the CPO Scheme requires the acquisition of leasehold interests and new rights. The Council has endeavoured to acquire the necessary interests by negotiation, but it has not been possible to reach agreement with all of the parties affected. The Council will continue to make reasonable attempts to acquire outstanding interests by private treaty with a view to limiting the number of interests that need to be compulsorily acquired.
- 1.7 Whilst compulsory purchase is a last resort, the Secretary of State recognises in paragraph 2 of the Guidance that, if an acquiring authority waits for negotiations to break down before starting the compulsory purchase process, valuable time will be lost. Accordingly, it may often be sensible, given the amount of time required to complete the compulsory purchase process, for an acquiring authority to plan a compulsory purchase timetable as a contingency measure; and initiate formal procedures, at the same time as seeking to purchase land by agreement.
- 1.8 On 13 December 2021, the Council resolved to approve the progress of all work necessary to establish a case for compulsory purchase and approved, in principle, the use of compulsory purchase powers for the acquisition of the Order Land required for the CPO Scheme.
- 1.9 On 28 March 2023, the local planning authority resolved to grant a hybrid planning permission (the "Planning Permission") for the Regeneration Scheme (of which the CPO Scheme forms part) to provide a residential-led mixed use development comprising the erection of mixed-use buildings providing ground floor flexible commercial use floorspace (use class E), a library (use class F1), market storage (use class B8), residential units (Use Class C3), landscaped amenity space, car parking, motorcycle parking, cycle parking, market infrastructure and associated works. It is proposed to deliver the Regeneration Scheme through the implementation of the Planning Permission.
- 1.10 It is proposed to deliver the CPO Scheme through the implementation of the detailed part of the Planning Permission on the Order Land. The detailed component of the Planning Permission comprises erection of mixed-use buildings providing ground floor flexible commercial uses (use class E), a library (use class F1), market storage (use class B8), residential units (use class C3) (up to 428 units), landscaped amenity space, car parking, motorcycle parking, cycle parking, market infrastructure and associated works.
- 1.11 Subject to the making (and confirmation) of the Order in order to secure the Order Land required for the purposes of implementing the CPO Scheme and the grant of the Planning Permission, the intention is to proceed with the detailed part of Planning Permission in a timely manner.
- 1.12 This Statement sets out the existing and proposed uses of the Order Land and the wider Estate, the justification for the Order, a description of the CPO Scheme, how the

CPO Scheme will be implemented and funded, steps taken to negotiate the acquisition of land by agreement and explains why there is a compelling case in the public interest for the making of the Order.

2 DESCRIPTION OF THE ORDER LAND AND ITS LOCATION, TOPOGRAPHICAL FEATURES AND PRESENT USE

Description

- 2.1 The Order Land is identified on the draft Order Plan at Appendix 2 and comprises 0.9927 hectares of land that is to be compulsorily acquired. The Order Land comprises part of the Estate, incorporating those leasehold properties (both commercial and residential) which have not already been acquired by agreement, together with any associated interests and rights that may exist. The Order Land is more particularly described below and a schedule of interests is being prepared, which lists the owners, lessees, tenants, occupiers of the Order Land and other parties with a qualifying interest in the Order Land where known as defined by section 12(2) of the 1981 Act. Details of statutory undertakers' rights and interests will also be included.
- 2.2 The Order Land is located within Church Street Ward within the City of Westminster. Church Street is an ethnically diverse ward and home to one of the highest concentrations of social housing in the borough. Despite its proximity to the West End, the area has high levels of social and economic exclusion. It is the most densely populated ward in London and in the 10% most deprived wards in the UK (index of Multiple Deprivation, DCLG 2015). According to the 2011 census¹, Church Street is the 23rd most diverse ward in the UK. A total of 50% of households speak English at home, with Arabic the most common language after English. The area encompassing the Estate has a high level of people reporting bad/very bad health and a prevalence of diabetes, being the highest amongst Westminster's wards (Public Health England – National General Practice – Profiles – Data, 2021). The proportion of the Church Street Ward's population affected by long-term illness or disability is also above average for Westminster. The area also suffers from severance caused by surrounding transport infrastructure creating barriers to accessibility and movement into and out of the area.
- 2.3 The Order Land is predominantly residential with the exception of 15 individual commercial spaces and a basement carpark used for storage.
- 2.4 The residential properties within the Order Land include 145 residential properties in Blackwater House, Cray House, Ingrebourne House, Pool House and Lambourne House. Of the 145 residential units, 98 are provided for social rent and 47 are provided as market housing.
- 2.5 The blocks were built in the 1970s and are arranged in long ranges, for the most part, fronting the streets, albeit in the case of Lambourne House and Pool House set back from the footway with some gardens or landscaped areas and in the case of Pool House a vehicle ramp down to a basement. A communal courtyard garden lies within the centre of the block. To the west of Ingrebourne House is a ramped vehicle access point into a large basement area and to the west of this a servicing area which backs

¹ Relevant sections of the 2021 Census are not available at the time of writing

onto the Edgware Road facing properties. The architecture is relatively uniform with a strong horizontal emphasis, using red brick as the main cladding material and punctuated by a regular arrangement of full-height window bays, which typically contain replacement upvc windows.

- 2.6 Blackwater House fronts onto Church Street and is four storeys in height. Approximately 2927 sqm GIA of commercial units are located at ground floor with residential units above. The majority of commercial units contain retail uses falling within Use Class E, although a public house (Lord High Admiral – Use Class Sui Generis) is also located at the northern corner, at the junction of Church Street and Penfold Street, and a betting shop (Use Class Sui Generis) is located on the Church Street frontage.
- 2.7 The Westminster Regeneration Base (Class E) (being one of the 15 commercial interests) is also located in Blackwater House and acts as a drop-in hub for residents and businesses to enable them to be kept informed as to the proposed regeneration of the Estate. All uses are accessed via Church Street, with the residential premises accessed through a designated entrance in-between the retail units.
- 2.8 Lambourne House is located on the south-eastern side of the Order Land, along the Broadley Street frontage. It is five storeys in height, with the top floor set back at roof level and houses residential units throughout. On the western side of the building at street level, there is a pedestrian and a vehicular access route that leads into the Order Land and provides access to a large single storey storage/plant building and basement parking level.
- 2.9 Pool House is located on the north eastern side of the Order Land, on the Penfold Street frontage. It is five storeys in height and contains residential units throughout. At its northern end there is also a vehicular access to the rear of the commercial units fronting Church Street.
- 2.10 Ingrebourne House is located towards the south-western end of the Order Land. It is also five storeys high and contains residential uses throughout.
- 2.11 Cray House is located between Blackwater House and Ingrebourne House. It is three storeys high and contains residential units throughout.
- 2.12 Cray House, Pool House and Ingrebourne House enclose a large communal garden area for existing residents.
- 2.13 The Order Land is bounded by Church Street to the north, Penfold Street to the east, and Broadley Street to the south, it is located directly east of Edgware Road. The properties on Edgware Road are outside of the Order Land save for the corner property which sits on the south side of Church Street at the junction with Edgware Road. However, the Order seeks the acquisition of rights over such properties for the purposes of oversailing and rights of access for the purposes of undertaking and maintaining works. The Order Land comprises of the following land and property

(subject to any revisions arising out of the land referencing exercise):

- (a) Parts of the public footpath, wall boundary, subsoil and airspace situated on Church Street and the land to the rear passageway to 372 Edgware Road;
- (b) Residential premises in Blackwater House comprising flat 7 together with communal stairwells and walkways situated in Blackwater House and Broadley Street Car Park located beneath;
- (c) Commercial premises comprising units 95, 97, 99, 101, 103, 105-107, 109, 111, 113 -115, 117, 119 - 123, 125-127, 129 (r/o 384 Edgware Road) (Church Street) and units 382 and 384-386 Edgware Road;
- (d) Residential premises in Cray House comprising flat 6 together with the communal stairwells and walkways situated in Cray House;
- (e) Residential premises in Ingrebourne House comprising flats 7 and 16 together with the communal stairwells and walkways situated in Ingrebourne House;
- (f) Residential premises in Pool House comprising flats 18 and 22, together with communal stairwells and walkways situated in Pool House;
- (g) Residential premises in Lambourne House comprising flat 7 together with communal stairwells and walkways situated in Lambourne House.

2.14 There is an electricity sub-station located within Lambourne House, which is subject to a lease to London Power Networks Plc.

2.15 In total the Order Land comprises:

- (a) 145 residential units, of which 7² remain in use.
- (b) 15 commercial units (inclusive of the Regeneration Base at 99 Church Street), of which 13 remain in use. It is proposed that a further tenant will vacate the property at 113-115 Church Street in August 2023.

2.16 The Order Land is located within Paddington and (along with the wider Estate) within the Church Street/Edgware Road Housing Renewal Area. The frontages to Church Street are also located within the Church Street/Edgware Road District Centre.

2.17 The buildings comprised within the Order Land have a post-war character being medium rise at 4-5 storeys, flat roofs and generally oriented to face in line with the road network with the public realm located within the centre. In general the Order Land (and indeed, the Estate) has a low-quality urban character, further reduced by a lack of sufficient public realm (primarily hard landscape), a lack of seating and play opportunities and insufficient lighting. The public realm is dominated by vehicles, with busy roads and on-street parking throughout. There are limited designated cycle routes

² Residential leasehold interests

and pedestrians are generally restricted to narrow footpaths.

- 2.18 At more than 50 years old the buildings are showing signs of deterioration, with most residential blocks lacking modern design standards such as internal lifts and private amenity space. Overcrowding is also an issue for up to 19% of social housing properties in the Estate.
- 2.19 The Order Land (and the Estate) does not feature any buildings that are designated as statutory listed or locally listed buildings, nor is it located within a Conservation Area. However, the neighbouring context includes the Grade II* listed Marylebone Lower House at King Solomon Academy and sculpture as part of the North Westminster Community School, which are approximately 100 metres southeast of the Order Land. The Grade II listed 129-135 Lisson Grove is located approximately 120 metres to the south-east of Church Street near its junction with Lisson Grove. Situated marginally south of the Order Land's boundary are the Miles Buildings that line Penfold Street, considered to be unlisted buildings of merit. Similarly, at an approximate distance of 30 metres directly north of the Order Land boundary are the Wallis Building, Tadema House and Eastlake House, which are also considered to be unlisted buildings of merit. There are no Tree Preservation Orders in respect of the Order Land.
- 2.20 The Lisson Grove Conservation Area is located approximately 120 metres of the Order Land and the Fisherton Street Conservation Area is located approximately 250 metres to the north of the Order Land.
- 2.21 The Order Land is within the Watling Street Archaeological Priority Area, a Nature Deficiency Area and an Air Quality Focus Area.
- 2.22 Prior approval was granted on 16 February 2023 (reference 23/00183/COAPAD) for the demolition of Pool House, Ingrebourne House, Lambourne House and adjacent single-storey storage units (forming part of the Order Land). The single-storey storage units have been demolished pursuant to the prior approval.

The Wider Estate and Surrounding Area

- 2.23 As above, the Order Land comprises part of the Estate. An indicative plan of the Estate is attached at Appendix 3, which identifies each of Site B and Site C comprised within the Estate. The Order Land is designated Site A. The Estate is 3.84 hectares and is located at the south-western end of Church Street. The Estate (inclusive of the Order Land) comprises 400 residential units (228 for social rent and 172 as market housing) and 6,020 sqm (GIA) of Class E floorspace.
- 2.24 As with the Order Land, the Estate is located within the Church Street/Edgware Road Housing Renewal Area and the frontages to Church Street within the entirety of the Estate are located within the Church Street/Edgware Road District Centre.
- 2.25 In addition to the Order Land, the Estate comprises (within Site B):
- (a) Eden House – a four storey high block fronting Church Street containing approximately 2278 sqm GIA of commercial units (Use Class E) at ground floor with residential uses above. Church Street Library (approximately 848 sqm GIA,

Use Class F) is located to the rear of Eden House and accessed via a shopfront on its Church Street frontage. The library has been in existence since the late 1960s. Whilst the library is well-used and frequently visited, it is currently inefficiently located in terms of layout and lacks visibility due to its location. The library comprises three floors and provides a number of important functions for Church Street residents, including study spaces, a learning centre including a computer room, meeting rooms and open learning provision;

- (b) A disused Multi-Use Games Area (MUGA) is located to the rear of the library;
- (c) The following blocks, all of four storeys and including residential units:
 - (i) Ravensbourne House – on the frontage to Broadley Street;
 - (ii) Wandle House – on the south-western frontage to Penfold Street;
 - (iii) Lea House and Roding House – located on the north-eastern frontage to Salisbury Street;
 - (iv) Medway House – located centrally within Site B,
- (d) A commercial car park (approximately 4310 sqm GIA) located under the majority of Site B and accessed via the Penfold and Salisbury Street frontages

2.26 Within Site C:

- (a) Darent House, Windrush House, Mole House, Isis House, Derry House and Colne House. All are three to five storeys in height and contain residential units;
- (b) A business known as 'Ayslum Aid' is located on the ground floor of Derry House;
- (c) A supermarket (Use Class E) to the ground floor of Darent House;
- (d) Storage containers for Church Street Market are located between Darent House and Windrush House; and
- (e) A paved play area with perimeter trees is located near the centre of Site C.

2.27 Kennet House, rising to 16 storeys and comprising residential units sits in the centre of Site C (outlined in blue on the Estate Plan). Given its good condition and the clear preference of local residents to retain Kennet House (as expressed during the various consultation exercises), is not included within the Estate for the purposes of the Regeneration Scheme.

2.28 In total the Estate comprises 18 buildings housing 145 residential units and 15 commercial units in the Order Land, 176 residential and 10 commercial units within Site B and 79 residential units and 3 commercial units within Site C.

2.29 As with the Order Land, Site B comprises 1970s Council-built housing blocks, albeit using a brown multi-stock brick rather than red; and containing recessed deck access

walkways and embellished end stair towers. Site C comprises a more disparate group of buildings with more varied architecture consisting of a mixture of post-war blocks of flats dating from c.1949 and blocks ranging from the 1960s – 1980s.

- 2.30 The historic Church Street Market (formerly known as the Portman Market) is located on Church Street Monday to Saturday. Monday to Friday it operates between Edgware Road and Salisbury Street and contains 135 market pitches. On Saturdays, the market extends to Lisson Grove and comprises a total of 220 market pitches. The Church Street Market has been operating since 1830 and some of the traders have operated from the Estate for generations.
- 2.31 The market is made up of two banks of pitches, each set to the north and south kerbsides of the street. The weekday market is spread along half the length of the street with approximately 60% occupancy and a mix of permanent and temporary licenced traders. On a Saturday, the market is fully occupied and runs the full length of the street with high representation from permanent licenced traders. The market is a key part of the local area and sells a range of products including food, clothing and other convenience items to the local population at affordable prices. The market's vibrant aspect contributes to the unique character of the area and its vitality.
- 2.32 The Estate (including the Order Land) has excellent transportation accessibility. Edgware Road is the nearest rail station, directly to the south of the Estate and served by the London Underground. London Marylebone and Paddington stations are 0.5 miles and 0.8 miles from the Estate, respectively and provide National Rail services to connect the Estate to the surrounding areas. Several roads with numerous bus routes link the Estate to Central London, notably Edgware Road and Lisson Grove. As such, local residents are offered regular and convenient services to Central London.
- 2.33 Edgware Road also plays an important role as a major arterial route into the Central London road network providing the primary north-south route for public transport, cars and pedestrians. The Church Street Market bus stop connects the Estate to a number of key locations in Central London including Paddington, Holborn, Victoria and suburban London locations. A cycle docking station is available at Penfold Street, within the Estate, which provides 15 Santander Cycles for hire. There are 33 off-street car parking spaces and occupiers hold 150 on-street residential parking permits across the Estate.
- 2.34 Due to its size, the PTAL rating of the Estate varies from 6a (excellent) to 6b (best). The rating for the Order Land is 6b. This indicates high levels of accessibility to public transport and optimal transport infrastructure for the local community.
- 2.35 The character of the area is very mixed in terms of age, form and architecture, ranging from early nineteenth century terrace housing at the eastern end of Church Street; through a variety of late nineteenth and twentieth century housing schemes, to post-war housing. Lying on the west side of Edgware Road, and very close to the Order Land, is a completed redevelopment known as West End Gate, which features a series of large 10-storey residential blocks lining Edgware Road, with taller blocks behind including a 30-storey residential tower.
- 2.36 If any generalisations about the character of the area can be made, it is that the

prevailing building height is in the order of four to five storeys. There are some blocks of considerably greater height, although, with the exception of Kennett House, these tend to be to the west of Edgware Road. The development at West End Gate has introduced a greater scale. The wider area is primarily residential but with a mix of uses concentrated along Church Street and Edgware Road in particular including retail, food and beverage and commercial space at ground level. The north-eastern end of Church Street is notable for its concentration of antiques and furniture trade.

- 2.37 The area is well served by a range of amenities including schools, such as the King Solomon Academy, further education facilities, such as City of Westminster College, and cultural venues such as the Cockpit Theatre. The Regent's Canal provides amenity value and historic attraction to the area. Its main connection locally runs from Kensal Town, over Regent's Park to Camden.
- 2.38 The nearby Lisson Grove, which is designated as a Site of Importance for Nature Conservation provides a valuable green space, in addition to Broadley Street garden, located to the east of the Estate. However, in general, the Estate is within an area deficient in public open space.
- 2.39 Two large developments are currently being constructed within the vicinity of the Estate. Planning permission was granted in March 2019 for the Luton Street/Carrick Yard (reference 17/08619/FULL) development comprising two large six storey blocks containing 168 residential units (market and affordable) and a new sports hall. The development is 62 metres northeast of the Estate. The green spine (being a new park and pedestrian-friendly route that runs through the Church Street area) connects the development, together with a pedestrian link along Fisherton Street.
- 2.40 The second development is at West End Gate, approximately 43 metres south-west of the Order Land at its closest point. The consented development comprises eight blocks from seven to thirty storeys containing 652 residential units (market and affordable) with commercial uses at ground floor level. The quantum of the development has been uplifted to 830 units when taken together with the neighbouring Paddington Green site. Potential residential-led development may also come forward at the former Paddington Green Police Station, albeit the proposals are currently under consideration by the Mayor.

Ownership

- 2.41 A substantial part of the Order Land is already within the ownership of the Council. The Council owns the freehold of Blackwater House, Cray House, Pool House, Lambourne House and Ingrebourne House including the freehold of the commercial premises included in the Order.
- 2.42 At the start of the purchase process there were 47 long residential leasehold interests throughout the Order Land that needed to be acquired by the Council. Of these leasehold interests, 31 were owned by non-resident lessees.
- 2.43 Since negotiations with lessees to acquire those leasehold interests began in 2018, the Council has purchased 35 properties with a further 5 owned by WCH. WCH has agreed to transfer the properties back to the Council in line with the vacant possession

timeline.

- 2.44 Of the remaining 7 residential leasehold interests to be acquired 4 are currently under offer to the Council and a further 2 in active negotiations. Efforts continue to be made with the remaining residential leaseholder yet to enter into negotiations to sell by agreement.
- 2.45 At the outset of the purchase process, there were 15 commercial/retail interests. 13 are currently occupied with a further tenant due to vacate in August 2023. Discounting the unit currently occupied by the Council's regeneration team and the tenant due to vacate, of the remaining 11 commercial leasehold interests, 2 have been served with notices pursuant to section 25 of the Landlord and Tenant Act 1954 (the "1954 Act ") and 5 are occupying pursuant to unprotected leases such that the Council is able to secure vacant possession of such units. The 4 remaining tenants occupy pursuant to leases protected by the 1954 Act (the "Protected Tenancies"). Of these Protected Tenancies, 3 are in active negotiations with the Council. Efforts continue to be made with the final leaseholder yet to enter into negotiations to sell by agreement.
- 2.46 With regard to council tenants, there were a total of 98 secure tenants within the Order Land. Since 2018 all residents have been rehoused.
- 2.47 The CPO Scheme will provide up to 428 new homes across two buildings, and will provide the opportunity for all Council-secure tenants and resident leaseholders to be re-housed, should they wish.
- 2.48 Given the number of commercial interests in Blackwater House and the limited re-provision in the CPO Scheme, none of the commercial interests are being offered a right to return. The Council is working with affected businesses to help them to find suitable, available premises to which to re-locate or, to agree on ending their respective lease with the payment of compensation. Presently, two tenants occupying under Protected Tenancies have expressed an interest in moving to an alternative location with the remainder considering ceasing operation. In respect of the Protected Tenancies, the Council has appointed Savills, a property consultancy with a specialism in compulsory purchase and compensation, to lead negotiations to purchase their interests by agreement.

3 EXPLANATION OF THE USE OF THE ENABLING POWER SECTION 226(1)(A) OF THE TOWN AND COUNTRY PLANNING ACT 1990

- 3.1 The Council has powers (subject to confirmation by the Secretary of State) under section 226 of the Act to acquire land compulsorily for "development and other planning purposes". Section 226(1)(a) allows the use of these powers if the Council thinks the acquisition will facilitate the carrying out of development, redevelopment or improvement on or in relation to that land.
- 3.2 Section 226(1)(a) is subject to subsection (1A) which provides that the Council as an acquiring authority, must not exercise the power unless it thinks that the proposed development, redevelopment or improvement is likely to contribute to achievement of the promotion or improvement of one or more of the economic, social or environmental well-being of its area. As explained in Section 7 below the Council is satisfied that the

compulsory acquisition of the Order Land will achieve the objectives of section 226(1) (a) and (1A). The proposed use of compulsory purchase powers will result in the redevelopment of the Order Land in a manner which will bring about social, economic and environmental improvements through the provision of new housing, new and improved community facilities and enhanced public realm.

- 3.3 The Guidance recognises the use of the Section 226 power as a positive tool to help acquiring authorities to assemble land where this is necessary to implement proposals in their local plans or where strong planning justifications for the use of the power exists. The Council has taken full account of the Guidance in making the Order. It is utilising the powers under section 226(1)(a) of the Act because it is not certain that it will be able to acquire the remaining interests and rights to enable the redevelopment to commence by agreement, notwithstanding that it is proposed to reach agreement by negotiation wherever reasonably possible.
- 3.4 Section 13 of the 1976 Act enables local authorities to purchase compulsorily new rights over land, where the acquisition of the land itself is not required and where such rights are not in existence when the compulsory purchase order is made. In the Order, new rights are sought for crane oversailing and rights of access for the purpose of erecting scaffolding and undertaking and maintaining works.
- 3.5 The Council has had regard to the advice in paragraph 11 of the Guidance, which states that acquiring authorities should look to use the most specific power available for the purposes in mind and only use a general power when a specific power is not available. The Council is satisfied that the use of the powers contained in the legislation referred to above are the most appropriate powers available for its purposes and will facilitate the carrying out of development, redevelopment or improvement on or in relation to the Order Land and that it will contribute to the development, redevelopment or improvement of that area, thus meeting the statutory tests.

4 PROJECT BACKGROUND AND PURPOSE IN SEEKING TO ACQUIRE THE LAND

Background – Option Selection

- 4.1 The Estate (of which the Order Land forms part) has been a regeneration priority of the Council for some time. The Estate comprised one of the priority housing estates identified in the Westminster Housing Renewal Strategy March 2010 (the "Renewal Strategy") as being in need of improvement and significant investment and as part of the Council's drive to address the shortage of affordable housing in the City. In accordance with the Council's City for All objective at the time, the overarching objective of regenerating the Estate was to create a comprehensive renewal that brings about physical, economic, and sustainable change; and that creates additional homes and improves the lives of residents, businesses and visitors alike.
- 4.2 The Renewal Strategy proposed five 'Wellbeing Principles' to be applied to key regeneration areas: These principles were:
 - (a) to increase the supply and quality of affordable housing to meet a variety of local needs including for families;

- (b) to improve the quality of the local environment with outstanding green and open spaces that promotes low energy consumption and environmental sustainability;
- (c) to promote a high quality of life for people of all ages and backgrounds in safe cohesive and healthy neighbourhoods, supported by a range of high quality housing and excellent community facilities;
- (d) to enable people to maximise economic opportunity with housing tenure with support for training, employment and enterprise, and housing tenures which help those in work to remain in the City;
- (e) to create a more distinct sense of neighbourhood ending the physical divide between Westminster's estates and surrounding streets.

4.3 Back in 2013, and in accordance with the Futures Plan (2012) a ballot was put to the community for a previous iteration of the Regeneration Scheme. The ballot received an 87.5% 'yes' vote, with a voter turnout of 25.5%. Although the majority of people supported the development, at the time it was not considered financially viable to proceed. Following the ballot, the Council took the view that ballots are not the optimum metric for measuring community appetite for regeneration (albeit this has changed again more recently, as described later in this Statement). As such, a long-term engagement model has been adopted to ensure that residents and stakeholders are informed and can participate and influence decision-making during the consultation process.

4.4 Six phases of structured engagement have been undertaken between September 2017 and July 2021 with stakeholders and the local community, including (amongst other things) over 30 weeks of formal consultation, over 1,500 exhibition visits and over 600 visitors to the Commonplace web consultation platform. A further programme of engagement has been embarked upon following the submission of the application underlying the development now subject to a resolution to grant Planning Permission. A summary is provided below:

The 2017 Masterplan Consultation

4.5 In order to work towards a new scheme, a Ward-wide consultation was undertaken for seven weeks during October and November 2017. This listening exercise was used to gather feedback about the regeneration of Church Street and inform the development of the Church Street Masterplan. Published in December 2017, the Masterplan outlined the main features for each proposed development site within the Church Street ward boundary and marked the start of a cohesive approach to regeneration across the Church Street Ward.

4.6 The Masterplan emphasised the need to ensure that regeneration meets the needs of the community and creates sustainable, socio-economic change for generations. Within the Masterplan a set of priorities were established which included creating more homes (particularly affordable), improving health and wellbeing, providing better shops and a more vibrant market and improving connectivity. The Masterplan was subject to significant consultation before its adoption. This included a permanent exhibition at 99

Church Street, outreach events to local groups and organisations and 6,000 copies of newsletters being distributed in the local area. In summary, 350 residents viewed the exhibition, a further 360 were engaged via outreach events, seven local schools were visited, 120 completed feedback forms were returned, 152 comment cards received and 3,400 visits were made to the consultation website.

- 4.7 The delivery of new homes in Church Street was identified by a majority of respondents to the Masterplan consultation as being the most important element of any regeneration scheme. 54% of those who responded supported higher residential density in the area, 75% felt that the current market could be improved and 80% of the respondents showed support for a Health and Wellbeing Hub on Lisson Grove.
- 4.8 Following the consultation, the Masterplan was adopted to guide the economic growth and physical development of the Church Street area for the next 15-20 years and the Council began working with residents to develop the more detailed plans for the regeneration of each of the sites comprised within the Estate.

2018 Priorities Consultation

- 4.9 The 2018 Priorities Consultation was undertaken between 12 November and 7 December 2018. The focus was ensuring that the Council's vision (per the Masterplan and the priorities set out above) aligned with the priorities of the local community and to further understand what the community most wanted from the regeneration. The consultation was promoted via newsletter and door knocking of all properties within the Estate. The feedback gathered shaped the Options Consultation, as to which see below.
- 4.10 The consultation began with a workshop for 27 residents identified as being keen to be involved in the consultation. A business forum was also offered for local business owners and market stall traders on 4 December 2018 to garner their views. Drop-in sessions and exhibitions available to all members of the public followed at the Regeneration Base on 24 and 28 November and 5 and 6 December 2018. The exhibition boards provided a background to the Masterplan and set out the four options for development (maintain, refurbish, part develop/part refurbish and fully develop) that could be considered as part of a future options appraisal process. Visitors were encouraged to complete feedback forms. A total of 162 responses were received during this phase of consultation.
- 4.11 Of the 162 people who gave their views, 115 (71%) chose providing new homes as one of their priorities in the Church Street regeneration. In particular, residents mentioned the poor quality of current housing and a desire for homes that are genuinely affordable, together with assurances regarding re-housing in the area and a wish for the community to remain mixed. Health and wellbeing was the second highest, with 57% saying that this was a priority. In particular, the provision of more and better public spaces. Just under half (48%) said that new jobs and supporting the shops and market in Church Street was a priority. Many people wanted to see more choice in what the market offered and an improvement as to the facilities available. Only 35% gave improving access as one of their top two priorities. Priorities around access were mainly focused on making Church Street more cyclist and pedestrian friendly. Other issues raised included the need for crime reduction, better street lighting and more

opportunities for young people.

- 4.12 Overall, the Consultation reaffirmed the priorities set out in the Masterplan. The Council began to shape future proposals for regeneration of the Estate, appointing a professional team to work on potential redevelopment options.

2019 Options Consultation

- 4.13 The consultation on the four options for Church Street took place between 7 March and 30 April 2019. As part of this consultation, the Council presented a set of pledges which underpinned the Council's assurance to residents that any scenario involving redevelopment would provide for:

- (a) A right of return for residents, guaranteed for all secure tenants and resident leaseholders;
- (b) Full replacement of all council homes;
- (c) 35% of any new homes provided will be affordable for social and intermediate rent;
- (d) Addressing overcrowding as a top priority;
- (e) Good local shopping that serves local communities to be central to any scheme;
- (f) Church Street remaining a Council-owned estate;
- (g) Residents being at the heart of developing a viable new scheme.

- 4.14 The four options presented to the community included the "do nothing" or maintenance only options as well as the option for comprehensive redevelopment; the latter having been progressed by a multi-disciplinary team appointed in summer 2018. Due to the complexities of the different phases of work and rehousing residents, the potential to choose individual options for each site within the Estate was ruled out ahead of the consultation and was communicated to all stakeholders. In summary the options comprised:

- (a) Option 1: Maintenance ('business as usual', with maintenance of buildings at current levels);
- (b) Option 2: Refurbishment (improvements to interior and exterior of buildings, including replacing kitchens and bathrooms);
- (c) Option 3: Partial redevelopment and partial refurbishment (redeveloping many blocks in Sites A, B and C, except Kennet House. Other buildings would undergo refurbishment as in Option 2);
- (d) Option 4: Comprehensive redevelopment (replacement of all buildings in Sites A, B and C) including Kennet House and Edgware Road properties.

- 4.15 The consultation involved residents and businesses within the Estate, plus stakeholders in the wider area. Information was given on each of the four options, and views were sought based on the extent to which each option met the main priorities identified. The criteria included viability, homes, health and wellbeing, market and enterprise and movement, as drawn from the Masterplan and confirmed as the community's priorities in the 2018 Priorities Consultation. As a result of the consultation, partial redevelopment and partial refurbishment (Option 3) was chosen as the preferred way forward. Council and private tenants indicated a preference for Option 3, closely followed by Option 4, whereas resident leaseholders and business owners were more evenly split between the four options. Option 4 was ultimately discounted as feedback received during consultation was critical of the high density and the loss of the Dutch gabled properties on the Edgware Road frontage adjacent to the Order Land as well as Kennett House. There was also a concern that the inclusion of the largely privately owned properties on Edgware Road in Option 4 would add a level of uncertainty and delay that could be avoided under Option 3. The overwhelming message from the consultation was a desire from the Church Street community for change. The decision to progress with Option 3 was endorsed by stakeholders and residents in accordance with the requirements of consultation under Section 105 of the Housing Act 1985.
- 4.16 The consultation was widely promoted including by sending 6,000 invitations to residents and businesses advising of dates of exhibitions and drop-in sessions, posters, targeted letters and a consultation booklet and questionnaire were also emailed to resident associations, schools, councillors, community organisations and various youth groups. The Council held a series of engagement activities during this time, including holding a permanent exhibition at 35 Church Street throughout the consultation, where each option was presented and consultation materials were available to take away. A large-scale model was also available to demonstrate the various development options. The exhibition was advertised in all publicised material and from the second week of the consultation window, vinyls were added to 35 Church Street to attract passers-by. A total of 236 people attended the exhibition between 7 March – 30 April 2019.
- 4.17 Consultation workshops were also held with residents of the Estate (20, 30 March and 2 and 6 April 2019) and community pop-up exhibitions were used to raise awareness about the regeneration at locations around the Church Street area (18, 20 March and 2, 23 and 30 April 2019). Themed sessions focusing on the priorities members of the community had identified and tenure-specific drop-ins were also held with residents as well as a lunch with market traders and a breakfast with Church Street businesses to ensure all relevant interests were heard.
- 4.18 Businesses and market traders within the Estate were invited to a series of breakfast, lunch and evening meetings (12 February, 14 February and 26 February 2019) to meet with members of the multi-disciplinary team, hear more about the CPO Scheme and ask any questions. The Church Street Regeneration Team also held a Business Options Consultation Breakfast on 9 April at 35-37 Church Street, which was publicised in advance to businesses within the Estate. Businesses were invited to attend, discuss any issues directly with the Community Engagement Team and the architects, planners and designers working on the potential options for re-development and complete a survey with their thoughts.

- 4.19 The Council has also run a series of Business Forums with affected businesses, during which local businesses were able to book a place to attend and hear details of the commercial strategy and how they could access support. It was also the Council's opportunity to hear from all businesses and market traders as to their views on the proposed regeneration. The Business Forums were/are widely publicised, with invitations (including translations) provided to businesses in the local area.
- 4.20 Overall findings from the consultation events showed a preference for redevelopment and support for the benefits this would bring. For example, that new homes and improvements would be of higher quality, it would make the area look more appealing for visitors, and more modern buildings and green spaces would be welcomed. Whilst quantitative data did not show a clear preference between Option 3 and Option 4 (with 63% and 62% of respondents, respectively, finding that they met or exceeded the needs of the community), written feedback from local stakeholder groups and Kennett House residents (which is retained in Option 3 but not in Option 4) indicated a stronger preference for Option 3 to be pursued. A small number of people expressed a desire for the redevelopment of shops on Edgware Road (Option 4) whilst others were keen for these properties to be kept as they are. Many residents considered that Kennett House was in good condition and did not need to be part of the regeneration project.
- 4.21 In order to develop the initial design proposal, the design team used the feedback from the Priorities and Options Consultations. The table below illustrates how community feedback has created a set of objectives which the design team fed into the initial designs for the Pre-Planning Consultation for the Estate:

	Key design objectives established	Design team response
Homes	Spacious flats	Flats designed to London Plan Housing Space Standards and Westminster Space Standards
	Suitable storage space	Good amount of storage space across all new home sizes
	Improved ventilation	Flats designed to encourage natural air flow and the ability to control temperatures in individual flats
	Private amenity space	Private balconies with space for tables and chairs
	Flexibility	Flexible design, ensuring layouts can be adapted as needs change
	Well designed	Windows on two walls (dual aspect) to maximise light and air; and the reuse of energy to be more efficient and sustainable
	Good insulation	Thermal insulation to increase energy efficiency and reduce bills. Acoustic insulation to reduce noise from the market and neighbouring properties
Shops and markets	More variety	New retail offer, variety of units sizes and enterprise space
	Cleaner and smarter market	Modern, flexible retail spaces; improved layout with better experience for customers with more space to move; enhanced public space with seating, planting and lighting
	Better market facilities	Improving the market including access to Wi-Fi, water and electricity; trader only welfare and toilet facilities; van parking facilities
	Significance of the market	Market remains central to creating a more vibrant Church Street
Health and wellbeing	More, and improved, green and community spaces	New public green spaces and a community garden. Places to sit and relax in; new street gardens; over 300 new trees planted across Sites A, B and C; planting with a broad range of biodiverse species; public access to the new spaces created by the Green Spine project
	Improved local community space	Provision for a new library and a health and wellbeing hub (at Lisson Grove)
	Library remaining on Church Street	Library remaining on Church Street, with better access.
	Variety of outdoor spaces	Space for children and young people, with playgrounds and a other areas to play and spend time in
Getting around	More pedestrianised and cycling areas	Pedestrian and cycle-friendly features; including over 1,500 new cycle spaces
	Improved safety	Better security in the area, with no hidden corners or dead ends; current walking routes made safer and brighter with the help of the Metropolitan Police's 'Designing Out Crime' team
	Parking provision	Parking to include accessible spaces and electric vehicle charging points

- 4.22 On 6 June 2019 the Council's Cabinet resolved to accept the officer's recommendation and approve Option 3 as the preferred way forward. Whilst it was acknowledged that Option 4 performs better than Option 3 in the delivery of new homes, given the support

from the community and the benefit of other factors such as health and well-being, market and enterprise and making connections, the better performance was only marginal. Further, there were considered to be significant challenges in the acquisition of interests outside of the Council's freehold. Given the general sense in the community that delivery should be accelerated, it made Option 4 less attractive.

- 4.23 The Cabinet agreed with officers' recommendation to include the properties on Edgware Road (within Site C) in the scope of redevelopment Option 3 on the basis that they were considered to detract from the character and appearance of the area and will be detrimental to the appearance, value and benefits of the regeneration scheme. Their inclusion was considered to maximise the transformational impact of regeneration.
- 4.24 The Council undertook soft market testing in April 2019 to gauge market interest from potential development partners. The market expressed a strong interest in partnering with the Council and was broadly supportive of both Options 3 and 4.

Best Value, Delivery Options Consultation 2020

- 4.25 To ensure 'best value' (per s3, Local Government Act 1999), the Council sought views from residents in the Church Street area as to how the Order Scheme could be delivered. The consultation held between 20 January and 17 February 2020 provided the team with feedback on three proposed strategies for delivery of the regeneration of the Order Land: (a) a developer-led strategy; (b) a partnership strategy; and (c) a direct delivery strategy. Overall, there was no clear preference but there was more support for the direct delivery approach. Feedback indicated an expectation that the Council makes sure that any agreement keeps the developer highly accountable.

Order Land Design Update 2020

- 4.26 In May 2020, a consultation update was carried out in respect of the Order Land only. The designs for the development of the Order Land were altered significantly in response to feedback to the Options Consultation. The key changes were the provision of more open space and a new street garden (New Street Gardens) created between the two residential blocks in order to offer more green space, better accessibility and more daylight onto Church Street. The update also provided a new location for the library within the Order Land, with additional garden space. The change means that the library only needs to move once from its location in Site B, removing the need for a temporary library to be provided, which feedback indicated was not supported by the community. The consultation was targeted on those living in and near to the Order Land. An eight page newsletter was delivered across the Ward, a film explaining the changes was made available on the Church Street website and stakeholder meetings and a webinar were held to inform and engage local residents and businesses.
- 4.27 A total of 37 people gave feedback on the updated designs. Generally, the designs were well liked and there was particular support for the location of the library and the changes to the public realm were seen as an improvement.

Pre-Planning Consultation

- 4.28 The pre-planning consultation consisted of the following parts:
- (a) Stage 1 (3 – 31 March 2021) – following the selection of Option 3, the Council worked with residents to develop the initial design proposal for the Estate informed by the feedback garnered through consultation to date; and
 - (b) Stage 2 (30 June – 28 July 2021) – the design proposal was presented in greater detail by the design team, based on feedback received as part of the initial design consultation.
- 4.29 The pre-planning consultation was undertaken widely within in the Church Street Ward and a section of the Little Venice Ward which includes around 7,000 properties. As part of the Stage 1 Consultation, the Council again employed a number of engagement activities, including meeting with local community groups, residents, Church Street Youth session, the business forum and market traders. Public webinars were also held. Due to the Covid-19 lockdown the consultation took place remotely. During Stage 1, feedback was sought (via a consultation booklet and questionnaire) on those aspects of the design that were considered to work well or needed improvement. Information was provided as to the approximate number of new homes, the library design, new public and green spaces, proposed walking and cycling routes, the consultation timeline and guarantees for tenants and leaseholders.
- 4.30 5,600 text messages were sent to Estate residents to remind them of the consultation both at launch and the week before it closed, over 1,500 residents and businesses were called and three webinars were held for the design team to present and answer questions. Comments could also be made and viewed and documents could be downloaded via Commonplace. Further, Public Participation Consultation and Research ("PPCR") contacted all residents within the Estate to make them aware of the consultation, in addition to holding their own drop-in sessions to provide independent support on the consultation process and pass on any queries to the project team.
- 4.31 Stakeholder meetings were also held with library staff, Church Street Ward councillors, the Church Street Neighbourhood Forum, Little Venice Ward Councillors and Friends of Church Street Library from January to March 2021 during which the design team (Bell Philips Architects and landscape architects, Camlins) were able to present a series of emerging designs, describe their evolution and answer any questions.
- 4.32 1,397 pieces of feedback were received via Commonplace, 324 completed surveys were received, 65 people attended webinars and 20+ pieces of feedback were received though email and via stakeholders. The feedback was overwhelmingly positive with 78% of respondents advising they felt well informed about the regeneration proposals. 80% of respondents felt positive or somewhat positive about the design of new homes, with similar scores (87%, 91% and 82%, respectively) in respect of proposals to increase the mix of shops and improve the market, improve the quality of green spaces and increase the health and well-being benefits and improve the way local people get around Church Street.
- 4.33 Many comments were positive about the design and materials but there was some concern as to the height and density of buildings. Some respondents were concerned

as to the effect of the height on natural light received by outside space nearby and that it was not in-keeping with the character of other buildings in the area. There was support for balconies and communal green space. Emphasis was placed on the need for rooms big enough for young families, with adequate storage space and light and ventilation. Noise, security and fire safety were also a concern, with many responses mentioning a need for double-glazed windows and fire safety measures. Concerns were raised regarding the upkeep and maintenance of communal areas and amenities. A number of comments mentioned the need for better accessibility (including lifts) and suggested better lighting, CCTV and fewer narrow alleyways to address security concerns. There was also an emphasis on the need for affordable housing and enough social housing.

4.34 The consultation identified the following main feedback themes, which were used to further develop and inform the design:

- (a) Concern regarding the proposed building heights and the impact on daylight reaching Church Street;
- (b) Concern as to the size of the new library and a request for more detail on the size and proposed uses;
- (c) A request to see the proposals within the context of the existing local townscape;
- (d) Positive feedback about how the designs for the homes, market and green spaces were seen as modern and an improvement on Church Street.

4.35 Engagement activities as part of Stage 2 of the Pre-Planning Consultation included webinars, a 3D design walk-through video available online, continuing to use Commonplace for residents and stakeholders to give feedback and consultation pop-up exhibitions, which were visited by over 400 people who either left feedback or took away a copy of the consultation booklet. Business and trader drop-in sessions to provide traders with an update on the proposed impact to their pitches during construction work and how the regeneration team was seeking to minimise disruption were also held.

4.36 The Stage 2 consultation presented back to the community the feedback from Stage 1 and further developed the designs. The consultation explained how the design team had responded to the main feedback themes:

- (a) It was acknowledged that, in order to build this volume of homes, the buildings would be considerably taller than existing buildings. To keep overshadowing to a minimum, the designs are stepped back along the facades and corners of buildings are configured so that lower storeys face Church Street, minimising overshadowing of public spaces. The configuration of the buildings also ensures that frequently used public spaces still benefit from sunlight. Sunlight studies were undertaken (and presented during consultation) and evidenced that the proposed new building designs will lead to more sunlight on Church Street than now, given the creation of the new garden street within the Order Land. Whilst there is some more overshadowing in the late morning, to remove this, the buildings would need to be lowered to six storeys which would be a significant

reduction in affordable homes and would limit the ability to create new open spaces and improvements to the market and library;

- (b) The current library comprises 613 sqm usable internal space and a 200 sqm garden. The new library is proposed to comprise 355 sqm of usable internal space and 192 sqm of garden area but would improve on existing facilities and offer the opportunity for a range of new events and activities. As a result of further engagement with community groups, the design was amended to include a mezzanine, increasing overall usable floorspace to 495 sqm with designated areas for different uses (e.g. childrens', events, adults);
- (c) Further modelling was presented showing the Regeneration Scheme in the local context, including a walk-through video to help residents understand the design in more detail;
- (d) As part of the Stage 2 Consultation, the Council was able to respond in more detail on issues such as materials and interiors. In respect of the latter, it confirmed every flat will have a generous balcony or terrace, good insulation and triple-glazed windows to provide low-energy homes and increased living areas. The number of dual aspect units was increased and balconies will be designed to shield clutter and provide privacy. Two lifts in each housing block will ensure that homes are accessible. In response to concerns about safety and security, the designs were further developed to remove blind corners and increase overlooking of external spaces to allow passive surveillance. All areas were proposed to be well-lit at night, with seating and hard landscaping designed to reduce opportunities for lingering and anti-social behaviour whilst soft landscaping would be used to ensure sight lines are not blocked.

4.37 The Stage 2 consultation garnered 1,310 pieces of feedback via the Commonplace website, 268 completed surveys, 465 visitors to the Commonplace website and 15+ pieces of feedback were received through email and via stakeholders. 80% of respondents were either positive or somewhat positive across all design proposals.

4.38 As with Stage 1, there was some criticism of the height of the proposed buildings but other comments were positive about the 'stepping back' approach. There was support for the design and materials proposed and the use of balconies and approach to windows (e.g. dual aspect). A returning theme remained the need for larger rooms with more storage space. There was also some concern regarding the construction impacts of the proposals and the impact of new residents on the local character of the area.

4.39 The overwhelming concern regarding the shops and markets was the tidiness and cleanliness of the latter and some suggestions were made as to improvements to amenities for traders such as storage spaces, refrigeration etc. Several respondents also suggested improved facilities on Church Street, such as toilets, parking for traders and measures to guard against anti-social behaviour. There was some concern as to the impact of the proposals on existing shops and whether rents would increase.

4.40 On the issue of health and well-being, the retention of the library on Church Street was supported but disappointment was expressed as to its reduced size. Support remained for green spaces and biodiversity and several comments observed that they would like

to see facilities for young people, such as play facilities and youth clubs. Anti-social behaviour and security remained a focus for residents. As to getting around, there was a mixed response with some feeling that car owners/car parking provision had been overlooked at the expense of cyclists and other respondents feeling that greater provision for cyclists – such as cycle lanes- was needed.

- 4.41 72% of respondents gave the highest scores as to how informed they felt about the proposals. After Stage 2 of the consultation, the Council prepared to notify the community on the formal submission of the planning application, which, if approved, would be the means by which to deliver the Regeneration Scheme.
- 4.42 In addition to formal consultation exercises, since 2016, the Council has used a vacant shop unit on the Order Land as an onsite office and one-stop shop for residents (the 'Regeneration Base') to get more information about the Regeneration Scheme. It is staffed by members of various teams, including housing services, business development, employment coaches and leasehold advisers. Residents are able to ask questions, pick up information and be directed to appropriate services. The Regeneration Base is open Monday-Friday between 9am and 5pm. During the Covid-19 lockdown, the service was available via online appointments before the office re-opened in the second quarter of 2021.
- 4.43 In furtherance of the Council's vision for the Regeneration Scheme to create a place that people love to work in, live and visit, it has also developed a significant social regeneration programme including the following support and services: (i) a Neighbourhood Keepers programme which funds local providers of health, wellbeing and environmental activities in the community at no cost to users (examples include over 50s-Zuma, a chess group and projects to encourage the community to garden together); (ii) employment coaches to support local people with essential skills to find ways into employment; and (iii) an ongoing business support programme to engage local business.
- 4.44 As to the support offered to tenants and leaseholders, since 2018 PPCR has been the Independent Tenant Liaison Adviser for the Estate, which provides confidential independent support and advice to residents whose homes are affected by the Regeneration Scheme. PPCR was chosen by Church Street residents and encourages residents to attend Council consultation events and provide feedback. It has held regular drop-in sessions both onsite and online, hosted community outreach activities and distributed posters and flyers raising awareness of the services they offer. Between 2020 – July 2021 (the period of the design update and pre-planning consultation), PPCR carried out over 200 doorknock sessions, held over 30 drop-ins and dealt with over 170 queries. PPCR remains engaged.
- 4.45 The approach to consultation and engagement has also been tailored to support people who have additional needs or require specific information. Detailed housing needs assessments have helped identify support needs and bespoke plans have been developed to support residents during their move away from the Order Land, including preparing their new homes with adaptations. The Council has liaised with the Church Street branch of Age UK who have assisted with promoting consultation activities and has sought the advice of the WCC Able Staff Network to facilitate exhibitions for people with autism and residents with visual and hearing impairments. Translation services

are also available and several of the team members speak Bengali and Arabic, being the most popular languages in the Ward after English. For those unable or unwilling to engage in person, the online engagement tool, Commonplace has been used to garner feedback, as recommended by the Mayor's Good Practice Guide to Regeneration (2018) (the "Guide"). Coffee and cake drop-ins have been held at 35-37 Church Street and the local school and the Church Street Youth Voice Forum has been established in partnership with the Marylebone Bangladesh Society and the Young Westminster Foundation to work with young people to make sure their opinions are heard across the programme. The Forum is made up of around 20 local young people aged 12-24 with the intention of creating a sounding board for both design development and social regeneration initiatives across the Regeneration Scheme.

- 4.46 As is clear from the feedback received, people feel both informed as to the proposals and there are high levels of approval in respect of the design. Apart from a small number of residents and stakeholders who have specific concerns about certain aspects of the design, the community has been shown to be largely supportive. The above evidences how the Council has listened to the community and responded to feedback in order to shape the Regeneration Scheme. It is considered that, at all stages of consultation, the Guide, in particular the principles of 'full and transparent consultation and involvement' and 'better homes for local people' have been adhered to. As noted by the GLA in its Stage 1 response, the Statement of Community Involvement submitted with the application for Planning Permission demonstrated that the consultation strategy employed has been extensive and transparent.
- 4.47 Following a change in the Council's political leadership, the Council launched its new Fairer Westminster strategy in October 2022, which sets out how the Council will work with the local community to support them and tackle inequality. In accordance with the same, a ballot was held between 28 November – 21 December 2022 as to whether there was support for the proposals to redevelop the Estate. All secure tenants, resident leaseholders and temporary accommodation tenants within the Estate (who have lived in the area for over a year) (including Kennett House residents) were eligible to vote. In total there were 352 eligible voters, being a 56% turnout. 73.1% voted 'yes' and 29.9% voted 'no'. The ballot was widely promoted over a 13 week period with ten weekly information drop-ins, four sessions held by PPCR and ballot information sessions held virtually. As part of the twelve dedicated landlord and tenant sessions, residents were taken through the proposals and their questions were answered. A number of one-on-one appointments were held for vulnerable residents and those requiring additional support.
- 4.48 A further round of consultation was also held with library staff and friends of the Church Street Library between June – November 2022 in respect of changes to the library's design to increase its size by incorporating two adjacent retail units. This change was supported by stakeholders and incorporated into the detailed component of the application underlying the scheme now subject to a resolution to grant the Planning Permission.
- 4.49 Engagement continues with residents and businesses within the Estate. The Council is in the process of establishing a Church Street Residents Group to bring local residents and stakeholders together to ensure they remain informed, updated and can work alongside the Council to deliver the CPO Scheme. The group will give residents

a platform to share ideas and raise any concerns with the Council. It is proposed that the group will be chaired by PPCR and, at present, 11 residents from across the Estate have expressed an interest in joining, with 6 attending a preliminary meeting. The terms of reference and structure of the group are currently being drafted with all participants.

- 4.50 Residents of the Estate have also been invited to participate in the appointment of the Council's joint venture partner to bring forward the CPO Scheme at the Order Land. Nominated residents will be asked to help the Council select the potential bidder as part of the negotiation process and the Council will look to them to assist with evaluating the prospective bidders' social value proposals. This process will continue until January 2024.

Phasing/Relocation and Rehousing

- 4.51 As above, as part of the 2019 Options Consultation, the Council presented a set of key pledges that would underpin any option taken forward. The first was a guaranteed right of return for all secure tenants and resident leaseholders. This commitment safeguarded a new home on the Estate for such residents in the event of a redevelopment option being taken forward.
- 4.52 Prior to any scenario appraisals, the tenure make-up of the Order Land was 98 council homes and 47 leasehold properties. To date:
- (a) All secure Council tenants and their families have moved from the Order Land (either temporarily or permanently);
 - (b) Of the total who have moved, 48 households have signalled they want to return to the CPO Scheme;
 - (c) 50 households have chosen to permanently move to another home in Westminster;
 - (d) 4 resident leasehold households have temporarily moved and expressed a wish to return to a new home in the CPO Scheme;
 - (e) It is expected that one further resident leaseholder will be supported to return to a new home in the CPO Scheme.
- 4.53 To fulfil the Council's commitment to enable a right of return for both secure tenants and resident leaseholders, the Council's rehousing strategy is underpinned with two bespoke policies: Policy for Tenants in Housing Renewal Areas 2019 and Policy for Leaseholders in Housing Renewal Areas 2018. The Council has a dedicated re-housing team, responsible for carrying out a thorough housing needs assessment and supporting each household with their temporary or permanent move from the Order Land. All secure council tenants are provided the highest bidding priority on the Council's choice based lettings system in respect of alternative accommodation. This means that if they identify a suitable alternative property they are likely to be successful when bidding. The re-housing team will also identify potential properties, ahead of them becoming available, and arrange viewings with tenants.

Council's Secure Tenants

- 4.54 Under the Council's policy secure tenants are entitled to a home loss payment, to compensate them for having to move at a time which is not of their choosing and a disturbance payment, to cover the reasonable costs of moving. Council tenants will have the option to move into one of the homes comprised in the CPO Scheme but will need to move into another social home in Westminster for a temporary period until the properties have been completed.
- 4.55 If tenants do not want to move into one of the new homes, they can: (i) move to another social home in Westminster; or (ii) have a high priority to buy any of the new intermediate homes that are for sale in the housing renewal area. Any new social homes will be of a size that is needed, of the same tenant type and offered at a rent set using the standard formula (per the bed size) accepted for the relevant fiscal year.

Leaseholders

- 4.56 In addition to the statutory home loss compensation, the Council has also consulted on and produced a leaseholder policy to support all resident leaseholders impacted by the renewal. Throughout 2017 and into 2018 widespread consultation on the policy took place across the borough.
- 4.57 Following this consultation, the Policy for Leaseholders in Housing Renewal Areas was updated with its key features including;
- (a) **An equity loan will be offered**, where the leaseholder is buying one of the new homes directly from any developer. The Council provides an interest free loan to bridge the gap between the leaseholder's contribution and the price of the new property.
 - (b) **Shared equity will be offered**, where the leaseholder is buying one of the new homes directly from the Council. The Council bridges the gap between the leaseholder's contribution and the price of the new property, by having a share in the equity of the home.
 - (c) **Buy one of the new homes on a shared ownership basis**, shared ownership is different to buying with an equity loan or on a shared equity basis as the leaseholder only part owns the property, rather than them being the full legal owner and rent is paid on the proportion that is not owned.
 - (d) **Buy one of the new homes outright**, Leaseholders can buy one of the new homes outright, if they want to and can afford to. There is no obligation on them to buy in this way, even if they can afford to. If this option is chosen they can buy a property of any size.
 - (e) **Buy another leasehold property in the housing renewal area**, Leaseholders may prefer to buy another property of the same value as their current home in the local area i.e. one that is not part of the redevelopment programme, if available. Where this is possible, assistance will be provided from the Council

to help them find one. In some cases, the Council may be able to sell them property from its own vacant housing stock.

- (f) **Become a social or an intermediate tenant in the housing renewal area**, in some cases leaseholders may be able to remain in the local area by becoming a social or an intermediate tenant. This option will only be offered in special circumstances, such as where none of the other home ownership options are suitable or where leaseholders want to become tenants due to having health problems for example. Where it is agreed leaseholders will receive 75% of the market value of their property, rather than 100%, to reflect the cost to the Council of the loss of a social or intermediate unit.
- (g) **Receive help and support to move away from the housing renewal area**, Practical help and support will be available for leaseholders, where needed, that want to move to another part of Westminster or elsewhere. This can include help to find a property or with the whole process of buying. In some cases the Council may be able to sell them a property in Westminster from its own vacant housing stock. An equity loan or shared equity might be offered to buy another property close to the housing renewal area, in some limited circumstances.

Commercial Operators

- 4.58 Due to the limited re-provision of commercial floorspace within the CPO Scheme, no businesses comprised within the Order Land will be offered a right to return.
- 4.59 In respect of those occupiers that are occupying under Protected Tenancies, the Council has appointed Savills to lead negotiations with affected businesses to purchase their interests by agreement. Qualifying occupiers will be entitled to compensation for any losses or costs reasonably incurred as a result of the compulsory purchase. Basic and occupier's loss payments will also be available, as appropriate.
- 4.60 The Council is developing a more formal Business Relocation Strategy ("BRS") to record and finalise its approach to the acquisition of commercial interests comprised within the Order Land and the engagement, advice and assistance given to occupiers of commercial interests to relocate from the Order Land to an alternative location. It seeks to identify measures that are/will be put in place to help minimise the impacts of the Order on affected businesses and the community they serve.
- 4.61 At the end of 2018, the Council appointed Tree Shepherd, a charity to work with businesses within the Estate to develop their respective business models to successfully manage the transition away from the Estate and ensure that their businesses are sustainable in their new locations. At a meeting of the Business Forum on 19 February 2018, Tree Shepherd invited businesses to sign up for free business training workshops, one-to-one confidential advice, support with local opportunities and measures to help build resilient local trade networks. Businesses were invited to sign-up to sessions held at 382-386 Edgware Road in the morning, afternoon and evening on 22 January 2019 (how to grow your business), 28 February (how to protect your business and help it grow), 3 April (accounting and financial planning with smart technology) and 21 May 2019 (generating more sales via social media). However, the businesses within the Order Land (and the Estate) expressed no interest in engaging

with the services provided. Accordingly, Tree Shepherd's contract came to an end and was not renewed.

- 4.62 Since the termination of Tree Shepherd's appointment, the Regeneration Team has continued to liaise with affected businesses to understand their particular circumstances and, where relevant, ensure that relocation proposals seek to meet their ongoing needs and accommodation requirements. Once the Regeneration Team has an understanding of a businesses' preference, it conducts searches on a monthly basis of suitable, available premises within Westminster's administrative area and distributes the particulars to affected businesses. Those businesses then have a one-month period in which to consider the alternative premises until it is placed on the open market. Priority is afforded to those occupying under Protected Tenancies.
- 4.63 In accordance with the BRS, the Council will continue to maintain a dialogue with affected businesses, produce details of current alternative sites, meet with those business willing to engage in order to discuss the CPO Scheme, compensation and answer their queries and, should the Order be confirmed, work with businesses to ensure that the acquisition of their interest will allow sufficient time for them to plan and organise relocation so as to minimise disruption to trade.

Market Traders

- 4.64 Although the Church Street Market does not form part of the Order Land, the Council is conscious that it is a valuable source of affordable food, clothing, employment and social interaction that will be affected by the CPO Scheme. As such, the Council is adopting policies to minimise the impact of the regeneration on the trading and storage abilities of the market stallholders.
- 4.65 A number of market traders currently use Broadley Street Car Park (under Blackwater House) for storage. The Council proposes to re-provide this storage via the acquisition of the Church Street Car Park, located on Site B until new market storage is delivered pursuant to the CPO Scheme.
- 4.66 The Council has produced the Church Street Market Impacts and Risk Assessment ("CSMIRA") to consider options for market traders during the redevelopment works and to ensure that the market can continue to operate as close to full capacity as possible whilst the regeneration of the surrounding area takes place.
- 4.67 The recommendations of the CSMIRA will allow stallholders to continue trading for as long as possible with trading suspensions only coming into effect for Saturday traders directly impacted by the phased public realm works. Weekday traders may be affected by heavy works or delivery of heavy plant machinery, in which case they may be relocated for a temporary period to Site B (within the wider Estate) or to the north kerb of the Order Land. Traders that need to be moved temporarily will be provided with as much advanced notice as possible of their proposed pitch number and market inspectors will be able to assist with relocations. Any traders unable to operate due to pitch suspensions will have their pitch fees waived for that period.
- 4.68 The noise of the works will be controlled via planning condition to ensure traders are not disrupted. The market will continue to be governed by the City of Westminster Act

1999, and as such, licence holders' rights and conditions will remain the same. The Council and the Church Street Regeneration Team will continue to inform, engage and update market traders as plans for the regeneration progress. Traders temporarily relocated for the purposes of undertaking the public realm works will be able to return to their pitch number, albeit the pitch maybe in a slightly different location.

- 4.69 An information leaflet was issued to traders in October 2021 to outline how the Council proposes to minimise disruption of building works, per the measures set out above.

Purpose of the Order

- 4.70 The purpose of the Order is to enable the implementation of the CPO Scheme which, in the opinion of the Council, will meet its planning and regeneration objectives within a realistic timescale. Without it, the Council has no certainty that development will come forward, which would mean that the economic, social and environmental benefits that come from redevelopment of the Order Land (and the wider benefits associated with the proposed regeneration of the Estate pursuant to the Regeneration Scheme, which the Order would unlock) would not be realised.
- 4.71 The Order Land is home to a cohesive community, including many householders and businesses who have lived there for a number of years and are established in the area. However, the building stock is ageing and in need of significant improvement. It currently provides relatively poor-quality housing, amenity space and best use is not being made of the public realm. The Renewal Strategy outlined how some of Westminster's housing estates face challenges as a result of high concentrations of social housing that does not meet modern living standards and is expensive to maintain; disproportionate levels of overcrowding; health problems; poor levels of numeracy and literacy that contribute to low levels of employment and economic activity and higher perceptions of anti-social behaviour. The Order Land is characterised by many of these problems.
- 4.72 The Order Land forms part of the Church Street Housing Renewal Area. City Plan Policy 6 acknowledges that the area has the potential to make efficient use of land to deliver a significant uplift in high quality homes that meet local needs. It also provides opportunities to link to further job growth in Westminster, particularly the Central Activities Zone (CAZ), to the community in Church Street/Edgware Road. In accordance with such policy imperatives, the regeneration of the Order Land presents the opportunity to improve quality of life for existing residents, deliver enhanced community uses, improve the public realm and enhance accessibility, connectivity and safety.
- 4.73 The CPO Scheme aims to reduce inequality by providing new homes of varying tenures and size, to high build and environmental standards, a proportion of which will be wheelchair accessible. It will deliver much-needed affordable housing (allowing all existing residents to return to the Order Land) in a highly accessible location. The improvements to the public realm will create a legible and accessible mixed-use neighbourhood with pedestrian links that will better integrate the Order Land into the surrounding street network. As to the Church Street Library, its re-provision and enhancement will ensure that it better serves the diverse needs of the community, whilst contributing to the vitality of the area with its commercial frontage. In addition,

the CPO Scheme also proposes improved facilities for the Church Street Market, including a new layout and storage facilities for traders. As such, the proposals retain and enhance a key local retail resource for both local people, as well as those from surrounding areas, exploiting the Order Land's accessibility.

- 4.74 The CPO Scheme will also deliver wider benefits to the community from increased investment e.g. new construction jobs and the increase in local spend resulting from the increased density. It is considered that the regeneration of the wider Estate, which also forms part of the Council's vision, will build on the benefits associated with the CPO Scheme. In this respect, the CPO Scheme will act as a catalyst for further development in the vicinity.
- 4.75 The Council is satisfied that: (i) all of the Order Land is required to deliver the CPO Scheme; and (ii) the social, economic and environmental benefits of the CPO Scheme are not capable of being realised otherwise than as part of a comprehensive redevelopment of the Order Land. As there is no certainty that all of the interests can be acquired by negotiation, the Order is needed to enable the full, unified ownership so the CPO Scheme can proceed.
- 4.76 Compulsory purchase will enable redevelopment to take place in a timely fashion in order to derive the wider public benefits the CPO Scheme will secure and the realisation of the Council's objectives. The Order is therefore, not only necessary, but justified in the public interest.
- 4.77 If compulsory purchase is not achieved then the redevelopment of the Order Land (and, as a consequence, the wider Estate) will not come forward, leaving the existing problems of the Order Land unaddressed. This would thwart the much-needed redevelopment of the area and the benefits to the local community would not be realised. The additional residential units (including an uplift in affordable housing), improved library offer and enhancements to public realm would be lost.

5 DESCRIPTION OF THE PROPOSALS FOR THE USE AND DEVELOPMENT OF THE LAND AND PLANNING POSITION

- 5.1 The CPO Scheme has been sensitively designed in response to detailed analysis of the Order Land, the local context, the wishes of local residents, stakeholders and the Council's objective of delivering high-quality development.
- 5.2 As detailed in Section 4, the CPO Scheme has been developed in close consultation with residents of the Order Land, the Estate, the local planning authority and other key stakeholders. Throughout the consultation process, the support aired for the CPO Scheme was widespread with feedback from consultation exercises used to inform the evolving design.
- 5.3 On 28 March 2023, the local planning authority resolved to grant the Planning Permission subject to the completion of a planning obligation under section 106 of the Act:
- (a) in full for the Order Land for the:

"demolition of all buildings on Site A and erection of mixed-use buildings providing ground floor flexible commercial use floorspace (use class E), a library (use class F1), market storage (use class B8), residential units (use class C3), landscaped amenity space, car parking, motorcycle parking, cycling parking, market infrastructure and associated works"

(b) in outline for Sites B and C and Church Street Market (i.e. the remainder of the Estate) for:

"the demolition of buildings and structures. The erection of buildings and works of alteration to existing buildings for the following uses: (a) flexible commercial floorspace (Use Class E); (b) community floorspace (Use Class F1 and F2); (c) public houses, wine bars, or drinking establishments floorspace (Use Class sui generis); (d) market storage (Use Class B8); and (e) residential floorspace (Use Class C3). Ancillary residential facilities; associated infrastructure; streets, open spaces, landscaping and public realm; car, motorcycle and bicycle parking spaces and delivery/servicing spaces; new pedestrian and vehicular access; market infrastructure and ancillary facilities; utilities and other works incidental to the proposed development."

- 5.4 Pursuant to the detailed element of the Planning Permission, the CPO Scheme proposes up to 428 Class C3 residential units, 605 sqm (GIA) of Community Floorspace (Use Class F1), 341 sqm (GIA) of Commercial Floorspace (Use Class E), 1,124 sqm of Market Storage Floorspace (Use Class B8), 2,603 sqm of plant & service and 896 sqm of parking.
- 5.5 The detailed component of the scheme now subject to a resolution to grant the Planning Permission is the means by which it is proposed to deliver the CPO Scheme on the Order Land. It comprises the demolition of all buildings and the erection of two buildings separated by a new pedestrian street (known as New Street Gardens) that runs northwest to southeast through the Order Land. The east building (Block A1) is a perimeter block development around a central landscaped garden. The building ranges from ten floors at the southern corner of the Order Land to fifteen floors at the eastern corner of the Order Land. The basement level houses parking for people with disabilities (22 spaces) and cycle car parking (827 long stay and 23 short stay), together with mechanical plant. Vehicular access to the basement level is proposed via a car lift on the Penfold Street frontage. Access to cycle parking is via cores to the floors above.
- 5.6 The west building (Block A2) has an L-shaped plan that wraps around a new podium level landscaped garden to the rear of the existing buildings on Edgware Road. The building height is proposed to range from eight floors on the Edgware Road/Church Street corner of the Order Land to twelve floors where the new building meets the New Street Gardens being a publicly accessible pedestrianised space.
- 5.7 Both blocks include commercial floorspace (Use Class E) at ground floor on the Church Street frontage. Block A1 would also include a new library (Use Class F), to replace the library to be demolished on Site B (within the Estate), at ground and mezzanine level and accessed via Church Street. Block A2 also includes storage and parking for market traders at ground floor level (Use Class B8), beneath the new landscaped garden. The ground floor frontages to Broadley Street, Penfold Street and New Street

Gardens would have residential units. The outline component comprises the subsequent phases of the Regeneration Scheme on land within the Estate but outside of the Order Land.

- 5.8 The landscaped garden area within Block A1 is to be divided, with the majority comprising a secure communal area for residents of Block A1, including soft landscaping and play equipment for residents. The ground floor residential units backing onto the communal area would benefit from private outdoor terraces. The second area is located to the rear of the proposed library and would be publicly accessible. It would also include seating and community gardening areas.
- 5.9 The podium level landscape garden within Block A2 would be for the exclusive use of residents in that Block, including soft landscaping and play equipment for residents. Again, those residential units backing onto this garden area will also have private outdoor terraces abutting the communal garden.
- 5.10 New Street Gardens will be pedestrianised and publicly accessible. It will comprise large areas of soft landscaping and play equipment, with those residential units that front onto New Street Gardens benefitting from private outdoor terraces.
- 5.11 The floor areas of the proposed uses and the residential units within the Order Land are set out below, together with relevant existing floor areas:

	Existing GIA (sqm)	Proposed GIA (sqm)	+/- (sqm)
Storage (Use Class B8)	2,736	1,124	-1612
Residential Affordable (Use Class C3)	9,336	18,833	+9,497
Residential Private (Use Class C3)	4,131	18,281	+14,150
Residential Total (Use Class C3)	13,467	37,114	+23,647
Commercial, Business and Service (Use Class E)	2,494	341	-2,153
Betting Shop (Use Class Sui Generis)	159	0	-159
Public House (Use Class Sui Generis)	174	0	-174
Library (Use Class F)	0	605	+605
Ancillary Parking	0	896	+896

Plant and Service Space	0	2,603	+2,603
Total	19,030	42,683	+23,653

5.12 The outline component of the scheme now subject to a resolution to grant the Planning Permission is the means by which it is proposed to deliver the wider Regeneration Scheme to include, in addition to the Order Land, Sites B and C (i.e. the Estate).

6 PLANNING POLICY

6.1 Any decision about whether to confirm an order made under section 226(1)(a) will be made on its own merits, however paragraph 106 of the Guidance makes clear what factors the Secretary of State is likely to take into account in deciding whether to confirm an Order, including whether the purpose for which the land is being acquired fits in with the adopted Local Plan for the area or, where no such up to date Local Plan exists, with the draft Local Plan and the National Planning Policy Framework.

6.2 The statutory development plan for the Order Land comprises:

- (a) Westminster's City Plan 2019-2040 adopted by the Council on 21 April 2021; and
- (b) The London Plan 2021.

6.3 As noted above, the local planning authority resolved to grant the Planning Permission on 28 March 2023. The application was determined having regard to the development plan. A resolution to grant was made on the basis that the development proposed was, on balance, in accordance with the development plan as a whole. There have been no material changes to the development plan or other material considerations since that very recent resolution and as such, the grant is considered to demonstrate that the Order does fit in with the adopted Local Plan for the area. Nonetheless, for the sake of completeness, the below sets out the development plan policies considered to be relevant to the proposed development and which the proposed development supports.

London Plan

6.4 The Mayor's London Plan (2021) is the Spatial Development Strategy for Greater London. It sets out an integrated social, economic and environmental framework for the future development of London.

6.5 The London Plan (2021) places a greater emphasis on the need to genuinely optimise residential land uses in order to provide the high quality and well- designed homes that London needs. This is set out across Chapter 3, in which the overarching principle is expressed as good growth through design. Policy H1 of the London Plan seeks to increase the supply in the capital and sets Westminster a 10 year housing target of 9,850 homes.

6.6 Within the London Plan (2021), Policy H8 concerns the loss of existing housing and

estate redevelopment. This policy provides that existing housing, if lost, should be replaced by new housing at existing or higher densities with at least an equivalent level of overall floorspace. It cautions that, before considering the demolition and replacement of affordable homes, consideration should be given to alternative options. The potential benefits of demolition and rebuilding of homes should be balanced against wider social and environmental impacts and consideration should be given to the availability of Mayoral funding. Paragraph 4.8.2 of the supporting text to Policy H8 states that the Guide provides detailed guidance to assessing appropriate approaches to estate regeneration.

- 6.7 The Guide sets out the following key principles: (i) like for like replacement of existing affordable housing floorspace; (ii) increase in affordable housing; (iii) full rights of return for social housing tenants; (iv) fair deal for leaseholders/freeholders; and (v) full and transparent consultation and involvement.
- 6.8 The London Plan (2021) comprises policies founded on the “golden thread” principle of ‘good growth’. For housing delivery this means guiding London’s development in a way that allows it to meet the needs of its growing population on existing brownfield sites. A key component of this is the support of mixed-use developments that are able to distribute the success of London’s economy, whilst delivering more housing and creating stronger communities. In terms of location, the London Plan emphasizes the importance of making best use of London’s land – by using brownfield sites and intensifying the density and use of existing places. Policy H1 reinforces this, noting that boroughs should seek to optimise the potential for housing delivery on all suitable and available brownfield sites. As Policy GG1 recognises, the creation of mixed-use developments contributes towards achieving good growth and inclusive communities.
- 6.9 Policy H4 sets London's strategic target for 50% of all new homes to be genuinely affordable with major developments required to provide affordable housing in line with Policy H5's 'threshold approach.' Policy H8 requires developments that include the demolition and replacement of affordable housing to provide the maximum possible amount of affordable housing to be determined through viability testing. As to tenure, Policy H10 expects residential schemes to comprise a range of unit sizes to meet local housing need, deliver mixed neighbourhoods and to ensure that sites reach their potential without adding to the pressure on existing housing stock.
- 6.10 Strategic policies D1, D4 and D8 set out a series of overarching design principles for major development in London, including in relation to tall buildings, design quality and urban design. Policies D4 and D6 stipulate that residential developments should be of high quality design, comprising comfortable and functional layouts that are fit for purpose and which do not differentiate between tenures. New development is also required to have regard to its context and make a positive contribution to local character within its neighbourhood.
- 6.11 Policy D5 on Inclusive Design states that proposals should have regard for specific groups, being designed to include spaces for social interaction and community. In addition, at least 10% of dwellings comprised in a development should be wheelchair user dwellings with the remainder accessible and adaptable.
- 6.12 Policy S1 considers that social infrastructure should be high quality and inclusive to

London's diverse communities by meeting local or strategic need. Developments which result in the loss of social infrastructure should only be permitted where: there is a realistic re-provision that continues to serve the needs of the community; or, the loss is part of a wider public service transformation, with fit for purpose infrastructure and facilities to meet the future needs of the community.

- 6.13 Policy HC7 notes that planning decisions should protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute towards wider policy objectives for town centres. Planning applications that propose the loss of public houses with such value should be refused unless marketing evidence demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.
- 6.14 Policy D9 concerns the London-wide strategy on tall buildings. It states that it is up to the borough to define both what constitutes a tall building and which areas are appropriate for them – though they should be located in areas that have capacity for such development. Tall buildings are required to be of an exemplary standard and address daylight, sunlight penetration and temperature conditions around the buildings and the neighbourhood must be carefully considered and not compromise the comfort and enjoyment of open spaces around the building(s).
- 6.15 Policy S4 requires developments to include suitable provision of play and recreation (of at least 10sqm per child) that is safely accessible, designed so that they are overlooked and integrated into the neighbourhood.
- 6.16 Policy G5 of the London Plan states that major development should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 6.17 Policy E9 supports London's markets in their full variety, including street markets and measures to improve their management, offer and contribution to local identity. The reasoned justification notes the valuable economic, social and cultural role they play in meeting Londoners' needs, in addition to contributing to the character of high streets and providing opportunities to start-ups.
- 6.18 In accordance with the NPPF, Policy HC1 requires development proposal affecting heritage assets and their settings to conserve their significance and avoid harm.
- 6.19 As to transport and accessibility, Policy T1 requires that development makes the most effective use of land, reflecting its connectivity and accessibility by public transport and walking and cycling routes. Policy T6 encourages car-free development.
- 6.20 Finally, Policy GG6 necessitates development to improve energy efficiency and support the move towards a low carbon economy, contributing towards London becoming a zero-carbon city by 2050. Policy SI2 requires all major development to be net zero carbon (Policy SI 7 adopts the same approach in respect of waste).
- 6.21 Policy SD8 states that District Centres should focus on the consolidation of a viable range of functions.

City Plan

- 6.22 The Council adopted the Westminster City Plan 2019 – 2040 on 21 April 2021. It sets out the vision for the City of Westminster up to and beyond 2040, putting in place a policy framework that would deliver this vision. Many of its policies are therefore of high relevance to the CPO Scheme.
- 6.23 The City Plan recognises the challenges faced by the Council to accommodate the growth required alongside the need to preserve a good quality of life for its residents and visitors. In this respect, the Plan's vision anticipates 'economic regeneration and housing developments in Church Street will bring a renewed vitality. A vitality that will resonate throughout the City.'
- 6.24 Spatial Strategy Policy 1 continues the theme of growth, and considers that supporting intensification and optimizing densities in high quality new developments that showcase the best of modern architecture and integrate with their surroundings to make the most efficient use of the land, is the best way to achieve this. In particular, the policy requires the delivery of 20,685 homes with 35% of new homes as affordable. The policy cites the renewal of the Church Street Housing Renewal Area as a key way in which growth will be delivered.
- 6.25 As a Housing Renewal Area, the expectation is for additional housing, improved connections and public realm, and the provision of new retail and community facilities. Policy 6 cites the Church Street/Edgware Road Housing Renewal Area as a Spatial Development Priority, which will deliver: (i) at least 2,000 new high-quality homes; (ii) at least 350 new jobs; (iii) community facilities; (iv) new green infrastructure and public realm improvements; (v) improved mobility; (vi) innovative and high-quality design to ensure the most efficient use of land, including tall buildings; and (vii) enhancements to the Church Street/Edgware Road District Centre, including the market.
- 6.26 Policy 8 within the City Plan 2019-2040 is geared towards encouraging more housing, optimising housing delivery sites and finding new innovative ways to deliver more homes. Through this approach, there is an expectation that the London Plan derived target of 20,685 homes across the plan period (2019-2040) will be exceeded. Policy 8 states that this will be achieved through, inter alia, optimising site densities and planning positively for tall buildings in certain locations.
- 6.27 The Council wishes to increase the amount of affordable homes delivered in Westminster. In carrying this through, City Plan Policy 9 protects affordable housing and will resist any development that would result in its net loss. Accordingly, all residential proposals are to provide a minimum of 35% of the total residential units as affordable on-site, subject to meeting certain conditions. City Plan Policy 10 requires a mix of units in terms of size, type and tenure to secure mixed and inclusive communities. The policy requires that 25% of all new homes are to be family sized and limits studio flats to no more than 10% of new homes.
- 6.28 As to design, City Plan Policy 12 provides that all new homes should be well- designed, energy efficient and create a high-quality living environment. It reiterates the accessibility requirements of the London Plan Policy D5 and requires all new homes to meet or exceed Nationally Described Space Standards.

- 6.29 As to amenity, City Plan Policy 7 requires development to be 'neighbourly'. This includes protecting and enhancing amenity by preventing unacceptable impacts in terms of daylight and sunlight, sense of enclosure, overshadowing, privacy and overlooking. The policy notes in paragraph 7.1 that the borough is already densely populated and detrimental impacts on existing occupiers must be avoided, with developments expected to make a positive contribution to the quality and function of the local area. It does however also note that a balanced approach should be taken to design solutions that consider the specific location and context as well as the merits of each proposal including the wider benefits a scheme can deliver against impacts on the surrounding area. Policy 33 also seeks to ensure that quality of life and well-being is not adversely affected by harmful pollutants and other negative impacts (e.g. light, noise and vibration) on the environment.
- 6.30 The Order Land is within the Church Street District Centre. Policy 14 of the City Plan states that proposals within the area will provide a mix of commercial and community uses to meet the needs of residents. Class E is the priority use at ground floor throughout the town centre hierarchy, supported by complementary town centre uses that increase consumer dwell time and enhance town centre vitality and viability. Policy 13 and Policy 6 of the City Plan also acknowledge the creation of jobs and provision of community facilities as spatial priorities.
- 6.31 City Plan Policy 16 protects public houses except where there is no reasonable prospect of its continued use as a public house, as evidenced by reasonable marketing for a period of 18 months.
- 6.32 City Plan Policy 17 resists the loss of existing community facilities and floorspace unless the loss or relocation is in the interests of reconfiguring, consolidating or upgrading services. The policy encourages new social and community uses where there is an identified or future need.
- 6.33 City Plan Policy 29 requires that delivery and services infrastructure should be incorporated into developments to allow them to operate and be maintained efficiently with minimal disruption. The parking standards contained within City Plan Policy 27 align with the standards prescribed by the London Plan.
- 6.34 As to open space, City Plan Policy 34 requires major development to provide new or improved public open space and space for children's play. Opportunities to enhance existing habitats and create new habitats should be maximized and trees of value ought to be protected. As to public realm, City Plan Policy 43 requires developments to incorporate well-designed public realm that is safe, attractive and accessible to all and to improve connectivity of the network of open space and public realm in the City.
- 6.35 City Plan policies 38 – 45 underline the fundamental role of new development to enhance its local context by positively responding to local characteristics and local features. In particular, City Plan Policy 38 requires new development to incorporate exemplary standards of high quality, sustainable and inclusive urban design and architecture, reduce emissions and ensure a reduction, reuse or recycling of resources. Development is required to positively contribute to Westminster's townscape and streetscape having regard to the character and appearance of the existing area and to create inclusive and accessible spaces that reduce the opportunity for crime and

promotes health and well-being. Principles of sustainable design should be incorporated into development proposals. Policy 39 requires development to conserve features that contribute positively to the setting of conservation areas and to take opportunities to enhance their settings, wherever possible.

- 6.36 City Plan Policy 42 recognises that the general principles to be applied to building heights (i.e. that buildings are proportionate to role, function and location, of exceptional architectural quality, avoid unacceptable impacts etc) in Housing Renewal Areas. It is acknowledged that appropriate height must be balanced against the wider public benefits the scheme is able to viably deliver. With regards to the Church Street Housing Renewal Area, the policy notes that there are opportunities for tall buildings (being buildings of more than 30 metres or, those that are more than twice the prevailing context height (whichever is lower)), where they contribute to the creation of a place with a strong and enhanced character. In particular, the tallest elements ought to be on the main east-west route and the commercial focus for the area; and are delivered in the heart of the regeneration scheme as part of a comprehensive approach.
- 6.37 The following are material considerations:

National Policy

- 6.38 The National Planning Policy Framework 2021 ("NPPF") (at paragraph 2) reiterates the statutory requirement to determine planning applications in accordance with the development plan and, therefore, the development plan is the starting point for determining the acceptability of the development. There is a presumption in favour of sustainable development which the NPPF identifies as having three overarching objectives, namely economic, social and environmental objectives (paragraph 8).
- 6.39 In relation to the economic objective, the NPPF explains that to help build a strong responsive and competitive economy, 'sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity, and by identifying and coordinating the provision of infrastructure' (paragraph 8a).
- 6.40 In relation to the social objective, the NPPF encourages the planning system to 'support strong, vibrant and healthy communities, by....fostering well- designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being' (paragraph 8b).
- 6.41 The NPPF's overarching environmental objective is to 'protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy' (paragraph 8c).
- 6.42 Chapter 5 of the NPPF promotes increases and improvements in the quantity, quality and variety of housing, with paragraph 60 noting the Government's support for schemes that significantly boost the supply of housing, including affordable housing. Paragraph 62 provides that dwellings should be delivered in a variety of sizes, types

and tenures to meet the broad needs of different groups in the community.

- 6.43 As regards design, Chapter 12 of the NPPF states that achieving well- designed places is a key purpose of the planning system. In addition, paragraph 130 cites functionality, attractiveness and responsiveness to local context as important principles in the design of developments and highlights that developments should promote accessibility.
- 6.44 Paragraph 86 of the NPPF notes that planning policies should retain and enhance existing markets and, where appropriate, re-introduce or create new ones.
- 6.45 Chapter 8 of the NPPF promotes the creation of healthy and safe communities. This is expressed in paragraph 98, which emphasizes the importance of creating high quality open space where people can meet and interact. Paragraph 98 of the NPPF builds on this, promoting the importance of a high quality network of open spaces which provide opportunities for physical activity and social interaction.
- 6.46 Paragraph 93 of the NPPF highlights the planning system's role in supplying the social, recreation and cultural facilities and services that are crucial in meeting community needs. The importance of safeguarding existing valued facilities and the need to ensure residential economic and community uses are integrated within new developments is noted. Paired with paragraph 98, paragraph 179 encourages the incorporation of biodiversity improvements in and around development, especially where this can secure measurable net gains. Paragraphs 98 and 99 also resist the loss of recreation spaces and require new developments to incorporate both private and public open spaces for use by occupants.
- 6.47 Section 9 of the NPPF sets out the importance of developments encouraging and facilitating an increase in the use of and access to sustainable transport modes.
- 6.48 Chapter 16 sets out the approach to be adopted to conserving and enhancing the historic environment. Paragraph 203 states that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Fairer Westminster Delivery Plan 2023-24

- 6.49 The Council's Fairer Westminster Delivery Plan sets out the Council's vision for building a city that supports all of its communities. In particular, to deliver:
- (a) Fairer communities to reduce inequalities at every turn;
 - (b) Fairer housing to ensure that the housing needs of all are met and that homes are well managed, environmentally sound and, most importantly, genuinely affordable;
 - (c) Fairer economy by catering for and supporting businesses;
 - (d) Fairer environment by tackling the climate emergency and become a net zero council by 2030 and a net zero city by 2040; and

- (e) Fairer Council by ensuring that residents are at the heart of all decision-making and listening to their needs.

Local Planning Authority's Determination

- 6.50 In recommending the grant of Planning Permission, officers reached the view that it will create a high quality neighbourhood for both existing and new residents on the relevant part of Church Street. Officers noted that the Estate is well located and the proposal is a high-density form of development designed to meet the objectives of national, regional and local planning policies, which seek to intensify the use of land and optimise the delivery of new homes including affordable homes. In respect of the detailed proposals for the Order Land, officers concluded that the proposals would represent a positive redevelopment with an exceptional quality of design.
- 6.51 The local planning authority ("LPA") considered the package of public benefits to be significant in terms of the City Plan's strategic aims and policies. Although the LPA's conclusions were in respect of the Regeneration Scheme, the LPA noted specific benefits referable to the CPO Scheme, namely:
- (a) a considerable uplift in residential accommodation, with the Order Land delivering an increase in 145 to 248 units;
 - (b) a 50% increase in affordable housing (units) on the Order Land;
 - (c) a new purpose built library;
 - (d) purpose built market infrastructure;
 - (e) new public realm including New Street Gardens and playspace.
- 6.52 Whilst a small degree of harm was identified as a result of the CPO Scheme to the setting of the row of non-designated traditionally scaled buildings which front Edgware Road, and which run parallel with the western extent of the Order Land, the good design and high-quality architecture were considered to mitigate this.
- 6.53 It was acknowledged that creating a high-density development at the Order Land would result in negative impacts on adjacent occupiers in terms of losses of light, sunlight, overshadowing and sense of enclosure, contrary to City Plan policies 7, 33 and 38C of the City Plan. This was considered to result largely due to the low-rise nature of the surrounding properties. However, officers concluded that this harm has to be balanced with the significant public benefits of redevelopment. In particular, boosting significantly the supply of market and affordable housing and optimising housing delivery, which could not be delivered as part of a lower density scheme. The Council considers that key to the significant benefits attributable to the hybrid planning application are those that will result from the redevelopment of the Order Land, per paragraph 6.51 above. Further, the redevelopment of the Order Land will serve to unlock the wider benefits the local planning authority noted would result from the regeneration of the wider Estate in accordance with the outline component of the Planning Permission.
- 6.54 The loss of retail floorspace was noted by the LPA (and found to be contrary to Policy

14 of the City Plan). However, siting an enhanced library in a prominent retail frontage within the Order Land was considered to maintain activity and vitality whilst providing a purpose built community facility that better meets the need of the community it serves.

- 6.55 It was considered that, on balance, the Regeneration Scheme (of which the CPO Scheme forms part) is in accordance with the Development Plan read as a whole. The proposed development was also considered to meet the policy objectives of the NPPF that seek to significantly boost the supply of homes, address the needs of groups with specific housing requirements and the provision of on-site affordable housing. The proposed enhancements to the public realm and Church Street Market were considered to promote greening and assist with the rejuvenation of the area.
- 6.56 Further, it is considered that the renewal of the Order Land will meet the Council's Fairer Westminster outcomes, including:
- (a) Fairer Communities and Housing – the CPO Scheme will provide high quality and affordable homes delivering a range of tenures beneficial to local residents and relieving overcrowding, making Westminster a more equitable place. The condition and energy efficiency of housing stock will be much improved. The CPO Scheme will enhance the quantity and quality of public realm in the area, allowing opportunities for physical activity and the library provision provides learning opportunities for children and adults alike;
 - (b) Fairer Environment – the CPO Scheme proposes an ambitious sustainability strategy and will provide access to high quality green spaces and community facilities. The enhanced connectivity ensures that residents, workers and visitors are encouraged to travel through Westminster in more active and sustainable ways; and
 - (c) Fairer Council – the CPO Scheme has been designed with the Church Street community in mind and includes a transparent engagement process with residents at its centre.

7 JUSTIFICATION FOR COMPULSORY PURCHASE

- 7.1 Having regard to paragraph 106 of the Guidance, the Council notes that, where a compulsory purchase order is promoted pursuant to section 226(1)(a) of the Act, the Secretary of State will take into account the following issues:
- (a) Whether the purpose for which the Order Land is being acquired fits with the adopted local plan for the area or, where no such up to date local plan exists, with the draft local plan and NPPF;
 - (b) The extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area;
 - (c) Whether the purpose for which the Order Land is to be acquired could reasonably be achieved by any other means within a reasonable timeframe;

- (d) The potential financial viability of the CPO Scheme (this is addressed in section 7(iv)).

7.2 The Guidance also requires the Council to have regard to the following when considering making a compulsory purchase order:

- (a) That the purposes for which the Order is made sufficiently justify interfering with the human rights of those with an interest in the land affected;
- (b) Whether it is likely that the CPO Scheme will be blocked by any physical or legal impediments to implementation.

7.3 These are each considered below in relation to the Order and the CPO Scheme.

(i) Whether the purpose for which the Order Land is being acquired fits with the adopted planning framework or, where no up-to-date local plan exists, with the draft local plan and NPPF:

7.4 The renewal of the Order Land is supported in land use terms. The development would optimise housing delivery and help the City Council meet its ten year housing target set out in the London Plan (2021). For the reasons set out below, the acquisition of the Order Land to facilitate the delivery of the CPO Scheme would on balance, be in accordance with the Development Plan when read as a whole and the NPPF.

7.5 The Council refers to the following key aspects of the CPO Scheme by reference to the planning framework:

Principle of Development

7.6 The regeneration of Estate (of which the Order Land forms part) is promoted at a strategic and local level. In particular:

- (a) it has been identified as a strategic opportunity since 2010 (per the Housing Renewal Strategy);
- (b) Policy 1 of the City Plan cites the Estate as a Housing Renewal Area key to the way in which the target for 22,685 homes over the plan period will be delivered;
- (c) Policy 6 of the City Plan cites the Estate as a spatial development priority with the scope (together with the wider Housing Renewal Area) to deliver approximately 2,000 high-quality new homes, new jobs linking further employment opportunities in the CAZ to the local community, enhanced community facilities, new green infrastructure and high-quality design to make the most effective use of land, including tall buildings;
- (d) Policy 8 of the City Plan aims to exceed the provision of 20,685 new homes across the plan period and acknowledges the uplift of homes will be achieved by optimising site densities in Housing Renewal Areas and incorporating tall buildings, where appropriate.

- 7.7 Accordingly, coupled with the increased demand for new homes and jobs, the policy framework clearly supports the need to optimise development on sustainable brownfield sites such as the Order Land.
- 7.8 The supporting text of the relevant City Plan Policy 6 states that Church Street has the potential to create a significant uplift in the number of high-quality homes to meet local needs and will also deliver wider benefits for the community. The reasoned justification acknowledges that regeneration presents the opportunity to improve quality of life for existing residents, increasing the offer of public open space and resulting in environmental improvements that will enhance accessibility and mobility. Further, policies H1 and GG2 of the London Plan recognise the need to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations (such as the Order Land) that are well-connected.
- 7.9 Turning to the NPPF, paragraph 119 states that planning decisions should promote the effective use of land in meeting housing needs and other uses in a way which makes effective use of previously developed or brownfield land. It is clear that the regeneration and effective use of the Order Land, being previously developed land, will contribute to sustainable development in accordance with the NPPF (paragraph 8). Regeneration and redevelopment will create a place that is well-designed, safe and accessible, with open spaces that support the well-being of surrounding communities (per paragraph 8b). Further, the regeneration of the Order Land and the application of development plan policies in the planning application determination process will ensure the protection and enhancement of the natural, built and historic environment (per paragraph 8c).
- 7.10 In accordance with the development plan, national policy imperatives and emerging policy, the CPO Scheme would act as a catalyst for further transformational investment in the local area. Relevant to the proposals is policy H8 of the London Plan. As detailed in Section 4 above, and in accordance with the reasoned justification to policy H8, there has been significant engagement and consultation with local residents, the wider community, businesses, market traders, amenity groups and other stakeholders since October 2017 as to the development proposals for the Estate. The Priorities and Options Consultations (and, most recently, the pre-planning consultation) have put these interest groups at the heart of the Estate's regeneration.
- 7.11 Ultimately, less disruptive alternatives (Options 1 and 2) scored less favourably when those consulted were asked whether such options met or exceeded the needs of the community. In particular, it was considered that such options failed to provide a real opportunity for future improvement and development of the area. The potential benefits of demolition and rebuilding of homes (namely, the uplift in affordable housing, enhanced and improved community uses and the creation of improved open space) are considered to clearly outweigh any social and environmental impacts. In addition, retrofitting the existing blocks would not be capable of delivering the same density and housing provision required.
- 7.12 Although it is noted that support for Option 3 and Option 4 was relatively evenly split, ultimately, it was considered that Option 3 is the only one that addresses the issues affecting the Estate (see Section 4 above) in a timely manner.

- 7.13 The proposals for the CPO Scheme have taken into account (and fully comply with) the Guide, which acknowledges that more interventionist regeneration can realise significant benefits, including opening up access to a full range of better quality housing of all tenures, improvements across neighbourhoods; new opportunities for training and employment and new community facilities. The ballot undertaken in November/December 2022 was overwhelmingly in favour of the regeneration proposals. Accordingly, the acquisition of the Order Land for the purposes of delivering the CPO Scheme is considered to fully comply with London Plan Policy H8, City Plan policies 1 and 6, and the Guide.
- 7.14 The proposed boost to housing, particularly affordable housing, improvements to the quality of homes, the provision of community facilities and enhanced public realm for residents (as proposed by the CPO Scheme) is strongly supported in principle by national, regional and local policy objectives, and specifically meets the aims of City Plan policy 6.

Housing

- 7.15 The Order Land will deliver 428 new homes, which is an uplift of 283 from the existing 145 units. In terms of habitable rooms, this is a residential uplift of (730) habitable homes, of which 335 (46%) are affordable. As to affordable housing, the Order Land currently has 98 units offered for social rent. The CPO Scheme proposes a net increase of 115 affordable homes (comprising 73 social rented units and 42 intermediate units), whilst also offering the re-provision of existing affordable homes, allowing existing residents the right to return.
- 7.16 Although the proposed use of the Council's compulsory purchase powers is limited to the Order Land (and the analysis in this Statement of Reasons is predicated on the CPO Scheme only), it is acknowledged that the implementation of the CPO Scheme is the first phase of the Council's intended regeneration of the wider Estate. Taken as a whole, the illustrative Masterplan proposes a residential net uplift of 1912 habitable rooms, of which 969 are affordable. This equates to a 51.1% provision as affordable. When expressed in terms of unit numbers, the illustrative masterplan proposes a net increase of 325 affordable homes.
- 7.17 The additional housing to be delivered within the Order Land would 'boost significantly the supply of housing' (per paragraph 59 of the NPPF) and optimize the potential for housing delivery on a suitable and available brownfield site (per London Plan policy H1). It will also serve to unlock the benefits associated with the uplift in affordable housing Estate-wide as part of the wider Regeneration Scheme.
- 7.18 The Order Land will deliver 213 affordable residential units, which would equate to 52.1% of affordable housing by habitable room and 50% when calculated on a unit basis. All social rented units within the Order Land will be replaced as part of the CPO Scheme (indeed, this is the case in respect of the Regeneration Scheme and is proposed for all social rented units comprised in the Estate). As to the significant uplift in affordable housing, the CPO Scheme proposes (in accordance with the Fairer Westminster Strategy) that this will comprise 70% council rent (or social rent), with the 30% intermediate housing comprising housing for London Living Rent. Accordingly, the proposed quantum complies with London Plan policy H8 and City Plan policy 9 and

the proposed tenure split is above the threshold set out in London Plan policy H6 and City Plan policy 9.

- 7.19 By reconfiguring the layout of the existing residential floorspace, the Council is able to deliver an optimised range of homes. As to this, a greater proportion of larger units are proposed to meet the needs of existing residents. In terms of the mix, only three studio flats are proposed within the Order Land. Whilst only 15% of the flats will have 3 bedrooms or more (in comparison to the policy requirement of 25%, per City Plan policy 10), the Council's Affordable Housing Manager has, in this case, accepted 2 bedroom flats as family housing (as is permitted in accordance with the glossary of the City Plan). The CPO Scheme includes 92x2 bedroom flats for 4 people. Taking this into account, it will deliver 25.2% family housing. In any case, given the Order Land's location and accessibility, a higher volume of 1 and 2 bedroom units is appropriate in this location, in accordance with City Plan policy 10.
- 7.20 The CPO Scheme's approach to density has been design-led, optimizing the use of the land in a way that respects the surrounding constraints and land uses in accordance with policy 6 of the City Plan and Section 11 of the NPPF (Making Effective Use of Land). In this regard, the CPO Scheme further accords with City Plan policy 8, which recognizes the need to optimize site densities on Housing Renewal Areas, so as to achieve the borough's 'stepped-up' housing delivery target.
- 7.21 The CPO Scheme will provide high-quality residential living. The detailed component of the scheme now subject to a resolution to grant the Planning Permission demonstrates that all flats will meet the nationally described space standards, the requirements of part F of policy D6 of the London Plan and policy 12 of the City Plan. The vast majority of units (91%) are dual aspect and whilst the CPO Scheme does not comply with new BRE guidelines this is largely due to a change in the way assessments are carried out introduced subsequent to the design for the detailed part of the Planning Permission being finalised. The local planning authority acknowledged in its determination of the Planning Permission that given the Order Land is to be redeveloped at a higher density level to meet policy objectives of boosting significantly the supply of housing and optimising housing delivery, reductions in daylight are to be expected and it will be difficult to achieve 100% compliance. It was considered that there will be benefits to light and airflow and where possible, the design has ensured that those worst affected flats have been arranged so that living areas are located where they will be best located for light and air.
- 7.22 The CPO Scheme (per the detailed component of the scheme now subject to a resolution to grant the Planning Permission) will also provide an uplift of 18,281 sqm of private residential floorspace within the Order Land. It is considered that the mix of tenures will give rise to a healthy and balanced community in accordance with the Council's aspirations for housing growth, per City Plan policies 8 and 10 and paragraph 61 of the NPPF. Further, the proposed buildings have been designed to be tenure-blind in terms of location, facility and appearance in accordance with London Plan policy H8.
- 7.23 Every flat will be provided with private amenity space in accordance with the London Housing Design Guide. In addition, all recessed balconies have single glazed fully openable bi-fold windows to give flexibility to occupants to have a private balcony or

enclosed winter balcony, which can be used all year round. Principles of inclusive design have also been incorporated to ensure that, in accordance with the Mayor's Housing SPD (standard 11) and London Plan policy D7, 10% of all proposed units will be wheelchair user dwellings.

- 7.24 In light of the above, the CPO Scheme would secure a mixed and balanced community at the Order Land in accordance with adopted policy.

Community Uses

- 7.25 In accordance with the aims of policies S1 and S5 of the London Plan and policy 17 of the City Plan, the Council's aim is to ensure that the Order Land continues to provide social and community infrastructure through protection or consolidated upgrades unless there is no demand or the same are available within the wider area.
- 7.26 The Church Street Library is currently inefficiently located in terms of layout and lacks visibility but provides both a dual library and community function for local residents. It measures 828 sqm GIA but contains significant areas of unusable (storage and circulation) space. The usable NIA measures 613 sqm.
- 7.27 The new library, in qualitative terms, is significantly better than the existing offer providing services for children, learning rooms, community space, and ancillary staff facilities in a space that can flex to changing needs and uses. It has been designed following extensive and ongoing consultation with the local community and the Library Group, which ensures a bespoke design for a facility that meets the needs of the local community. The library garden will provide opportunities for recreational use and contribute to the physical and mental well-being of the local community. The library will take up a prominent and highly visible location on Church Street contributing to the mix of uses and activity on the street in accordance with London Plan policy SD6.
- 7.28 Although the CPO Scheme will result in the loss of a public house (Lord High Admiral), the public house is of no architectural or historical significance and is not listed as an Asset of Community Value. Although, contrary to policy 16 of the City Plan no marketing has been undertaken to evidence that there is no real prospect of its continued use, this has been precluded by the pub's continued operation and, in any case, the results of the various consultation exercises have demonstrated that there is no desire amongst residents to retain the pub. It is not considered that the pub has any of the values that policy HC7 of the London Plan seeks to protect. Should a community need for a public house become evident, it is proposed to provide for up to 174 sqm of sui generis floorspace as part of the wider Regeneration Scheme, in accordance with the relevant reserved matters consent.

Commercial and Retail

- 7.29 The Order Land is located within the Church Street District Centre which is known for its range of shops and services for local people. Whilst the scheme now subject to a resolution to grant the Planning Permission proposes a reduction in the amount of Class E floorspace (from 2,494 sqm to 341 sqm), this is in part a result of moving Church Street Library from Site B to the Order Land, which, at 605 sqm comprises the majority of the Church Street retail frontage. In addition, the frontage is reduced

through the provision of New Street Gardens, which provides valuable and enhanced public realm.

- 7.30 The proposals are for the whole of the ground floor facing onto Church Street to be commercial or community uses. The CPO Scheme seeks to provide a flexible and viable Class E use. Although there will be a loss of Class E floorspace within the Order Land, within the spirit of Policy 14 of the City Plan, a mix of community and commercial uses will be provided which, when taken together, will meet residents' day to day shopping needs and more effectively support opportunities for community interaction.
- 7.31 The Class E floorspace presents an active frontage to Church Street and Edgware Road and reinforces the existing adjacent uses in accordance with London Plan policy SD7 and City Plan policy 14. Whilst officers in the determination of the Planning Permission considered the loss of retail floorspace regrettable, it was considered to be compensated for by the re-provision of the library and opportunity for replacement retail as part of the wider Regeneration Scheme.
- 7.32 Finally, the CPO Scheme acknowledges that the Church Street Market is a core asset for the community, providing much-needed goods and services but also a community hub for people to engage. In accordance with London Plan policy E9 and Policy 6 of the City Plan the Church Street Market will be supported and enhanced in order to promote the vitality of the Church Street District Centre. The CPO Scheme proposes measures to improve market storage (with the detailed component of the Planning Permission proposing 1,124 sqm of storage floorspace), welfare facilities and vehicular and pedestrian access to support the continued (and improved) operation of the Market, which is considered a key landmark contributing to the wider character and identity of the Church Street area.

Design

- 7.33 The CPO Scheme presents an opportunity to provide a high-quality design in keeping with that of the existing and emerging developments in the Paddington Basin to the historic context of Marylebone in accordance with London Plan policies D5 and D6, City Plan policies 39 – 46 and Chapter 12 of the NPPF. Although the development is taller than the surrounding context, the elevations respect those on the Edgware Road frontage which vary between 7 – 11 storeys incorporating set-backs and a rhythm of projecting and recessed bays. Although the development is of a significant scale, the quality of design and upscaling of typical characteristics seen across Westminster ensure it is effectively integrated with officers noting its exceptional quality during the determination of the Planning Permission. In accordance with London Plan policies D3 and D4, the design responds to, respects and enhances those architectural features that contribute towards the local character of the area.
- 7.34 The two urban blocks to be delivered as part of the detailed component of the scheme now subject to a resolution to grant the Planning Permission are sympathetic to the local context and the introduction of New Street Gardens helps to extend connections to the wider area. It provides a greater sense of openness, allowing light to be drawn into Church Street. A secure pedestrian route will also be provided within the Order Land as part of the market infrastructure, which will create a positive reciprocal relationship between buildings and the surrounding environment and will increase

footfall, thus generating liveliness and interest among visitors and residents. Access for all will be facilitated to create a development that is inclusive. The design of the ground floor of both blocks seeks to distribute uses in a legible, rational and efficient layout that compliments and reinforces adjacent uses whilst maximising the extent of active frontages. Further, in consultation with the Metropolitan Police Crime Prevention Officer, the layout of the CPO Scheme serves to enhance perceptions of safety and reduce crime and anti-social behaviour.

- 7.35 In terms of amenity, the CPO Scheme will result in significant losses of daylight and sunlight to neighbouring properties in excess of what the BRE recommends. It will also result in an increased sense of enclosure to surrounding properties. These arise both as a result of the increase in bulk of the CPO Scheme and its location adjacent to properties that currently experience a relatively open aspect and are of modest scale with windows at low levels. Overshadowing to surrounding areas of open space and the market will also be experienced. However, the BRE Guide is to be applied flexibly and with an awareness of the Order Land's Central London location. Whilst a conflict with policies 7, 33 and 38 of the City Plan is acknowledged in respect of the development now subject to a resolution to grant the Planning Permission, the LPA considered that such impacts are, on balance, considered acceptable given the Order Land's location and weighed against the benefits of redevelopment.

Conservation

- 7.36 The proposed height and layout of the CPO Scheme would have a wide visual and townscape impact, which would affect heritage assets in the vicinity. The visual impact of the development now subject to a resolution to grant the Planning Permission was assessed pursuant to a Townscape and Visual Impact Assessment from 19 viewpoints. Although the introduction of taller and denser development would be noticeable in certain views, overall, it was considered that, given the existing townscape is varied in terms of height and character, the impact is not a harmful one (as endorsed by the LPA). There would be no harm to designated heritage assets or their settings.
- 7.37 A small degree of harm would result to the setting of the row of non-designated traditionally scaled buildings which front Edgware Road and which run parallel with the western extent of the Order Land. However, even in such views, the high quality architectural quality of the development, including that of the rear facades, would be appreciable so as to mitigate (or compensate) any harm. Further, any such harm is outweighed by the regeneration of the Order Land, which secures its optimum viable use.

Public Realm and Open Space

- 7.38 The existing public realm is sparse and is dominated by vehicles and on-street parking. As such, it comprises primarily hard landscaping and pedestrians are generally restricted to narrow footpaths with limited opportunities to sit or gather. The public realm proposals are based on the creation of a new publicly accessible, pedestrianised space to be known as 'New Street Gardens', with natural surveillance to the same provided by way of the reconfigured Class E use space.
- 7.39 Children's play spaces and landscapes will be distributed both within the private

communal gardens and the publicly accessible New Street Gardens. Although the development comprised within the detailed component of the scheme now subject to a resolution to grant the Planning Permission falls short of the 2,112sqm required by policy (providing 1,774 sqm), the overall quantum proposed as part of the masterplan for the wider Estate exceeds the London Plan requirement and it is considered that the play space that will be delivered in the Order Land is qualitatively better and better suits the needs of residents and the local community than the existing offer. In addition, there is a growing green network throughout the Ward that provides ample space for residents of the CPO Scheme to enjoy.

- 7.40 A further source of open space is provided for residents within the ground level courtyard and library encased within Block A1. This will provide secure communal play and seating, private rear gardens and a public garden attaching to the Church Street Library. A podium level secure communal courtyard is also proposed within Block A2. These secure spaces provide a greater sense of security and privacy whilst providing opportunities for growing, playing and socialising. It is considered that the new open spaces are superior in terms of amenity, usability and ecological value to the existing spaces. In particular, they will maximise existing habitats and create new ones for priority species. Further, the significant amount of urban greening will increase the biodiversity of the Order Land.

Transport and Parking

- 7.41 The Order Land is in a highly sustainable location with a PTAL rating of 6b and future occupants will be able to access key transport facilities, which will result in the reduced need for car-use. In accordance with London Plan policy T1 and Section 9 of the NPPF, the location of the Order Land facilitates access on foot, via safe and convenient routes to the local area and transport nodes.
- 7.42 The introduction of New Street Gardens as a pedestrianised street together with long stay cycle parking (in excess of that required by London Plan policy T5 and consistent with paragraph 104 of the NPPF) will support sustainable travel options by residents, staff and visitors. Cycle provision is also provided for non-residential uses. Vehicular trips are also minimised by including a parcel consolidation centre in proximity to the concierge facility and cores to enable deliveries to a central location, rather than traversing the Order Land.
- 7.43 On-site car parking is removed as part of the CPO Scheme. The detailed component of the scheme now subject to a resolution to grant the Planning Permission proposes car parking for use by disabled residents (22 spaces) in accordance with Policy 27 of the City Plan and London Plan policy T6. The accessible car parking spaces are to be provided within the basement of the Order Land and accessible via 2 car lifts situated on Penfold Street. Such spaces will also provide active provision of electric vehicle charging points. A car club is also proposed to reduce car ownership amongst future occupiers and limit on-street parking stress.

Energy and Sustainability

- 7.44 Sustainability and energy efficiency measures have been incorporated as part of the scheme now subject to a resolution to grant the Planning Permission. A series of

measures have been adopted in accordance with the energy hierarchy – be lean, be clean and be green to maximise sustainability and opportunities for renewable energy. Even though upfront carbon will be relatively high, the design demonstrates a series of reductions in whole life carbon in accordance with London Plan policy S12 to deliver buildings that address fuel poverty and resilience. Across the Order Land, heat pumps and PV panels will result in the lowest carbon option. Efforts will also be made to ensure that a significant proportion of demolition and construction waste is re-used and recycled during construction.

- 7.45 The CPO Scheme has been designed so as to extend the lifetime of buildings and spaces and to respond to the likely risks of climate change. It incorporates measures to mitigate overheating in accordance with City Plan policy 36 and London Plan policy SI3, with self-shading and overhanging balconies and predominantly dual-aspect units maximising passive ventilation.
- 7.46 The public realm has also been designed to promote sustainable drainage and, per policy G5 of the London Plan, include urban greening as a fundamental element of site and building design. This is achieved by including measures such as a large-scale rainwater recycling system, biodiverse green and blue roofs and permeable/porous pavements. Such measures will optimise resource and water efficiency and mitigate the risk of surface water flooding. In addition, the development of the Order Land will prioritise walking and cycling and minimise and manage trips by motorised vehicles. Measures have also been incorporated to enhance biodiversity within the Order Land, with the inclusion of bird and bat boxes and the planting of a significant quantum of trees.
- 7.47 Orientation and site layout, natural ventilation and lighting, thermal mass and solar shading have been optimised having regard to site constraints. Accordingly, the Council is satisfied that the CPO Scheme (to be delivered pursuant to the detailed component of the Planning Permission) will make the fullest contribution to the mitigation of, and adaption to, climate change, energy usage and resource wastage, whilst minimising carbon dioxide emissions in accordance with London Plan policy S12, policies 37 and 38 of the City Plan and the NPPF.
- 7.48 In light of the above, the Council is satisfied that the CPO Scheme accords with the strategic objectives of the development plan and the NPPF. The purposes for which the Order Land is being acquired accords with the adopted planning policy for the area as recognised by the recent resolution to grant the Planning Permission.
- 7.49 Having considered how the redevelopment is to be carried out, in order to ensure delivery, the Council is seeking to exercise powers under section 13 of the 1976 Act for the compulsory purchase of new rights over the Order Land (shown coloured blue on the draft Order Plan at Appendix 2). In particular, crane oversailing rights are sought for the purposes of erecting scaffolding and rights of access to undertake and maintain works. Without these rights, it would not be possible to deliver the CPO Scheme, and therefore the rights have been included in the Order. The Order will therefore enable the regeneration of the Order Land to take place in accordance with a managed programme, providing certainty for land assembly and implementation of the CPO Scheme. Such certainty will contribute towards the achievement of the Council's regeneration objectives for the Order Land, the wider Estate and the Church Street

area as set out in adopted policy.

(ii) The extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area:

Social

- 7.50 A key benefit of the proposed CPO Scheme is that it intensifies the use of land and provides a high density form of development to support additional homes. The CPO Scheme will make best use of an under-utilised site to deliver a vibrant mixed-use and mixed tenure community comprising high-quality housing, an improved community and commercial offer and enhancements to the public realm. The population of Westminster is projected to increase to 298,302 by 2040, representing a growth of 13% on 2020 levels.³ This projected increase is an important consideration for the requirement for the delivery of new housing. In addition, the CPO Scheme will help to meet Westminster's acute need for additional affordable homes, providing 50% (per the scheme now subject to a resolution to grant the Planning Permission) within the Order Land as affordable tenure. This re-balancing of tenures will create a more inclusive and balanced community.
- 7.51 The Order Land is currently characterised by high levels of social and economic exclusion and suffers from overcrowding. The proposed housing is designed to meet current housing standards and incorporate measures to improve quality of living, in addition to providing a greater proportion of larger units to better meet the needs of existing residents. In addition, homes will meet policy requirements for wheelchair user dwellings and (per the scheme now subject to a resolution to grant the Planning Permission) two lifts are proposed in each block within the Order Land to enhance accessibility.
- 7.52 The carefully considered design features of the CPO Scheme will contribute to an overall improvement in the built environment of the area with benefits not only in terms of the buildings themselves but streetscapes and the way in which the CPO Scheme will fit, and connect with, the surrounding areas. The public realm and open spaces will create an attractive, well located and secure area for residents to interact, whilst the large proportion of play space provided at ground level ensure that opportunities for play and social interaction will benefit the wider community. Further, the provision of enhanced library and market facilities will benefit all sections of the community and reconfiguration of commercial uses, in addition to providing natural surveillance over public areas, will bring vitality to the area.
- 7.53 The opportunities presented by the CPO Scheme will create social gains for local people and contribute towards the promotion and improvement of social well-being in the Council's area. The economic and environmental benefits listed below will improve the social well-being of the Council's area, for example creating jobs and creating an attractive environment will also indirectly enhance the social well-being of people in the area.

³ Office for National Statistics, 2020: Sub-National Population Projections (2018)

Economic

- 7.54 Although there is an overall reduction in commercial floorspace and a likely net loss of jobs associated with the CPO Scheme, in line with the Estate Regeneration Statement and BRS, where relevant, existing commercial operators are being supported to find and relocate to new premises in the local area in order to minimise the likelihood that their businesses will be affected by the CPO Scheme.
- 7.55 The CPO Scheme will create a modern, well planned and attractive location that with improved connections and access that will increase footfall for those commercial uses comprised within the Order Land and wider area. This is in addition to the uplift in spend in the local economy that would result from the additional housing comprised within the Order Land, which would be a net benefit of the CPO Scheme.
- 7.56 A number of economic benefits can be directly attributed to the development subject to a resolution to grant the Planning Permission through construction work. As such, the demolition and construction of the CPO Scheme presents opportunities for local employment and upskilling. The capital and revenue expenditure involved in the construction period will also lead to increased output in the local economy.
- 7.57 The heads of terms for the section 106 Planning Agreement associated with the Planning Permission indicate that it will secure an Employment and Skills Plan to promote and facilitate the provision of employment, training and apprenticeship opportunities for local residents during the construction and the end-use periods of the CPO Scheme. The creation of new employment opportunities for residents within the local community, whilst perhaps only temporary, will be beneficial in the context of existing significant income and employment deprivation within the vicinity of the Order Land.
- 7.58 The Council is satisfied that the CPO Scheme would contribute towards the improvement and promotion of the economic well-being of its area.

Environmental

- 7.59 The CPO Scheme will replace aged and poorly designed existing housing with high quality homes that meet London housing standards. Opportunities for renewable energy on-site are maximised by using a central Air Sourced Heat Pump (ASHP), in conjunction with ambient loop and Water Sourced Heat Pumps in each dwelling and PV panels that will result in the lowest carbon option. Each residential unit will have an individual mechanical ventilation with heat recovery system installed, which is a highly efficient approach and architectural measures have been optimised, including orientation and site layout, natural ventilation, lighting, thermal mass and solar shading to elevate living conditions.
- 7.60 The CPO Scheme will be car free with the exception of accessible parking spaces and the introduction of New Street Gardens will emphasise pedestrian and cyclist priority through the Order Land and enhance the connectivity and permeability of the area. The new areas of public and private, communal open/play space will contribute to health and well-being as well as maximising opportunities for amenity, biodiversity, urban greening and providing a number of Sustainable Urban Drainage Systems

(SuDs). Further, the location of active ground floor commercial uses will allow for surveillance of public spaces and pedestrian connections, helping to reduce the perceived risk of crime in the area.

7.61 In summary, the CPO Scheme will maximise the Order Land's potential, enhance public space, provide a mix of uses and will be accessible, legible and sustainable. The social, economic and environmental benefits of the CPO Scheme are substantial.

(iii) Whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means.

7.62 The Council does not consider that there are any suitable alternatives to the Order which would deliver the objectives of the CPO Scheme. The purpose for which the Order Land is proposed to be acquired is in accordance with the adopted planning policy framework and, in addition to its own obvious benefits, will unlock the wider regeneration of the Estate.

7.63 As described in Section 4, the Council has undertaken extensive consultation with the local community in order to develop a sustainable, deliverable regeneration proposal for the Order Land. The CPO Scheme proposed will secure the comprehensive development of the Order Land in accordance with regional and national planning policy, in a manner sympathetic to its location and constraints.

7.64 No alternatives to the Order have been advanced by any other party. Notwithstanding this, the Council considered a number of potential scenarios as part of the 2019 Options Consultation. These were considered either to fail to meet the needs of the community (Options 1 and 2) or, in the case of Option 4, was subject to impediments that would put at risk the timely delivery of much-needed regeneration.

7.65 Whilst the Order Land may be capable of piecemeal development with individual areas of land being brought forward in isolation, the combined approach of using the whole site to secure comprehensive development is considered to yield a significantly better redevelopment outcome for the area. It is considered that the social, economic and environmental benefits of the CPO Scheme detailed above are specific to the Order Land and will only be fully realised if the Order Land is comprehensively developed.

7.66 Given the nature of the Order Land, its history and current status, the Council consider it unlikely that its comprehensive regeneration can be achieved without the Order being made (and confirmed). Confirmation of the Order will enable the regeneration of the Order Land to take place in accordance with a managed programme, providing certainty for land assembly and implementation of the CPO Scheme. Such certainty will contribute towards the achievement of the Council's regeneration objectives for the Order Land, the wider Estate and Church Street area as set out in adopted policy.

7.67 The Council has given careful consideration to the need to include each parcel of land within the Order Land and is satisfied that the Order is necessary and in the public interest and that all of the Order Land is required to facilitate the development.

7.68 The Council considers that the use of compulsory purchase powers is fully justified. The CPO Scheme offers social, economic and environmental benefits as summarised

above which provide a compelling case in the public interest. There is no credible alternative which could deliver a comprehensive scheme on the Order Land to meet the planning policy objectives within a reasonable timeframe.

(iv) The potential financial viability of the CPO Scheme for which the land is being acquired

- 7.69 Paragraph 106 of the Guidance states that an acquiring authority should provide details of sources and timing of funding for both acquiring the Order Land and implementing the CPO Scheme.
- 7.70 Under a CPO, property or rights are acquired at open market value but disregarding any increase (or decrease) in value attributable to the scheme for which the land is acquired. Affected parties may also be entitled to other compensation for loss payments and disturbance depending on circumstances. The Council will be responsible for paying all compensation to landowners, whether as a result of voluntary acquisition or through the CPO process. The cost of securing vacant possession of the Order Land will be met from an approved acquisition budget of £40 million. As of April 2023, £27.6 million has been spent on the vacant possession strategy.
- 7.71 Whilst the Council will meet the costs of acquiring all outstanding interests in the Order Land, it proposes to enter into a partnership with a development partner to deliver the CPO Scheme by way of joint venture and has a shortlist of bidders who are prepared to proceed to the next stage of negotiations. This process is ongoing with negotiations to last throughout 2023. The Council and the joint venture delivery partner will enter into a development agreement to secure the delivery of the CPO Scheme.
- 7.72 A viability appraisal was submitted with the underlying planning application which concludes that, by applying the GLA's sensitivity analysis, the CPO Scheme can be considered viable and therefore deliverable.
- 7.73 In light of the above, funds have been allocated to complete the land acquisition process and the Council is confident, having regard to the interest expressed by potential bidders, that a suitable developer partner with sufficient funding in place will be secured to deliver the CPO Scheme.

(v) That the purposes for which the Order is made sufficiently justify interfering with the human rights of those with an interest in the land affected;

- 7.74 The Human Rights Act 1998 incorporated into domestic law the European Convention on Human Rights (the "Convention"). The Convention includes provisions in the form of Articles, which aim to protect the rights of the individual.
- 7.75 Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way that is incompatible with the Convention. The Guidance provides that a compulsory purchase order should only be made where there is a 'compelling case in the public interest,' and that a public authority pursuing a compulsory purchase order should be sure that the purpose for which it is making that order sufficiently justifies interfering with the human rights of those with an interest in the land affected. In making this assessment, the authority should have regard, in particular, to the provisions of

Article 1 of the First Protocol ('A1P1') and Articles 6 and 8 to the Convention.

- 7.76 Under A1P1, every natural or legal person is entitled to the peaceful enjoyment of his possessions. A1P1 states 'no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.'
- 7.77 Article 6 of the Convention provides that 'in determining his civil rights and obligations...everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.'
- 7.78 Article 8 of the Convention protects private and family life, home and correspondence.
- 7.79 It is acknowledged that the above Convention rights may be at issue in the course of making and leading up to the confirmation or non-confirmation of the Order. As regards A1P1, it is acknowledged that the owners of the land comprised within the Order Land may be deprived of their property if the Order is confirmed and thereafter implemented. However, such interference will be in accordance with the law. The public benefits associated with the Order are set out in this Statement, and the Council is satisfied that the Order will strike a fair balance between the private loss of property rights and the public interest in securing the implementation of the CPO Scheme (which is unlikely to happen in the absence of the Order).
- 7.80 In respect of the right to a proper hearing under Article 6 of the Convention, there has been considerable public consultation and engagement on the proposals to regenerate the Order Land, and numerous opportunities throughout the planning process for interested third parties and those with a proprietary interest in the Order Land to make representations. Leaseholders have also had the opportunity to engage in negotiations for voluntary acquisitions prior to the compulsory purchase process being initiated. In any case, the Council is satisfied that the statutory compulsory purchase process provides for the consideration of objections and, if such objections are duly made, for a public inquiry to be convened into the Order, all of which complies with Article 6. With regard to the Secretary of State's decision, a right of challenge before the High Court exists. In relation to compensation disputes, affected persons have the right to refer any claim for compensation to the Upper Tribunal (Lands Chamber), being an independent body.
- 7.81 As to Article 8, this right is qualified in the case of interference in accordance with the law, where there is a legitimate aim and where it is fair and proportionate in the public interest. The Council is satisfied that their proposed use of compulsory purchase powers for site assembly of the Order Land and the interference caused is justified and falls within these exceptions having regard to the compelling public benefit which would arise from the CPO Scheme.

Equality

- 7.82 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender re-assignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. Pursuant to section 149 of the Equality Act 2010, the Council is subject to the Public Sector Equality

Duty, which requires the Council, when exercising their powers, to have due regard to the need to:

- (a) Eliminate unlawful discrimination, harassment and victimization and other conduct prohibited by the Equality Act 2010;
- (b) Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- (c) Foster good relations between people who share a protected characteristic and those who do not.

7.83 The Council has been mindful of its duty and has had regard to the impact of regeneration of the Order Land and provision of the CPO Scheme on such protected characteristics. A full Equalities Impact Assessment ("EQIA") was commissioned by the Council in support of the planning application that gave rise to the Planning Permission. An update has been commissioned which considers the equality impacts of the redevelopment process including the use of compulsory purchase powers.

7.84 The EQIA considers the potential impacts of the Order on the commercial and residential leaseholders and occupiers who share protected characteristics within the footprint of the Order Land. It also considers the potential equality impacts of the Order for those employees and customers of affected businesses as well as for local residents sharing protected characteristics, together with those impacts realised as a result of the delivery of the CPO Scheme (i.e. construction and operational impacts). The Council has sought to mitigate the impact on those sharing protected characteristics through a range of reasonable and proportionate measures focused on engagement, compensation options and opportunities for relocation (temporary and permanent). The benefits of the redevelopment seek to improve outcomes for the current and future Estate community.

7.85 The EQIA acknowledged that the effects on protected characteristics are being managed through engagement and consultation and the mitigation measures set out in the Policy for Tenants in Housing Renewal Areas, the Policy for Leaseholders in Housing Renewal Areas and the support developed by the Council for businesses included in the Order Land.

7.86 The EQIA concluded that the CPO Scheme will contribute to improvements in the area through a net increase in new housing, new employment opportunities, a new library and improvements to the public realm as well as the benefits of the overall regeneration of the wider Estate. Whilst it acknowledges potential direct negative effects associated with the Order and indirect negative impacts that could occur as a result of bringing forward the CPO Scheme the measures taken by the Council to-date (e.g. the respective policies for tenants and leaseholders in Housing Renewal Areas, approach to engagement, appointment of, and work undertaken by, PPCR and the developing commercial relocation strategy) together with further planned mitigation measures serve to strengthen, secure or enhance the positive beneficial impacts and mitigate for the potential adverse equality impacts associated with the Order. Accordingly, it is considered that, should the Order be made, the equality risks have been addressed and the potential for negative effects minimised such that there is a case for the Order,

if it is required to facilitate the CPO Scheme.

(vi) Whether it is likely that the CPO Scheme will be blocked by any physical or legal impediments to implementation.

- 7.87 The Guidance requires an acquiring authority to show that the scheme underlying the Order is unlikely to be blocked by any physical or legal impediments to implementation. These include the programming of any infrastructure accommodation works or remedial work as may be required and any need for planning permission or other consent or licence.
- 7.88 As noted above, the LPA has resolved to grant the Planning Permission. The Council is also satisfied that adequate funding is or will be available not only to complete the assembly of the Order Land but to implement (and complete) the CPO Scheme. It is content that there are no physical or legal impediments to the implementation of the CPO Scheme and that the CPO Scheme will proceed if the Order is confirmed.

8 SPECIAL CONSIDERATIONS AFFECTING THE ORDER LAND

- 8.1 The Council does not consider that there is any open space comprised within the Order Land for the purposes of section 19 of the Acquisition of Land Act 1981.
- 8.2 The Order Land is located in the Watling Street Archaeological Priority Area (APA) Tier 2. The Estate has been subject to a programme of archaeological desk-based assessment. This is due to the presence and potential survival of Roman and post-Roman remains. Whilst the proposals could cause harm to archaeological remains Historic England advised ahead of the grant of the resolution to grant the Planning Permission that the effect can be managed using a two-stage planning condition to secure, firstly, an evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.
- 8.3 The Order Land includes land used by statutory undertakers for the purposes of its undertaking. This gives such undertakers a separate and additional power to object to the Minister responsible for their undertaking in accordance with section 16 of the 1981 Act. The following statutory undertakers have been identified as having services within the Order Land and which will be affected by the CPO Scheme:
- (a) Cadent Gas Ltd;
 - (b) Environment Agency;
 - (c) Fulcrum Pipelines;
 - (d) GTC;
 - (e) LinesearchbeforeUdig;
 - (f) Openreach;
 - (g) Sky Telecommunications Services;

- (h) Thames Water;
- (i) TfL;
- (j) UPKN;
- (k) Utility Assets;
- (l) Virgin Media;
- (m) Vodafone; and
- (n) Zayo Group UK Ltd

8.4 Detailed diversion and relocation schemes will be agreed with the relevant statutory undertakers and the Council will negotiate with statutory undertakers to resolve any objections.

8.5 Only London Power Networks Plc has an occupational interest within the Order Land, namely the sub-station within Lambourne House. The sub-station will be re-provided and the Council will engage with London Power Networks Plc in this respect.

9 DETAILS OF ANY VIEWS WHICH MAY HAVE BEEN EXPRESSED BY A GOVERNMENT DEPARTMENT ABOUT THE PROPOSED DEVELOPMENT OF THE ORDER LAND

9.1 No views have been expressed by a Government Department about the proposed development of the Order Land.

9.2 The Greater London Authority ("GLA") responded in relation to the application for Planning Permission. The GLA concluded in their Stage 2 Report that:

"The strategic issues raised at consultation stage with respect to the land use, affordable housing, sustainable development and transport have either been addressed or acceptably resolved on balance, and having regard to the details of the application, the matters set out in the committee report and the Council's draft decision, and considering the material planning considerations of strategic importance raised in responses to the public consultation the application is acceptable in strategic planning terms, and there are no sound planning reasons for the Mayor to intervene in this case. It is therefore recommended that Westminster Council is advised to determine the case itself, subject to any action that the Secretary of State may take."

10 STEPS THE AUTHORITY HAS TAKEN TO NEGOTIATE FOR THE ACQUISITION OF THE LAND BY AGREEMENT

10.1 The Council has been seeking to acquire the Order Land through private treaty negotiation to enable delivery of the regeneration proposals. The following details the

Council's efforts to acquire:

Lessees & Tenants on the Order Land

- 10.2 There has been a regeneration office onsite since 2016. This has allowed the Council to help and to support residents affected by the CPO Scheme by keeping them up to date with relevant information and to help their move away from the Order Land either temporarily or permanently; this has either been done via the choice based lettings list, with priority given to a Council tenant affected by any renewal scheme, or by supporting with the negotiation process for leaseholders.

Lessees

- 10.3 As noted earlier, since negotiations with lessees to acquire those leasehold interests began in 2018, the Council have purchased 35 properties with a further 5 owned by WCH. WCH has agreed to transfer the properties back to the Council in line with the vacant possession timeline.
- 10.4 Of the remaining 7 leasehold interests to be acquired 3 are currently under offer to the Council and a further 2 in active negotiations. Efforts continue to be made with the final leaseholder yet to enter into negotiations to sell by agreement.
- 10.5 In accordance with the Guide, residents who have to move off the Order Land are given a full right to a new home on the regenerated Order Land of adequate size for their needs and the same security of tenure.

Tenants

- 10.6 With regard to the 98 council tenants, all tenants have been rehoused. Of these, 48 households expressed a desire to move back into the new development. The remaining 50 households wish to remain in their new homes.
- 10.7 The CPO Scheme will provide the opportunity for returning Council tenants to move back into properties within the Order Land, should they wish. In accordance with the Policy for Tenants in Housing Renewal Areas 2019, all residents have a new home that suits their needs and security of tenure will be as existing.

Commercial Tenants

- 10.8 As noted earlier, disregarding the unit that is to be vacated in August 2023 and that which is occupied by the Regeneration Team, there are currently 11 occupied commercial interests within the Order Land. The Council is actively working with them, to find an alternative location or agree on ending their lease with a payment of compensation.

Summary

- 10.9 The Council has contacted all leaseholders within the Order Land inviting them to enter into negotiations with a view to securing acquisition of their interests by agreement. These negotiations will continue in parallel with the compulsory purchase process.

However, it is unlikely the Council will be able to acquire all the necessary interests by private agreement within a reasonable timescale. Compulsory powers are being sought so that, in the event that the Council is unable to acquire all the necessary interests by private agreement within a reasonable timescale, the CPO Scheme can still proceed.

11 THIRD PARTY RIGHTS AND SECTION 203 OF THE HOUSING AND PLANNING ACT 2016 ("HPA 2016")

- 11.1 The construction of the CPO Scheme will potentially interfere with rights benefitting owners of nearby properties, such as rights of light. The Council has not secured releases from each of the affected third parties.
- 11.2 Section 203 of the HPA Act 2016 provides the powers that will enable the Council to override any claim for an injunction in respect of the rights and covenants adversely interfered with as a result of the development of the CPO Scheme. Under section 203 of HPA 2016 the Council can override easements and other rights in land that has been appropriated for planning purposes.
- 11.3 Once section 203 of the HPA 2016 is exercised, a landowner whose rights or covenants are adversely interfered with as a result of the appropriation of the land will have those rights or covenants converted into a right of compensation and lose the opportunity to stop the infringement of its rights by way of an injunction or seek damages in lieu. Section 204 of the HPA 2016 confirms that compensation is to be calculated on the same basis as compensation payable under sections 7 and 10 of the Compulsory Purchase Act 1965.
- 11.4 The Council will consider in due course the use of its appropriation powers in respect of the CPO Scheme so as to engage the provisions of S203 of the HPA 2016.

12 EXTENT OF SCHEME

- 12.1 Section 6A(1) of the Land Compensation Act 1961 provides that "The no-scheme principle is to be applied when assessing the value of land in order to work out how much compensation should be paid by the acquiring authority for the compulsory acquisition of the land (see rule 2A in section 5)".
- 12.2 For the purposes of section 6A, the "scheme" means the scheme of development underlying the acquisition.
- 12.3 The 'scheme' is that provided for by the Order unless it is shown that the underlying scheme is larger than, but incorporating, the scheme provided for by that instrument.
- 12.4 The Order authorises the compulsory acquisition of land for the purposes of facilitating the regeneration of the Order Land, which forms part of the proposed regeneration of the Estate. The Council confirms that the extent of the scheme to be disregarded for the purposes of assessing compensation is larger, therefore, than development within the red line area of the Order Land and the scheme to be disregarded is the Regeneration Scheme.

13 OTHER INFORMATION WHICH WOULD BE OF INTEREST TO PERSONS AFFECTED BY THE ORDER

13.1 The background documents relating to the Order are listed in Appendix 1 to this Statement. This Statement can be inspected during normal office hours at:

Westminster Council, City Hall, 64 Victoria Street, London SW1E 6QP

or

Church Street Regeneration Base, Church Street, London NW8 8EP.

13.2 All of the documents can also be viewed online from a link on the Westminster City Council home page at <https://www.westminster.gov.uk/>.

13.3 Persons requiring further information regarding the Order should contact Adnan Rahim by post to Westminster City Council, City Hall, 64 Victoria Street, London SW1E 6QP, by phone: 07966 202902 or by email: arahim@westminster.gov.uk

13.4 Owners and occupiers of the Order Land who wish to negotiate a sale or discuss matters of compensation should contact Ian Sellens (in the case of residential interests) or Devrim Zarif (in the case of commercial interests) by post to Church Street Regeneration Base, Church Street, London, NW8 8EP or by email to isellens@westminster.gov.uk or dzarif@westminster.gov.uk, respectively.

14 DETAILS OF ANY RELATED ORDER, APPLICATION OR APPEAL WHICH MAY REQUIRE A COORDINATED DECISION BY THE CONFIRMING MINISTER

14.1 There are no related orders.

15 CONCLUSION

15.1 In summary, the Council considers that the public interest in proceeding with the redevelopment proposals justifies the compulsory acquisition of the interests in the Order Land, which are required if the redevelopment is to proceed.

15.2 The Council is satisfied that there is no planning or financial impediments to the implementation of the proposal and that the CPO Scheme is therefore likely to proceed if the Order is made and confirmed.

15.3 The Council has applied the advice in the Guidance and has set out above its view that the Order meets its requirements. For the reasons set out above, there is considered to be a compelling case in the public interest to proceed with the Order to facilitate the delivery of a significant regeneration project.

15.4 Appropriate steps have been taken to seek to acquire the land and interests needed by agreement, and it is clear that compulsory acquisition is necessary to acquire the Order Land. The Order is being made as a last resort, in accordance with the Council's own policy and the guidelines identified in the Guidance.

15.5 Negotiations are continuing and attempts to acquire as many of the outstanding interests as possible by agreement will continue throughout the CPO process.

Dated:

Debbie Jackson

Executive Director of Growth Planning and Housing

APPENDIX 1

LIST OF EVIDENCE DOCUMENTS

In the event that it becomes necessary to hold a public inquiry into the Order, the Council may refer to the documents listed below. This is not an exhaustive list and the Council may also refer to additional documents in order to address any objections made to the Order. An updated list would be provided to inform any public inquiry.

No	Document Name
1	Guidance on Compulsory purchase process and The Crichel Down Rules" issued by MHCLG.
2	London Plan (2021)
3	Westminster City Council, City Plan Adopted April 2021
4	Westminster Housing Renewal Strategy March 2010
5	Cabinet Member Reports; - 1. 13 December 2021 – Church Street Regeneration (Site A) – "In Principle" Compulsory Purchase Order Resolution 2. TBC – Site A – Church Street Regeneration – Compulsory Purchase Order Resolution
6	Planning Committee Report
7	Equalities Impact Assessment and Equalities Impact Assessment
8	GLA Stage 1 Report
9	GLA Stage 2 Report
10	MHCLG Estate Regeneration Good Practice Guide Parts 1 to 3
11	Mayor of London, Better Homes for Local People, The Mayor's Good Practice Guide to Estate Regeneration

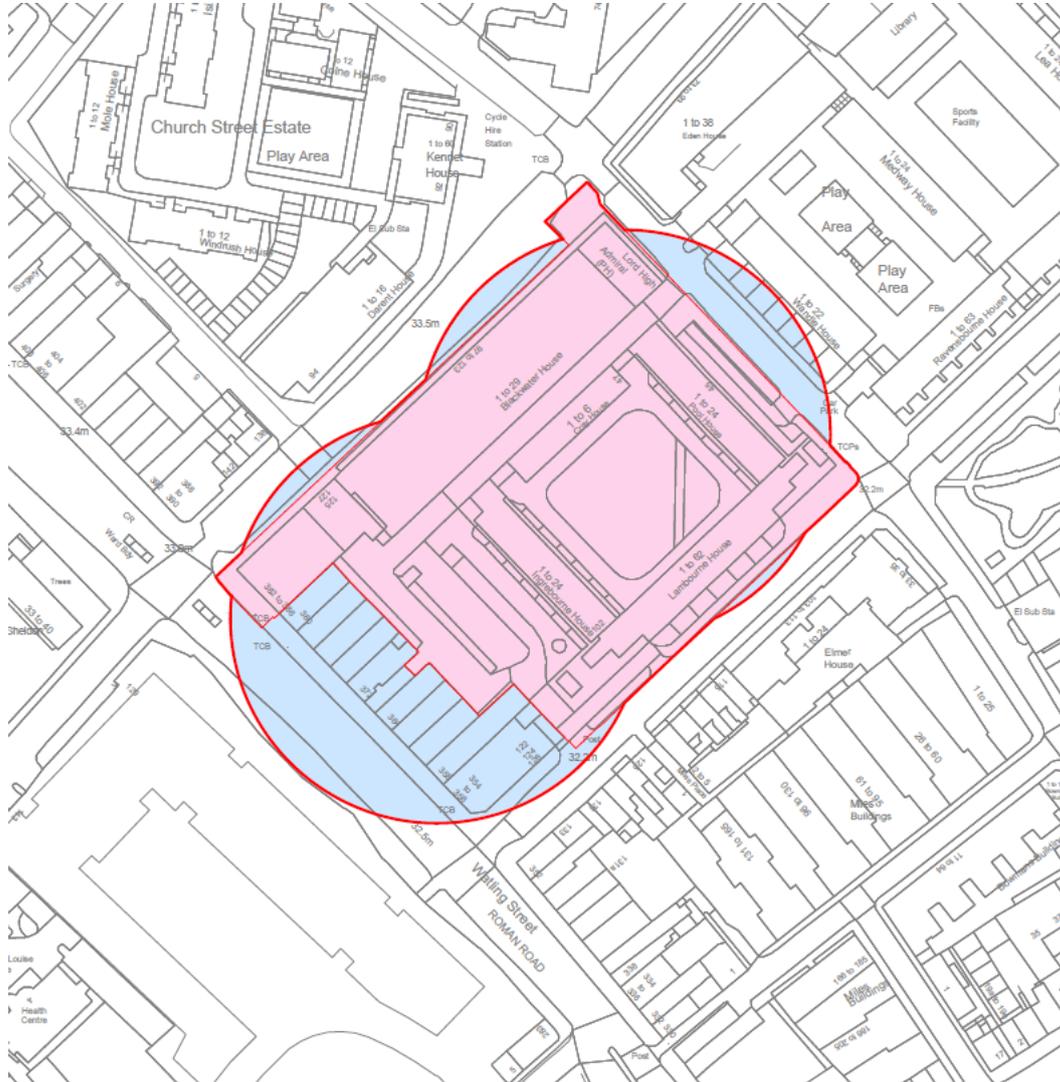
12	Policy for Leaseholders in Housing Renewal Areas August 2018
13	Policy for Tenants in Housing Renewal Areas August 2019

The Council reserve the right to add to and amend this list. In particular other planning application documents may be referenced.

All planning application documents can be found at: <https://idoxpa.westminster.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

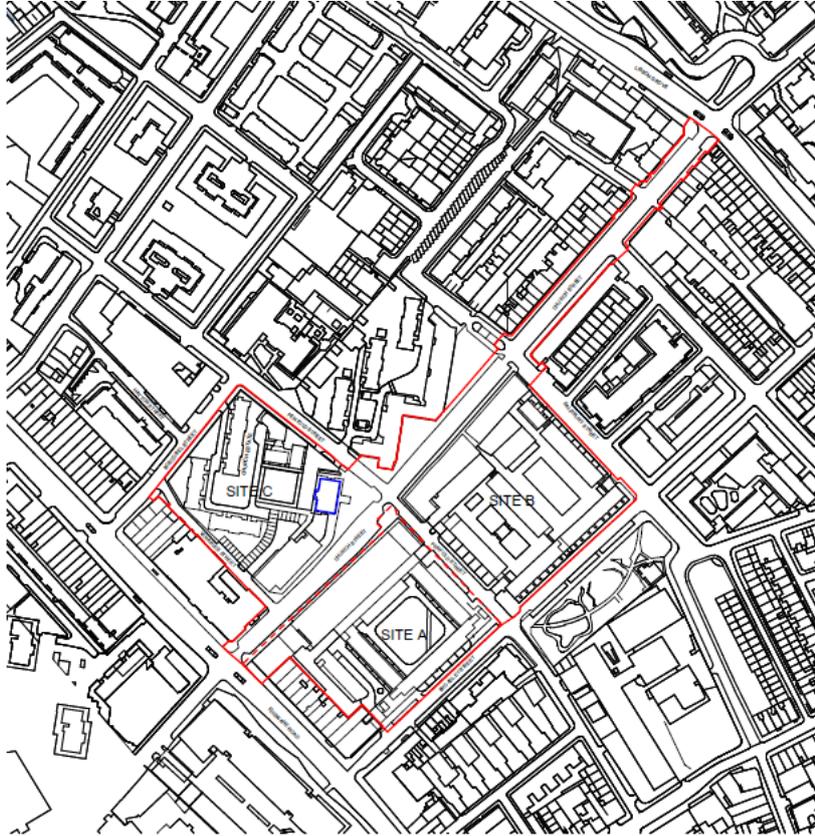
APPENDIX 2

DRAFT ORDER PLAN



APPENDIX 3

ESTATE PLAN



8th June 2023

Quality information

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1. Introduction

1.1 Purpose

AECOM has been commissioned by Westminster City Council ('the Council') to provide an Equality Impact Assessment (EqIA) on the use of the Council's compulsory purchase powers to enable the delivery of Site A of the proposed Church Street Estate Regeneration Scheme.

As a public sector organisation, the Council has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that the Compulsory Purchase Order (CPO) does not lead to unlawful discrimination (direct and indirect), and that it advances equality of opportunity and fosters good relations between those with a protected characteristic¹ and all others.

An EqIA is often used by public sector organisations to demonstrate how this duty has been discharged. It is a systematic assessment of the potential or actual effects of plans, policies, or proposals on groups with protected characteristics. The purpose of this EqIA is to consider how the CPO could contribute to equality impacts on businesses and residents affected.

The Council is currently aiming to acquire current interests in Site A through agreement. However, it is anticipated that the Council will need to use CPO powers to acquire any outstanding interests. This EqIA will support the Council to fulfil its equality duties in relation to the PSED as well as addressing the Council's equalities objectives in using its CPO powers. It provides a consideration of potential direct equality impacts (both negative and positive) associated with the CPO process on affected businesses and residents.

It is the Council's policy that EqIAs are undertaken at the earliest stages of project, and updated as the project develops. As such, a wider regeneration scheme EqIA (referred to throughout this document as 'regeneration scheme EqIA') was initially produced by AECOM in November 2019. Following on from this, the report was updated at the following milestones:

- June 2020 - to reflect changes to the regeneration plans arising from the design update of Site A in March/April 2020;
- October 2021 – for the purposes of the planning application; and
- January 2023 – updates to planning application incorporating amendments to the design of Site A between August and November 2022.

Whilst this CPO EqIA report has been produced as a separate document to the regeneration scheme EqIA, it draws on the same evidence collated including both secondary data sources as well as primary research undertaken between February and April 2018 and subsequent primary research carried out in November 2021. It also refers to the actions and recommendations within the regeneration scheme EqIA which demonstrate how the Council has considered its duties to date with regards to the PSED in relation to the affected interests and wider community.

1.2 Context

The draft Church Street Masterplan was launched in September 2017 and, following an intensive consultation, the final draft was agreed by Cabinet in December 2017.

¹ Protected characteristics are defined under the Equality Act 2010: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and marriage/civil partnership.

In summer 2018, the Council's Development Team engaged a consultant to develop a range of options for the three largest development sites within the Masterplan, Sites A, B & C and Church Street market infrastructure. Four options for these sites and the Market were developed ranging from maintenance to full regeneration.

After a period of public consultation on these options in spring 2019, a Preferred Way Forward (PWF) based on partial redevelopment was approved by the Cabinet Member in May 2019. The PWF was then developed into a partial Outline Business Case in November 2019 and was further developed into a full Outline Business Case for submission at the end of May 2020, which was subject to further consultation with residents, businesses and market traders living and working in Sites A, B & C, the Church Street market infrastructure.

The Council submitted a hybrid planning application comprising a part detailed application covering Site A and a part outline application for the balance of the site comprising the two further phases (Site B and Site C) in November 2021. Since the submission of the planning application, a series of amendments were made to the scheme and submitted in January and February 2023.

Each phase of the development is expected to take between three to five years to complete, however there will be overlap between each phase. With this in mind the total length of the programme is currently estimated to be around thirteen years to deliver the development from commencement on site. Works are currently programmed to begin on Site A in 2023.

1.3 Report structure

Following on from this introduction section, the remainder of the report is structured as follows:

- **Section 2: Methodology** – setting out our approach to collecting evidence and assessment of impacts of the CPO;
- **Section 3: Policy and legislation review** – providing context through relevant national, regional and local policy and legislation associated with equalities and housing and regeneration;
- **Section 4: Summary of planned regeneration** – an overview of the planned regeneration including details of Site A affected interests;
- **Section 5: Consultation and engagement** – a summary of consultation and engagement undertaken to date on the proposed regeneration;
- **Section 6: Equalities baseline** – using secondary data sources such as Census 2021 data to form an understanding of the community residing and working within the area, and a summary of primary research undertaken for the project wide EqIA;
- **Section 7: Assessment of potential equality impacts** – an assessment of indirect and direct impacts and equality effects of Site A CPO; and
- **Section 8: Recommendations and conclusions** – high level recommendations and conclusions for enhancing positive equality impacts and minimising potential negative impacts based on available evidence to date.

2. Methodology

2.1 Introduction

This section sets out the approach to assessing the equality impacts of the CPO of Site A interests to support the delivery of the Church Street Regeneration Scheme (the 'regeneration scheme'). The assessment considers how the CPO could directly impact (both positively and negatively) commercial and residential leaseholders and occupiers who share protected characteristics within the footprint of the proposed development.

It also considers the potential equality impacts of the CPO for those employees and customers of affected businesses as well as for local residents sharing protected characteristics, including direct impacts of loss of use of services available and indirect impacts associated with changes to the public realm immediately surrounding the site.

It also considers the indirect impacts that would be realised as a result of the CPO leading to the successful delivery of the regeneration scheme. This applies to both construction and operational impacts associated with the development.

In considering the direct impacts of the CPO, this EqIA takes a 'worst case scenario' approach, considering the most severe possible outcome that can reasonably be predicted to occur in a given situation.

2.2 Approach overview

The approach for undertaking this EqIA and compiling this report follows a three-stage process:

1. Desk-based review - including relevant national, regional and local policies and legislation, planning application documents, documents associated with the CPO and secondary and primary datasets relating to groups with protected characteristics;
2. Assessment of potential impacts - informed by a consideration of the policy context, consultation responses, equalities baseline data, primary research survey findings; and
3. Recommendations and conclusions.

The approach is based on an understanding of the Equality Act 2010, particularly section 149 regarding the PSED, and supporting technical guidance produced by the Equality and Human Rights Commission (EHRC) as well as AECOM's in-house approach to conducting EqIAs.

2.3 Desk-based review

In addition to a review of recent relevant national, London-wide and local policies and legislation, the desk-based review included the following:

- Review of all relevant and recent documentation regarding the proposed regeneration under key equality themes of housing, business and employment, public realm, transport and accessibility, crime and safety;
- Review of national and local datasets to develop an equalities baseline profile of groups with protected characteristics within and surrounding the regeneration area;

- Review of the primary research undertaken for the project wide EqIA to identify responses associated with the affected interests in Site A.
- Review of recent impact assessments produced, notably the socioeconomic analysis of Church Street Masterplan (2017) and Environmental Impact Assessment (EIA) (2021) and Health Impact Assessment (2021); and
- Review of the consultation activities undertaken to date in relation to the proposals undertaken by the Council to identify any issues of relevance to this EqIA.

2.4 Primary research

For the purpose of the regeneration scheme EqIA, AECOM have undertaken a series of primary research activities. These include a Housing Needs Assessment (HNA), business and market trader surveys and on-street customer surveys. Table 2-1 summarises the approach for each different activity and the response rate achieved.

Table 2-1 Summary of primary research

Type of primary research	Description of research activities	Response rates
Housing Needs Assessment	<p>A Housing Needs Assessment survey was undertaken by the Council with households in Sites A, B & C in Autumn 2018.</p> <p>The survey consisted of interviews undertaken directly with households and collected information on all occupants of the household including age, disability, employment status, ethnicity and other demographics. It also collated data on the type of property and property facilities as well as requirements and preferences for moving out of Church Street. This data has been used to summarise the main issues for residents with regards to those with protected characteristics. The result of this analysis can be found in Section 6 of this report.</p>	<p>In total 299 households responded to the survey (55% response rate).</p> <p>The survey was undertaken with: council tenants, registered provider tenants, homeless households living in temporary accommodation, private tenants, resident leaseholders and non-resident leaseholders.</p>
EqIA business and market trader survey	<p>A list of commercial property interests in the area was collected by AECOM and agreed with Westminster City Council in April 2019. The list consisted of tenants and occupiers within the site of the proposed regeneration. In total, the team of trained market research interviewers attempted to make contact with up to 150 businesses and market stall holders who were deemed to be occupiers.</p> <p>Each business was visited up to three times between the 14th May and 21st May. The survey was either completed or an appointment to conduct the survey at a later</p>	<p>In total 128 business interviews were conducted with occupiers.</p>

date was made to maximise participation in the survey.

EqIA On-street surveys	An on-street survey was prepared for customers of Church Street businesses and the market. Respondents were stopped and asked to participate in the survey on-street by the survey team. This included a mix of customers exiting the businesses in the project area and passers-by. Screening criteria was applied to include only those that visited the project area at least once per week. Anyone responding that they lived in the area bounded by the development was asked to complete the resident survey also. Interviewing took place on Church Street.	In total 100 members of the general public were interviewed on Church Street.
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Once the surveys were completed all datasets were checked, cleaned and coded in the case of open-ended responses. Analysis was undertaken identifying any significant differences in responses by different groups with protected characteristics. A summary of the survey findings are provided in Section 6 of this report.

2.5 Assessment of impacts

An assessment of equality impacts has been undertaken and takes into account the information gathered through the above activities. A judgement has then been made as to how the CPO could contribute to the realisation of the equality impacts for affected groups with protected characteristics as defined in the Equality Act 2010 as:

- **Age:** this refers to persons defined by either a particular age or a range of ages. This can include children (aged under 16), young people (aged 16-25), older people or pensioners (i.e. those aged 65+), the elderly (i.e. those aged 80+);
- **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities. It can also include people who have progressive conditions such as HIV, cancer, or multiple sclerosis (MS) - even where someone is able to carry out day to day activities;
- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- **Marriage and civil partnership:** marriage and civil partnerships can be between a man and a woman or between two people of the same sex. Civil partners must not be treated less favourably than married couples;
- **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;

- **Sex:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.

The assessment considers both disproportionate and differential impacts. A disproportionate equality impact may arise when the impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location. For the purposes of this EqlA, disproportionality can arise in two main ways, either:

- Where an impact is predicted for the area, where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation in the wider local authority district and/or county/region; or
- Where an impact is predicted on a community resource predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for very elderly people).

A differential equality impact is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised sensitivity or vulnerability associated with their protected characteristic, irrespective of the number of people affected.

In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects. The EqlA will consider impacts on groups of people rather than on individuals.

Criteria used to determine differential or disproportionate impacts of the regeneration with respect to equality protected characteristics include:

- People who share a protected characteristic form a disproportionately large number of those adversely affected by the regeneration;
- Amongst the population affected by the regeneration, people who share protected characteristics are particularly vulnerable or sensitive to a possible impact in relation to their possessing a specific protected characteristic;
- The regeneration may either make worsen or improve existing disadvantage (e.g. housing deprivation or economic disadvantage) affecting people who share a protected characteristic;
- People with shared protected characteristics amongst the affected population may not have an equal share in the benefits realised as a result of the regeneration. This can be either due to direct or indirect discrimination or where the groups experience particular barriers to realising such benefits, unless suitable mitigations are proposed to overcome those barriers; and
- The regeneration may worsen existing community cohesion amongst the affected local population or exacerbate conflicts with community cohesion policy objectives.

Although income is not classed as a protected characteristic under the Equality Act 2010, the assessment also considers the additional impact of disproportionate and differential effects on those groups with protected characteristics from low-income households.

2.6 Conclusions

The final section of this report sets out conclusions on the equality impacts of the CPO as well as setting out recommendations for mitigating against adverse impacts and opportunities enhancing equality of opportunity.

3. Policy and legislation context

3.1 Legislation

3.1.1 Equality Act 2010 and the Public Sector Equality Duty

The Equality Act 2010 is a major piece of UK legislation which provides the framework to protect the rights of individuals against unlawful discrimination and to advance equal opportunities for all. Section 149 of the Equality Act sets out the PSED to which Westminster Council, as a public body, is subject in carrying out all its functions, including in the exercise of its CPO powers.

Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

The duty covers the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation as described Section 2.5 of this report.

Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic, but that the other arms (advancing equality and fostering good relations) do not apply.

3.1.2 Compulsory Purchase Order

Compulsory purchase powers are provided to enable acquiring authorities to compulsorily purchase land to carry out a function which Parliament has decided is in the public interest. Anyone who has land acquired is generally entitled to compensation. Local authorities have CPO powers under the Acquisition of Land Act 1981, the Town and Country Planning Act 1990 and other specific Acts of Parliament in order to promote development and regeneration. The CPO process comprises a number of stages, including Resolution, Inquiry, Decision and Compensation stages. The acquiring authority does not have the powers to compulsorily acquire land until the CPO is confirmed by the relevant Government

minister. However, they can acquire by agreement at any time and the general presumption is that they should endeavour to do so before acquiring by compulsion.

The Government guidance on CPO process² includes an explanation of how the PSED should be taken into account. The guidance confirms that in exercising compulsory purchase powers public sector acquiring authorities must have regard to the effect of any differential impacts on groups with protected characteristics.

The guidance acknowledges that an important use of compulsory purchase powers is to help regenerate run-down areas. Although low income is not a protected characteristic in itself, it is not uncommon for people from ethnic minorities, the elderly or people with a disability to be over-represented in low income groups. As part of the PSED, acquiring authorities must have due regard to the need to promote equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This means that the acquiring authority may need to develop a process which promotes equality of opportunity by addressing particular problems that people with certain protected characteristics might have (e.g. making sure that documents are accessible for people with sight problems or learning difficulties and that people have access to advocates or advice).

Through the CPO process the acquiring authority should demonstrate that it has considered alternatives to the scheme underlying the CPO, and whether the public benefits of the scheme could be delivered without interfering with the private rights of existing owners and occupiers, or via a method where the impact would not be so detrimental.

3.2 National Policy

3.2.1 National Planning Policy Framework (July 2021)³

The National Planning Policy Framework (NPPF) was adopted in July 2018 and updated with minor revisions in February 2019 and most recently, July 2021. It consolidates the Government's economic, environmental and social planning policies for England into a single document and describes how it expects these to be applied. The NPPF supersedes the majority of National Planning Policy Guidance and Planning Policy Statements and provides overarching guidance on the Government's development aims.

While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system:

- The economic role contributes to building “a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure”;
- The social role supports strong, vibrant and healthy communities by “providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being”; and
- The environmental role contributes to protecting and enhancing the “natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

² Ministry of Housing, Communities & Local Government (2018). Guidance on Compulsory purchase process and the Cribel Down Rules. Available at: [Compulsory purchase process and the Cribel Down Rules - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/728287/Compulsory_purchase_process_and_the_Cribel_Down_Rules_-_GOV.UK_(www.gov.uk).pdf)

³ Department for Communities and Local Government (2021). National Planning Policy Framework. Available at: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/98714/National_Planning_Policy_Framework.pdf)

The NPPF identifies key principles that local planning authorities should ensure that they consider, including:

- Local strategies to improve health, social and cultural wellbeing for all;
- The delivery of sufficient community and cultural facilities and services to meet local needs;
- The requirement to plan for the needs of different groups within communities.

In Chapter 8, the NPPF outlines how planning policy should help promote healthy communities by taking a positive and collaborative approach to enable development to be brought forward. The NPPF emphasises that planning policies and decisions should aim to create places which offer: opportunities for social interaction and meetings between members of the community through the delivery of mixed-use developments, strong neighbourhood centres and active street frontages; safe and accessible environments which include social, recreational and cultural facilities and services the community needs; and access to high quality open spaces and opportunities for sport and recreation.

3.3 Regional Policy

3.3.1 London Plan (2021)⁴

The London Plan was adopted with amendments in March 2021. The Plan includes strategic and planning policies to encourage equal life chances for all, in recognition of social inequalities existing within the city. A number of policies outlined in the Plan are relevant to the proposed regeneration, including tackling deprivation, promoting equality and enabling different groups to share in the benefits of development, specifically:

- **Policy GG1: Building Strong and Inclusive Communities** which builds on the idea that “good growth is inclusive growth” and requires that planning and development involves community and stakeholder engagement, provides access to good quality community spaces, and supports the creation of a London for all Londoners, where all people including protected characteristic groups (PCGs) are able to move around and enjoy the city’s opportunities with ease, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation;
- **Policy SD 10: Strategic and Local Regeneration** which requires development and regeneration opportunities address inequality and deprivation across London, by allocating Strategic Areas of Regeneration and Local Areas of Regeneration. The policy also highlights the need to work collaboratively with local stakeholders and understand local community’s needs so that regeneration can address the local area’s most urgent issues;
- Policies **HC1 and HC3**, which highlight heritage conservation and the importance of strategic and local views;
- Policies **S1 to S7** concerning the provision of social infrastructure, including health and social care, education, sports and recreation facilities, are all relevant to equal opportunities;
- Housing policies **H1 – H16** concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities;
- Design policies **D6, D7 and D7**, which relate to accessible design and tall buildings, which are especially relevant here;
- Employment policy **E11: Skills and Opportunities** for all requires that strategic development proposals should support local employment, skills development,

⁴ Greater London Authority (2016). London Plan. Available at: [Page not found | London City Hall](#)

apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, and that low pay and gender and ethnicity pay gaps are critical issues; and

- Employment policy **E9: Retail, Markets and Hot Food Takeaways**, which highlight the importance of a diverse and competitive retail sector, stating specifically the crucial role played by street markets in creating and sustaining London’s vibrant character, while also serving the shopping and leisure needs of specific ethnic groups.

3.3.2 Inclusive London: Mayor’s Equality, Diversity and Inclusion Strategy (2018)⁵

The Mayor’s Equality, Diversity and Inclusion Strategy (EDIS) was published in May 2018. The strategy sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed by tackling issues such as poverty and socio-economic inequality, as well as the challenges and disadvantage facing London can be a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential. The strategy sets out 33 equality, diversity and inclusion objectives which include working with councils and other partners to:

- Increase the supply of homes that are genuinely affordable to buy or rent.
- Improve property conditions, management standards, security and affordability for private renters. Including supporting the growing numbers of households with children in private rented homes, as well as groups who are more likely to live in the sector.
- Better protect Londoners living in social housing, including those affected by estate regeneration projects, to ensure that their views are properly heard and acted upon.
- Improve the supply of homes available to meet Londoners’ diverse housing needs, including for accessible and adapted housing, specialist and supported accommodation, and Gypsy and Traveller sites.
- Regenerate the most deprived parts of London in a way that supports good growth and opens up opportunities for the most disadvantaged groups.
- Protect and provide the social infrastructure needed by London’s diverse communities.
- Promote the use of inclusive design through planning, procurement and commissioning of projects and programmes.
- Support effective ways to involve communities in the development of their neighbourhoods and the wider city.

Objectives also include working with employers, education and skills providers, and voluntary and community organisations so that as many Londoners as possible can participate in, and benefit from, employment opportunities in London. This includes providing employability and skills support for those who are disadvantaged in London’s skills, enterprise and jobs market and increasing the diversity of the workforces in vital sectors in London. These include digital, construction, creative and the built environment.

The strategy aims to encourage inclusive growth in London through better planning and provision of business support, including access to finance for BAME, women and disabled-led businesses, and to help save and sustain diverse cultural places and spaces by promoting good growth.

⁵ Greater London Authority (2018). Mayor’s Equality, Diversity and Inclusion Strategy. Available at: [The Mayor’s strategy for equality, diversity and inclusion | London City Hall](#)

3.3.3 London Housing strategy (2018)⁶

The London Housing Strategy was formally adopted in May 2018. The Strategy identifies its emphasis to deliver significant new housing across all tenures to address demand and support London's continued economic growth. Its long-term ambition is to increase supply of homes, while also addressing issues such as affordable housing needs, quality of housing and types of tenures offered. The Strategy has a particular focus on low- and middle-income working households, whilst also addressing the needs of vulnerable and older households. Key messages from the Strategy include:

- **Policy 3.1: Increasing the Supply of Land for New Homes** which sets of how land supply for new homes should be boosted. Policy 3.1 increased supply can be achieved through increasing intensification, higher densities, and co-location of various purposes – as well as through “proactive involvement in London's land market to unlock and accelerate the pace of development.”
- **Policy 4.1: Genuinely Affordable Homes** which sets out the ways in which homes should be “genuinely affordable” to Londoners, on the basis of affordability tests
- **Policy 5.1: Well-Designed, Safe and Good Quality Homes** which states new and existing developments in London should have homes that are safe, accessible, good quality and environmentally sustainable.
- **Policy 5.1: Meeting London's Diverse Housing Needs**, which states all homes in London should be able to meet the needs of a range of groups, including disabled and older people. The policy also mentions that housing provision for Syrian refugees to be a key part of housing provision, as social integration should be an essential part of housing provision in London.

3.3.4 Better homes for local people - The Mayor's Good Practice Guide to Estate Regeneration (February 2018)⁷

The Mayor's Good Practice Guide to Estate Regeneration sets out the expectations for how local authorities and housing associations should engage with residents as part of all estate regeneration schemes, whether or not they include the demolition of homes. The guide outlines the Mayor's three Better Homes for Local People principles, specifically:

1. **An increase in affordable housing** - Local authorities should consider alternative options for demolition. Should demolition be pursued then like-for-like provision of floorspace for affordable housing on estate regeneration projects should be provided. Gap funding is available through GLA housing grant funding to ensure financial viability of affordable housing provision if required. Where possible, local authorities should also be trying to increase the density of estates to maximise potential for an increase in affordable homes. Landlords should adopt local lettings policies for new affordable homes for rent to help ensure that local people benefit from the additional homes being built.
2. **Full rights to return or remain for social tenants** - Where estate regeneration plans involve the demolition of existing homes Councils and housing associations should seek to phase projects wherever possible, with the aim of ensuring that households can remain on the estate by moving no more than once. Social tenants who have to move as a result of estate regeneration plans, either through a single move or a temporary move off the estate, should be:
 - provided with a full right to a property on the regenerated estate of a suitable size, at the same or a similar level of rent, and with the same security of tenure.

⁶ Greater London Authority (2018). London Housing Strategy. Available at: [London Housing Strategy](#)

⁷ Greater London Authority (2018). Better homes for local people: The Mayor's good practice guide to estate regeneration. Available at: [Microsoft Word - Better Homes for Local People - The Mayor's Good Practice Guide to Estate Regeneration.docx \(london.gov.uk\)](#)

Households who are currently overcrowded should be offered homes large enough for their needs. Households who under-occupy their current homes should not automatically qualify for a new home with the same number of bedrooms. For example, landlords may choose to limit the number of bedrooms offered to under-occupiers to a maximum of one greater than their need.

- awarded high priority in the local allocations policy should they need to move into a new home temporarily as a result of estate regeneration. Any offer of alternative accommodation should be reasonable, in that it meets the needs of the household in terms of the number of bedrooms and any special requirements (such as wheelchair accessibility or adaptations).
- offered the maximum home loss compensation permitted by legislation by landlords if they meet the statutory criteria and are displaced from their homes due to estate regeneration.
- awarded 'disturbance costs' of moving home by the landlord. This means paying the reasonable costs of moving, such as removal costs, telephone and utility connection and installation costs, and the provision of new carpets and curtains. Tenants who must move more than once should receive home loss payments for each move.

Furthermore, Councils and landlords should work together to make sure that private tenants on estates being considered for regeneration are aware of their options and rights, including signposting them towards alternative housing options. Councils may also have duties towards private tenants under homelessness legislation. Additional support and assistance should be offered to more vulnerable households living on estates, regardless of their tenure. In some cases, this may mean that they want to move out of the area or into specialist accommodation.

Where councils or housing associations propose to let homes on short-term tenancies, they should ensure that new tenants are fully informed about any plans to regenerate the estate and are aware of their rights, including how they differ from those on secure tenancies. Short-term tenants should be reminded of these differences to avoid confusion at a later stage. They should also be given as much advance notice as possible of planned regeneration, so that alternative accommodation can be found if necessary.

3. **A fair deal for leaseholders and freeholders** - Leaseholders and freeholders affected by estate regeneration should be treated fairly and fully compensated if their homes are to be demolished. Where it is necessary to acquire homes owned by leaseholders and freeholders, landlords should:

- always seek to do so by negotiation in the first instance to help avoid a compulsory purchase process, which creates uncertainty for the household and can lead to significant delays.
- offer market value (plus home loss payments where appropriate) in the first instance. Where compulsory purchase is required, the rights of resident and non-resident leaseholders and freeholders are set out in legislation. The purchase should be based on a value of the home undertaken by an independent valuer, paid for by the landlord if requested by the leaseholder or freeholder. The valuation must reflect the value of the property before the impact of any regeneration or proposed regeneration is taken into account.
- consider enabling resident leaseholders and freeholders to combine market value and home loss payments towards the purchase price for a new home.

- consider paying for other costs that might be borne by resident leaseholders and freeholders, such as the cost of moving home or setting up new utility connections.

Councils and housing associations are also encouraged to consider other ways to support resident leaseholders and freeholders including:

- support to use their equity to buy a home on the open market in the local area, with the Council or housing association owning the difference between the value of this equity and the market price of the home (either on a shared equity or shared ownership basis).
- offer the right to a new home on the regenerated estate through shared equity or shared ownership basis.
- Enable home swaps, or early buy-back arrangements.
- Provide assistance throughout any process of buying a new home.

3.4 Local policy

3.4.1 Private Rented Sector Strategy 2021-2025 (January 2021)⁸

On 6th January 2021, Westminster Council published a five-year private rented sector strategy detailing its plans to improve housing market conditions for tenants and to ensure the sector is well managed. The strategy identifies the need to ensure properties are good quality, and that all stakeholders including tenants, landlords and lettings agents are informed of their rights and responsibilities. This includes that support can be provided where needed, including taking action when the law is broken. The strategy includes the four interconnected aims:

- **Aim one:** Improve conditions in the private rented sector and ensure lawful practices
- **Aim two:** Support and engage with tenants, landlords and lettings agents
- **Aim three:** Improve knowledge and intelligence about the sector and work with other organisations that give advice and support to tenants, landlords and lettings agents
- **Aim four:** Help to improve the energy efficiency of the private rented sector

3.4.2 City Plan 2019 – 2040⁹

Westminster’s City Plan is the key policy document for determining planning applications in Westminster and contains the most up-to-date policies. This document was formally adopted in April 2021, following the publication of the Inspector’s report on 19th March 2021.

The City Plan 2019 – 2040 contains a number of policies which are relevant to promoting equality and tackling existing disadvantage, and to the renewal of Church Street specifically, including:

- Objective 1 of the City Plan is to “increase the stock of high-quality housing and provide variety in terms of size, type and tenure to meet need and promote mixed and inclusive communities, with a clear focus on affordability and family homes.”
- Objective 2 of the City Plan is to “ensure those from disadvantaged backgrounds benefit from the opportunities [job growth] presents.”

⁸ City of Westminster (2021). Private Rented Sector Strategy. Available at: [Private Rented Sector-ActionPlan 2021-25](#)

⁹ Westminster Council (2019). City Plan 2019 – 2040 Regulation 19 Publication Draft. Available at: [City Plan 2019 - 2040: previous stages | Westminster City Council](#)

- **Objective 8** of the City Plan is to “promote quality in the design of buildings and public spaces ensuring that Westminster is attractive and welcoming.
- **Policy 1 Westminster’s spatial strategy** sets out the ambition to deliver growth via, among others, the renewal of Church Street / Edgware Road Housing Renewal Area. This policy also contains the requirement for 35% of new homes to be affordable.
- **Policy 6 Spatial Development Priorities - Church Street / Edgware Road and Ebury Bridge Estate Housing Renewal Areas** outlines the priorities in the regeneration of the Church Street /Edgware Road Housing Renewal Area. It indicates that the Church Street Masterplan constitutes the framework for development and is a material consideration for any planning application. This will include at 2,000 high quality new homes in accordance with the Church Street Masterplan, improved facilities for Church Street Market Infrastructure and the renewal of the Ebury Bridge Estate. The policy also states there will be at least 350 new jobs, and new community facilities, including new health and wellbeing facilities.
- **Policy 7 Managing development for Westminster’s people** requires development be ‘neighbourly’: considering daylight, sense of enclosure and privacy, protecting and enhancing the local natural and historic environment, not overburdening local infrastructure, contributing to greening, improving sustainable infrastructure and making appropriate waste management arrangements.
- **Policy 9 Affordable housing** requires that the affordable housing provision will be between ‘intermediate’ affordable housing for rent and sale (60%) and social or affordable London rent (40%). The Council will maximise the provision of additional affordable housing in designated housing renewal areas.
- **Policy 11 Housing for specific needs** sets out that residential development will provide a housing mix to secure mixed and inclusive communities and contribute towards meeting Westminster’s housing needs for different groups. This policy includes provisions for family sized homes, specialist housing, older people’s housing, purpose-built student accommodation, and provisions for gypsies and travellers.
- **Policy 12 Housing quality** proposes that all new homes be designed to a standard that ensures the safety, health and well-being of its occupants.
- **Policy 14 Town centres, high streets and the CAZ** sets out that the intensification of town centres, high streets and the CAZ will be supported in principle. This policy provides a section on markets, which states that “suitably located, well designed and managed markets” are key aspects of the culture and diversity of the city, and specifically mentions Church Street as a key council-run market within Westminster. The policy also states that existing markets will be enhanced through partnerships with traders, residents and businesses, in line with the council’s Market strategy.
- **Policy 43 Public realm** sets out that development should create “a well-designed, clutter free public realm” and high-quality soft landscaping should be integrated as part of the streetscape design. Furthermore, pressures on space in Westminster mean the council has emphasised that inclusivity and accessibility are priorities for public realm development and maintenance, with an emphasis placed on disabled people, children and those with dementia and mobility requirements.
- **Policy 17 Community infrastructure and facilities** states that community facilities and floorspace will be protected and that major development will contribute to employment, education and skills initiatives.

3.4.3 Church Street Masterplan City of Westminster (December 2017)¹⁰

The Church Street masterplan, which was adopted by the Council in December 2017, builds on the themes in the Futures Plan. The Futures Plan is a renewal plan for the Paddington Green, Church Street and Lisson Grove area, prepared during 2011 and published in 2012.

The masterplan seeks to deliver real change for the community by creating great places, opportunities for a healthy and prosperous lifestyle, new homes and more jobs. The masterplan addresses four interconnected themes and drivers of change:

- **Homes** – Developing new and better homes;
- **Health & Wellbeing** – Provide new community, health and wellbeing facilities and increase accessible open space;
- **Market & Economy** – Improve the market, provide affordable workspace and employment opportunities; and
- **Making Connections** – Create a new pedestrian priority street and improve the public realm offering.

The masterplan is divided into a number of broad geographical study areas which are Lilestone Street, Church Street Sites (A, B and C), Lisson Grove, Gateforth and Cockpit Theatre, Little Church Street, A number of sites have previously been identified for regeneration by the Futures Plan and are currently being developed or will be developed before the first main masterplan sites come forward.

3.4.4 Westminster Housing Renewal Strategy (2010)¹¹

In 2010 the Council published a Housing Renewal Strategy that set out plans for housing renewal over a number of years and a number of programmes are underway. The key objectives of the strategy are to:

- Increase the supply and quality of affordable homes to meet a variety of local needs, including housing for families;
- Improve the quality of the local environment with outstanding green and open spaces and housing that promotes low energy consumption and environmental sustainability;
- Promote a high quality of life for people of all ages and backgrounds, in safe, cohesive and healthy neighbourhoods, supported by a range of high quality housing and excellent community facilities;
- Enable people to maximise economic opportunity in Westminster with support for training, employment and enterprise, and housing tenures which help those in work to remain in the city; and
- Create a more distinct sense of neighbourhood, ending the physical divide between Westminster's estates and surrounding local streets.

3.4.5 Housing Strategy: Direction of Travel Statement (2015)¹²

In 2015, a Housing Strategy Direction of Travel Statement was published, which set out the Council's intentions to deliver existing housing renewal programmes and to work towards housing renewal becoming business as usual including at Church Street. The strategy built up on the draft Housing strategy that was consulted on in June and July 2015. It sets out the direction that the Council intends to take with regards to new affordable housing,

¹⁰ City of Westminster (2017). Church Street Masterplan. Available at: [Church Street](#)

¹¹ Westminster Council (2010) Westminster Housing Renewal Strategy http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf

¹² City of Westminster (2015). Westminster Housing Strategy – Direction of Travel Statement. Available at: [Decision - Westminster Housing Strategy - Direction of Travel Statement | Westminster City Council](#)

intermediate housing, disposal of affordable properties, reviewing CityWest home, the private rented sector and energy efficient homes.

It also provides a direction for residents' health, housing and support for vulnerable people, older peoples' housing, flexibility in allocating social housing and homelessness.

3.4.6 Policy for Tenants in Housing Renewal Areas (August 2019)¹³

The Council's Policy for Tenants in Housing Renewal Areas sets out the rehousing options, headline financial compensation and the general processes that will be followed when homes occupied by council tenants need to be acquired. It also sets out the general approach to be taken when homes occupied by other tenants (including private and temporary accommodation) need to be acquired.

The policy states that all tenants will be supported by a named officer and have access to an independent advisor. Additional assistance will be provided to vulnerable tenants and the Council may work with third parties, including family members, social services and health practitioners to identify and address any special needs. Tenants will be entitled to claim two sorts of financial payment:

- **A home loss payment** – a statutory payment amount set by the Government to compensate them for having to move at a time which is not of their choosing; and
- **A disturbance payment** – to cover all the reasonable costs of moving. If a tenant has opted to return to the Housing Renewal Area but needs to move away temporarily while the new homes are built, they will be entitled to two disturbance payments.

Council tenants, including introductory, secure or flexible or those in community supportive housing, has the right to a new social home in the Housing Renewal Area. They have the following options:

- Option 1: Move straight into one of the new social homes, if this is possible; or
- Option 2: Move into another social home in Westminster for a temporary period, but then move into one of the new social homes in the Housing Renewal Area when they are ready.

Tenants that don't want to move into one of the new homes can also take the following option:

- Option 3: Move into another social home in Westminster, this might be in the same general area, or in another part of Westminster. It could also be into Community Supportive Housing (sheltered housing) for those that are eligible and 60 or over.

For tenants that want to become home owners:

- Option 4: Tenants will have high priority for any new intermediate homes built in the housing renewal area and which are for sale, so they can get on the housing ladder. To qualify for this option, tenants will need to be eligible for "intermediate housing¹⁴" and be able to afford to buy the new intermediate homes.

The policy sets out the rehousing process for tenants as follows:

- Stage 1: The Housing Needs Survey – at this stage the tenant considers their options and the Council finds out about who is in the household, the type of new home needed and any particular needs the tenant has.

¹³ Westminster Council (2019) Policy for Tenants in Housing Renewal Areas. Available at: [policy for tenants in housing renewal areas 2019 final.pdf \(westminster.gov.uk\)](https://www.westminster.gov.uk/policy-for-tenants-in-housing-renewal-areas-2019-final.pdf)

¹⁴ Intermediate housing refers to housing for working people that aren't eligible for social housing but can't afford market housing. This is let through the Council's intermediate housing service called Homeownership Westminster.

- Stage 2: The Assessment – at this stage a detailed assessment is undertaken of the size and type of new home needed.
- Stage 3: Rehousing begins – at this stage the option chosen is confirmed in writing and generally cannot be changed. Rehousing will then start.

All homeless households that have been placed in temporary accommodation by the Council will be visited and advised of the relevant timescales, such as when they will need to move and the processes that will be followed. They will generally be offered alternative temporary accommodation but households in temporary housing do not have a right to remain in or return to the Housing Renewal Area and the above options do not apply to them. Temporary accommodation can be in different locations and some is outside London. All households in temporary accommodation in housing renewal areas will be prioritised for alternative temporary accommodation in London. Households with the highest needs will always be prioritised for temporary accommodation in Westminster and adjoining boroughs. In order to avoid households moving twice, where a household in temporary accommodation is estimated to be within twelve months of being able to successfully bid or be made offers for social housing, they will be awarded additional priority to bring this forward.

The policy states that every effort to communicate will be made by the Council with private tenants as early as possible to explain what is happening and when. All private tenants will be visited at least once and informed where they can get further advice, particularly if they are at risk of being homeless as a result of housing renewal. Those at risk of homelessness will be referred to the Council's Early Intervention Trailblazer Service. Additional support will be offered to vulnerable households where it is needed.

The policy was consulted on in January and February 2019 and the responses helped to shape them. The policy was also subject to an EqlA. An easy to read summary leaflet version of the policy will also be produced.

3.4.7 Policy for Leaseholders in Housing Renewal Areas (August 2019)¹⁵

The Council's Policy for Leaseholders in Housing Renewal Areas sets out headline financial compensation and assistance leaseholders will receive from the Council where their properties are identified for acquisition, as well as the Council's overall approach to acquiring properties.

Resident leaseholders have five options if they wish to remain in the housing renewal area (Options 1-5) and one option if they want to move away (Option 6):

- Option 1 - Buy one of the new homes with an equity loan or on a shared equity basis;
- Option 2 - Buy one of the new homes on a shared ownership basis;
- Option 3 - Buy one of the new homes outright;
- Option 4 - Buy another leasehold property in the housing renewal area;
- Option 5 - Become a social or an intermediate tenant in the housing renewal area; and
- Option 6 - Receive help and support to move away from the housing renewal area.

The policy also covers arrangements for buying with Options 1, 2 and 3 including temporary housing where required, process for buying, and new homes.

There is only one option for non-resident leaseholders, which is to sell their property to the Council and receive the statutory financial compensation. This includes receipt of market value of the property being acquired plus a basic loss payment, which is 7.5% of the market value of the property (this is capped by the Government at £75,000). Non-resident

¹⁵ Westminster Council (2018) Policy for Leaseholders in Housing Renewal Areas. Available at: [Decision - Policy for Leaseholders in Housing Renewal Areas | Westminster City Council](#)

leaseholders are also entitled to a disturbance payment in relation to costs incurred in acquiring a replacement property, within one year.

The policy went through public consultation in 2018 and replaces the previous version published in 2014. The policy was also subject to an EqlA. An easy to read summary leaflet of the policy has also been produced.

3.4.8 A strategy for Westminster City Council's markets 2019-2022¹⁶

Within the City of Westminster there are nine regular street markets with approximately 300 pitches including Church Street. In 2018, Westminster City Council ran a public consultation on the markets over 12 weeks. The results of the consultation were used to inform the market strategy, which is a three-year framework to take forward the priorities identified during the consultation.

3.4.9 Westminster's equality objectives¹⁷

Under the Equality Act 2010, local authorities must prepare and publish one or more objectives they think they should achieve to do any of the things mentioned in the aims of the PSED. The aim of the equality objectives is to help focus attention on the priority equality issues within an organisation in order to deliver improvements in policy making, service delivery and employment. Objectives should be updated at least every four years, be specific and measurable and published in a way that is accessible to the public. Westminster City Council's corporate equality objectives are:

- Staff will represent the demographic of our communities at all levels of the organisation.
- Understand our diverse communities and embed that understanding in how we shape all that we do across the Council.
- Support Westminster's communities to be sustainable, socially inclusive and empowered to act, when they are best placed to do so.
- Demonstrate inclusive leadership, strategic partnership and a clear organisational commitment to be a leader in equality, diversity and inclusion in the city.

3.4.10 Our Strategy for a Fairer Westminster 2022-26¹⁸

The Fairer Westminster Strategy for 2022 to 2026 was set to help build a more inclusive city that celebrates diversity. The Council's ways of working will be centred around diversity and inclusion, openness and transparency, and partnership and collaboration.

Five key outcomes are detailed in the Strategy, which will support decisions at the Council. These include Fairer Communities; Fairer Housing; Fairer Economy; Fairer Environment; and Fairer Council. The target strategies for Fairer Housing and Fairer Communities are most relevant to this report and detailed below:

Fairer Housing:

- The housing needs of residents, families and social care users are met through the provision of greener and more genuinely affordable housing, the majority of which is for council rent, aiming for 70% on council-owned developments.
- Homelessness is reduced due to increased support.
- Private rented sector properties are well managed.

¹⁶ Westminster Council (2018). A strategy for Westminster City Council's markets 2019-2022. Available at: [4.1. Market Strategy Final Doc.pdf \(westminster.gov.uk\)](#)

¹⁷ Westminster City Council (2022). Equality objectives [online]. Available at: [Equality duties | Westminster City Council](#)

¹⁸ City of Westminster (2022). Fairer Westminster strategy. Available at: <https://www.westminster.gov.uk/our-new-strategy-build-fairer-westminster>

- Our tenants and lessees are consistently satisfied with our housing services, and the improved condition and energy efficiency of our housing stock.

Fairer Communities:

- Poverty and inequality are reduced, making Westminster a healthier and more equitable place.
- The city is a safe place where all discrimination is tackled and everyone feels welcome.
- Westminster provides excellent public health and social care services, and physical activity opportunities that ensure all adults can stay healthy and thrive as they age.
- Westminster is a great place for children to grow up, with its cultural and learning opportunities, active communities, and excellent schools.
- Community and voluntary sector organisations are empowered to prosper in Westminster.

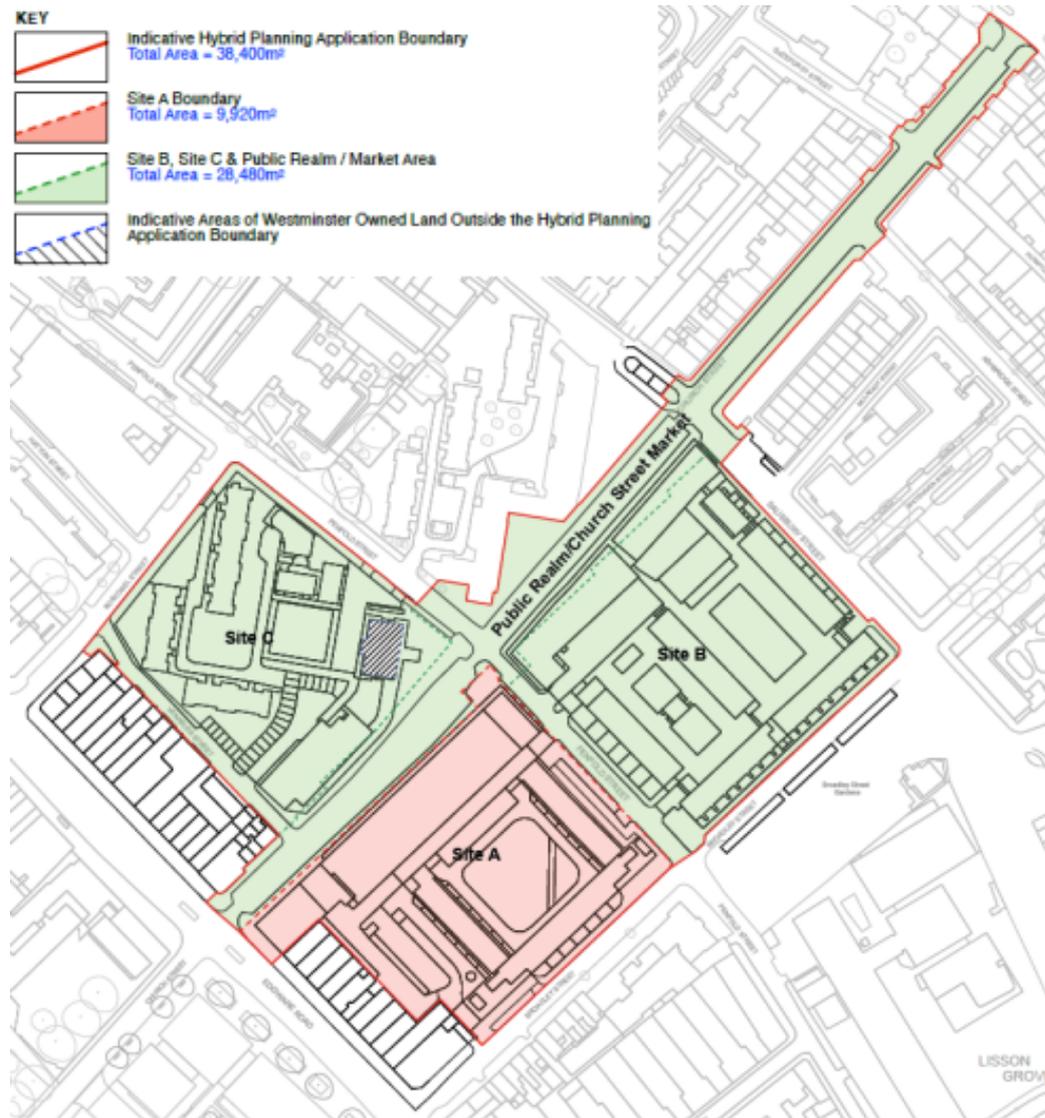
4. Summary of planned regeneration

4.1 The current site

Site A, shown in Figure 4-1 below, is located within the Church Street ward and is approximately 9,920 sqm in size. The site area is bound by Church Street to the north, Edgware Road and Penfold Street to the east and Broadley Street to the south.

The site is close to major public transport hubs (Marylebone, Edgware Road and Paddington stations) and to many city centre amenities such as London’s West End. This development also falls within the Church Street/Edgware Road Housing Renewal Area.

Figure 4-1: Site Location Plan



Source: WCC, 2021

Site A is predominantly composed of residential properties, with the exception of 15 commercial units. Of these commercial interests, 13 remain in use, 14 are leaseholders, 10 are independently owned businesses and 10 are BAME owned businesses covering a range of services including: a public house, pharmacy, convenience store, value retailers, betting

shop and homeware/carpets/fabric retailers. The CPO Scheme does not allow for these existing business occupiers to relocate within the new proposed development.

The 145 residences within the Site A boundary are composed of Blackwater House, Cray House, Ingrebourne House, Pool House and Lambourne House. This post-war housing was built in the 1970’s with relatively uniform architecture ranging from 3 to 5 storeys. Cray House, Pool House and Ingrebourne House enclose a large communal garden for existing residents. Within these four residential blocks, 98 units are provided for social rent and 47 are provided as market housing, with the range of unit mixes shown in table 4-1 below.

Table 4-1 Site A unit mix

	Bedroom	Social rented	Market	Total
Site A	1	58	6	64
	2	0	22	22
	3	40	18	58
	4	0	1	1
Total		98	47	145

Blackwater House offers both residential and commercial interests. The upper three floors are occupied residences, while the ground floor composes 2,927 sqm of commercial units. The Westminster Regeneration Base is also located within Blackwater House as a drop-in hub for both businesses and residents to remain informed as to the proposed regeneration of the site and wider Estate.

The properties on Edgware Road are outside the Site A boundary, except for the corner property (382-386 Edgware Road and 125-127 Church Street) which sits on the south side of Church Street at the junction with Edgware Road. Site A also encompasses parts of the public footpath, wall boundary, subsoil and airspace situated on Church Street.

As of June 2023, the 98 social tenants have all been rehoused via the choice based lettings list¹⁹. All of these residents were re-housed within Westminster with none choosing to relocate outside the Borough. All social tenants have been provided the opportunity to return to the Site A development. While 48 households express a desire to return, 50 wish to remain within their new homes. Upon return, all social residents will be afforded flats of adequate size for their needs on the same/similar rent and the same security of tenure.

Site A also contains 47 privately owned properties, of which seven leaseholders remain on site. Four of the seven leaseholds are under offer to the Council, while two are undergoing active negotiations.

4.2 Hybrid planning application (2021)²⁰

In 2021, the Council submitted a Hybrid Planning Application comprising a detailed planning application for Site A and a Phased Outline planning application for Sites B and C and the Church Street Market infrastructure. The detailed planning application seeks full planning permission for the redevelopment of Site A comprising:

- The proposed demolition of all buildings on Site A;

¹⁹ Choice Based Lettings is a local authority managed system for applying for a general needs home. Residents affected by any renewal scheme are prioritised on the lettings list.

²⁰ Westminster Borough Council (2021). Planning – Planning Application Documents (21/08160/COOUT). Available at: [21/08160/COOUT | Hybrid planning application consisting of: An application for full planning permission for SITE A; and An application for outline permission for SITES B, C and Church Street Market](#)

- The erection of two buildings, ranging up to 14 storeys, that could deliver up to:
 - 428 Residential Units (Use Class C3) or 37,114 sqm (GIA) of Residential Floorspace and ancillary residential facilities;
 - 605 sqm (GIA) of Community Floorspace (Use Class F1 and F2);
 - 341 sqm (GIA) of Commercial Floorspace (Use Class E).
 - 1,124 sqm (GIA) of Market Storage Floorspace (Use Class B8); and
 - 2,603 sqm plant space (GIA) and 896 sqm (GIA) parking.
- Alterations to the existing access road;
- Streets, open spaces, landscaping, and public realm;
- Car, motorcycle and bicycle parking spaces, and servicing spaces;
- Market infrastructure and ancillary facilities; and
- Other works incidental to the proposed development.

4.2.1 Residential

The proposed development of Site A will comprise of two new urban blocks, referred to as A1 and A2, delivering 428 residential units ranging from 8-11 storeys.

Block A1 will be a perimeter block development around a central garden located adjacent to Penfold Street, Broadley Street and Church Street. The building will stand at 10-storeys at the southern corner and reach 15-storeys at the eastern corner. Block A1 will also provide a basement level for accessible car parking and cycle storage.

While block A2 will be an L-shaped development surrounding a podium level garden located adjacent to Church Street, Edgware Road and Broadley Street. The building will range from 8-storeys on the Edgware Road/Church Street corner and increase to 12-storeys where the building interfaces the new pedestrianised road 'New Street Gardens'. Block A2 will provide parking and market storage from traders at the ground floor level.

Table 4-2 below displays the accommodation schedule and housing mix for Site A.

Table 4-2 Accommodation Schedule and Housing Mix for Site A

Unit Type	Market Sale		Social reprovision		New social		New intermediate		Total	
	Units	%	Units	%	Units	%	Units	%	Units	%
1 bed	119	55%	60	62%	15	21%	28	67%	222	52%
2 bed	77	36%	22	22%	26	35%	12	29%	137	32%
3 bed	19	9%	8	8%	32	44%	2	4%	61	14%

4 bed	0	0%	6	6%	0	0%	0	0%	6	2%
5 bed	0	0%	2	2%	0	0%	0	0%	2	0%
Total	215	100%	98	100%	73	100%	42	100%	428	100%

The new residences have been designed to be tenure-blind in terms of location, facility and appearance to promote social cohesion between residents. They have also been arranged in clusters to deliver 91% dual-aspect flats and the relationship to open space.

Each flat will be provided with private amenity space in accordance with the London Housing Design Guide with sizes of 6sqm for 1-bed flats, 7sqm for 2-bed flats and 8sqm for 3-bed flats.

4.2.2 Retail and commercial

Site A will deliver 341sqm GIA of Class E floorspace and 1,124sqm of market storage facilities for market traders (Class B8).

Retail floorspace will occupy the ground floor of block A2 facing onto Church Street. Two further corner retail units will be provided in the base of the block, one with frontages onto Edgware Road and Church Street and another interfacing with Church Street and New Street Gardens.

4.2.3 Community and landscape

The proposed development will provide a new Church Street Library, in replacement of the existing library located in Site B. The library space will be delivered over one floor with a hierarchy of spaces including a children’s library, adult’s library, learning rooms, community space, and ancillary staff facilities. The library will provide IT equipment including printers and computers, as well as meeting rooms and quiet zones for private study. Community activities planned for the space include Yoga/Pilates, skills classes and workshops, book clubs and school outreach events. A public managed library garden will also be accessible to the rear and visible from the library entrance on Church Street.

Site A is designed to deliver a total of 2,478sqm of new public open space, which is approximately 26% of the Site A total area. This public open space will be provided via a new pedestrianised street ‘New Street Gardens’ running between Church Street and Broadley Street and 1,774 sqm of play space areas for children with inclusive design in both ability and age range. While private outdoor space for each block will be provided through central communal gardens to be located on the ground floor of block A1 while block A2 will have a podium garden above market infrastructure on the first floor.

The proposed development will be car-free with the exception of 22 (5%) accessible parking spaces provided within the basement of Site A. These will be accessible via car lifts on Penfold Street and provide 100% EV charging points. A total of 827 long-stay and 23 short-stay residential cycle spaces will also be available as a mix of Sheffield stands, double stacker stands, accessible spaces and cycle lockers on the basement and ground floor of Site A. Non-residential cycle parking will be provided along Church Street and in the library.

4.2.4 Commercial Relocation Strategy

WCC is developing a more formal Relocation Strategy to record and finalise WCC’s approach to acquiring commercial interests comprising Site A. While the CPO Scheme has the potential to deliver significant benefits, WCC recognise the proposal will require the displacement of business interests.

WCC intend to acquire properties through agreement where possible. In order to provide advice and support occupiers in reaching an agreement, the Relocation Strategy aims to:

- assist in identifying relocation options in a way that best meets their needs and minimises disruption to trading;
- retain the Businesses within the borough and, if possible, within proximity to the Order Land and the community that they serve (if this is their preference); and
- prepare for change; be this in terms of relocation i.e. communicating the move to their client base, develop methods to stay in contact with their client base, market to new client base. Or, in dealing with extinguishment and planning for what may come next i.e. retirement, new business elsewhere etc.

Following discussions with businesses to understand particular circumstances surrounding floorspace, rent and location, WCC's regeneration team has identified parameters to search for relocation options. Monthly searches are conducted via online portals and will be distributed to commercial interests upon suitability. CPO tenants will also be given priority over WCC assets within the Church Street area.

The Council have appointed Savills to advise on the compensation payments available to leasehold interests upon acquisition of the commercial units.

5. Consultation and engagement

This section presents a summary of consultation and engagement activities by the Council in relation to the proposed development, focusing on findings relevant to Site A. Further detail regarding the approach and findings of consultation for Sites B and C are available in the wider project EqIA report.

5.1 Options Consultation 2019

An 8-week consultation period ran from 7 March – 30 April 2019 informing stakeholders of the four following development options for Church Street: maintenance; refurbishment; partial redevelopment and partial refurbishment; and comprehensive redevelopment. Findings from the consultation responses revealed strong support for the regeneration of Church Street and displayed a slightly higher preference for Option 3.

Many residents expressed support for change while also communicating concern about the level of disruption and the impact this would have on them individually and on the community. A key theme from discussions with residents was frustration at the perceived slow pace of change, linked with the fact that the uncertainty that this created was unsettling.

5.2 Best Value, Deliver Options Consultation (2020)

To ensure 'best value', in January-February 2020 the Council consulted residents on three strategies for delivering the regeneration of Site A: (a) a developer-led strategy; (b) a partnership strategy; and (c) a direct delivery strategy. While there was no clear preference, more support for the direct delivery approach was indicated and an expectation that the Council ensure any agreement holds the developer accountable.

5.3 Site A Design Update (2020)

In May 2020, the Council undertook a round of consultation following significant design updates to Site A in response to feedback from the options consultation.

Key design changes included the following:

- Increased provision of open space;
- New Street Garden to run between the two residential blocks offering increased green space, improved accessibility and more daylight onto Church Street; and
- Re-provision of Church Street Library within Site A and an associated library garden.

This consultation was targeted at residents living or working within and in close proximity to Site A. A newsletter was distributed across Church Street Ward and stakeholder meetings and a webinar were held to engage with local residents and businesses. A film outlining the design changes was also made available on the Church Street website.

A total of 37 people provided feedback on the design updates for Site A, the majority of which were supportive. In particular, stakeholders expressed support for the new location of the library. The original proposal re-provided the library facility in Site B which presented community concerns that a temporary library would be required. The public realm design changes were also seen as improvements by stakeholders.

5.4 Pre-application consultation

Following this, pre-planning consultation was undertaken in two stages between March and June-July 2021.

The first stage of consultation highlighted the following main issues relevant to Site A:

- Most respondents stated ‘generous outdoor spaces including balconies’ was an important aspect of development along with dual aspect windows to maximise light and air;
- Concern as to the size of the new library and a request for more detail on the size and proposed uses;
- Concern regarding the proposed building heights and the impact on daylight reaching Church Street; and
- Most respondents answered play spaces, outdoor fitness spaces and seating areas were key features they would like to see.

The stage two consultation presented back to the community how the design team responded to comments from stage one, including adaptations to design. Those relevant to Site A include:

- To minimise overshadowing, buildings have been stepped back along the facades and corner buildings have been designed so lower storeys face Church Street;
- Sunlight studies demonstrated that adapted building designs will allow more sunlight on Church Street following the creation of New Street Gardens;
- The new library is proposed to comprise 355 sqm of internal space and 192 sqm of garden area. Following further engagement, the design was updated to provide a further 495 sqm of mezzanine area;
- Confirmation that each flat will provide private amenity space in the form of a balcony or terrace area, and the number of dual aspect units was increased; and
- To ease safety concerns, increased overlooking of external spaces provides natural surveillance, all areas will be lit at night and hard landscaping designed to reduce opportunities for anti-social behaviour.

On 24th August 2021 a virtual design workshop was held via Zoom with members of the library management team where three main design options were presented. The following feedback was received:

- The location of the children’s library should consider noise levels;
- Seating overlooking the garden should be provided and the garden should be visible from the street to ensure people access the facility;
- A public/community supported café is welcomed and could employ local residents who are less likely to employ local residents; and
- The community space should provide a store and be split in two to allow for future flexibility of space.

A second design workshop was undertaken on 22nd September on the library premises attended by key library staff and members of the ‘Friends of Church Street Library’ stakeholder group.

Following this second workshop, a revised design has been developed and reissued to the stakeholder group.

5.5 Residents Ballot

Between November 19th – December 21st 2022, the Council held a Residents Ballot for residents to vote in support of the Church Street regeneration proposals. The ‘Landlord offer’²¹ was published alongside the ballot detailing the Council’s commitments to tenants

²¹ Westminster County Council (2022). Church Street Sites A, B and C Landlord Offer. Available at: [ChurchStreetSitesABC_LandlordOffer.pdf](#)

and leaseholders and the vision for the regeneration of Sites A, B and C to enable residents to make an informed decision.

Residents were able to respond to the ballot via post, online portal, telephone or ballot box. The ballot received a response from 56% of residents, 73.1% of which voted 'yes'.

5.6 Engagement with existing Site A businesses and residents

Since 2016, the Council has provided a dedicated regeneration office within a vacant commercial unit on Church Street. The aim of which was to nurture long term relationships with residents, businesses and market traders affected by the regeneration scheme and offers a local resource for information.

5.6.1 Businesses

The Church Street Regeneration Team has consulted with businesses throughout the design process for the regeneration of Site A. Business Forums were held between July 2018 – March 2020 to continually engage with local businesses on the commercial strategy, how businesses will be supported and businesses/market traders' ideas for regeneration.

In 2018, the Council appointed the charity Tree Shepherd to develop a business model to manage the viable relocation of businesses. During a Business Forum on 19th February 2018, Tree Shepherd offered free business training workshops, one-to-one confidential advice, support with local opportunities and measures of resilience for local trade networks.

In terms of acquisition, the Council has written to all affected businesses regarding the proposals for Site A and the support available for relocation. Following this, the Church Street Regeneration Team have held one-to-one meetings with existing commercial occupiers to understand their particular circumstances and identify requirements for relocation including rent, floorspace, location and planning use class. While WCC recognise there is a shortage of immediately available and suitable alternative sites, the Regeneration Team are undertaking monthly searches via online platforms using the identified parameters and offering to the most suitable commercial interests.

5.6.2 Residents

The Council and its agent Westminster Community Homes have been attempting to acquire leaseholds through private treaty negotiations since 2014. All resident leaseholders have been offered a new home on the estate, of which only four have expressed an interest in returning. Objections received from leaseholders felt that they would be unable to afford a similar property within the area through compensation. There are currently two remaining leaseholders in Site A undergoing active negotiations.

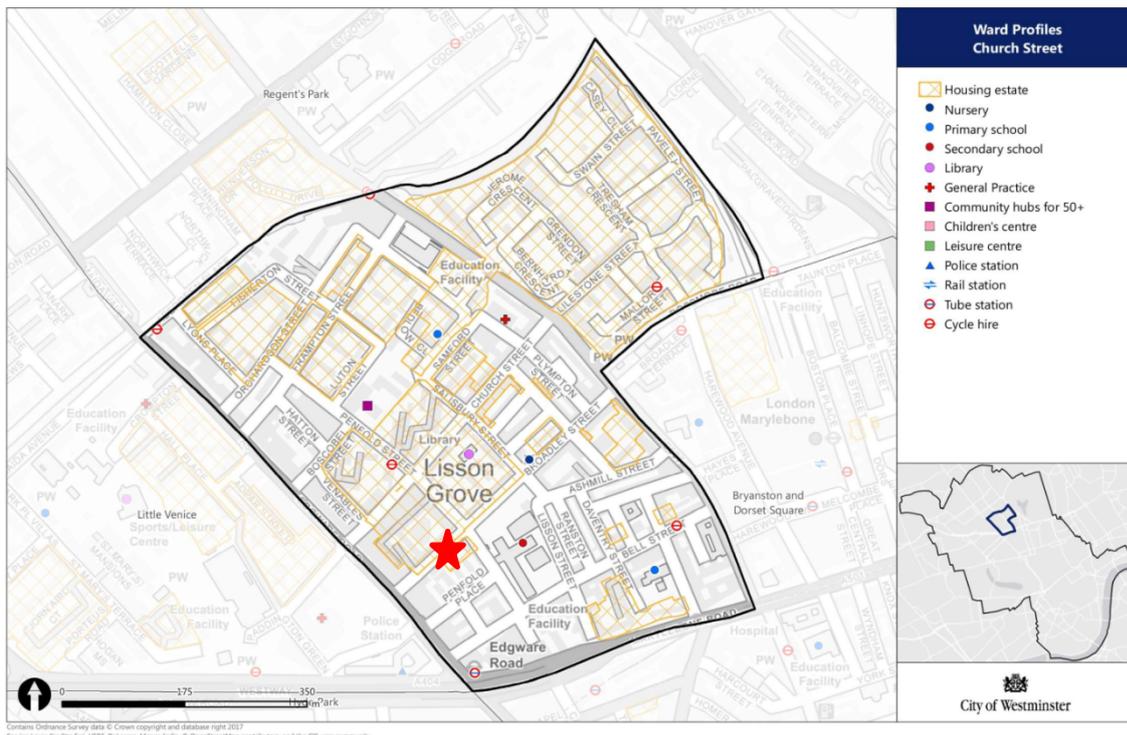
The Council have ensured that local residents are provided opportunities to raise concerns and seek clarifications through a dedicated phone number, email address and website, in addition to monthly newsletters and weekly drop-in sessions. The Regeneration Base on Church Street is also a space for residents to interact with members of the regeneration team Monday-Friday 9am-5pm.

6. Equalities Baseline

6.1 Introduction

The section outlines the equalities baseline relevant to the regeneration scheme area. This includes analysis of Census 2021 data and other datasets from the Office for National Statistics (ONS). Where possible, the most recent data is presented at five geographic levels relevant to the study area. These are, in increasing size, Westminster Lower Super Output Area (LSOA Westminster 009K – E01033605, and LSOA Westminster 009J – E01033604), the Church Street Ward (E05013794), Westminster Borough, and London. Westminster 009K and 009J have been included for context as Site A sits within both of them.

Figure 6-1 Church Street Ward, Site A marked by the red star



6.2 Protected characteristics

6.2.1 Population

Between 2001 and 2021, all geographical areas have experienced population growth, except for Westminster LSOA 009J which has experienced a 22.7% decline. Westminster LSOA 009K recorded a marginal rate of increase at 0.4%, Church Street experienced the greatest proportion of 79.8%, Westminster by 12.7% and London 20.2%. However, in the last ten years between 2011 and 2021, only London has experienced population growth (by 7.7%). In the same period, Westminster 009K has seen a 19.8% decrease, Church Street a 0.8% decrease, and Westminster a 6.9% decrease.

Table 6-1 Population growth by geographies, 2001 - 2017²²

Year	Westminster 009J	Westminster 009K	Church Street	Westminster	London
2001	1,527	1,634	6,490	181,286	7,172,036
2011	1,236	2,046	11,760	219,396	8,173,941
2021	1,181	1,640	11,670	204,236	8,799,728
% Change	-22.7	+0.4	+79.8	+12.7	+20.2

6.2.2 Age

Table 6-2 reveals the age breakdown across the five geographies. The data shows that Westminster 009K has the highest proportion of children (22.1%) and elderly residents (13.7%).

Table 6-2 Age breakdown (%) by different geographical areas²³

Age (years)	Westminster 009J	Westminster 009K	Church Street	Westminster	London
0-15	14.8	22.1	16.9	13.2	19.2
16-64	73.1	64.2	70.6	74.8	68.8
65 and over	12.1	13.7	12.5	12.1	11.9

Greater London Authority (GLA) Population Projections estimate that by 2040, the proportion of 0-15-year-olds living in Westminster will decrease by approximately 5% on 2017 levels, while it will increase by 38% in Church Street. The working age population of 16-64-year-olds is projected to increase over the same time period by 13% in Westminster and 61% in Church Street. The greatest population increase is expected in the 65 and over age group, which will increase considerably. Westminster’s population aged 65+ is projected to increase by 43% by 2040 and the population aged 85+ is projected to double in the same timeframe. The population of Church Street is also projected to increase considerably on 2017 levels, by 70% for over-65s and 94% over-85s.²⁴

Children and older people may be more vulnerable to CPO as residents due to the potential loss of local informal and formal care networks. Young and elderly people also have an increased risk of health issues or sensitivities associated with the environmental impacts during site construction. For example, evidence shows that traffic-related noise causes increased health risks for older people²⁵ and lowers health-related quality of life in children²⁶. Both groups are also more vulnerable to the effects of poor air quality compared to the overall population. Elderly people are also more vulnerable to the environmental, safety and accessibility impacts of construction activities associated with construction projects.

²² ONS: Census 2001: Usual resident population (KS001); Census 2011: Population Density 2011 (QS102UK); Census 2021: Number of usual residents in households and communal establishments (TS001). All available at:

<https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp>

²³ ONS (2020) Census Output Area population estimates – London, England (supporting information). Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/censusoutputareaestimatesinthelondonregionofengland>; ONS (2021) Census 2021: TS007 Age by single year. Available at:

<https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?theme=93&subgrp=Topic+Summaries>

²⁴ GLA Population Projections - Custom Age Tables, (2017); available at: <https://data.london.gov.uk/dataset/gla-population-projections-custom-age-tables/resource/4c7f998b-ae3a-4558-8ae1-b976a2b16382/download> and

https://files.datapress.com/london/dataset/gla-population-projections-custom-age-tables/2018-04-06T13:55:51.53/Ward_Housing_led_projection_age_range_creator_2016.xls, accessed April 2019.

²⁵ Halonen, J. et al (2015). Road Traffic noise is associated with increased cardiovascular morbidity and mortality in London. *European Heart Journal*. 36(39), 2653-2661

²⁶ Hjortebjerg, D. et al (2016). Exposure to road traffic noise and behavioural problems in 7-year-old children: a cohort study. *Environmental health perspectives*, 124(2), 228-234.

6.2.3 Disability

Table 6-3 highlights the breakdown of people with disabilities in the relevant geographies. Church Street ward has the highest proportion of residents whose day-to-day activities are limited a lot (11.6%) followed by Westminster 009K (10.9%) and Westminster 009J (10.5%). These proportions are significantly higher compared to Westminster and London.

Westminster 009K and Church Street also have high proportions of residents whose day-to-day activities are limited a little, at 11.4% and 9.6% respectively. While Westminster 009J, Westminster and London all have similar proportions of residents whose day-to-day activities are limited a little, ranging between 7.3 and 7.5%.

Table 6-3 Limiting long-term illness or disability (%) by different geographical areas²⁷

Level of disability	Westminster 009J	Westminster 009K	Church Street	Westminster	London
Day-to-day activities limited a lot	10.5	10.9	11.6	6.5	5.7
Day-to-day activities limited a little	7.4	11.4	9.6	7.3	7.5
No long term physical or mental health condition	79.1	74.4	75.3	81.5	81.5

According to the Department for Work and Pensions (2018) Church Street has almost five times the proportion of Disability Living Allowance Claimants (1.19%) than Westminster (0.26%).²⁸

Disabled people, including those with weak respiratory systems, or people who suffer from other health problems associated with weaker lungs, may be disproportionately impacted by emissions and dust, both traffic-related and as a result of construction of the infrastructure.²⁹ Additionally, in cases where disability causes people’s daily activities to be significantly limited, construction can impose further limitations in terms of disruption of accessibility.

6.2.4 Gender reassignment

Until the 2021 Census, there were no official statistics relating to gender reassignment and the UK Census only collected data relating to sex (gender assigned at birth). The 2021 Census included the optional question “Is the gender you identify with the same as your sex registered at birth?”, for which findings are presented at the Borough and London geographies in Table 6-4.

Of those who responded, the majority (90%) of Westminster’s population identify with the same gender as their sex registered at birth, while 0.7% identify with a different gender. Similarly, in London 91.2% of the population identify with their gender assigned at birth, and 10% identify with an alternative gender.

²⁷ ONS (2021). Census 2021: TS038: Disability. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/dataset/ts038)

²⁸ City of Westminster (2018). Church Street Ward Profile 2018. Available online at: [Church-street-ward-profile](#)

²⁹ Font, A. et al (2014). Degradation in urban air quality from construction activity and increased traffic arising from a road widening scheme. *Science of the Total Environment*, 497, 123-132.

Table 6-4 Gender identity (%) in Westminster and London, 2021³⁰

Gender identity	Westminster	London
Gender identity the same as sex registered at birth	90.0	91.2
Gender identity different from sex registered at birth but no specific identity given	0.4	0.5
Trans woman	0.1	0.2
Trans man	0.1	0.2
Non-binary	0.1	0.1
All other gender identities	0.0	0.0
Not answered	9.2	7.9

Trans people are at greater risk of being victims of hate crime. Increased footfall and natural surveillance as a result of Site A redevelopment will potentially reduce incidences of hate crime and boost the confidence of LGBTQ+ people.

6.2.5 Marriage and civil partnership

Across the four Westminster geographies the majority of residents aged 16 and over have never been married, the highest proportion being in Westminster 009K at 57.4%. Contrastingly, across London less than half of residents aged 16 and over have never married and the highest proportion of residents married to someone of the opposite sex (39.3%), followed by Westminster at 31.1%. Westminster and Westminster 009J have the highest proportion of residents married to someone of the same sex at 0.6% each. Westminster 009J also has the highest proportions of separated (4.0%) and divorced (9.7%) residents. While Westminster 009K has the highest proportion of widowed residents (6.6%), sitting significantly higher than Westminster 009J (2.8%).

Table 6-5 Legal partnership status (%) by geographical area, 2021³¹

Legal partnership status	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
Never married	53.1	57.4	54.7	54.4	46.2
Married: opposite sex	29.3	25.5	28.4	31.1	39.3
Married: same-sex	0.6	0.2	0.3	0.6	0.4
In a registered civil partnership: opposite sex	0.2	0.0	0.1	0.1	0.1
In a registered civil partnership: same-sex	0.3	0.0	0.1	0.4	0.2
Separated	4.0	2.9	3.5	2.4	2.3
Divorced	9.7	7.4	7.8	7.6	7.3
Widowed	2.8	6.6	5.1	3.4	4.2

³⁰ ONS (2021). Gender identity (detailed) (TS070). Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

³¹ ONS (2021) Census 2021: TS002 – Legal partnership status. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

6.2.6 Pregnancy and maternity

Table 6-6 provides a breakdown of the different household compositions and the proportions of different household types with dependent children. Westminster 009J (9.4%), 009K (10.3%) and Church Street (10.2%) all have a higher proportion of lone parent family households with dependent children compared to married or civil partnership households with dependent children.

Westminster 009K and Church Street also have high proportions of other household types with dependent children, at 5.4% and 6.1% respectively. London has the next highest proportion in this category, at 4.7%.

Table 6-6 Household composition and lone-parent households (%) by geographical area, 2021³²

Household composition	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
Single family household	45.0	44.9	47.7	45.6	58.0
Single family household: Married or civil partnership couple: Dependent children	8.7	10.2	9.4	9.9	15.8
Single family household: Cohabiting couple family: With dependent children	3.3	1.3	2.2	1.3	3.0
Single family household: Lone parent family: With dependent children	9.4	10.3	10.2	5.3	7.8
Other household types	13.8	15.0	15.4	11.7	12.7
Other household types: With dependent children	1.7	5.4	6.1	2.5	4.7

Pregnant women can be more susceptible to experience negative effects associated with development and the built environment. For example, pregnant women can be more susceptible to poor air quality, which can have a negative impact on birth weight. Pregnant women will also need good access to health care facilities, particularly towards the latter stages of pregnancy. Accessibility is therefore an important issue for this group. With regards to income, housing and wellbeing, young mothers (and fathers) may be more likely to suffer from deprivation and struggle to find affordable housing.

6.2.7 Race

Table 6-7 shows the percentage breakdown of ethnic groups by geographical area. The proportion of White British residents is lowest in the project area LSOAs and Church Street, ranging between 16.9 and 19.9%, compared to 28% in Westminster and 36.8% in London. There are high proportions of Other White residents across all geographies, being highest in Westminster (24.6%) and lowest in Church Street (14.2%).

Westminster 009K (7.1%) and Church Street (16.4%) have high proportions of Bangladeshi residents compared to Westminster and London (both 3.7%). All of the geographies have similar significant proportions of African residents, ranging between 7.0% in Westminster 009J and 8.8% in Church Street. The Westminster geographies all have high proportions of Arab and Other residents; Westminster 009J (24.8% Arab residents and 10.8% Other),

³² ONS (2021). TS003 – Household composition. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

Westminster 009K (22.1% Arab residents and 8.9% Other), Church Street (15.6% Arab residents and 8.4% Other) and Westminster (7.6% Arab residents and 5.9% Other) compared to London (1.6% Arab residents and 4.7% Other).

Table 6-7 Ethnic groups (%) by different geographical areas³³

Ethnic group		Westminster 009J	Westminster 009K	Church Street	Westminster	London
White	British	16.9	19.9	17.2	28.0	36.8
	Irish	0.8	0.8	1.1	1.8	1.8
	Gypsy or Traveller	0.2	0.0	0.0	0.0	0.1
	Roma	2.0	0.3	0.5	0.7	0.4
	Other	18.7	15.4	14.2	24.6	14.7
Mixed/ Multiple Ethnic Groups	White and Black Caribbean	0.8	1.2	1.0	1.0	1.5
	White and Black African	1.1	1.5	1.2	1.0	0.9
	White and Asian	1.2	0.9	0.9	1.8	1.4
	Other	2.9	1.8	2.2	2.7	1.9
Asian/ Asian British	Indian	1.6	1.8	1.8	3.9	7.5
	Pakistani	2.4	0.9	1.3	1.2	3.3
	Bangladeshi	1.8	7.1	16.4	3.7	3.7
	Chinese	2.0	0.7	2.1	3.2	1.7
	Other	5.5	6.1	4.3	4.7	4.6
Black/ African/ Caribbean/ Black British	African	7.0	7.6	8.8	8.1	7.9
	Caribbean	2.8	2.6	2.3	2.1	3.9
	Other Black	0.3	0.4	0.8	0.8	1.7
Other Ethnic Group	Arab	24.8	22.1	15.6	7.6	1.6
	Other	10.4	8.9	8.4	5.9	4.7

In terms of nationality, less than half (47%) of Church Street residents were born in the UK, 1.5% were born in Ireland, 8.8% were born in the EU and 42.5% were born outside of the EU (Census 2011). EU nationals have arrived mainly from 2001 member countries (6.8%) and from accession countries (2%).³⁴

The GLA produces ethnic group population projections which are updated annually at both local authority and ward level. The Ethnic Group population projections disaggregate the GLA’s borough-level population projections into ethnic groups. The outputs have been produced for 17 ethnic groups. Table 6-8 summarises the 2016-based housing-led projected ethnic population for Westminster. The Bangladeshi and Black African population, which form a significant proportion of Church Street’s population, are expected to decrease. The

³³ ONS (2021). Census 2021: TS021 – Ethnic group. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

³⁴ City of Westminster (2018) Church Street Ward Profile 2018. Available to download online.

White British and Arab population, another large group in Church Street are projected to increase, with the largest increase in Westminster experienced by the Arab population.

Table 6-8 Ethnic group projections - Westminster³⁵

Ethnic Group	2011	2016	2021	2031	2041	2016-41 Change	2016-41 % Change
All persons	219,582	247,614	262,317	275,466	285,280	37,666	15%
White British	77,474	73,967	77,267	81,550	83,931	9,964	13%
White Irish	4,977	4,860	4,555	4,144	4,041	-819	-17%
Other White	53,066	71,564	77,738	82,529	86,671	15,107	21%
White & Black Caribbean	1,868	1,682	1,546	1,392	1,355	-327	-19%
White & Black African	1,931	2,174	2,202	2,128	2,121	-53	-2%
White & Asian	3,585	4,424	4,776	4,826	4,889	465	11%
Other Mixed	4,013	5,093	5,616	5,881	6,000	907	18%
Indian	7,214	8,419	9,055	9,619	10,063	1,644	20%
Pakistani	2,328	2,607	2,731	2,816	2,867	260	10%
Bangladeshi	6,293	6,296	5,716	4,604	3,972	-2,324	-37%
Chinese	5,893	5,803	5,881	5,898	6,016	213	4%
Other Asian	10,109	12,623	13,663	14,675	15,407	2,784	22%
Black African	9,138	9,994	10,491	11,001	11,350	1,356	14%
Black Caribbean	4,458	3,974	3,509	2,954	2,712	-1,262	-32%
Other Black	2,884	2,955	2,909	2,829	2,803	-152	-5%
Arab	15,728	20,518	22,892	25,518	27,158	6,640	32%
Other Ethnic Group	8,623	10,660	11,769	13,104	13,924	3,264	31%
BAME	84,065	97,222	102,756	107,243	110,637	13,415	14%
White	135,517	150,391	159,560	168,223	174,643	24,252	16%

People from certain ethnic minority groups are more likely to be unemployed, underpaid, or economically inactive.³⁶ Employment opportunities created by the redevelopment of Site A and the wider Church Street Estate have the potential to mitigate these issues.

³⁵ London Datastore (2020). Ethnic group projections (2016-based central trend). Available at: [Ethnic group population projections - London Datastore](#)

³⁶ Devine-Francis, B. Unemployment by ethnic background. (2022) Available at: [Unemployment by ethnic background - House of Commons Library \(parliament.uk\)](#)

6.2.8 Religion or belief

Table 6-9 highlights the breakdown of religious groups by geographical area. The LSOA and ward geographies have higher proportions of Muslim residents, at 41.0% in Westminster 009J, 45.4% in Westminster 009K, and 48.6% in Church Street, compared to 20.0% in Westminster and 15.0% in London. Correspondingly, the project area geographies have lower proportions of residents belonging to the other religious groups, or not following a religion, compared to Westminster and London.

Table 6-9 Religion or belief (%) by different geographical areas³⁷

Religion	Westminster 009J	Westminster 009K	Church Street	Westminster	London
Christian	26.3	30.0	26.6	37.3	40.7
Buddhist	1.5	0.7	0.8	1.3	0.9
Hindu	0.3	1.0	0.8	2.2	5.1
Jewish	0.1	0.5	0.5	2.8	1.7
Muslim	41.0	45.4	48.6	20.0	15.0
Sikh	0.0	0.2	0.1	0.3	1.6
Other religion	0.5	0.6	0.5	0.9	1.0
No religion	22.1	14.3	14.9	25.9	27.1
Religion not stated	8.1	7.1	7.1	9.4	7.0

6.2.9 Sex

Table 6-10 highlights that the Church Street Ward has the highest proportion of female residents at 52.2%, contrastingly Westminster 009J has a low proportion of female residents at 47.0%, this is the only geographical area where females don't make up more than half of the population.

Table 6-10 Proportion (%) of residents by sex and geographical area, 2021³⁸

Sex	Westminster 009J	Westminster 009K	Church Street	Westminster	London
Female	47.0	51.5	52.2	51.6	51.5
Male	53.0	48.5	47.8	48.4	48.5

6.2.10 Sexual orientation

Table 6-11 shows the proportion of adults by their identified sexual orientation for London and Westminster Borough. Westminster Borough has a higher proportion of adults identifying as Gay or Lesbian (3.5%) compared to London (2.2%). London has marginally higher proportion of adults identifying as Pansexual (0.4%) and Queer (0.1%), than Westminster Borough (0.3% and 0.0% respectively).

³⁷ ONS (2021). Census 2021: TS030 – Religion. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)

³⁸ ONS (2021). Census 2021: TS008 – Sex. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)

Table 6-11 Sexual orientation (%) in Westminster and London, 2021³⁹

Sexual orientation	Westminster	London
Straight or Heterosexual	83.3	86.2
Gay or Lesbian	3.5	2.2
Bisexual	1.5	1.5
Pansexual	0.3	0.4
Asexual	0.1	0.0
Queer	0.0	0.1
All other sexual orientations	0.0	0.0
Not answered	11.2	9.5

People who identify as LGBTQ+ are at greater risk of being victims of hate crime⁴⁰. Increased footfall and natural surveillance as a result of Site A redevelopment will potentially reduce incidences of hate crime and boost the confidence of LGBTQ+ people.

6.3 Socio-economic profile

The socio-economic profile of the area considers several factors including levels of deprivation, employment, education, health, housing, transport and connectivity; access to services and facilities; public realm and open space; safety, security and well-being; and community cohesion. These factors are pertinent to those with protected characteristics and inequality and as such provide additional baseline information relevant to the assessment of equality effects

6.3.1 Deprivation

According to the English Indices of Deprivation 2019 (IoD2019), Church Street⁴¹ is primarily located in one of the 20% most deprived Lower Super Output Areas in England and Wales. It is also within:

- The top 10% most deprived areas nationally for the ‘wider barriers’ sub-domain which includes issues relating to access to housing such as affordability and homelessness;
- The top 5% most deprived areas nationally for the ‘outdoors’ living environment sub-domain which contains measures of air quality and road traffic accidents;
- The top 10% in terms of employment deprivation which measures the proportion of the working age population in an area involuntarily excluded from the labour market; and
- The top 20% most deprived areas for crime deprivation which measures the risk of personal and material victimisation at the local level.

Furthermore, in terms of income deprivation Church Street is amongst the top 10% most deprived nationally. Supplementary indices for deprivation also rank Church Street:

- In the top 10% most deprived areas nationally for Income Deprivation Affecting Children Index (IDACI) which measures the proportion of all children aged 0 to 15 living in income deprived families; and

³⁹ ONS (2021). Sexual orientation (detailed) (TS079). Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

⁴⁰ True Vision (2022). Sexual Orientation Hate Crime. Available at: [Sexual Orientation & Transgender Hate Crime - True Vision \(report-it.org.uk\)](https://www.report-it.org.uk/)

⁴¹ For the purpose of this report deprivation in Church Street will refer to the Lower Super Output Area (LSOA) named Westminster 009K

- In the top 5% most deprived areas nationally for Income Deprivation Affecting Older People Index (IDAOP) which measures the proportion of those aged 60+ who experience income deprivation.

6.3.2 Employment

The regeneration scheme is located within the top 10% most deprived neighbourhoods nationally in terms of employment deprivation, employment deprivation measures the proportion of the working age population involuntarily excluded from the labour market.⁴²

Table 6-12 below indicates both economic activity and inactivity levels of the population at the relevant geographies. The project area LSOAs have the highest proportions of residents who are economically active but unemployed, at 5.3% in Westminster 009J and 5.9% in Westminster 009K. Furthermore, Church Street ward (50.3%) and the LSOAs (43.6% in 009J and 48.5% in 009K) have significantly higher proportions of economically inactive residents than Westminster (37.9%) and London (33.8%).

Table 6-12 Economic activity status (%) by geographical area, 2021⁴³

Economic activity status	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
Economically active: in employment	47.4	41.5	40.9	55.6	59.4
Economically active: unemployed	5.3	5.9	5.2	4.0	4.1
Economically inactive	43.6	48.5	50.3	37.9	33.8

Table 6-13 Employee jobs by broad sector group (%) by geographical area⁴⁴

Occupation	Westminster 009J	Westminster 009K	Church Street	Westminster	London
Managers, directors, senior officials	12.6	14.6	12.1	22.5	14.6
Professional occupations	22.3	20.0	20.1	30.6	25.8
Associate professional & technical occupations	10.7	14.3	13.6	17.3	15.3
Administrative & secretarial occupations	6.8	8.2	8.8	6.6	8.5
Skilled trades occupations	10.3	5.0	6.9	3.4	7.5
Caring, leisure & other service occupations	8.9	10.0	10.2	6.1	7.7
Sales & customer service occupations	9.7	11.1	11.2	5.1	6.3

⁴² Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 009K LSOA. Employment Deprivation Domain. Available at: [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

⁴³ ONS (2021). TS066 – Economic activity status. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

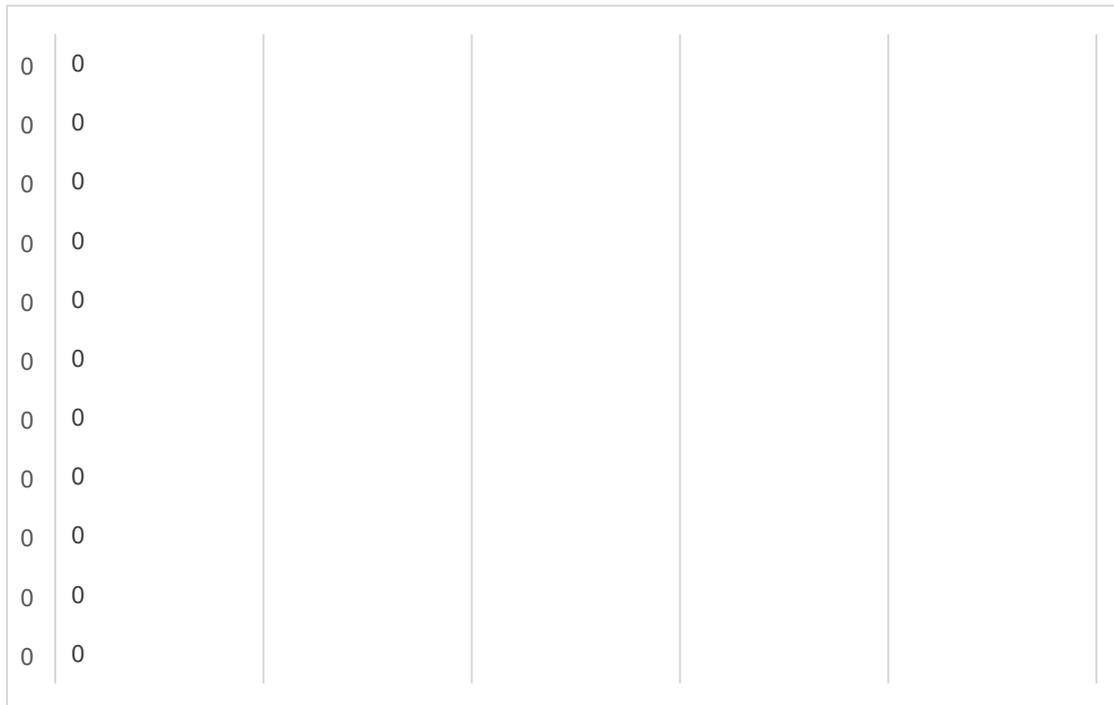
⁴⁴ ONS (2021). TS063 – Occupation. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

Process plant / machine operatives	4.8	5.7	5.7	2.7	5.0
Elementary occupations	14.0	11.1	11.5	5.7	9.2

Table 6-13 presents a detailed breakdown of employment sectors within the geographical areas for 2021. At all geographies, more people work in professional occupations than any other occupation sector – the range being between 30.6% in Westminster, and 20.0% in Westminster 009K. Westminster 009J has a high proportion of residents working in elementary occupations, at 14.0%, and Westminster 009K has a high proportion working in Manager, director, or senior official occupations, at 14.6%.

Figure 6-2 shows the percentage of people aged 16-64 years in employment within each ethnic group for London in 2021. This shows a lower rate of employment for BAME groups (except Indian), especially amongst Pakistani and Bangladeshi groups (58%). Furthermore, employment rates for people aged 16-25 are lower than the overall population and the disparity between ethnic groups is even greater.

Figure 6-2 Percentage of people aged 16 to 64 years in employment within each ethnic group, 2021⁴⁵



Source: Annual Population Survey (2021)

6.3.3 Education

The regeneration scheme is located within one of the 50% most deprived neighbourhoods nationally in the education, skills and training domain, this domain measures the lack of attainment and skills in the local population.

Table 6-14 highlights the different levels of educational attainment by the relevant geographical areas. The project area geographies in Westminster have significantly higher proportions of residents with No Qualifications – 22.8% in Westminster 009J, 24.4% in Westminster 009K, and 25.2% in Church Street Ward, compared to 12.9% in Westminster

⁴⁵ Gov.uk (2022). Employment: main facts and figures. Available at: [Employment - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://www.gov.uk/ethnicity-facts-figures)

and 16.2% in London. 50% of residents in Westminster 009J have a Level 3 or 4 qualification compared to 50.9% in Westminster 009K and 51.3% in Church Street – Westminster and London have significantly higher proportions of residents with Level 3 or 4 qualifications.

Table 6-14 Educational attainment by different geographical areas⁴⁶

Educational attainment	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
No qualifications	22.8	24.4	25.2	12.9	16.2
Level 1 qualifications	10.6	8.7	8.1	4.9	7.7
Level 2 qualifications	9.2	10.7	9.4	6.9	10.0
Apprenticeship	3.2	3.0	2.7	2.1	3.2
Level 3 qualifications	9.3	12.8	14.3	12.4	13.2
Level 4 qualifications and above	40.7	38.1	37.0	57.7	46.7
Other qualifications	4.1	2.3	3.3	3.2	3.1

There are no schools within the immediate site, however there are several schools located within Church Street ward. These include the following primary schools: Gateway Primary School, St Edward's Catholic Primary School, Christ Church Bentinck CofE Primary School, Paddington Green and Portman Early Childhood Centre. Secondary schools include Ark King Solomon Academy, Paddington Academy, St. Marylebone and North Westminster Community School.

Table 6-15 Estimated Walking Distance (miles)

School Name	Walking Distance from Church Street
Gateway Primary School	6 min (0.3 mile)
St Edward's Catholic Primary School	6 min (0.3 mile)
Christ Church Bentinck CofE Primary School	7 min (0.3 mile)
Paddington Green	4 min (0.2 mile)
Portman Early Childhood Centre	5 min (0.2 mile)
Ark King Solomon Academy	2 min (0.1 mile)
Paddington Academy	24 min (1.2 mile)
St. Marylebone	21 min (1.1 mile)
North Westminster Community School	22 min (1.1 mile)

Source: Google Maps, 2020

6.3.4 Health

There is a tendency for people belonging to protected characteristic groups, particularly young people, older people, disabled people, and BAME people, to experience poorer health.⁴⁷

The health of people in Westminster is varied compared with the England average. Westminster is one of the 20% most deprived local authorities in England and about 27% (6,900) of children live in low-income families. Between 2014 and 2016 life expectancy for both men and women was better than the national average.⁴⁸

⁴⁶ ONS (2021). TS067 – Highest level of qualification. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

⁴⁷ Equality and Human Rights Commission, (2010); *How Fair is Britain?* Report. Available at: [How fair is Britain? | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com)

⁴⁸ Public Health England (2018). *Westminster Health Profile 2018*. Available at: [Local Authority Health Profiles - Area search results - OHID \(phe.org.uk\)](https://phe.org.uk)

Life expectancy of the Westminster population can vary dramatically depending on where people live. Men living in least deprived areas live nearly 17 years longer than men living in the most deprived areas. For women this gap is nearly 10 years.⁴⁹

In terms of health issues within the borough, rates of childhood obesity, incidence of tuberculosis, and sexually transmitted infections, are all significantly worse than the England average.⁵⁰

As the population continues to age, the number of people with many chronic conditions is expected to increase. For example, the number of people with diabetes in England is expected to increase in the next two decades from 3.9 million people in 2017 to 4.9 million in 2035. Obesity is a major risk factor for diabetes and a range of other diseases, including heart disease and some forms of cancer, and this number will increase further if the prevalence of obesity also increases.

According to the 2015 Joint Strategic Needs Assessment on Dementia⁵¹, diagnoses of long-term conditions associated with ageing, such as dementia and Alzheimer's, will see an increase of 56% between 2013 and 2033. Furthermore, over 2,600 people in the city will have dementia by 2030. This trend will continue beyond 2030 with over 760 new expected cases of dementia in the city each year. This will have significant implications for health and social care services.

In terms of health facilities in the area there is only one GP and Health Centre in the Church Street area, the Lisson Grove Health Centre. There are four dentists: the Central London Community Healthcare, Church Street Dental Surgery, mydentist, and Inspire Dental Health one optician: Braham Optician and the Pharma Medic pharmacy on Church Street.

6.3.5 Housing

Westminster's private rented sector is the largest in England, comprising 43% (45,000)⁵² of properties. Intermediate housing comprises an estimated 1.5% of the stock in Westminster (1,600 homes) while social housing makes up 25% (27,000 homes).

There is an on-going need to increase the provision of affordable housing available to residents in Westminster. In November 2019 there were 7,500 households waiting for affordable housing.⁵³ This includes:

- 4,500 households waiting for social housing (of which 2,700 are homeless households in temporary accommodation); and
- 3,000 households waiting for intermediate housing.

Due to the shortage of social housing in the borough, households face waiting times (over ten years) in temporary housing before a permanent property is available and up to 25 years for a larger home.

There are approximately 4,950 properties located in Church Street.⁵⁴ According to the 2021 Census, the majority of households at the LSOA and ward level are rented. Church Street has the largest percentage of social rented households (58.3%) followed by Westminster

⁴⁹ Joint Strategic Needs Assessment for Westminster & Kensington and Chelsea (2018); *Highlight Reports*. Available at: [Local Authority Health Profiles - Area search results - OHID \(phe.org.uk\)](#)

⁵⁰ Public Health England (2018). *Westminster Health Profile 2018*. Available at: [Local Authority Health Profiles - Area search results - OHID \(phe.org.uk\)](#)

⁵¹ Joint Strategic Needs Assessment (2015). Dementia. Available at: [Dementia | Joint Strategic Needs Assessment \(jsna.info\)](#)

⁵² City of Westminster (2015). Westminster Housing Strategy – Direction of Travel Statement. Available at: [Decision - Westminster Housing Strategy - Direction of Travel Statement | Westminster City Council](#)

⁵³ Information provided by Westminster Council.

⁵⁴ Valuation Office Agency (2017). Available at: **Error! Hyperlink reference not valid.**

009K (52.4%). These proportions are significantly higher than observed across both London (23.1%) and the borough (28.3%).

Consequently, the percentage of households who own their home are significantly lower across the LSOA and ward geographies compared to Westminster (27.4%) and London (45.2%). The median price paid for a property in Church Street was £464,500 in 2017, which is less than the media price in Westminster by 56%.⁵⁵

Table 6-16 Tenure (%) by geographical area, 2021⁵⁶

Tenure	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
Owned	6.4	19.2	13.7	27.4	45.2
Shared ownership	0.4	1.9	0.7	0.7	1.5
Social rented	32.6	52.4	58.3	28.3	23.1
Private rented	60.2	25.2	26.0	43.3	30.0

Table 6-17 below shows occupancy rates (based on the ONS definition - number of bedrooms occupied) derived from 2021 Census data. London has the highest proportion of overcrowded households at 48.9%, followed by Westminster 38.6%, and Church Street Ward 24.5%.

Overcrowding is more likely to occur among some protected characteristic groups and is also likely to be more detrimental to people belonging to certain protected groups, for example, young people and disabled people.⁵⁷

Table 6-17 Household overcrowding and under-occupation⁵⁸

	Overcrowded			All households	% Overcrowded
	1 below standard	2+ below standard	Total		
Church Street	774	338	1,112	4,545	24.5
Westminster	25,088	11,541	36,629	94,814	38.6
London	927,909	746,047	1,673,956	3,423,890	48.9

6.3.6 Transport and connectivity

Church Street benefits from excellent public transport accessibility. Edgware Road Underground Station is located in the southwest corner of the area. The station provides access to the Bakerloo Line. A separate Edgware Road Underground Station which accesses the Circle, District and Hammersmith and City Lines, is located three minutes' walk to its southeast. Marylebone Station provides access to the Bakerloo Line and also National Rail services.

Most of the site has a Public Transport Accessibility Level (PTAL) rating of 6b; the highest level, emphasising the area's importance as a diverse residential, business and leisure

⁵⁵ City of Westminster (2018). Church Street Ward Profile. Available to download online.

⁵⁶ ONS (2021). TS054 – Tenure. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk)

⁵⁷ Equality and Human Rights Commission, (2010); *How Fair is Britain?* Report. Available at: [How fair is Britain? | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com)

⁵⁸ This analysis uses the 'bedroom standard' measure of overcrowding, which determines how many bedrooms households need based on the ages, genders and relationships of members. Households are overcrowded if they have fewer bedrooms than they need. They are under-occupying if they have more bedrooms than they need.

destination for local residents.⁵⁹ However, the rating is fragmented in the north of the site, ranging from 1b (second worst) to 6a (second best).

Despite good transport accessibility and connectivity, Church Street area is bound by large infrastructure which creates clearly defined edges but also act as barriers to accessibility and movement from the neighbourhood.⁶⁰

6.3.7 Public realm and open space

The ability to access and use the public realm is important to ensuring that all members of society are able to participate in their community. However, certain PCGs such as people with a disability and BAME groups are less likely to take part in public life than other sections of the population. For disabled people, public spaces can often be inaccessible due to mobility limitations. Access to the public realm is also important to the provision (and management) of play space for children.

The Partnership Approach to Open Spaces and Biodiversity in Westminster⁶¹ identified that there were over 200 open spaces in the borough, and that public open spaces amount to approximately 822 hectares. Almost one quarter of Westminster's 8.9 square mile area is open and green space, ranging from large, multi-functional areas such as Paddington Recreation Ground to small ornamental gardens, squares and 'pocket parks'. Westminster's 'blue ribbon' waterways are also included – canals and of course the Thames. These assets are supplemented by the five Royal Parks that fall within Westminster – Royal Parks' land accounts for around 80% of the borough's total green space. Finally, there are 21 registered parks and gardens and 85 London Squares in Westminster.

The closest open spaces are: Regent's Park (east of the site) and Broadley Street Gardens (within the site). There is also a private open space located within the site. Regent's Canal, to the north-west, provides a linear green route with opportunity for walking, cycling and interaction with nature, providing vital green infrastructure. Currently the Canal is mostly inaccessible directly from the Church Street area due to built development and level changes associated with the Canal. Regent's Park and Hyde Park are two major London parks within a 15-20 minute walk to Church Street, however there is not a clear or direct route to the parks and there is a lack of way-finding and signage.

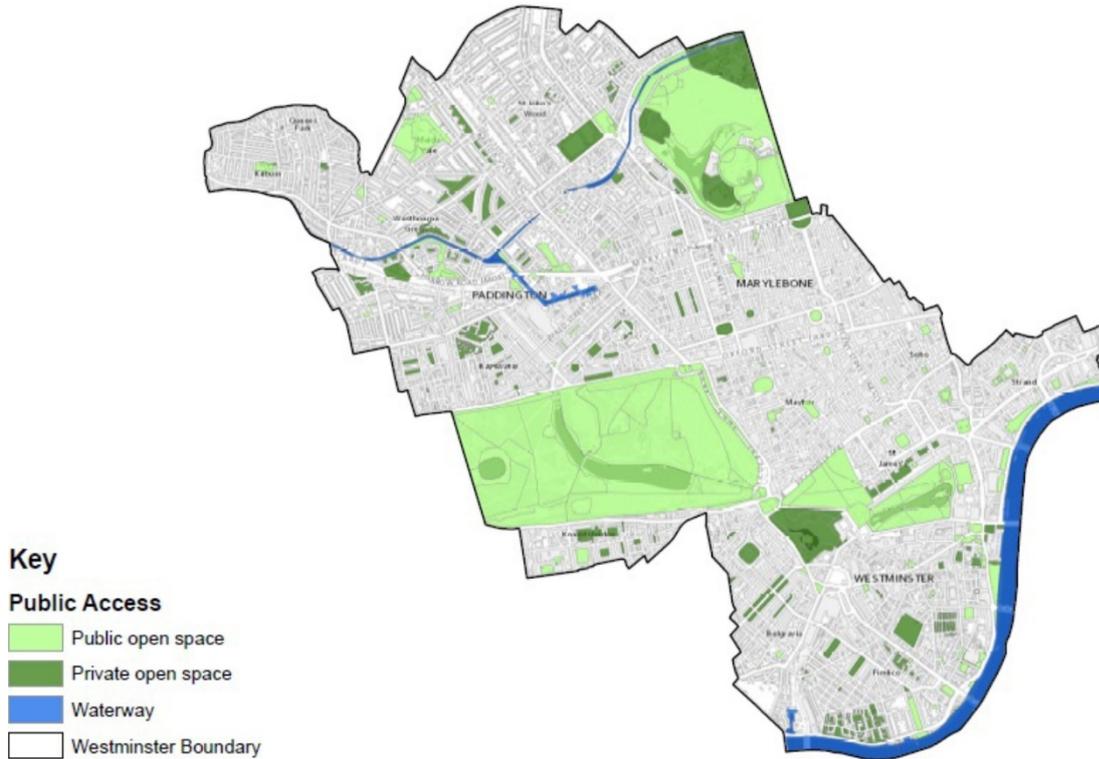
The open and green spaces are listed in the Appendix 1 of the Partnership Approach to Open Spaces and Biodiversity, reproduced below in Figure 6-3.

⁵⁹ Transport for London (2019). Public Transport Accessibility. Available at: [WebCAT planning tool - Transport for London \(tfl.gov.uk\)](https://www.tfl.gov.uk)

⁶⁰ City of Westminster (2017). Church Street Masterplan. Available at: [westminster.gov.uk/sites/default/files/church_street_masterplan_dec_2017.pdf](https://www.westminster.gov.uk/sites/default/files/church_street_masterplan_dec_2017.pdf)

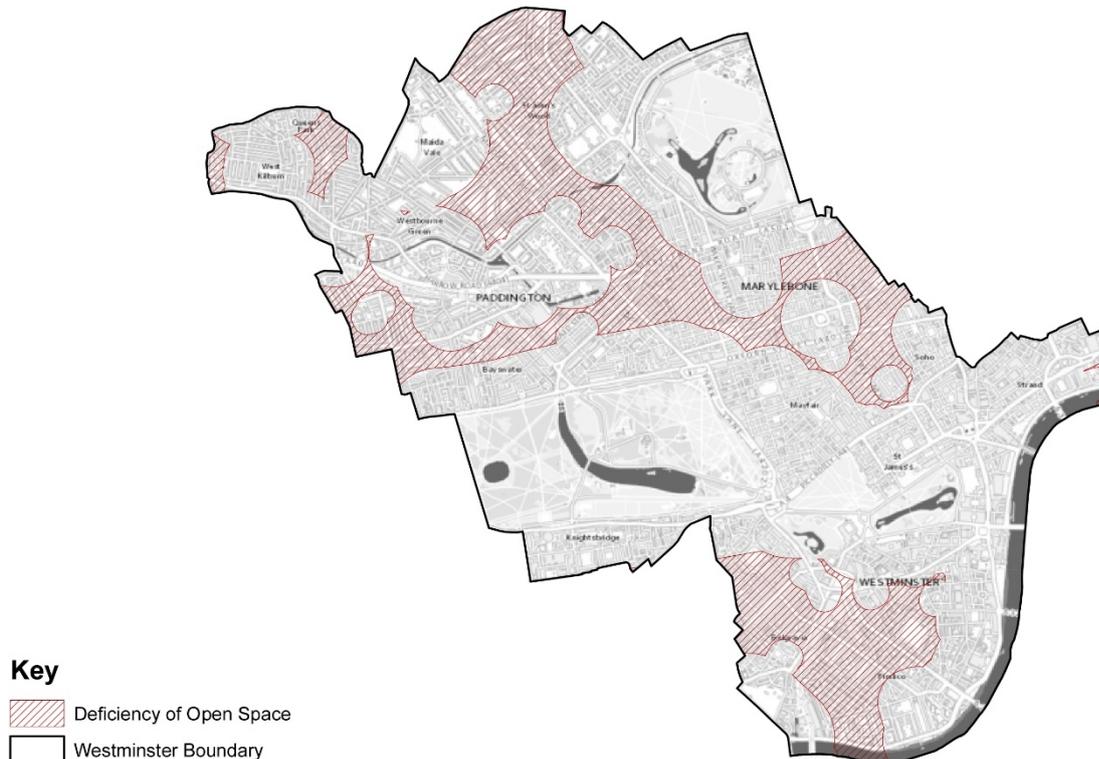
⁶¹ City of Westminster (2019). Open Space and Biodiversity Strategy. Available at: [a_partnership_approach_to_open_spaces_and_biodiversity_in_westminster_-_march_2019.pdf](https://www.westminster.gov.uk/sites/default/files/open_space_and_biodiversity_strategy_march_2019.pdf)

Figure 6-3 Map of open and green spaces



Despite its proximity to Regent’s Park, a large swathe of the area is also classed as being deficient in access to open space, as noted in the Partnership Approach to Open Spaces and Biodiversity in Westminster and as can be seen below in Figure 6-4.

Figure 6-4 Map of open space deficiency areas



People sharing protected characteristics may be disadvantaged if they are unable to access public open space, and for certain protected groups there are considerable advantages associated with access to open space; for example, young and older people are likely to benefit from opportunities for active and passive recreation, and socialising with others.⁶²

6.3.8 Safety and security

The feeling of safety and security within a person's local area is key to ensuring their personal wellbeing. Everyone is vulnerable to feelings of being unsafe, however these may be particularly acute for people belonging to certain protected characteristic groups, including young people, older people, disabled people, women, and people belonging to a particular ethnicity, or sexual orientation.⁶³

The top three reported crimes within Church Street in April 2023 were classed as anti-social behaviour (45) followed by violence and sexual offences (36) and theft from the person (14).⁶⁴

Crime rates in Westminster's wards are influenced by the influx of visitors to the borough. According to the 2017 City Survey, 33% of residents in Church Street perceived anti-social behaviour to be a problem in their area.⁶⁵

6.3.9 Community cohesion

To ensure healthy communities which are functional, safe, and enjoyable places to live and work, it is important to promote community cohesion and good relations between different groups. Encouraging civic engagement and ensuring dialogue with all people in the community; particularly those belonging to protected characteristic groups, is an important step in working towards community cohesion. For people belonging to protected characteristic groups, their feelings of a lack of cohesion (or exclusion) may be more acute than those of other people.

According to the City Survey 2017, 87% of the community within Church Street say that people from different backgrounds get on well. 20% of the residents spend time helping to improve the community and 26% are interested in helping more to improve community.⁶⁶

6.4 Primary research

Primary research has been undertaken as part of the wider Church Street Regeneration project, including a Housing Needs Assessment (HNA) with residents as well as business and market trader interviews and on-street customer surveys undertaken as part of the regeneration scheme EqIA. The following sections provide a summary of evidence collected from this research.

While these findings represent the wider regeneration scheme area, the high-levels trends can be indicative of the demographics and businesses within Site A. A detailed analysis of primary research findings is provided within the regeneration scheme EqIA.

⁶² Equality and Human Rights Commission, (2010); *How Fair is Britain?* Report. Available at: [How fair is Britain? | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

⁶³ Equality and Human Rights Commission, (2010); *How Fair is Britain?* Report. Available at: [How fair is Britain? | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

⁶⁴ Metropolitan Police (2023). Church Street. Available at: [Church Street | Your area | Metropolitan Police | Metropolitan Police](#)

⁶⁵ City of Westminster (2018). Church Street Ward Profile. Available to download online.

⁶⁶ City of Westminster (2018). Church Street Ward Profile. Available to download online.

6.4.1 Housing Needs Assessment

This section provides a summary of Church Street Residents using the Housing Needs Assessment (HNA) carried out by Westminster Council in Autumn 2018 as follows:

- A wide range of ethnic groups are represented. The highest concentrations of ethnic groups amongst were white British (21.6%), Arab (9.1%) and African (7%);
- Amongst residents 41.7% identify as Muslim, 24.1% as Christian and 14.3% identified as having no religion or belief;
- Many households were well established in the area, with the majority of households (68.6%) have lived in their property for over 5 years and 47.7% have lived there over 10 years;
- Nearly 50% of households were home to a resident aged 65 or over, 65% of which had medical issues, 21% needed to use wheelchair or walking aid at least some of the time and 62% said that they would not consider a move off the estate;
- Just over 50% of households had a member with a medical issue, 36% of which has a disability;
- The majority of residents were social housing tenants. Of these tenanted households, 28% contained children, 21% were considered overcrowded and 6% were single-parent households;
- 43% of social housing residents said they would consider moving off the estate if regeneration goes ahead, with preferred areas including Maida Vale, Little Venice, Marylebone, St Johns Wood, Church Street and Paddington.
- Around 40% of all properties were private leasehold properties, of which 51% were resident leaseholders or family occupied and 49% were rented out to private tenants; and
- Just over 30% of leaseholders were aged 65 or over and had owned the lease for 15+ years.

6.4.2 Business interviews

This section provides a summary of interviews that took place with businesses and market stall holders in May 2019:

- The majority of businesses interviewed were owned by males (89.8%);
- The largest ethnic group amongst business owners and managers was Arab followed by Asian/Asian British: Pakistani. Overall, BAME groups make up over 80% of business owners on the existing site;
- The majority (66%) were license holders for a market stall followed by those who are the main leaseholder of the property they were occupying (21%);
- Most businesses were well established at the location, with over 60% of businesses have been at the location for over 6 years and almost 40% over 10 years;
- The largest religious group amongst business owners and managers was Islam (69.2%), followed by Christianity (12.6%), Hinduism (5.5%) and Judaism (5.5%);
- There was a high presence of small businesses in the area, with businesses having two full time and two part time employees on average with the majority being Asian/Asian British (31%);
- The highest level of agreement from business owners was to statements that customers come from the local community and their business serves people from a shared ethnic background;
- Almost 60% of businesses were supportive/very supportive of the regeneration plans for Church Street due to economic uplift and increased footfall; and
- While ~5% were very unsupportive due to fear of losing customer base and uncertainty of work during construction periods and beyond.

6.5 On-street surveys

The following section summarises interviews that were undertaken in the Church Street area in May 2019, with customers visiting local business as well as those passing through the area:

- The majority of respondents (43%) lived in the Church Street area, 28% visited every day and 19% visited every week;
- Active and public transport is population, with the most frequent mode of travel to the area being walking (46.5%), while a quarter travelled by bus and around 10% took the underground;
- Over 70% rated proximity of Church Street businesses and market as 'good' or 'very good', indicating the importance of the regeneration site to local residents;
- Over 50% visit Church Street to visit one or more specific businesses, shops or market stalls;
- Over 30% of interviewees felt there were no nearby alternatives to services they were using, with the market being unique to the area;
- Positive comments regarding regeneration of Church Street included welcoming the idea of modernisation to improve safety, community cohesion and economic uplift. While some negative comments included disruption to the community and difficult accessing relocated services; and
- There was limited variation in views on the regeneration across different genders, ethnic groups or religious groups but overall there were more negative views towards the proposals from women between 25 and 44.

7. Assessment of potential equality effects

7.1 Introduction

The assessment considers the potential impacts on affected people sharing protected characteristics arising from the potential exercise of CPO powers associated with Site A of the Church Street Estate Regeneration project. It considers the direct impacts of the CPO for interested parties of affected residential and commercial properties on the site.

It also considers how the exercise of CPO powers would likely contribute to the realisation of equality effects arising from the wider planned development for groups with protected characteristics in the area. For the purpose of this EqlA the wider planned development refers to the Church Street Regeneration project as a whole (planned activities covering sites A, B and C). However, where appropriate the assessment focuses on specific detailed proposals within Site A.

7.2 Homes

7.2.1 Direct impacts of the CPO

Loss of homes for resident leaseholders

The CPO associated with Site A could result in the loss of homes for existing resident leaseholders living within properties currently on the site. Whilst the Council has successfully negotiated with the majority of leaseholders to acquire residential leaseholds prior to the development, as of June 2023, there are still seven residential leaseholders remaining within Site A.

The Council has confirmed that four of the seven leaseholds are under offer to the Council and aims to negotiate the purchase of the remaining leaseholds from existing leaseholders. However, compulsory purchase powers may be required to acquire the remaining leaseholds should these negotiations be unsuccessful.

It is understood that leaseholds have been bought from the Council under the Right to Buy scheme and as such at discounted rates from the market value of the property. Whilst the leaseholds will be brought at market value, leaseholders may have difficulty in securing a similar property in the area, in other preferred areas or in the new development at an equivalent cost. This could result in adverse effects for leaseholders who live in the affected interests and may force them to move out of the area or lose full ownership of a leasehold property.

Specific details about the protected characteristics of these resident leaseholders are unknown. However, groups that could be particularly sensitive to the impact of the CPO include people from ethnic minority groups, older people, disabled people and families who may lose important social and community ties. Further adverse impacts may be experienced by older people, those with low incomes as well as some non-UK born residents who may find it difficult to transfer mortgages or apply for a new mortgage for a new property. Some leaseholders may have no option but to join the private rental sector if they are unable to find an affordable equivalent home.

The Council's Policy for Leaseholders in Renewal Areas⁶⁷ sets out a number of options for resident leaseholders to remain in, or return to, their Housing Renewal Area with different options available to suit different circumstances. Where leaseholders opt to remain in, or return to the Housing Renewal Area, reasonable efforts are made to help them to remain homeowners. Options include:

- Buying one of the new homes outright or through an equity loan or on a shared equity basis or shared ownership basis;
- Buying another leasehold property in the housing renewal area; or
- Becoming a social or an intermediate tenant in the housing renewal area.

All resident leaseholders have been offered a new home within the regeneration scheme, of which only four have expressed an interest in returning. Engagement with leaseholders has resulted in objections to the sales of leaseholds and as it was felt that they would be unable to afford a similar property within the area.

For leaseholders who wish to move away from the area, the Council provides help and support with the move. Resident leaseholders are entitled to financial compensation equal to the open market value of the property as well as further compensation in the form of disturbance and homes loss payments.

Non-resident leaseholders (those not currently living within the properties on Site A) will only have the option to sell their property at market value to the Council and receive the statutory financial compensation. They will also receive a basic loss payment, which is 7.5% of the market value of the property and disturbance payment in relation to costs incurred in acquiring a replacement property.

The EqIA for the Policy for Leaseholders in Renewal Areas identified a potential negative impact where a leaseholder is eligible to become an intermediate tenant, rather than a social one. In this case, the tenancy offered is likely to be a shorthold assured one which offers less security than a social tenancy (and some providers only renew them in certain circumstances or offer them for a fixed term). They offer less security than a leaseholder will have now as a homeowner. Having to pay an intermediate rent may also lead to some leaseholders having higher housing costs than before. This might particularly impact households with children, older people and those with disabilities. However, a tenancy is only likely to be offered in limited circumstances and where the home ownership options are not appropriate for the leaseholder and intermediate tenancies are offered subject to the being affordable on the leaseholder's income.

The Council's current mitigation plan involves offering all renewal tenants moving on a permanent basis first refusal to all available new build local stock, with the option to move permanently if that is the preferred option. While this option minimises both the inconvenience of tenants having to move more than once and also means tenants will not have to wait until the new development is built (which can take years to complete) before moving into their new permanent home, it does not presently mitigate the possible impacts experienced by those that may not accept these conditions and may have to find alternative accommodation outside the Church Street area. Tenants may refuse the options offered for a number of reasons, ranging from loss of sentimental value of their home to problems with the design and anxiety around moving, in which case the Council should engage directly with these residents and find ways to mitigate the negative impacts they will experience.

Westminster Community Homes (WCH) have initially acted on the Council's behalf to organise and maintain engagement and communication with all renewal leaseholders. This has been done by writing, calling and physically visiting leaseholders at a time and place which meets the leaseholder's needs. During these personal sessions WCH run through all

⁶⁷ Westminster Council (2018) Policy for Leaseholders in Housing Renewal Areas. Available at: [Decision - Policy for Leaseholders in Housing Renewal Areas | Westminster City Council](#)

the available options leaseholders have, explain the home loss and disturbance compensation packages the leaseholders is eligible to and outline the additional support the Council can offer them.

Furthermore, the Church Street regeneration office has also held leaseholder engagement sessions during weekday evenings and on Saturdays, to offer more support and advice to all leaseholders in case they work or have care responsibilities during the day and week. The following steps have been undertaken to improve communication and engagement with different leaseholders including:

Older leaseholders:

- Larger font on correspondence provided on request;
- Engagement and communication with the leaseholder's family members arranged with their consent;
- Setting aside additional time for visits/interviews/viewings etc for elderly leaseholders;
- Arranging transport to viewings/events etc; and
- Encouraging leaseholders to have an advocate, for instance a family member attend meetings.

Leaseholders who do not speak English as a first language:

- Translation services have been arranged where English is not easily understood by the leaseholder.

Disabled leaseholders:

- Within the Leaseholder policy the Council will cover the cost of the new adaptations if already fitted in the existing property

Public Participation, Consultation and Research (PPCR) and an independent residential advisory service were also appointed by the Council as a residential impartial support to offer free advice to all leaseholders, secure tenants, Tenants' Association tenants and private tenants.

The Council has also provided additional assistance to vulnerable leaseholders and engagement with third parties including family members, social services and health practitioners to identify and address any special needs.

Loss of homes for private tenants

The CPO associated with Site A could result in the loss of homes and rel of private rental tenants. The EqIA undertaken for the Policy for Tenants in Housing Renewal Areas 2019 found that the impact on private tenants is largely negative as there is no rehousing offer, although help and support will be available to those that may be homeless as a result of housing renewal. In addition, availability of private rental accommodation in the Church Street area is lower than much of Westminster so it could be particularly hard for this group to find alternative housing in the local area or borough.

Whilst there are no confirmed details about private rent tenants remaining on the site, households that include private tenants with BAME status, older people, disabled people and families that may lose important social and community ties if they need to move away from the area could be particularly vulnerable to adverse impacts. However, it is also recognised that this is a risk that already exists with shorthold private rental tenure.

The Council has already appointed an Independent Resident Advisor to provide advice and support to tenants and leaseholders. This continued support (or signposting towards existing organisations providing advocacy and advice) to help find alternative affordable accommodation has helped to minimise against negative equality impacts. In January 2021, the Council published a five-year private rented sector strategy detailing its plans to improve

housing market conditions for tenants and to ensure the sector is well managed. The strategy identifies the need to ensure properties are good quality, and that all stakeholders including tenants, landlords and lettings agents are informed of their rights and responsibilities and that support can be provided where needed, including taking action when the law is broken.

7.2.2 Indirect impacts of regeneration realised by CPO

Net increase in housing provision on Site A

The approval of the CPO for Site A would enable new housing to be developed on the site as part of the regeneration schemes. This would result in an increase from 145 to 428 residential properties (a net increase of 283 homes) on site A.

This includes replacement homes provided at social rent for existing council tenants and new homes, of which 50% will be affordable. The net increase in affordable housing will benefit people with priority for affordable housing, both social and intermediate, that are more likely to have protected characteristics (particularly for social housing).

While those likely to benefit from the increase in affordable homes are not necessarily local residents, the council has committed to developing a Local Lettings Plan (LLP) for the new additional affordable housing supply. Proposed principles for regeneration areas within the LLP are set out in the Supply and Allocation of Social Housing 2018/19 Cabinet Report⁶⁸ and focus on prioritising local people. LLP will be subject to consultation.

Baseline data and information from the Housing Needs Assessment shows that Church Street has high levels of overcrowding. It is considered that an increase in the provision of housing suitable for families would also have a positive impact for households with children and multi-generational families.

Specific groups with high needs for access to housing and high representation amongst the local population include BAME groups and older people. These groups particularly stand to benefit from the new housing, except where affordability barriers could limit these opportunities. In particular, new private housing in the area may be beyond the means of many local residents.

There is also an on-going need to procure more settled accommodation for homeless households and this was cited as a priority during consultation with young people with regards to housing regeneration. There may be an opportunity for the regeneration to help address the needs of vulnerable people in the area through suitable housing and other forms of support, which may benefit people belonging to certain protected groups including young people.

The population aged 65+ is projected to increase significantly over the next 20 years in Church Street and Westminster borough. An increase in the number of elderly people will require appropriate housing that meets their needs. Housing implications include increased demand for both specialist accommodation for older people and for services and home adaptations to enable older people to remain 'at home' living independently. This will also have implications for the types of development and services that will be required to meet the needs of society, including disabled people.

The proposals include 10% of new homes to be fully wheelchair accessible. This will be of particular benefit for people with mobility issues including older people and people with disabilities and an improvement on current housing on site which do not have lift facilities.

⁶⁸ Westminster Council (2018). Cabinet Report: Supply and Allocation of Social Housing 2018/19. Available at: [social_housing_supply_and_allocations_2018-19.pdf](https://www.westminster.gov.uk/social-housing-supply-and-allocations-2018-19.pdf) ([westminster.gov.uk](https://www.westminster.gov.uk))

Improved quality housing on Site A

Many of the responses to initial public consultation regarding the options for Sites A, B & C acknowledged that properties on the site were no longer 'fit for purpose' and cited specific issues around access, heating and ventilation and anti-social behaviour. Older people also specifically commented on the lack of lift access, being unable to bathe, difficulties in using their toilets and the heating systems. The properties currently within Site A do not have lifts and initial consultation feedback found that residents would like new homes to be accessible to older people and people with disabilities, including lift access.

In line with the feedback received from more recent consultation, the Council have stated that new homes will be designed in accordance with the Nationally Prescribed Space Standards which promotes dual aspect flats, good natural surveillance, adaptable for changing needs and provision of private amenity space. It's estimated that the new homes will require less energy to heat and thereby expected to reduce heating bills. This is a benefit that can be shared by groups with protected characteristics including those in lower income or single households and more vulnerable to heating charges such as older people.

Potential adverse effects with respect to loss of light

A Rights of Light report has been prepared by GIA on behalf of the Council. This assesses the impact on neighbouring properties as a result of the Church Street Masterplan.

Of the 100 properties assessed for potential rights of light (RtL) impacts, 10 properties experience minimal losses and 33 properties experience actionable losses of light as a result of implementing the regeneration scheme proposals.

For properties, particularly residential properties, which do experience a loss of light, equality effects may arise for residents who share protected characteristics. This may arise where a resident is more sensitive than other people, due to a protected characteristic, for example a disability.

All parties who suffer an expected RtL injury will be notified and engaged with. Property owners will be entitled to compensation for any reduction in the value of their property caused by the development. It is acknowledged where occupiers are tenants, they may not be the beneficiary of the compensation. All affected parties included in the CPO, including RtL parties, will be notified that the CPO has been submitted and notified of the process for making an objection / representation. If a council tenant experiences an interference with their natural light which has a significant impact on their use and enjoyment of their accommodation due to a disability/condition or their specific use of a property, they will be able to approach the Council's housing team for a review of their housing needs.

7.3 Market and economy

7.3.1 Direct impacts of the CPO

Business closure/non-viability of business following permanent loss of units

Where possible the Council is negotiating with existing property owners to acquire commercial freeholds and leaseholds prior to the development. However, there are seven remaining interests on site where an agreement has not been made with leasehold interests. The use of compulsory purchase powers could result in the closure or relocation of these businesses. Whilst the proposed regeneration scheme includes provision for shop units, the CPO Scheme does not allow for existing business occupiers to relocate on the site.

Primary research undertaken for sites A, B and C found that over 84% of affected businesses were managed by a BAME freeholder or leaseholder. This may result in the closure of a number of BAME-owned businesses where they are unwilling or unable to relocate the business successfully, with some associated loss of employment, including amongst BAME employees. This is likely to be particularly important for any family-run businesses where more than one member of the family works for the business.

Equality effects can be experienced where the pattern of affected business owners or employees affects a single ethnic group, or other patterns in terms of protected characteristics, including effects of changes to the clustering of businesses offering services to a common customer set.

The Church Street regeneration team has assisted current businesses in the area since 2016. Located on Church Street the Regeneration Base has:

- Served as a single point of contact for enquiries;
- Coordinated and delivered consultations and engagement sessions and workshops;
- Disseminated feedback, updates and information;
- Managed relationships with internal and external parties;
- Understood the needs and wants of the occupiers; and
- Created a Business Forum to centralise discourse providing an open forum for all.

A more formal Commercial Relocation Strategy is being developed to support existing occupiers find alternative accommodation so that they can maintain continuity of trade. Whilst the Strategy cannot guarantee a successful relocation, a concerted effort is being made by the Council to give businesses an opportunity to relocate through the identification of potentially suitable and available premises within the Borough. The aim of the Strategy is to;

- Assist in identifying relocation options in a way that best meets their needs and minimises disruption to trading; and
- Retain the Businesses within the borough and, if possible, within proximity to Church Street and the community that they serve (if this is their preference).

The Church Street regeneration team has gained an understanding of individual floor space requirements, rent, location and planning use class requirements. Initial discussions with occupiers have outlined a preference to remain within Westminster. Based on the specific preference (i.e. to remain on Church Street, close to Church Street, an area like Church Street within Westminster or just anywhere within Westminster), the team compiled data on suitable and available commercial units within Westminster's boundary. Searches are conducted monthly via online portals such as Rightmove, Zoopla and Loop.net by the Regeneration Team and, once assessed, suitable premises have been distributed to all leaseholders remaining on the site with priority given to those leases protected under the Landlord and Tenant Act 1954.

Since February 2020 the Council has engaged with Pharm Medica, being a key community resource that occupies a double unit on Site A. Given the service that the Business provides to the local community and the health and well-being benefits it offers, the Council was keen to retain the pharmacy in proximity to Church Street and facilitated an introduction with Berkley Homes, the developer of the neighbouring West End Gate development. An agreement has been reached for Pharm Medica to move into a unit within that development in Autumn 2023.

Additionally, a curation strategy for Church Street is being developed as part of the regeneration programme which will set out the strategy to be used when letting the new commercial units within the development. This will allow WCC to invite or accept business applications for commercial units. It is recommended that the strategy should include

measures to prioritise those businesses on the existing site and mitigation measures such as marketing and financial support for businesses who will not be able to return to the site.

The purchase of leaseholds or freeholds, appropriate compensation for costs associated with relocation and disruption in line with guidance, and support with identification of suitable alternative accommodation through the Commercial Relocation Strategy are considered appropriate measures to assist with mitigation against negative impacts for affected business owners on the site. However, it is important to ensure continued effective collaboration between all interested parties, taking consideration of the differing levels of support needed by individual business owners.

Some businesses may not be eligible under the CPO compensation code and are therefore vulnerable to closure/non-viability but will still be provided support to identify potential relocation opportunities under the Commercial Relocation Strategy.

There is an assumption that if all requirements are not fulfilled, there could be some adverse equality effects on businesses and employees on the site. It is recommended that the Council monitor engagement with affected parties, ensure compensation payments to those who are entitled to receive them are paid expeditiously, and that where viable, the Council supports relocation by making compensation payments in advance of the possession date to allow businesses to pay deposits on alternative premises.

Permanent or temporary loss of employment

Employees and self-employed workers at affected businesses may experience temporary or permanent loss of income and/or employment until relocated and/or where the employer closes/downsizes/relocates elsewhere.

Equality effects may be experienced where the pattern of effected employees affects a protected characteristic (e.g. race) disproportionately or have other protected characteristics which make them more sensitive than others to the effects of the regeneration. The potential negative impacts for affected employees can be mitigated against by providing support and advice through initiatives such as an Employment, Skills and Education Strategy for the scheme.

In addition, any employment opportunities created through the regeneration scheme should be accessible to all and promoted through a variety of channels to attract a diverse workforce. The localised Westminster Employment Service continues to provide an employment coaching service for the local community and works with local partners (Job Centre/developers etc.) to ensure existing employees and local people can benefit from job opportunities arising through the regeneration programme.

The Church Street Responsible Procurement Plan is also being compiled and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that residents and businesses are given priority over jobs and training opportunities.

Loss of shops and businesses providing current mix of culturally specific services and goods

The loss of existing shops, market stalls and business premises providing the current mix of goods, services and facilities at the site will also affect customers/users of these services. The on-street survey prepared for the wider project EqIA found that 51% of respondents were visiting the Church Street area for a specific shop or service.

Equality effects may be experienced where there are patterns in terms of affected customers and their having protected characteristics. The regeneration will bring a different mix of goods, services and facilities at the site, with the potential for a mix of positive and negative

effects for groups, possibly patterned in relation to protected characteristics. The existing site currently provides a cluster of businesses and organisations that provide goods and services to the Arabic and Muslim community which include, specialist food shops, restaurants, supermarkets and clothing. The effects on these ethnic and religious groups may include changes to access to culturally-specific goods and services, associated sense of belonging and cultural connections. The loss of these facilities could have an adverse impact on certain groups with protected characteristics in cases where the service is not relocated nearby or where there is no nearby alternative.

However, effective engagement with the local community should assist in identifying the needs and requirements of residents. The new retail provision is likely to result in increased number of customers who want to shop in the area and therefore benefiting existing businesses and providing better facilities for customers.

The Church Street regeneration team have provided on-site support to local business and an Independent Business Advisor was appointed to provide support and advice to local businesses. This has resulted in the successful relocation of Pharma Medica, to a nearby unit. A more formal Commercial relocation strategy is being developed to support other businesses to maintain operations and therefore limit the impact on customers.

The Cultural Infrastructure Plan work has been commissioned to identify and map existing cultural assets, identify any gaps and risks to culture as a result of the development proposals. The Council will conduct combined Regeneration and Place-shaping workshops to establish potential impacts of the design proposal and establish a set of strategic design principals that respect the cultural wealth potential of the ward. The Council is also presently running monthly property searches for Site A businesses requesting assistance with relocating locally and commercial units on Church Street are also being kept from going to market to provide options for affected businesses.

Loss of shops and businesses providing affordable and accessible goods and services for existing local community

The market and surrounding businesses currently provide affordable and accessible goods and services to those living in the immediate area. Local shops and markets offer staples such as fresh fruit and vegetables, meat and fish as well as affordable clothing and accessories. Other businesses provide affordable and/or local services such as hairdressers, cafes and pharmacies. The loss of these goods and services may have an adverse effect on those with low incomes, children, young people, older people, disabled people, families including single parent families and those from BAME groups.

The temporary relocation of the market is planned to be within close vicinity to the existing site which should minimise the impact on some of the above groups. However, there may still be issues for older people and people with disabilities who may have difficulties accessing the temporary market location. The Council should develop and implement appropriate support measures for these residents during the market relocation period, for example, through dedicated transport services and/or home delivery services.

An Independent Business Advisor has been appointed to provide support and advice to local businesses and this advice could extend to marketing and advertising advice to businesses to ensure existing and new customers are made aware of relocations.

Further, a commercial relocation strategy and market relocation strategy are being developed by the Council in support the relocation of businesses within the wider immediate area and to ensure that the market can continue to operate whilst the regeneration of the surrounding areas take place.

7.3.2 Indirect impacts of the regeneration scheme realised by the CPO

Creation of new employment opportunities

The Church Street regeneration project brings with it the opportunity for new employment, including temporary construction jobs and new retail jobs on site.

The area has high levels of unemployment and low levels of educational attainment. This includes those from BAME groups (Asian/ Black African/Arab and Latin American) who are currently overrepresented on the site in terms of employees. The groups who benefit from this new employment may vary considerably depending on the type of business and associated training. Equality effects may arise where employment or training is not available to groups with protected characteristics, for example if jobs require high skill/education levels which make it harder for some groups to access the opportunities.

The localised Westminster Employment Service provides an employment coaching service for the local community. The service works with local partners (Job Centre/developers and employers) to provide job opportunities and training for local young people. Similarly, the CS Neighbourhood Keeper Programme also plays an active role and supports local people into employment, entrepreneurship and training through local projects and capacity building training. The Church Street Responsible Procurement Plan has been drawn up and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that local residents are given priority over construction jobs and training.

Temporary disruption/relocation of Church Street Market

The overall regeneration scheme provides the opportunity to improve both the market offer and the facilities offered to existing and future traders. This includes around 220 stalls, 150 van parking spaces and 3,600m² of storage and facilities.

However, market stall holders may experience temporary relocation to a new site in the wider immediate area during the construction phase. Equality effects may be experienced where the pattern of affected business owners or employees affects a single race or share other protected characteristics.

While the Council will retain market stalls where possible, it is anticipated that temporary relocations may occur in situations where either:

- The construction site boundary encroaches on to the current location of the market;
- The trader requests a move;
- Large machinery must be brought to site via Church Street; or
- Noise and dust from especially heavy works might prove difficult for traders to endure.

Since the Council employs a Section 61 policy which does not allow for noisy works on a Saturday, disruption to Saturday traders in this area will be reduced. Additionally, public realm works will be phased in small increments to minimise impact on individual traders and make for faster completion. Due to lack of alternative pitches it may be necessary to suspend trading from affected pitches.

The EIA undertaken for this scheme found that areas most likely to be impacted by noise and vibration levels are Boscobel Street, Penfold Street, Church Street, Salisbury Street, Broadley Street and Edgware Road. This means stall holders and customers will be impacted by high noise and vibration, as well as air pollution during the construction phase of the scheme.

Overall, disruption to market traders is being minimised by continuing market trading as a whole in a new temporary location. The Council is currently consulting with market traders

on the new public realm plans and how the impacts of both the Public Realm and Site A works might affect them. The Council notes that to date, engagement feedback from traders has been very positive with only a couple of concerns about the suspension of trading.

Going forward, the council must ensure the relevant needs of traders and customers continue to be considered in order to continue operating successfully. Any additional financial burdens should also be considered, for example where potential costs of moving location could adversely impact market traders and where existing customers might need to pay extra travel costs in order to keep on using the market. In cases where relocation may not occur, the Council should consider potential health and wellbeing impacts from construction works on both stall holders and customers.

A Temporary Market Relocation Strategy has also been developed by the Council in an attempt to ensure that the market can continue to operate whilst the regeneration of the surrounding areas take place. The Council has pledged that the market will continue to operate throughout the works and be retained in one location. The commitment to residents has been made that this source of affordable food and clothing will not be adversely affected.

Regeneration of Church Street Market Infrastructure

Feedback from the business survey and public consultation found that there was strong support for improving the market facilities. The regeneration provides the opportunity to make comprehensive improvements to the market for existing and future traders. This includes changes to design, layout, appearance, storage, parking, provision of water, electricity and trader welfare facilities including toilets. This includes around 220 stalls, 150 van parking spaces, up to 4900m² storage and facilities. The regeneration of the market provides an opportunity to create an inclusive environment to meet the needs of market stall holders and their customers, including those with protected characteristics.

The revised detailed design for Site A includes toilet facilities, 4 loading and unloading spaces and between 24-32 trader storage spaces. According to the Environmental Statement produced for the proposed scheme, the revised detailed design for Site A includes toilet facilities and will offer 5% (of the number of units) disabled parking provision for residents as well as 5% standard residential car parking spaces. According to the statement, at Site A, this will be 22 residential disabled parking spaces and 21 standard residential car parking spaces. The residential car parking spaces are to be provided within the basement of Site A and will be accessible via two car lifts situated on Penfold Street. These facilities will be accessed from Church Street as opposed from Broadley Street as originally proposed, making it more accessible to traders. Respondents in the 2021 consultation sessions remarked on the need for cleaner toilets and parking spaces as important factors for the proposed development.

Although parking has been reduced at this site it is recommended that the Council seek to maintain overall parking and storage provision at the target levels of 55 van parking spaces and 55 storage spaces across sites A, B and C. Allocation of parking and spaces for traders has yet to be determined and should be included as part of a future strategy for the new market. Prioritisation should take into account a variety of factors and the cost of parking and storage hire should be assessed to ensure fairness and affordability to all market traders.

On-going engagement with market stall holders has been undertaken by the CS Retail, Markets and Business Team. It is recommended that a dedicated 'Market facilitator' is appointed from the team for continued engagement to ensure that the appropriate facilities for traders are provided.

Potential for increasing rents or ‘gentrification’ of the area

The regeneration scheme will provide brand new fit for purpose commercial units which in combination with the enhanced public realm and access improvements will likely result in an increase in commercial rents in the area. The mix of type and usage of shops, businesses and facilities on offer, as well as public space will differ from what currently exists. This may create a change in the types of businesses moving into the area and result in the potential for other businesses to relocate permanently elsewhere.

Aside from BAME business owners, this may also affect BAME people who currently work or shop in businesses on the existing site may be forced to leave the area due to high rents or experience a loss of community cohesion, cultural connections and social inclusion where the cluster of services they use is dispersed or lost.

The Church Street Regeneration Programme has contracted business support providers to assist businesses adaptation to changes brought by the regeneration process. This will assist in mitigating against some of the adverse impacts for businesses. BAME jobseekers will be able to share in direct and indirect newly created employment opportunities and should be supported to ensure that they are aware of job opportunities in the area.

The Independent Business Advisor appointed by the Council to provide support and advice to local businesses could provide marketing and advertising advice to businesses to ensure existing and new customers are made aware of relocations of businesses or of alternative businesses offering similar services or products. However, businesses that serve the local community should be supported by the Council to continue operating in the area during construction and operation phases where possible.

7.4 Making connections

7.4.1 Indirect impacts of the regeneration scheme realised by CPO

Safety, security and accessibility during construction

The proposed development is large scale with the construction phase estimated to last around 7 years. During this time some tenants will be living in the area whilst the demolition and construction of other residential buildings takes place.

The area has high levels of crime deprivation and feedback from public consultation and other engagement activities has identified fear of crime in the area as an issue. There is a need to balance safety and security with accessibility needs during construction. It is important to ensure that the direct and indirect risks of physical danger associated with construction are minimised. This includes avoiding the creation of secluded or isolated areas through construction hoardings.

Safety and security risks could result in adverse effects for those who are more vulnerable to safety and security issues including children, women (including pregnant women), older people, people with disabilities, young people, ethnic minority groups and people from the LGBT community.

A Construction Management Plan should be followed and best practice Code of Construction should be followed, taking into account the needs of those with protected characteristics.

For example, footpath diversions could have an adverse impact on those with mobility issues, in particular older people, disabled people, pregnant women and people with pushchairs. Key walking routes and crossing points in the area should therefore be

maintained or appropriately diverted where possible and CCTV or manned security provided where natural surveillance has been limited.

Awareness and education as to the dangers of playing on construction sites should also be provided in local schools and community centres to discourage children from entering construction areas.

Improvements for walking and cycling

The regeneration scheme will provide improvements to the pedestrian experience by introducing new routes and improving existing routes and spaces in terms of better-quality road and pavement surfaces, wider and clearly defined footways, less clutter, better lighting and signage, street furniture and clear priority given to pedestrian in the design of the new development. The improved environment, lighting, signage and permeability will encourage walking, access to secure bike storage will encourage cycling and access to car clubs will discourage car ownership.

This will have benefits that can be shared by all groups with protected characteristics through an improved environment, better air quality, increased safety and more natural surveillance resulting in improved security.

However, consultation held in June-July 2021 found that several respondents were concerned that increased cycling could be dangerous for older and disabled people living in the area within shared pedestrian/cycle paths and crossing facilities. The Council should consider enforcing times during which e-scooters and bikes can be ridden through the market, for instance during trading hours and also consider sectioning off areas of public open space where bicycles (or e-scooters) are not permitted so that older people and those who are more vulnerable can enjoy open space safely.

Increased parking/ better management of parking

The regeneration scheme will result in improved and better managed parking for residents and market traders. This will provide benefits for those residents who have mobility impairments and rely on private vehicles for some of their journeys. Furthermore, trader parking on Site A has been reallocated as loading/unloading for storage unit users to increase storage provision on site, which will benefit stall holders.

It is worth noting that the Council has determined that any loss of parking in the surrounding area will not be able to be recouped anywhere else. In order to mitigate against these impacts, public realm work will consider retention of current permit parking bays.

7.5 Population & Community/Health & Wellbeing

7.5.1 Direct impacts of the CPO

Loss of informal community hub (Church Street Café)

Many local businesses currently act as informal community hubs providing meeting places and places of social connection for older people, people with disabilities or limited mobility. These businesses provide a continuity for local people and a familiar link to the area, plus they are affordable for people on low incomes. For example, the Church Street cafe is used by older people, people with learning difficulties and other disabilities on a regular basis. Many customers with these protected characteristics have provided feedback, as part of the engagement process, that they feel comfortable and welcome at the cafe and use it on a regular basis. The loss of this business could potentially have an adverse impact on these groups with regards to their social interaction and wellbeing.

As part of the Church Street masterplan, a new community hub on Church Street will provide more formal community facilities⁶⁹. In addition, the proposed Triangle development on Church Street will also offer flexible enterprise, arts and community space. However, it is noted that these facilities are outside the scope of sites A, B and C. Furthermore, recent consultation feedback regarding the importance of community space, particularly in relation to the library has been acknowledge (as is discussed further below). Plans have been drawn up to ensure the Library retains a Church Street presence and these designs will be included in the second stage of the consultation where community feedback on current proposals will be considered. The Church Street team are also working with library staff to ascertain the best ways forward to limit the disturbance of the space and ensure the new space offered enables them to continue offering their popular services.

Despite the benefits created by these new formal community spaces, it is worth noting that they may not be able to accommodate the facilities provided by existing informal community hubs and cannot replace the social and cultural value of informal community spaces. Therefore, businesses providing informal community spaces for older people and people with limited mobility issues should be supported by the Council to stay in the area where possible, especially those with established relationships with local people. The Council should identify ways in which to support the continued operation of informal spaces of specific community importance as part of a business model for social value. This should include anchoring points that link the past to present in the Church Street area.

Uncertainty and anxiety for existing residents

Engagement with local people has highlighted many anxieties and concerns with regards to the regeneration including uncertainty over plans and relocation. The HNA highlighted a number of residents with mental health and depression issues that could make them more vulnerable to changes in circumstances and the uncertainty about their future living arrangements. The HNA data shows a large number of residents born outside of the UK many of whom do not have English as their first language. Language barriers can add to difficulty with engagement and add to anxieties of residents who are uncertain about plans.

The EqIA for the Policy for Tenants identified potential negative impacts around lack of information on timing and detail for tenants (around disturbance payments for example). This might have particular impacts on vulnerable tenants.

The Council's Relocation team currently offer comprehensive support to tenants before, during and following a move and provide one-to-one engagement. Translation services are also provided where necessary to help people that are not comfortable using English and would prefer another language choice. This provides a dedicated officer for each household, which is on hand to continue offering support to all tenants with any housing issues, their moving options, their bidding process, their offers, their viewings, their moves. All removals and transportation are also organised by the team.

Furthermore, in order to help Church Street residents with any anxiety about the regeneration works, the Council has established the Church Street Regeneration office (99 Church Street) which is open every weekday, and staffed with at least one manager, in order to offer support and assistance.

⁶⁹ Note this hub is part of the wider development and not a direct part of the offerings of Sites A, B and C.

7.5.2 Indirect impacts of the Church Street Estate Regeneration Project realised by CPO

Community engagement during regeneration

Equality legislation emphasises the importance of supporting positive relations between different groups, whilst local community cohesion policy supports group interaction, fair treatment, equal opportunity, and a sense of common belonging, including empowering local communities to shape decisions affecting their lives.

Church Street is an area of entrenched deprivation and among the top 10% most deprived wards nationally, creating a complex and nuanced range of community needs. The extent to which benefits of the regeneration are shared amongst all members of the community, including protected characteristics (e.g. BAME businesses), will depend in part on engagement efforts to include their views in the planning process.

Throughout the regeneration process continuous and effective engagement and consultation will need to be undertaken with affected parties. Equality effects may be experienced during engagement activities. For example, young people, BAME people and those from the LGBTQ+ community can face barriers to taking part in engagement processes effectively and therefore be underrepresented in such activities. Furthermore, there is a high percentage of children living in the area and a significant number of impacts affecting this group.

The need to engage with children with regards to the regeneration plans is important. In terms of youth engagement specifically, a strategy is currently being drafted, and will engage youths specifically with the regeneration consultation process over a series of workshops and other events. The implementation of the Youth Engagement Strategy has begun through youth engagement webinars and focus groups. The Young Westminster Foundation and Marylebone Bangladesh Society engaged to facilitate the CS Youth Voice to ensure participation of young people in consultation and engagement opportunities across the programme. Additionally, the Youth Voice has undertaken its first youth walk to understand the lived experience of the area for young people which will feed into the regeneration plans and help young people understand more about the onsite and planned projects.

A broad community engagement strategy should also be developed incorporating all of the groups mentioned above. This should include a baseline study used for undertaking regular diversity monitoring to assess the impact of the development on groups with protected characteristics, and so that any key groups are not excluded during the engagement process. This will also allow the Council to engage with any key groups that might have issues in the future.

Environmental impacts of construction work on health and well-being of residents in the wider area

The construction works associated with the regeneration scheme are likely to result in environmental impacts such as noise, vibration and dust from demolition and construction activities. According to the Environmental Impact Assessment for the scheme, existing residential properties adjacent to sites A, B and C along Boscobel Street, Penfold Street, Church Street, Salisbury Street, Broadley Street and Edgware Road are likely to be affected by dust, noise and vibration levels during the construction phase of this project. Furthermore, educational/school sites around the site area, specifically Portman Nursery School, Imps Pre-School and King Solomon Academy, will also experience adverse impacts from noise and vibration levels.

Some residents could be more sensitive to the effects of these construction impacts than others. For example, those who spend more time at home would be subjected to longer

periods of adverse noise impacts. These residents are likely to include older people, some people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity or those caring for small children. Some groups with protected characteristics also have differential sensitivity to noise. For example, children are susceptible to increased noise levels, particularly with regards to cognitive impairment.⁷⁰ Autistic children can be particularly sensitive to their environment and, in some cases, can be extremely distressed by loud noise. Children may also be more sensitive to health effects arising from poor air quality and dust concentrations, as well adults with limiting illnesses such as chronic lung or heart conditions^{71 72}. People with dementia also have an increased sensitivity to both noise and light.⁷³

Many of the local schools identified as sensitive receptors offer special education services, specifically King Solomon Academy, and students at these schools with special education needs (SEN) might be impacted by demolition and construction works. The presence of infrastructure and visual barriers in the landscape can also create 'isolation effects'. Construction sites can be visually unappealing or hinder access to green space and this could potentially result in differential impacts on children with SEN, including those with autism.

A Construction and Environmental Management Plan (CEMP) will be implemented throughout the construction phase of the Scheme. However, in order to understand the specific issues faced by local residents, active engagement with local residents with health issues should be carried out. A Health Impact Assessment is currently being prepared to understand the major health impacts of the scheme.

New Library on Church Street

The Church Street Library is to be relocated from its current location at Site B to Site A. The new library will be built before the existing library on Site B is demolished so that there is no interruption in service provision.

Feedback from the public, stakeholders and Councillors were in favour of keeping the library on Church Street and as such the new location provides a suitable nearby alternative location to its existing location. Although there is a reduction in floorspace when compared to the existing library, the new design will allow for a more efficient, accessible and flexible use of space, therefore allowing all existing services within the library to operate from the new location. In addition, the new library will also have outdoor space within the 'library garden' replacing the existing outdoor space at the current location.

The needs of current library users and service providers should be considered through active engagement with relevant groups to ensure that access for those with protected characteristics are improved where possible, and that the new location and site does not act as a barrier to participating in library activities.

New open/public spaces

Open spaces and public realm offer opportunities for active and passive recreation, places to meet, and can help to improve health, wellbeing, and community cohesion. Safe and accessible spaces should cater to the needs of all people, and provide places where people of different ages, sexes, ethnicities, and abilities can all enjoy together.

⁷⁰ WHO (2006). What are the effects of air pollution on children's health and development? Available at: [WHO/Europe | Home](#)

⁷¹ Defra (2013). Short-term effects of air pollution on health. Available at: [Short-term effects of air pollution on health - Defra, UK](#)

⁷² WHO (2006). What are the effects of air pollution on children's health and development? Available at: [WHO/Europe | Home](#)

⁷³ Social Care Institute for Excellence (2023). Dementia Friendly Environments. Available at: [Noise levels - Dementia-friendly environments - SCIE](#)

The Covid-19 pandemic has revealed the need for public or shared spaces, such as spaces for social interaction and open green spaces, especially in those areas that are densely populated and where households may not have their own backyards or gardens.

Several vulnerable groups, including older people and those from low-income communities, may rely on various public and open spaces to be able to have social interactions, exercise or enjoy solitude. The ability to engage in such activities can have positive impacts of people's health and wellbeing, and thus, the lack of access to these facilities during the construction and operational phase both will strongly impact local communities.

The Council aims to increase publicly accessible open space within the Church Street ward by 40%. This includes the provision of New Street Gardens between Church Street and Broadley Street on Site A which will have allocated space for local play. The improved open space is likely to bring improvements in feelings of safety, actual safety and security, inclusive access and access to open space.

Well-designed streets can also help to promote walking and healthier active transport modes and improve air quality. Disabled and elderly people are likely to particularly benefit from inclusive access improvements, enabling them to share the benefits (such as physical and mental health benefits) of the overall regeneration. Other groups may also particularly benefit from access, safety and security improvements, in relation to needs /priorities associated with their protected characteristics.

7.6 Summary of potential impacts

Table 7-1 provides a summary of direct and indirect effects of the CPO. This describes each potential impact alongside the potentially effected groups with protected characteristics. Details of embedded mitigation are provided that support the enhancement of positive effects and minimising of negative effects as well as further recommendations.

It is envisaged that this table can be updated with more detailed mitigation measures when developed and used to monitor equality effects of the CPO. It also provides mitigations which can reduce adverse impacts, and which in some instances, will provide beneficial impacts.

Table 7-1 Summary of potential direct and indirect impacts of CPO

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation	
	Age			Sex	Race	Religion/ belief	Disability	Gender reassignment	Sexual Orientation	Pregnancy/ Maternity	Low income households			
	Children	Young People	Older People											
Homes – Direct Impacts														
Loss of homes for residential leaseholder	x		x		x		x					x	<p>Leaseholders with protected characteristics that influence their ability or desire to move out of the area. This includes those ethnic minority groups, people with disabilities, older people and families who may have formed formal and informal social and community ties and support.</p> <p>Further adverse impacts may be experienced by older people, those with low incomes as well as some non-UK born residents who may find it difficult to transfer mortgages or apply for a new mortgage for a new property.</p>	<ul style="list-style-type: none"> Westminster Community Homes (WCH) act of the Council's behalf to organise and maintain engagement and communication with all renewal leaseholders. They do this by writing, calling and physically visiting the leaseholder at a time and place which meets the leaseholder's needs. The Council's Policy for Leaseholders in Housing Renewal Areas sets out options for resident leaseholders to buy new homes in the renewal area. Financial compensation for resident and non-resident leaseholders is also set out within the Policy. Support to navigate through relocation process for leaseholders especially elderly as those with English as a second language. In the case of resident leaseholders, the Council have looked into the option of offering available new build stock to them on a shared equity basis, which gives them a financially achievable option to remain in the local area and remain close to their local connections. The CS regeneration office has also held Leaseholder engagement sessions to offer more support and advice to all leaseholders, in case they work or have care need responsibilities during the day and week.

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<p>Temporary or permanent loss of employment following closure or relocation of affected businesses</p>					x						x	<p>BAME employees of affected businesses; particularly Asian/ Black African/Arab and Latin American employees who are over represented on the site</p>	<ul style="list-style-type: none"> The localised WES service continues to provide an employment coaching service for the local community. The service works with local partners (Job Centre/developers etc.) to ensure existing employees and local people can benefit from job opportunities arising through the regeneration programme. The Church Street Responsible Procurement Plan is being compiled and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that residents and businesses are given priority over jobs and training opportunities. <p>Further recommendation: Monitoring with businesses to assess level of job losses for local people.</p>
<p>Permanent loss of shops and businesses providing current mix of culturally specific services and goods</p>					x	x						<p>BAME community living in close proximity to the site especially those from Arabic and Asian communities and Muslims.</p>	<ul style="list-style-type: none"> Independent Business Advisor has been appointed to provide support and advice. The Council are running monthly property searches for Site A businesses requesting assistance with relocating locally. Commercial units on Church St are also being kept from going to market to provide options for effected businesses. <p>Further Recommendation: Marketing and advertising advice to business so to ensure existing and new customers are made aware of relocations of businesses.</p>
<p>Loss of shops, market stalls and businesses providing affordable and accessible goods and services for existing local community</p>	x	x	x		x		x				x	<p>The loss of these services could have an adverse effect on those with low incomes, children, young people, older people, disabled people, families including single parent families and those from BAME groups. These groups may have a stronger dependency on businesses providing local and affordable goods and services.</p>	<ul style="list-style-type: none"> The market will remain on Church St throughout the development process and will not be relocated elsewhere. The temporary relocation of the market is planned to be within close vicinity to the existing site which should minimise the impact on these groups. A Temporary Market Relocation Strategy has been developed to support this An Independent Business Advisor has been appointed to provide support and advice to local businesses. Suspension of pitches will only happen on a Saturday as part of the public realm works. The Council are currently running monthly property searches for Site A businesses requesting assistance with relocating locally.
<p>Unknown document property name.</p>	Error!	Unknown document property name.										<p>AECOM Error! Unknown document property name.</p>	<p>73</p> <ul style="list-style-type: none"> Further recommendation: Business advice could extend to marketing and advertising advice to businesses to ensure existing and new customers

Market and Economy – Indirect Impacts of CPO													
Page 242	Creation of new employment opportunities		✓			✓					✓	Jobs generated through construction activities and through new retail offer on site may benefit young people, and BAME groups who are over-represented in local unemployment figures	<ul style="list-style-type: none"> The localised WES service continues to provide an employment coaching service for the local community. The service works with local partners (Job Centre/developers and employers) to provide job opportunities and training for local young people. The CS Neighbourhood Keeper Programme supports local people into local employment, entrepreneurship and training through local projects and capacity building training. The Church Street Responsible Procurement Plan is being compiled and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that residents and businesses are given priority over jobs and training opportunities.
	Temporary relocation/disruption of Church Street Market			x		x					x	Market traders; especially those who are low earning and those that depend on customers from shared cultural identity. Customers including local residents and others on low incomes including older people who rely on the market for affordable goods.	<ul style="list-style-type: none"> The market will remain on Church St throughout the development process and will not be relocated elsewhere. The temporary relocation of the market is planned to be within close vicinity to the existing site which should minimise the impact on these groups. A Temporary Market Relocation Strategy has been developed to support this Suspension of pitches will only happen on a Saturday as part of the public realm works.

	Improvement of the facilities and infrastructure for Church Street Market			✓		✓	✓							Benefits should be accessible to all groups but especially those more likely to be from local income households/businesses and those who would benefit from accessibility improvements and increased facilities.	<ul style="list-style-type: none"> • Further recommendation: Continued effective engagement with the local community and traders to ensure that appropriate facilities are provided on site. Potentially through the creation of a dedicated Market Facilitator role within the Retail, Markets and Business Team. • Further recommendation: Although parking has been reduced at Site A it is recommended that the Council seek to maintain overall parking and storage provision at the target levels across sites A, B and C. Prioritisation and allocation of parking and spaces for traders should be included as part of a future strategy for the new market. The cost of parking and storage hire should be assessed to ensure fairness and affordability to all market traders. This should allow for an increase in the number of storage units which should reduce the need for on-street parking.
	Potential for an increase in commercial rents and 'gentrification' of the area			x		x							x	BAME business owners and BAME people and older people who currently work or shop in businesses on the existing.	<p>Further Recommendation: Guarantees on commercial rents and market stall rates and leases through market trader agreement.</p> <p>A Curation Report is being developed to manage the lease of commercial units on site</p>
Making Connections – Indirect Impacts of CPO															
Beneficial	Safety and accessibility issues during construction	x	x	x				x	x	x	x			Groups who are more vulnerable to poor security including young people, older people, disabled people, ethnic minority groups, transgender and non-heterosexual people. Safety issues are more prevalent amongst those for who mobility is an issue including older people, disabled people, pregnant women and children.	<p>A detailed construction management plan will be prepared in conjunction with a developer partner. This will take in to account the recommended mitigations and strive to reduce the impact of construction as far as possible.</p> <p>Further recommendation: Key walking routes and crossing points in the area should be maintained or appropriately diverted where possible with appropriate security provided where natural surveillance has been limited.</p>

	Loss of informal community hubs			x				x				x	<p>The loss of local businesses such as cafes could potentially have an adverse impact on older people and people with limited mobility who use these as places for social interaction and connection.</p>	<p>A new library on Church Street will provide formal community facilities and services. The new health and wellbeing hub on Lisson Grove also will provide additional community facilities and library services.</p> <p>Further recommendations: The Council should identify ways in which to support the continued operation of businesses and informal spaces of specific community importance as part of a model for social value. This particularly applies to businesses that have established relationships with local people with protected characteristics.</p> <p>The new health and wellbeing hub and library should be accessible to all.</p> <p>The Council will also conduct Combined Regeneration and Placeshaping workshops to establish potential impact of design proposal and establish a set of strategic design principals that respect the cultural wealth potential of the ward.</p>
	Uncertainty and anxiety for existing residents			x	x			x					<p>Older people, people with medical issues affecting mental health or who might require more support and assistance with the move, people with language barriers who may find it more difficult to understand the details of the development.</p>	<ul style="list-style-type: none"> • Relocations team, with a dedicated officer for each household, are on hand to continue offering support to all tenants with any housing issues, their moving options, their bidding process, their offers, their viewings, their moves. All removals and transportation is organised by the team. • Relocation team offer comprehensive support to tenants before, during and following a move. • Council provide additional assistance to vulnerable residents and engage with third parties including family members, social services and health practitioners to identify and address any special needs (policy for leaseholders and tenants) • Translation services are provided where necessary to help people for whom English is not their first language. • Regeneration office (99 Church Street) is open every weekday, staffed with at least one manager, to offer full support and assistance to residents.

	New Library on Church Street	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	All groups may benefit from brand new library services.	<ul style="list-style-type: none"> Plans have been drawn up to ensure the Library retains a Church Street presence. These designs will be included in the second stage of the consultation, where again staff will listen to the feedback on current proposals for the community space, location and size. The Church Street team are working with library staff to ascertain the best ways forward to limit the disturbance of the space and ensure the new space offered enables them to continue offering their popular services. The Council has also commissioned a Cultural Infrastructure Plan work to identify and map existing cultural assets, identify any gaps and risks to culture as a result of the development proposals.
	New open/public spaces	✓	✓	✓				✓					Disabled people, older people, women and other groups in terms of accessibility, health, wellbeing and safety benefits.	<p>The development is being designed to the latest, highest standards, all public realm areas are accessible with the use of steps avoided wherever possible and if it cannot be avoided access ramps provided. There is public space provided in the form of New Street Gardens, a pedestrianised street through the middle of Site A. This provides a variety of play space and amenity space adopting inclusive design standards.</p> <p>Further recommendation: Inclusive design standards (including inclusive play) should be developed and followed for public realm improvements</p>

8. Conclusions

8.1 Conclusions

The exercise of compulsory purchase powers will enable interests in Site A to be brought under the Council's control, enabling regeneration which will contribute to the improvements in the area through a net increase in housing, new employment opportunities associated with the construction and the completed development, a new library and improvements to the public realm as well as the benefits of the overall wider regeneration of the Church Street Estate. The CPO will help move the project forward towards realising the identified positive equality effects arising from the planned development, including:

- A net increase of 283 residential properties (629 residential properties as part of the regeneration scheme).⁷⁴ This includes social housing, family housing, wheelchair accessible housing and affordable housing. The net increase in housing should benefit people with priority for affordable housing, both social and intermediate, who are more likely to have protected characteristics (particularly for social housing). It should be noted that affordability barriers may make it harder for certain groups, including low-income BAME households, children living in low income and overcrowded households and (mainly female-headed) single parent households, from sharing in this benefit. The Council should aim to meet affordable housing, social housing and shared ownership targets of the development;
- Employment creation in construction, as well as retail and service jobs on the completed site;
- A new location for Church Street library within Site A with an improved, flexible and more efficient use of space to deliver services for the local community; and
- An increase in open public space, play space and community facilities providing benefits in terms of safety, accessibility and connectivity. People sharing equality protected characteristics are likely to be able to share in these benefits.

The assessment of impacts shows that there are some direct potential negative effects associated with the CPO.

- Loss of homes for affected residential leaseholders on Site A. Groups that could be particularly sensitive to the impact of the CPO include people from ethnic minority groups, older people, disabled people and families who may lose important social and community ties. Further adverse impacts on older people, those with low incomes as well as some non-UK born residents who may find it difficult to transfer mortgages or apply for a new mortgage for a new property. The Council has provided support to residents in finding alternative accommodation that best meets their needs including returning to the new development. It is also recognised that the CPO will result in an overall net increase in residential properties which will benefit the wider community including those with protected characteristics.
- Potential closure of BAME owned businesses where businesses are not eligible for compensation. It is considered that the successful relocation of existing businesses will also depend, in part, on the flexibility of individual businesses, some of which are specific in terms of where they consider an appropriate location for their business to operate successfully.
- Temporary or permanent loss of employment following closure or relocation of affected businesses, particularly amongst BAME employees;

⁷⁴ Based on existing properties on site being 492 and the planning application proposals delivering up to 1121 properties, the proposed scheme would deliver a net increase of 629 residential homes.

- A loss of shops and services providing current mix of culturally specific services and goods as well as potential loss of cultural and social connections. However, there is also the potential for positive effects as a result of the opportunity for new accommodation with improved facilities;
- The loss of Church Street Café which provides an informal community hub for local residents; and
- Anxiety and stress caused by uncertainty around development plans and relocation.

Further indirect negative impacts of the CPO could occur as a result of enabling the regeneration scheme. These include:

- Safety, security and accessibility issues for residents of the local area as a result of construction activity;
- Health and wellbeing impacts of construction related activities including increased noise levels and a reduction in air quality;
- Potential for 'gentrification effects' to result in higher rent levels; and
- Right to light injuries will occur in identified properties neighbouring the development site. Property owners will be entitled to compensation. However, it is acknowledged where occupiers are tenants, they may not be the beneficiary of the compensation and that some tenants have protected characteristics that could make them more vulnerable to negative effects. This extent of this impact will be reviewed as more direct engagement takes place.

Action undertaken to date and planned mitigation set out in Table 7-1 aim to strengthen, secure or enhance positive beneficial impacts and to mitigate for potential adverse equality impacts associated with the CPO of Site A.

8.2 Further recommendations

In order to further minimise negative effects and enhance positive effects identified, the Council should seek to:

- Explore the early release of compensation payments. These payments are typically only paid after vacant possession is provided and therefore employing a policy to make payments to those eligible in advance of needing to vacate could be used to support a successful relocation i.e., to pay deposits, fund relocation expenses, etc;
- Develop an inclusive design framework for the public space design in order to ensure potential barriers that may prevent disabled people and older people from utilising the new public space have been considered;
- Monitor further aspects associated with actions included in the Commercial Relocation Strategy. For example, time taken to issue compensation payments and time spent on active engagement from the Council; and
- Monitor the progress of the CPO with regards to relocation of private residential tenants and business occupiers where possible. This would help to determine the success of policies and other measures with regards to relocation of private tenants and help to develop best practice with regards to future developments.

8.3 Next steps

The Church Street regeneration scheme will require the procurement of a developer to deliver the regeneration scheme. The PSED will apply to the procurement process because it is a non-delegable duty and procurement is a "function" of the Council. Therefore, in circumstances where the Council chooses to "contract out" part or all of a function (for

example the delivery of regeneration) to another entity (for example a developer), the Council cannot absolve itself from its responsibility to fulfil the PSED.

The Council should ensure that compliance with PSED is factored in throughout the procurement process, and is considered in future procurements, including procurements of delivery partners.

Guidance on embedding the PSED into the procurement process from the Equality and Human Rights Commission⁷⁵ states will be that the Council will be able to factor in a potential development partner's ability to fulfil contractual obligations related to the PSED in its evaluation of tenders and has the right not to award the Contract to a developer submitting the most economically advantageous tender where the Council has established that the tender would not comply with current obligations in environmental, social or employment law.

It is important that the Council continues to pay due regard to the PSED when contracting out the delivery of the regeneration scheme to a developer. Therefore, the Council should ensure that the importance of the PSED and the need to follow and enhance the recommendations set out in the EqIA are embedded within the procurement process. The appointed developer should demonstrate how they will incorporate the EqIA into the delivery of the regeneration and provide commitments to mitigation and enhancing benefits through the Section 106 agreement and other funding mechanisms.

The EqIA is a predictive assessment and considers the effects of the CPO on groups of people rather than on individuals. The recommendations outlined are therefore suggested to minimise effect on recognised groups with protected characteristics living, working and visiting the area at the time of the assessment.

This EqIA should be considered as a live document, and should be updated, refreshed and the actions within it monitored on a regular basis at further milestones. This should include a monitoring update on the status of identified potential impacts and associated mitigation. Whilst the EqIA identifies short-term and medium-term impacts of the regeneration proposals it will also be important to capture any additional impacts including any identified long-term impacts as the programme progresses.

⁷⁵ Equality and Human Rights Commission (2013). Buying Better Outcomes: Mainstreaming equality considerations in procurement - A guide for public authorities in England. Available at: https://www.equalityhumanrights.com/sites/default/files/buying_better_outcomes_final.pdf

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City of Westminster

Cabinet Report

Decision Maker:	Cabinet
Date:	10 July 2023
Classification:	Open
Title:	Medium Term Financial Planning (2024/25 to 2026/27)
Wards Affected:	All
Cabinet Member/Lead Member:	Councillor Boothroyd, Cabinet Member for Finance and Council Reform
Key Decision:	Yes
Financial Summary:	This report sets out the financial framework for the budget setting cycle and medium-term financial planning for this year
Report of:	Gerald Almeroth, Executive Director of Finance and Resources

1. Executive Summary

- 1.1. This report outlines the Council's updated financial position over the next three years and provides the financial framework for the Council to deliver its key policy objectives as outlined in its Fairer Westminster strategy.
- 1.2. This report updates the budget assumptions approved at Full Council in March 2023 and plans for a further two years to 2026/27 updating the medium term framework. The funding position for local government is still undetermined at this point and will be impacted by several central government policy initiatives due over the coming years including the Fair Funding Review, Adult Social Care reform and the impact of the 2021 Census.
- 1.3. The financial position over the planning period has been updated and provides an indicative budget gap of £6.141m in 2024/25, rising to £48.461m by 2026/27. This is an improved position on the £56.8m gap previously reported in March.

2. Recommendations

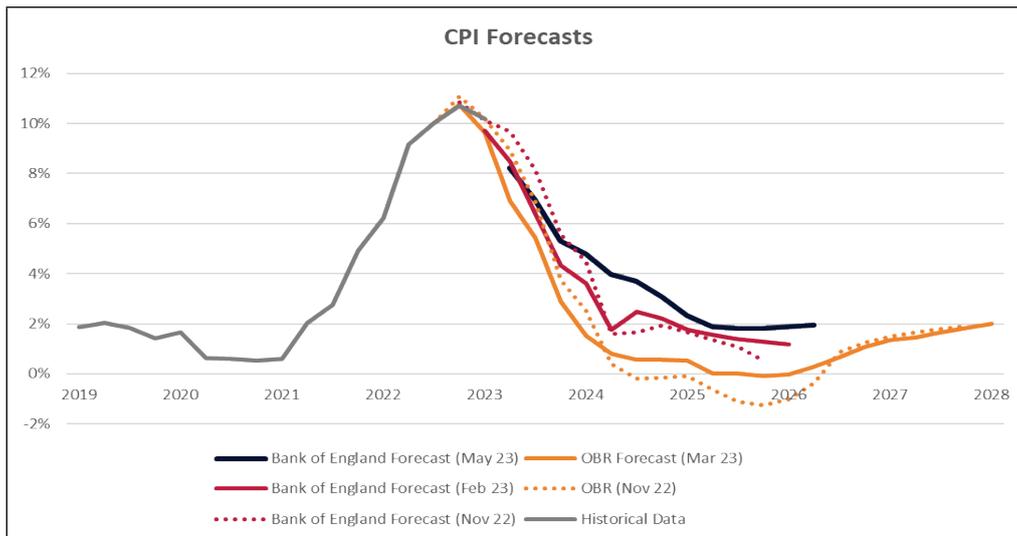
- 2.1. That Cabinet note the revised medium term financial planning forecast to 2026/27 and to agree the budget process approach as set out in the report.

3. Reasons for Decision

- 3.1. The preparation of the budget and three-year medium term financial plan is the first stage of the annual business planning cycle for the forthcoming financial year 2024/25. There is a statutory requirement to set an annual balanced budget and submit budget returns to the department of Levelling Up, Housing and Communities (DLUHC). Approval of the revenue estimates constitutes authority for the incurring of expenditure in accordance with approved policies. It is considered good practice to produce medium financial plans.

4. National Context

- 4.1. Inflation has remained higher than originally expected at the beginning of this year. While twelve month Consumer Price Index (CPI) inflation fell from 10.1% in March to 8.7% in April, it remained unchanged for May and remains higher than the previous forecasts. This indicates that it will take longer to get back to the Bank of England (BoE) target rate of 2%. Price inflation continues to exceed earnings growth, with high energy prices replaced with high food prices in a continuation of the cost-of-living crisis. The graph below shows the current Bank of England and Office for Budget Responsibility (OBR) forecasts for inflation. These have recently been revised upwards with CPI now expected to remain above 5% for the remainder of 2023, dropping to 2% by the start of 2025.



- 4.2. The BoE continues with its policy to raise interest rates in a bid to tackle inflation. This is increasing the cost of borrowing with the potential for rates to rise further. During its June meeting the BoE raised its policy interest rate by 0.5% to 5%, marking a 13th consecutive rise. Market expectation is for rates to increase further and then begin falling back during mid-2024, although this will very much depend on the path of inflation.
- 4.3. The UK economy remains on course to avoid a technical recession. Economic growth is expected to remain at 0.3% throughout 2023, rising slightly to 1% in 2024.
- 4.4. It is expected that there will be a General Election in 2024. The current government spending review covers 2024/25, so there will need to be a further comprehensive spending review to take place soon after the general election. Public spending totals in years after 2024/25 currently show a reduction in available resources for non-protected spending departments.

5. Local Policy Context

- 5.1. The Council launched its new Fairer Westminster strategy on 4 October to set out the outcomes it wants to deliver for the city across five themes. The delivery plan can be found here: [Delivering on our plan to build a Fairer Westminster](#). The key Fairer Westminster pillars are as follows:
 - **Fairer Communities** – Inequality is reduced, everyone feels safe, adults can stay healthy, community and voluntary sector organisations prosper, and Westminster remains a great place for children to grow up.
 - **Fairer Environment** – Westminster is a net zero council by 2030 and a net zero city by 2040, air quality meets World Health Organisation guidelines, our streets are clean, recycling is increased, people are enabled to travel more sustainably, and people have access to high-quality services within 15 minutes from their homes.

- **Fairer Housing** – The housing needs of people are met through greener and more genuinely affordable housing, homelessness is reduced, private rented sector properties are well managed, and our tenants and lessees are consistently satisfied with our housing services and the quality and energy efficiency of our housing stock.
 - **Fairer Economy** – Westminster remains economically successful, Oxford Street and the West End are revived and retain their position in the national economy, small businesses are supported to grow and remain, and residents have the right skills to take advantage of the city’s employment opportunities.
 - **Fairer Council** – People can more easily find the information and services they need, the Council makes decisions more transparently, the Council is financially sustainable, and our procurement is responsible.
- 5.2. The Council’s approach in developing its medium-term financial plans will continue to ensure resources are applied in a way that most effectively and efficiently contributes to the Council’s Fairer Westminster ambitions. The recent Future of Westminster Commission’s reports and recommendations will also be considered as part of the planning process.

6. Local Government Finance

- 6.1. Government announced the one-year finance settlement on 6 February 2023 for 2023/24. The underpinning Spending Review 2021 (SR21) set government departmental budgets to 2024/25. Further announcements are yet to be made on the distribution of the 2024/25 settlement to local government.
- 6.2. The additional £2.8bn Adult Social Care (ASC) and NHS funding given in 2023/24, increases to £4.7bn in 2024/25. Some funding comes through Better Care Fund ringfenced to support hospital discharge. The £2.8bn includes an expectation that authorities also raise funding through the ASC Precept. ASC reform on charging for services and other matters has been pushed back to at least 2025.
- 6.3. The core schools’ budget in England will receive £2.3bn of additional funding in each of 2023/24 and 2024/25. It is estimated that schools per pupil funding will increase by about 5% in 2024/25, this however may not cover the full cost of pay awards and price increases. It also does not remove the pressure on schools with falling or low pupil numbers, which is now at 15 schools in deficit at March 2023 in Westminster. Pressure also continues on high needs funding due to the increasing demand for Education, Health and Care Plans (EHCPs) and other inflationary costs.
- 6.4. There is no indication from government regarding the thresholds for 2024/25 for housing social rents and council tax (capped at 7% and 5%, respectively for

2023/24). Each 1% increase in the council tax raises additional income of £0.6m.

- 6.5. The Department for Levelling Up, Housing and Communities (DLUHC) is expected to implement its core funding changes from the Fair Funding Review in 2025/26 alongside any changes arising from the 2021 Census population data and updating of mid-year estimates. This is one year later than previously anticipated.

7. Medium Term Financial Plan 2023/24 to 2026/27

- 7.1. The MTFP approved at Full Council on 8th March 2023 outlined a total residual budget gap up to 2026/27 of £56.8m. This is summarised in the table below:

	2023/24 £m	2024/25 £m	2025/26 £m	2026/27 £m	Total £m
Annual Budget Gap	0.000	11.435	27.255	18.140	56.830

- 7.2. The total budget gap is inclusive of £56.8m savings to 2026/27 which were approved by Full Council in March 2023. The updated budget gap assumes that these savings will be delivered in full.

8. Current Financial Position

- 8.1. The General Fund outturn position for 2022/23 was a net outturn underspend of £3.0m (1.6%) against an approved net budget of £185m. The Council transferred its unspent budget of £3m to general fund reserves. This was a more favourable position compared to earlier forecasts mainly due to increased income from treasury investments.

- 8.2. The current forecast for 2023/24 is a balanced position against the budget, but the UK's macro-economic outlook remains uncertain over the medium term with several risks and uncertainties over future government funding levels, the fiscal outlook, and the time framework of the cost of living crisis. The Council retains a level of unallocated General Fund reserves to mitigate those risks whilst also having the ability to invest in its priorities.

9. Reserves

- 9.1. Reserves form an important part of financial planning. Unallocated reserves and earmarked reserves are maintained for two primary reasons:
- To mitigate any uncertainties and risks facing the Council
 - To enable investment into the Council's priorities over multiple years in a sustainable manner

- 9.2. During the Covid pandemic the Council utilised the general reserve to absorb the financial pressures experienced. In total the general reserve reduced by £5.8m between 2020/21 and 2021/22 leaving a balance of £57m to manage any unforeseen circumstances. The Council is looking to rebuild those reserve balances as a risk mitigation measure.
- 9.3. The current unallocated reserves balance is £60m (or 11% of the gross budget) which is considered a robust level of reserves to manage in year pressures that may arise, particularly in a Council with a high level of income related to economic activity. It will also help manage the positive delivery of savings over the medium term and cover one-off shortfalls in between years in the budget process.
- 9.4. There are earmarked reserves for other specific risks, invest to save funds and capital financing. These will be reviewed to ensure that they are being used affectively and where appropriate released for investment in achieving the Council's policy objectives or supporting ongoing savings delivery. The use of earmarked reserves is one off in nature and so cannot be used to supplement the medium term financial plan in an ongoing manner.
- 9.5. Some earmarked reserves which were originally allocated for other purposes, have been reallocated, and other allocations reduced, to provide short term one-off funding for immediate Fairer Westminster priorities. These were included in the 2023/24 budget proposals and the full year cost of £8.2m per annum, was funded initially through one off reserves and then built into the base budget in future years. This ongoing pressure is mainly picked up in 2024/25. This includes financial support for the Cost of Living Strategy, free school meals and school uniform support.

10. Medium Term Financial Plan: 2024/25 to 2026/27

- 10.1. The assumptions in the medium-term financial plans have been reviewed up to 2026/27 and the revised position is outlined in the table below. There is uncertainty in forecasting over this period, but it is good practice to set a financial framework within which the Council can effectively plan.
- 10.2. The budget gap is estimated to be £48.461m up to 2026/27 which is an £8.369m decrease since March 2023 and represents 9% of the Council's adjusted gross 2023/24 budget, the equivalent of 3% per annum.

Core Funding and Grants	2024/25 over 2023/24	2025/26 over 2024/25	2026/27 over 2025/26	Total
	£m	£m	£m	£m
Funding:				
Core Funding and Grants	(12.474)	(0.325)	(4.241)	(17.040)
Estimated Loss from Fair Funding Review and Census Impact	0.000	9.000	9.000	18.000
Corporate Provisions:				
Capital Financing	3.000	3.000	3.000	9.000
Inflation: Pay	4.204	3.038	3.099	10.341
Inflation: Non Pay	5.116	5.208	5.208	15.533
Provision for Corporate Pressures and Policy Investments	3.000	3.000	3.000	9.000
Interest Earnings	3.000	4.000	4.000	11.000
Concessionary Fares	1.471	2.324	0.000	3.796
Temporary Accommodation additional pressures	5.000	0.000	0.000	5.000
Inflation on sales, fees and charges	(3.000)	(2.000)	(2.000)	(7.000)
Approved Savings:				
Net Savings approved	(8.725)	(3.635)	(3.615)	(15.975)
Fairer Westminster investments:				
Investments in base	5.549	1.393	(0.135)	6.807
Budget Gap	6.141	25.003	17.317	48.461
2023/24 adjusted Gross Budget				£527m
% of adjusted gross budget				9%

10.3. The changes since the March 2023 position taken to Full Council are shown in the table below and briefly explained below:

- £5m additional provision for anticipated cost and demand pressures in temporary accommodation for 24/25 onwards;
- further £3m provision in 2024/25 onwards for policy investments and future pressures across service budgets;
- delay of Fair Funding Review / Census population data expected implementation from 2024/25 to 2025/26;
- additional interest earnings in 2024/25 of £3m and £2m in 2025/26 reflecting the position that inflation and interest rates are staying higher than previously expected, and;
- revised forecast for the reduced cost of concessionary fares for 24/25 and 25/26.

	2024/25 over 2023/24	2025/26 over 2024/25	2026/27 over 2025/26	Total
	£m	£m	£m	£m
Forecast Budget Gap as at March 2023 Council	11.435	27.255	18.140	56.830
Changes & Variations				
Temporary Accommodation additional pressures	5.000	-	-	5.000
Corporate Pressures and New Policy Investments	3.000	-	-	3.000
Estimated additional interest earnings	(3.000)	(1.000)	-	(4.000)
Revised forecast concessionary fares	(0.865)	(0.774)	-	(1.638)
Funding Changes				
Delayed Implementation of Fair Funding Review / Census	(9.000)	-	-	(9.000)
Other Grant Funding adjustments	-	(0.465)	(0.809)	(1.274)
Council Tax Base increase	(0.429)	(0.013)	(0.013)	(0.455)
Revised Budget Gap	6.141	25.003	17.317	48.461
Movement in Gap since March 2023	(6.294)	(2.252)	(0.822)	(9.368)

10.4. The current medium term financial plan includes an inflationary provision of 3% for pay and 2% for prices for 24/25 and then assumes 2% for 25/26 and 26/27 in line with government's target for CPI. The updated plan has held those inflationary assumptions for both pay and prices although this will be reviewed further during the MTFP review process with reference to inflationary pressures being experienced during 2023/24 and the changing economic backdrop affecting forecasts for future years inflation.

10.5. There is some level of uncertainty on future pay inflation given that the pay award for 2023/24 is yet to be agreed. The Local Government NJC pay award offer at an average of 5% has recently been rejected by the unions. Contract inflation for 23/24 is also being reviewed to ensure that provision for 23/24 onwards is sufficient to cover these pressures.

11. Budget risks and uncertainties

11.1. Local Government Finance

The current Spending Review (SR21) lasts until March 2025. A new Spending Review will be required after the next General Election in 2024. Additional resources have been made available for social care recently, it is not expected that will be withdrawn. The long awaited implementation of the Fair Funding review, together with updating of population data from the Census, is likely to lead to reduced resources for Westminster. The ONS have accepted that the Census was done at a time (2021) that didn't reflect a 'normal' position as it was

during the pandemic. The Council is leading Pan-London work to respond to the ONS to capture a more realistic position for the next mid-year population estimate.

11.2. Economic conditions

The risks and uncertainties created from the current economic climate of high inflation and interest rates are set out throughout this report. The provision for inflation has been increased but the conditions will continue to be monitored through the year and updated as required. There is a risk that the additional provision may not be sufficient or that there will be a longer-term impact beyond 2024/25. Financial plans assume inflation returns to the Government target of 2% by 2025/26.

11.3. Service Pressures

Cost pressures in temporary accommodation (TA) are a particular issue currently, although largely driven by external factors outside of the Council's control. Over this last year there has been an unusually sharp increase in the cost of private rented accommodation (over 21%). There remains a risk that this trend continues with lease renewals due in the future. Compounding market supply issues are exacerbating the pressure in addition to the impact of the cost of living crisis, and the end of the Government supported scheme for Ukrainian refugees. There is no current indication that Government is considering any changes to the rent and benefits regime so income levels will remain relatively static, meaning the net cost of TA will continue to increase. Government consultation on changes to the formula for calculating Homelessness Prevention Grant have been postponed, although there is certainty of funding for 23/24 and 24/25 with Westminster seeing small increases of c£0.1m per annum. The Council has allowed £85m to purchase an additional 270 properties for TA to partly relieve the pressure on the revenue budget and to improve the Council's support for homeless residents.

12. Approach to identifying new savings

12.1. New savings of £28.498m were agreed as part of the March 2023 budget over the planning period to 2026/27. Most of these new savings fall in 2023/24 and so it will be important to track the progress of their implementation as part of the current year monitoring arrangements. Further savings will need to be identified as the medium-term planning period progresses to close the updated three-year budget gap currently estimated at £48m.

12.2. The Council has commenced an internal "zero-based" budget review of all service budgets. The aim of the review is, subject to considering the Council's legal obligations, to examine and review council spending based on the outcomes it delivers for residents and communities and ensure they are aligned to the Fairer Westminster objectives and wider policy aims. It is anticipated that the reviews will identify areas for savings and lead to greater value for money in the future. The outcomes from the reviews will feed into the medium term financial planning process in due course.

13. Housing Revenue Account

- 13.1. The Housing Revenue Account (HRA) is a statutory ring-fenced account that captures all transactions relating to the Council's duties as a social landlord and the operation of the Council's housing stock. Whilst it is separate to the General Fund, it is still required to undertake medium and long-term financial planning in much the same way. This is done via the HRA 30-Year Business Plan. It is a statutory requirement that this is updated at least annually and must demonstrate long-term financial viability whilst also delivering the Council's housing priorities.
- 13.2. The business plan considers all HRA revenue streams (principally tenant rents and leaseholder service charges, but also other sources of income) and sets these projections against anticipated expenditure on management and maintenance (both revenue and capital), staffing and other running costs (including a fair share of Council overheads recharged from the General Fund). The HRA holds its own reserves and can therefore operate a deficit in any single year where this can be covered by available reserve balances.
- 13.3. The sections below detail the key considerations for the 2023 business plan update that will be delivered in conjunction with the Council's wider MTFP process. The new iteration of the business plan will consider the 30-year period from 2024/25 onwards.
- 13.4. It is likely that there will be a need to provide some short-term investment funding to support the Corporate Housing Improvement Programme in order to achieve the outcomes being sought. There is sufficient flexibility in the HRA balances to do this with the year end balance at March 2023 being around £2.5m above the recommended minimum.

HRA Capital

- 13.5. The HRA capital programme is the vehicle through which the Council can identify and prioritise funds to support two important areas of investment: (1) improving the condition of its existing stock; (2) delivering new affordable housing.
- 13.6. In October 2018, restrictions on HRA borrowing (known as the Debt Cap) were eased to allow local authorities to set their own borrowing limits (in much the same way as they do for the General Fund). However, the HRA is still subject to the CIPFA Prudential Code and must therefore set borrowing limits that are sustainable within the context of the 30-year business plan. This means that all borrowing is ultimately underpinned by the affordability of interest on new debt within the HRA revenue budget.
- 13.7. The current approved HRA business plan set two simple parameters to assess the sustainable borrowing capacity of the HRA:

- a minimum HRA reserve level of £17m for the next 5 years (reverting to 10% of turnover thereafter), this is reflecting the higher risks during intense development periods, and;
 - a minimum interest cover ratio of 1.20 to ensure that the operating surplus is not entirely committed to covering interest costs (and can therefore tolerate some volatility on interest rates, inflation, etc).
- 13.8. The MTFP process will involve a complete refresh of all assumptions that go into the business plan. There is a strategic requirement to maximise HRA borrowing capacity to support the delivery of social and affordable housing, alongside the need to mitigate the impact of high inflation. This means that the HRA will be required to identify savings in the same way as the General Fund to maintain a balanced 30-Year Business Plan.

Rent Setting

- 13.9. A key consideration for the HRA business plan refresh is future rent levels, given that social rents are the main source of HRA revenue. Rent increases are subject to the government's policy on rents for social housing (which are regulated). The current policy was set for a five-year period, with 2024/25 being the final year. This stipulates maximum annual rent increases of CPI+1% (based on September CPI). There has been no update on what central government intentions are for social rent policy from 2025/26 onwards. It is also worth noting that a cap of 7% on annual rent increases was enforced for 2023/24 (which superseded the rent policy of CPI+1%).
- 13.10. The business plan currently assumes that rent increases will at least keep pace with inflation over the life of the plan. With the UK experiencing its highest rates of inflation for 40 years clearly these are assumptions that will need to be carefully reviewed. It is important to note that this could have a direct impact on HRA borrowing capacity if the revised assumptions leave the HRA with a lower operating surplus.

Risk Measures

- 13.11. Whilst the economic climate is creating some substantial financial challenges for the HRA business plan, each iteration of the plan contains a series of measures designed to help the HRA to manage the sort of volatility noted above. The capital programme holds a contingency, the revenue budget has a set level of interest cover, and HRA reserves exist to manage short-term shocks. These are all things that can be leveraged to keep the HRA on a sustainable footing, and a review of appropriate risk cover will form another integral part of the business plan refresh.

14. Capital Strategy Review

- 14.1. The approved capital programme has a gross spend of £2.4bn and a net spend of £1.2bn over the next fifteen years. This includes a significant housing development and regeneration programme that relies on GLA grant and capital receipts from private sales to help subsidise the affordable housing elements. The net capital cost is financed from revenue borrowing which is allowed for in the MTFP. The capital programme will be reviewed again this year as part of the medium-term financial planning process.
- 14.2. The Council is committed to embedding climate action and sustainability into all areas of work and the Climate Emergency Action Plan includes work to incorporate carbon impact assessment into all capital funded project proposals, to maximise the climate benefit of council investments and limit new sources of emissions wherever possible.

15. Dedicated Schools Grant

- 15.1. The DSG has a cumulative surplus of £1.100m after an in-year underspend of £2.267m in 2022/23. £2.209m of the in-year spend relates to special educational needs and disabilities (SEND) which reflects the Education Banding Tool (EBT) review to cap some of the banding values and the recalibration carried out to amend the other overfunding previously in the system for pupils with Education, Health and Care plans (EHCPs). This also reflects significant work to verify destinations for 160 students previously in post 16 settings to ensure that EHCPs could be ceased and funding for support was no longer an in-year financial commitment. Further work re the post 16 settings in relation to expected costs for 2021/22 resulted in an underspend of £750,000 in 2022/23. It should be noted that there is a trend of increasing numbers of pupils with SEND.
- 15.2. There are 15 schools (out of 39) with deficit balances at 31 March 2023 compared to 11 last year. Two of the schools with deficits will amalgamate from September 2023 and most of the others have or are finalising deficit recovery plans. Falling pupil rolls have played a significant part in schools having difficulty in managing their budgets and with the impact of higher inflation on costs there is a risk that this will become more difficult.
- 15.3. The Department for Education (DfE) previously confirmed the Government's ambition that all mainstream schools funding will be via the National Funding Formula (NFF) rather than through local formulae set independently by each local authority. This will fund all schools across the country on a comparable basis. The full move to the NFF is expected within four years (2027/28 funding year) with a gradual pace of change, starting with the requirement to move 10% closer to the NFF factor values in 2023/24. The move to the NFF is likely to lead to some schools benefiting from an increase in funding and others receiving minimal funding increases. The DfE will also review the central school services block which is expected to result in lower funding for central services such as admissions, leadership costs, finance, and the virtual school. The DfE will consult with authorities on these changes in due course.

16. Timelines

16.1. The broad timeline of this year's budget setting cycle is outlined in the table below:

Group	Month	Comments
Cabinet	10 July 2023	Financial planning report – review assumptions, set out three-year budget gap and agree savings approach
Executive Leadership Team (ELT)	July to September 2023	ELT, directors, and officers review service expenditure across directorates, identify savings options
Budget and Performance Scrutiny Task Group	September 2023	Scrutiny of Council's Financial Planning approach and priorities
Budget and Performance Scrutiny Task Group	November 2023	Scrutiny of Council's savings and investment proposals
Budget and Performance Scrutiny Task Group	January 2024	Final overview of Council's budget and capital strategy following Government settlement announcement in December
Cabinet	19 February 2024	Agree the 2024/25 budget and three-year MTFP
Council	6 March 2024	Approve the 2024/25 budget and three-year MTFP

17. Legal Implications

17.1. This report is submitted to the Cabinet in accordance with the Finance procedure rules. Cabinet is asked to note the revised medium term financial forecast to 2026/27 and to agree the budget process approach as set out in the report.

17.2. The function of calculating the City Council's budget requirement and the City Council's element of the Council Tax, and the function of setting the Council Tax, are the responsibility of the full Council. The function of preparing estimates and calculations for submission to the full Council is the responsibility of the Cabinet.

17.3. Section 25 of the Local Government Act 2003 requires that when a local authority is making its budget calculations, the Chief Finance Officer of the authority must report to the Council on the robustness of the estimates made for the purposes of the calculations and the adequacy of the proposed financial reserves.

- 17.4. The Council has a statutory duty to have regard to the report of the Chief Finance Officer on these issues when making decisions about its budget calculations.
- 17.5. Some savings proposals may only be delivered after specific statutory or other legal procedures have been followed and/or consultation taken place. Where consultation is required, the Council cannot rule out the possibility that they may change their minds on the proposal because of the responses to a consultation, and further reports to Cabinet or cabinet member (as appropriate) may be required.
- 17.6. Apart from statutory duties relating to specific proposals the Council must consider its obligations under the Equality Act.
- 17.7. If General Fund Reserves are used to support the budget, they will need to be reimbursed at the earliest opportunity to provide the necessary, margin of safety in future years.

18. Consultations

- 18.1. No specific consultations arise from the recommendations in this report, however individual savings proposals that come forward as part of the budget process may require specific consultation.
- 18.2. The Council is developing an approach to participatory budgeting and this may play a part in the engagement with communities at some stages in the coming year.

If you have any queries about this Report or wish to inspect any of the Background Papers, please contact:

Jake Bacchus, Director of Finance

BACKGROUND PAPERS

Fairer Westminster Delivery Plan (<https://www.westminster.gov.uk/delivering-our-plan-build-fairer-westminster>)



City of Westminster

Decision Maker:	Cabinet
Date:	10 July 2023
Classification:	General Release
Title:	Revenue and Capital Outturn 2022/23
Wards Affected:	ALL
Key Decision:	No
Financial Summary:	The report summarises the Council's 2022/23 year-end financial position and requests approval for unspent capital budgets to be reprofiled into future years
Report of:	Gerald Almeroth, Executive Director – Finance and Resources

1. Executive Summary

- 1.1. This report sets out the Council's 2022/23 outturn position for revenue and capital for the General Fund (GF) and Housing Revenue Account (HRA), as well as a summary of the pension fund and the Council's treasury management for the year.
- 1.2. The General Fund (GF) revenue outturn position is a net underspend of £2.967m against an approved budget of £185m. This equates to a net underspend of 1.6%. This is an improved position compared to the Quarter 3 forecast position of a net £3m overspend. This improvement was primarily due to increased income from some services within Environment and City Management and treasury investment income. The revenue underspend will increase the Council's general reserve balance by 3.5% to £60m.
- 1.3. The Council's general reserves are held as risk mitigation and allow the management of any unforeseen circumstances and economic volatility. The current level of general fund reserves is considered a sufficiently robust level to manage any in-year pressures that may arise from either cost inflation or reduced income or funding levels below those factored into the 2023/24 budget. It can also help manage the positive delivery of savings over the medium-term and cover one-off shortfalls in the annual budget setting process.

- 1.4. The HRA outturn is a surplus of £5.139m. The 2022/23 HRA budget had been set with the expectation that income would be fully balanced against expenditure, with no reserve drawdown budgeted for.
- 1.5. The general fund capital outturn is a gross expenditure variance of £69.6m against a revised budget of £267m. The HRA capital outturn has an expenditure variance of £21.894m against a revised budget of £193.777m. Detailed explanations of the reasons for the variances are set out in the report.

2. Recommendations

- 2.1. That Cabinet notes the outturn position for 2022/23
- 2.2. That Cabinet approves the reprofiling from the 2022/23 capital programme into future years as set out in appendix 1 (GF) and appendix 2 (HRA)

3. Revenue Budget

General Fund

- 3.1. The table below summarises the year end revenue position:

ELT	2022/23 Net Budget £m	2022/23 Net Outturn £m	2022/23 Net Variance £m
Adult Services	54.172	53.963	(0.208)
Children's Services	41.171	43.030	1.858
Environment and City Management	3.245	1.038	(2.207)
Growth, GF-Housing and Planning	23.268	34.371	11.103
Finance and Resources	33.093	9.983	(23.110)
Innovation and Change	19.580	18.701	(0.879)
Public Health	(1.141)	(1.141)	0.000
Other Corporate Directorates	4.237	4.024	(0.213)
Corporate Items*	7.236	17.926	10.690
Total	184.862	181.894	(2.967)

* Corporate Items includes non-specific grants, levy payments, New Homes Bonus and capital financing

- 3.2. The key expenditure variances for the final outturn position across Council services are explained in the sections below. In summary these are:
 - Contract and salary inflation was a pressure across all services as inflation rates increased to above 10% over the year. Inflation was 5% at the time of setting the budget. This overspend is contained within Corporate Items in the above table;

- Growth, Planning and Housing overspent as a result of ongoing pressures on temporary accommodation combined with a higher than expected shortfall in planning income;
- Children’s Services overspent due to further demand pressures on short breaks and SEN transport, and;
- Finance and Resources showed a positive variance due to additional treasury investment income as interest rates increased rapidly in the year.

Inflation

3.3. Over the past year the Council has experienced significant inflationary pressures above those originally budgeted for. This included additional contract inflation requests from suppliers and finalisation of the 2022/23 pay award. In total these inflationary pressures totalled £10.7m as shown in the table below.

	Pay £m	Contract £m	Total £m
Adult Services	0.525	1.325	1.850
Growth, GF-Housing and Planning	0.629	0.845	1.474
Finance and Resources	0.941	0.672	1.613
Environment and City Management	0.743	2.971	3.714
Childrens Services	0.985	0.377	1.362
Innovation and Change	0.553	0.006	0.559
Other Corporate Directorates	0.118	-	0.118
Total	4.494	6.196	10.690

3.4. These inflationary pressures have been shown within the corporate items line on the outturn summary which is reporting a year end overspend of £10.690m. As part of the 23/24 budget setting process additional provision was made for service areas to manage the pay and contract price inflationary pressures experienced during 22/23. In addition the 23/24 budget includes provision for further anticipated pay and contract inflation. An uplift of 5% or £10.4m has been allowed for pay inflation and 5.5% or £12.4m for contract inflation.

Investment Income

3.5. Whilst high inflation has created cost pressures for the provision of Council services, it has been mitigated by increases in the Bank of England base rate pushing up the level of investment interest earned on Council cash balances. At the start of 22/23 bank base rate was at 0.75%. Following steady increases throughout the year it reached 4.25% by the end of year and has increased again in June to 5%.

3.6. These increases in investment income have offset the additional inflationary cost pressures but also other service pressures such as those arising from temporary accommodation, resulting in an overall underspend position for 2022/23. Whilst this has been beneficial in the short term, once interest rates reduce that benefit will no longer be there and the additional cost pressures will need to be balanced in other ways.

Major Income Streams

3.7. A summary of the Council's top income variances can be found in the table below:

Key Income Streams	Budget £m	Actuals £m	Variance £m
Parking - paid for parking	41.171	38.332	2.839
Paid for parking - motorcycles	0.625	0.627	(0.002)
Parking penalty charge notices - marshals	15.409	18.710	(3.301)
Parking penalty charge notices - cameras	4.083	4.520	(0.437)
Parking - suspensions and dispensations	21.030	21.563	(0.533)
Parking - resident permits	4.562	4.044	0.517
Parking - trade permits	1.320	1.175	0.145
Commercial Waste	13.720	17.329	(3.609)
Licensing fee income	3.211	2.833	0.378
Road management fees	9.792	10.922	(1.130)
Leisure	1.342	1.351	(0.009)
Registrars	2.401	3.243	(0.842)
Planning – development control	7.642	4.424	3.219
City Promotions, Events and Filming	1.591	2.582	(0.991)
Local Land Charges	1.444	1.491	(0.047)
Property - commercial rental income - General Fund & HRA	31.474	33.096	(1.621)
Court costs recovery income	1.908	3.620	(1.712)
Total	162.723	169.862	(7.139)

Medium-term Financial Plan – 2022/23 savings

- 3.8. In March 2022, Full Council approved £16.588m of savings as part of its balanced General Fund budget.
- 3.9. Achievement of those savings is set out in the table below. Those savings that either weren't achieved or reprofiled form part of the year-end outturn position.

Directorate	Saving achieved £m	Saving reprofiled £m	Saving unachieved £m	SAVINGS TOTAL £m
Adult Social Care	2.610	-	-	2.610
Children's Services	1.483	-	0.450	1.933
Environment and City Management	4.790	0.158	0.900	5.848
Finance and Resources	1.675	0.400	-	2.075
Growth, Planning and Housing	2.410	-	1.100	3.510
Innovation and Change	0.612	-	-	0.612
TOTAL	13.580	0.588	2.450	16.588

- 3.10. 23/24 budgets have already been amended for unachieved savings in GPH and ECM. The unachieved savings in Childrens are being reviewed and will be picked up in the monitor.

Movements from Quarter 3

- 3.11. The main movements by Directorate from the quarter 3 position is shown in the table below:

Movements by Directorate	£m
Quarter 3 Forecast (Underspend) / Overspend	3.043
Adult Services	(0.108)
Growth, GF-Housing and Planning	0.927
Finance and Resources	(3.357)

Environment and City Management	(2.422)
Childrens Services	(0.100)
Innovation and Change	(0.605)
Other Corporate Directorates	(0.173)
Corporate Items	(0.172)
Movement since Q3	(6.011)
Final Outturn for 22/23	(2.967)

Key Variances

3.12. The key expenditure variances across the Council services are explained in further detail below.

Adult Social Care and Public Health (ASC): Underspend £0.208m

- 3.13. The Adult Social Care (ASC) sector continues to face challenges linked to high demand for services and acuity of needs. However, like in past year, these challenges have been robustly managed by maximising efficiencies and lobbying health partners for additional funding. This hard work means that the ASC financial outturn is an underspend of £0.208m which is 0.3% of the net budget, £54.2m. This is £0.100m greater than the position reported previously. The positive movement is largely due to higher income achieved than previous forecast.
- 3.14. The financial position is positive because of £2m one-off funding received in year from the Integrated Care Board (ICB) and £1m from the Department of Health and Social Care (DHSC) to offset cost pressures and allow additional investment to support the hospital discharge process. Expenditure across Homecare continues to increase linked to demand and complexity. The number of Homecare clients increased by 8% in 22/23 compared to the previous year. It is expected that there will be a continuous increase in presenting need within Learning Disabilities, Mental Health, and people with complex needs in the coming year.
- 3.15. In 23/24, central government announced additional funding for the Council, through a £3.1m Market Sustainability and Improvement Fund grant and £2.5m from the Discharge Fund. These grants have conditions and reporting requirements and are expected to be spent in full.
- 3.16. The Public Health financial outturn is a break-even position. The department will continue its commitment to invest in cross-council initiatives and public health interventions which address health inequalities in the local population. The aim will be to target key vulnerable groups, offer increased resilience and support health and wellbeing.

Children's Services: Overspend £1.858m

- 3.17. A £1.858m overspend is reported for Childrens Services which represents 5% of the overall service budget of £41.171m. There was a small net movement of £0.100m since quarter 3.
- 3.18. In the Education service, a £1.420m overspend was reported as a result of short break pressures relating to care packages and direct payments, social care cases from Disabled Children's Team and Tresham-related staffing and building pressures. At the end of 2022/23 there were 97 FTE care packages of which 34 were social care cases in addition to 142 active direct payments where there was a £0.584m overspend on packages as well as £0.240m on staffing.
- 3.19. The annual pressure of operating across multiple sites has been calculated at approximately £0.350m. This is made up of mainly staffing (£0.260m), building costs (£0.050m) and transport costs (£0.040m). There are currently 154 pupils attending the Tresham site of which 32 are social care cases. Additionally, the Council is no longer receiving funding from the NHS where they would have previously funded part of care packages costs under the continuing care panel (circa £0.350m).
- 3.20. Family services overspent by £0.354m mainly due to placement costs particularly those with no recourse to public funds (NRPF).
- 3.21. The net overspend on Libraries and Archives (0.089m) was due to unachieved income targets in Libraries.

Environment & City Management: Underspend £2.207m

- 3.22. Environment and City Management reported a £2.207m underspend which is an improvement of £2.4m on the forecast position as at Quarter 3. This is due to additional income from several areas including Commercial waste, parking bay suspensions and road management.
- 3.23. Waste and Cleansing reported an underspend of £3.580m. Commercial waste collected £3.609m more than budgeted, and experienced growth in both new and existing customers. The economic recovery post pandemic was much higher than originally estimated. Disposal costs underspent by £0.253m due to an untypically high-value rebate from recyclable materials offsetting the increased waste tonnage.
- 3.24. Collection and Cleansing overspent by £0.647m due largely to an additional collection round for sorted paper and glass which also helped reduce disposal costs and additional leased vehicles.
- 3.25. Public Conveniences had an income shortfall of £0.246m which was offset by £0.236m reduced costs, but overall underspent by £0.403m due to a one-off

refund from the contractor relating to a previous financial year. There were other minor net adverse movements £0.028m.

- 3.26. Parking reported an overspend of £0.501m. This was made up of an under recovery of £2.839m on Paid for Parking, £0.517m on Resident Permits and £0.515m on other parking income, offset by over recovery of £0.533m on Suspensions, £0.516m on CCTV PCNs, and £3.256m on Marshal-issued PCNs.
- 3.27. Additional parking service costs of £1.803m were incurred, largely in respect of extra targeted on-street enforcement and other costs associated with higher PCN volumes, the increased number of CCTV cameras, and additional resourcing in the service to support the contract implementation and the ongoing Cycle Hangars scheme. A further underspend £0.868m occurred in respect of Concessionary Fares due to lower usage than anticipated.
- 3.28. Public Protection and Licensing reported a overspend of £1.745m which arises mainly from an expected staffing expenditure saving of £0.9m that was delayed, additional legal provision requirement of £0.1m and income shortfalls of £0.745m from a number of income streams including Massage, Street Trading, Advice Giving and Inspection Services.

Growth, GF-Housing and Planning: Overspend £11.1m

- 3.29. The overall GPH outturn variance to budget is £11.1m, which is broadly consistent with projections throughout the financial year.
- 3.30. Planning income has continued at below the levels of pre-pandemic times and was £3.6m below the budget. Major Applications (that attract the higher fees) are 59% below 2019/20 volumes. The table below shows a comparison of activity levels for planning and pre-planning applications:

	2019/20	2021/22	Change	2019/20 (Q3)	2022/23 (Q3)	Change
Major	67	37	-45%	58	24	-59%
Minor	2,735	3,082	13%	2,121	2,256	6%
Other	7,067	4,916	-30%	5,466	3,647	-33%
Pre Apps	1,272	843	-34%	971	637	-34%

- 3.31. There have been significant pressures in General Fund Housing that have impacted during 2022/23. In particular this has been on Temporary Accommodation, partly demand related, but more significantly driven by supply pressures that are pushing the Council to use expensive emergency accommodation to ensure that they fulfil their statutory duties. The outturn variance to budget is £6.8m (once allowing for the corporately held inflation allocation). It is worth noting that the number of households in nightly rated accommodation at the end of 22/23 had risen to 120 compared to 20 at the

equivalent point in the prior year, and that this will have an impact on the 2023/24 financial position.

- 3.32. The overall number of households housed in temporary accommodation has increased significantly during 2022/23. An average of 2,899 households were housed in TA (compared to 2,692 in 2021/22). On top of this, the average net unit cost of TA has increased from approx. £67 per week to over £113 per week. It is worth noting that the increase during 2022/23 was sharper in the final 6 months of the year, where demand grew by c30 extra households per month, and that this trend has continued into 2023/24.
- 3.33. The outturn position on Housing Benefits is a £0.9m overspend to budget. This is primarily driven by the overall HB expenditure less the HB Subsidy income received being more significantly in deficit than budgeted.

Finance and Resources: Underspend £23.110m

- 3.34. Finance and Resources is reporting a £23.110m underspend against the budget of £33.093m. This is largely due to significant interest rate increases experienced in 2022/23 and has resulted in a favourable return on investment.
- 3.35. The overall outturn position is a favourable variance of £3.357m since quarter 3, this is as a result of:
- 3.36. Corporate Property: £2.4m favourable movement of which £1.875m relates to rent reviews and collection of one-off backdated rent. Of this £1.875m, £1.300m was rent backdated to 2020/21 and £0.575m rent backdated to 2011. In addition, utilities had a favourable movement due to lower than expected energy consumption of £0.346m and there was further realisation of investment income opportunity £0.400m; offset by Queen Mother Sports Centre capital write off £0.593m.
- 3.37. Treasury and Pensions: £2.3m favourable since Q3 as a result of further investment income from increased base interest rates. Daily investment balances steadily increased from £454.5m at 31 March 2022 to £837m at 31 March 2023. Interest rate forecasts were initially suggesting only gradual rises, but the rate rises were more frequent and higher than anticipated leading to a changing position throughout the year. How far interest rates rise will be dependent upon the path of inflation.
- 3.38. Revenues & Benefits: £0.4m favourable movement since quarter 3 which is due to staffing costs coming back in line with the budget (£0.2m) and an improved underspend on benefits administration (£0.1m) and Revenue Services Contract Performance (£0.1m).
- 3.39. The favourable variances outlined have been offset by an overspend in Digital and Innovation of £1.996m. This is attributed to a change in profile on the Small

Cell contract income (£1.285m) following renegotiation (the contract will be achieving the same value, but this has now more backloaded over the 10 year period), as well as a reduction in rechargeable income from HRA staff costs and shared IT software (£0.227m) There is also an overspend in Procurement of £0.2m from reduced staff capitalisation £0.1m and management fees associated with Matrix platform £0.1m.

Innovation & Change: Underspend £0.879m

- 3.40. Overall within Innovation and Change there is an underspend position of £0.879m resulting from staff underspends from vacancies held and improved income within the City Promotions, Event and Filming team.

Other Corporate Directorates: Underspend £0.213m

- 3.41. Other Corporate Directorates have reported a £0.213m underspend which relates to staffing vacancies. The movement from quarter 3 relates largely to the inflation which had not been forecast within People Services and improved underspends on other non-pay areas.

4. Housing Revenue Account (HRA)

- 4.1. The HRA has end the year with a surplus of £5.139m against budget. The 2022/23 HRA budget had been set with the expectation that income would be fully balanced against expenditure (i.e. no budgeted drawdown of reserves).
- 4.2. The key driver of the surplus was primarily linked to a £nil borrowing requirement on the 2022/23 HRA capital programme. This was largely due to the in-year receipt of additional GLA grant for the Ebury regeneration (moving profiled borrowing back a year and into 2023/24).
- 4.3. The main HRA variances were predominantly corporate items, as follows:
 - Reduced interest costs due to £nil borrowing (£2.232m)
 - A reduced revenue contribution to fund capital (£2.200m)
 - A reduced contribution to the HRA Bad Debt Provision (£0.500m)
 - Lower than budgeted staff incentive payments (£0.348m)
- 4.4. The service delivery element of the HRA budget was balanced, with high levels of inflation on repairs spend (£4.336m) largely offset against staff underspends and increased recovery of costs via leaseholder service charges.
- 4.5. The surplus has been transferred to HRA earmarked reserves to fund known future commitments and mitigate future risk. This includes planned revenue contributions to fund capital (re-profiled from 2022/23), the HRA rent support fund and other planned MTFP initiatives.

5. Capital

5.1. General Fund Capital Programme

5.1.1. The Council's capital programme was approved by full Council in March 2022, with a General Fund expenditure budget of £301.895m and an income budget of £46.939m for 2022/23. The 2022/23 budgets were revised at 2021/22 outturn and again at P6 to an expenditure budget of £267.003m and income budget of £42.170m.

5.1.2. As part of the outturn position, budgets have also been reviewed to reprofile across years. For General Fund, this represents expenditure reprofiling from 2022/23 to future years of £69.667m and income reprofiling from 2022/23 to future years of £11.735m. This is explained in more detail below.

5.1.3. The table below summarises the General Fund capital outturn position for 2022/23:

Directorate	2022/23 Expenditure Budget £m	2022/23 Income Budget £m	2022/23 Net Budget £m	2022/23 Outturn Expenditure £m	2022/23 Outturn Income £m	Net Outturn £m	Expenditure Variance £m	Income Variance £m	Net Variance £m
Adults & Deputy Chief Executive Services	5.460	(0.860)	4.600	4.533	(0.163)	4.370	(0.927)	0.697	(0.230)
Children's Services	10.333	(10.281)	0.052	6.987	(6.977)	0.010	(3.346)	3.304	(0.042)
Environment and City Management	79.116	(19.209)	59.907	50.273	(18.347)	31.926	(28.843)	0.862	(27.981)
Finance & Resources	55.737	(5.127)	50.610	42.625	(3.507)	39.118	(13.112)	1.620	(11.492)
Growth, Planning & Housing	100.087	(6.673)	93.414	74.653	(18.619)	56.034	(25.434)	(11.946)	(37.380)
Westminster Builds	14.700	0.000	14.700	17.599	0.000	17.599	2.899	0.000	2.899
Innovation & Change	1.570	(0.020)	1.550	0.684	(0.003)	0.681	(0.886)	0.017	(0.869)
Total	267.003	(42.170)	224.833	197.354	(47.616)	149.738	(69.649)	(5.446)	(75.095)

5.1.4. In total the general fund capital programme has gross expenditure reprofiling of approximately £69.7m. The detailed reasons for the main variances are explained in the paragraphs below:

5.1.5. This report requests this net movement to be re-profiled into future years. The tables below provide a breakdown of these movements by Directorate. A more detailed breakdown by project is provided in appendix 1.

Expenditure:

Directorate	Slippage from 2022/23 to 2023/24 £m	Bfwd from 2023/24 to 2022/23 £m	Slippage from 2022/23 to 2024/25 £m	Slippage to 2022/23 from 2024/25 £m	Total Slippage £m	(Under)/Overspends £m	Total 2022/23 Outturn Variance £m
Adults & Deputy Chief Executive Services	(0.556)	0.001	0.000	0.000	(0.555)	(0.372)	(0.927)
Children's Services	(2.477)	0.000	0.000	0.000	(2.477)	(0.869)	(3.346)
Environment & City Management	(34.606)	5.327	0.000	0.000	(29.279)	0.436	(28.843)
Finance and Resources	(12.049)	0.027	0.000	0.185	(11.837)	(1.275)	(13.112)
Growth, Planning & Housing	(29.828)	1.950	0.000	0.345	(27.533)	2.099	(25.434)
Westminster Builds	0.000	2.899	0.000	0.000	2.899	0.000	2.899
Innovation and Change	(0.896)	0.011	0.000	0.000	(0.885)	(0.001)	(0.886)
TOTAL	(80.411)	10.215	0.000	0.530	(69.667)	0.018	(69.649)

Income:

Directorate	Slippage from 2022/23 to 2023/24 £m	Bfwd from 2023/24 to 2022/23 £m	Slippage from 2022/23 to 2024/25 £m	Slippage to 2022/23 from 2024/25 £m	Total Slippage £m	Under / (Over) recovery £m	Total 2022/23 Outturn Variance £m
Adults & Deputy Chief Executive Services	0.482	0.000	0.000	0.000	0.482	0.215	0.697
Children's Services	2.435	0.000	0.000	0.000	2.435	0.869	3.304
Environment & City Management	4.061	0.000	0.000	0.000	4.061	(3.199)	0.862
Finance and Resources	1.915	(0.013)	0.000	0.000	1.902	(0.282)	1.620
Growth, Planning & Housing	2.899	(0.097)	0.036	0.000	2.838	(14.784)	(11.946)
Westminster Housing Investments Limited	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Innovation and Change	0.020	(0.003)	0.000	0.000	0.017	0.000	0.017
TOTAL	11.812	(0.113)	0.036	0.000	11.735	(17.181)	(5.446)

5.1.6. The table below summarises the projects with the largest gross expenditure variances to budget:

Project	Variance to Expenditure Budget £m	Comments
Main Fleet Replacement Programme	(16.711)	Delays with securing site lease agreement has resulted in slippage to 2023/24 in site infrastructure works. These are now partially complete, and work is expected to be finalised in June 2023. The 40 electric waste collection vehicles are being built and originally had a delivery date in 2022/23. However, negotiations have taken place with the manufacturer to store the vehicles under their insurance until the electrical charging infrastructure work at the site is completed, which will result in delivery in July 2023.
Westminster Community Homes Loans	(5.733)	Loan agreement between WCC and WCH has not taken place, as planned, this financial year, as legal agreements have taken longer to reach than expected. The loan is for development costs of social units. Units were switched from intermediate to social mid-year, explaining the legal related delays. New viabilities also had to be run to test whether the scheme was viable being 100% social. Agreement is expected early in the new financial year, therefore the variance will be reprofiled to 2023/24.
Temporary Accommodation	(3.877)	Of the targeted 68 acquisitions this year, 49 have been completed, with a further 10 where a sale had been agreed, but legal completion had not been achieved by 31 st March 2023 (of these, 4 completed during April 2023). The nature of this programme of acquisitions means that unspent resources will be rolled forward into 2023/24 and beyond. A review of the structure of the service is being undertaken with a view to accelerating the delivery of the overall acquisitions programme, this will form the basis of a Cabinet Member report in the summer.
Church Street Acquisitions	(3.400)	The acquisitions programme is driven by engagement from residents and negotiations are still in progress and these units are expected to complete in 2023. A certain number of homes would have been budgeted for in 2022/23, however as these were not

		purchased, all costs (the values of the properties and any associated costs) have been reprofiled to 2023/24.
Carbon Management Programme	(3.207)	The focus has been on completing the Phase 1 BEIS funded projects so most of the work on the Council/S106 funded projects has been reprofiled to 2023/24, as part of a rolling programme. These projects include Seymour Leisure Centre, Stowe Youth Centre, Maida Vale Library, George Eliot Primary School, Barrow Hill Junior School, Four Feathers, Queens Park Library and Abbey Community Centre.
Improvements Investment Properties	(2.425)	The reprofile reflects the following: <ul style="list-style-type: none"> • Orange Street (£1.072m) – changes in the specification and the time taken to agree the contract has delayed the delivery of this work. The work is now expected to complete in Q2 23/24 • Huguenot House – maintenance / refurbishment (£0.757m) – work was delayed, now expected to commence in Q2 2023/24. • Other projects (£0.596m) – an allowance for ad hoc investment portfolio projects that was not required in 2022/23
Public Realm Improvement Schemes	(2.418)	Several smaller schemes (Abel & Cleland, Wellington hotel, Connaught Village Green) which were planned to start in 2022/23 have now been rescheduled to start in 2023/24 due to project funders' request, as there were issues securing and raising funding - these have now been resolved. Therefore, expenditure has been reprofiled to 2023/24.
Highways - Protective Measures	(2.172)	Issues outside of the control of WCC such as access to land to commence works and specialised material availability due to general shortage in the construction industry has resulted in re-profiling of this scheme to 2023/24.
Lisson Grove Programme	(1.763)	The budget assumed three acquisitions of Gayhurst House units to be completed this year. At Period 9, the best-case scenario was for one unit to be purchased this financial year, less than planned. The acquisitions programme is driven by engagement from residents and negotiations are still in

		progress and these units are expected to complete in 2023. The spend has been reprofiled into 2023/24.
Church Street Green Spine Public Realm	(1.562)	Reprofiling is due to a year's defects on the planting (standard for planting contract) and contingency kept back for 1 year from completion to ensure there are no defects or issues.
Strand-Aldwych	(1.560)	£0.8m costs for the sculptural benches to be incurred in 2023/24, £0.5m risk and contingency not utilised in year, £0.25m utility costs timing differences within the contractor's schedule. Further delays due to planning approval meaning that materials could not be ordered. Therefore, the spend has been reprofiled to 2023/24.
Planned Preventative Maintenance - Lighting	(1.548)	Structural critical columns work affected by long delays with obtaining materials due to overseas supply issues. Also, several street works notices being declined due to other utilities working in the road and some issues found on site as existing columns are on bespoke foundations. This has resulted in delays to the programme, therefore the spend has been reprofiled to 2023/24.
TOTAL	(46.376)	

5.2. Housing Revenue Account Capital Programme

5.2.1. The 2022/23 HRA capital budget was initially approved at **£197.508m** (in March 2022). Slippage of **£4.294m** from the 2021/22 outturn was subsequently added. When the capital budgets were revised at P6 to reflect in-year projections, the HRA budget was reduced by **£8.025m**. This resulted in a revised 2022/23 HRA capital budget of **£193.777m** (see table below).

HRA Capital Programme	2022/23 Base Budget £m	2021/22 Slippage £m	2022/23 Budget + Slippage £m	2022/23 P6 Reprofile Budget £m
Housing Planned Maintenance	57.826	-	57.826	49.985
Housing Regeneration	121.529	4.294	125.823	126.689
Other Projects	18.153	-	18.153	17.103
Total Capital Expenditure	197.508	4.294	201.802	193.777

5.2.2. The 2022/23 outturn resulted in a variance of **£21.894m** against the revised budget (see table below). Much of this variance reflects a need to re-profile the budgets for several the Development projects within the HRA capital programme in response to revised delivery timelines and/or amended payment schedules.

HRA Capital Programme	2022/23 Revised Budget £m	2022/23 Out-turn £m	2022/23 Variance £m
Housing Planned Maintenance	49.985	52.778	2.793
Housing Regeneration	126.689	116.197	(10.492)
Other Projects	17.103	2.908	(14.195)
Total Capital Expenditure	193.777	171.883	(21.894)

5.2.3. In most instances, the slippage reflects a simple adjustment to the 2023/24 HRA capital budget. However, there are some instances where the budget slippage has been re-profiled into later years. The proposed increase to the 2023/24 HRA capital budget because of slippage from 2022/23 into 2023/24 is £21.416m. This is summarised in the table below. A more detailed breakdown by project is provided in appendix 2.

Programme Element	2022/23 HRA Capital Outturn Variance	Allocation of 2022/23 Variance		
		Slippage into 2023/24	Slippage into 2024/25+	(Under) / Overspend
Planned Maintenance	2.793	-	-	2.793
Development & Regeneration	(10.492)	(18.323)	7.431	0.400
Other Projects	(14.195)	(3.092)	(11.103)	-
TOTAL	(21.894)	(21.415)	(3.672)	3.193

5.2.4. The HRA Business Plan approved by Full Council in March 2023 approved a gross 2023/24 HRA capital budget of **£148.110m**. The proposed re-profiling of **£21.416m** of budget from 2022/23 would result in a revised total budget of **£169.526m** (see below).

HRA Capital Programme	2023/24 Base Budget £m	2022/23 Slippage £m	2023/24 Total Budget £m
Housing Planned Maintenance	60.796	-	60.796
Housing Regeneration	84.525	18.323	102.848
Other Projects	2.789	3.092	5.881
Total Capital Expenditure	148.110	21.416	169.526

5.2.5. Details of the major drivers for the re-profiling being reflected because of slippage in 2022/23 are laid out below:

- **Ebury** covers most of the proposed re-profiling into 2023/24 (£14.667m). This is due to some initially optimistic cash flow forecasts from the on-site contractors (BYCK and G&T) which caused the variance in 2022/23. However, positive progress has been delivered since and is expected to ensure the scheme remains on track for its currently projected timescales.
- The **Self- Financing programme** includes re-profiling of £3.092m (within the Other Projects heading above). Disposals of social units were ceased in 2022/23, however some acquisitions are expected to complete in this financial year (funded from historic capital receipts generated by the programme).
- **Ebury Acquisition** includes reprofiling of £1.390m of acquisition budget due to some buybacks not being completed because of conveyancing delays.
- **Cosway** shows slippage of £1.149 due to a change in practical completion (PC) date, with the scheme now due be completed in 2023/24 financial year.
- **Infill development programme** includes re-profiling of £1.044m due to revised programme on a number of the individual schemes. This was a consequence of high inflation on construction materials which delayed the tendering of contracts.
- **Cundy St Quarter** shows re-profiling of £1.000m due to a delay to the project timeline that has shifted the proposed purchase of the units into the new financial year.

6. Treasury

Investments

6.1. As at 31 March 2023, net cash invested was £437.7m, an increase of £281.4m on the position at 31 March 2022 as shown below:

	31 March 2023 (£m)	31 March 2022 (£m)
Total Borrowing	(400.1)	(298.2)
Total Cash Invested	837.8	454.5
Net Cash Invested	437.7	156.3

- 6.2. The Council's Annual Investment Strategy, which forms part of the annual Treasury Management Strategy Statement (TMSS) for 2022/23, was approved by the Council on 2 March 2022. The Council's policy objective is the prudent investment of balances to achieve optimum returns on investments, subject to maintaining adequate security of capital and a level of liquidity appropriate to the Council's projected need for funds over time.
- 6.3. The table below provides a breakdown of investments, together with comparisons with the previous financial year end.

	Investment Balance 31 March 2023 (£m)	Investment Balance 31 March 2022 (£m)	Movement (£m)
Money Market Funds	188.3	71.5	116.8
Notice Accounts	0.0	30.0	-30.0
Term Deposits	649.5	353.0	296.5
Total:	837.8	454.5	383.3

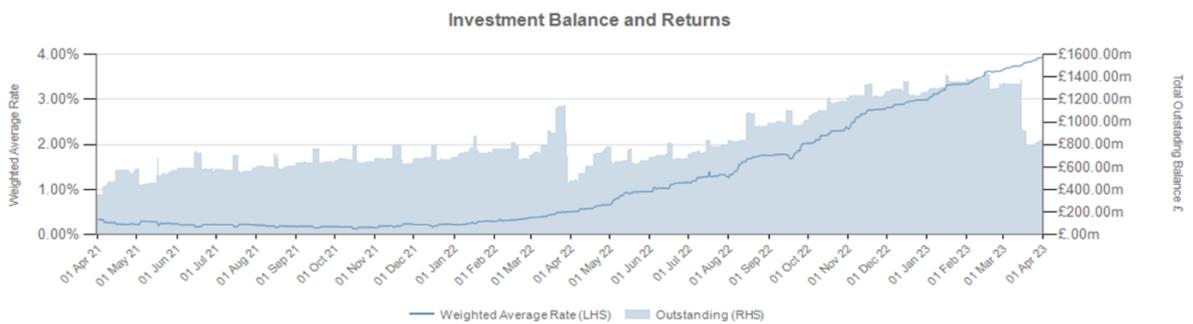
- 6.4. Liquid balances are managed through Money Market Funds, providing same day liquidity. Cash has also been invested in less liquid instruments such as term deposits. The average level of funds available for investment in 2022/23 was £1,008.3m.
- 6.5. Daily investment balances have steadily increased from £454.5m at 31 March 2022 to £837.8m at 31 March 2023.
- 6.6. The table below provides a more detailed breakdown of the Council's treasury investment position and interest rate received as at 31 March 2023:

	Investment Balance (£m)	Interest Rate (%)
Money Market Funds	188.3	4.14
UK Banks	190.0	3.98
Non UK Banks	170.0	3.66
UK Government	204.5	3.65
Local Authorities	85.0	4.58
Total:	837.8	3.93

- 6.7. Over the last three years, the coronavirus pandemic has caused huge economic turmoil within the UK and the global economy. After the Bank of England took emergency action in March 2020 to cut the Bank Rate to 0.10%, it left the Bank Rate unchanged at its subsequent meetings until raising it to 0.25% at its meeting on 16th December 2021, to 0.50% at its meeting of 4th February 2022 and then to 0.75% in March 2022.
- 6.8. Investment returns picked up throughout the course of 2022/23 as central banks, including the Bank of England, realised that inflationary pressures were not

transitory, and that tighter monetary policy was called for. Starting April 2022 at 0.75%, the Bank Rate moved up in stepped increases of either 0.25% or 0.5%, reaching 4.25% by the end of the financial year 2022/23, with the potential for further increases in 2023/24.

- 6.9. Meanwhile, throughout the Autumn 2022, and then in March 2023, the Bank of England maintained various monetary policy easing measures as required to ensure specific markets, the banking system and the economy had appropriate levels of liquidity at times of stress.
- 6.10. Westminster’s surplus cash for investment remained high throughout the year and the weighted average rate has increased since the start of April 2022. The level of funds available was mainly dependent on the timing of precept payments, receipt of grants and progress reference the Council’s capital programme.



- 6.11. Interest rate forecasts were initially suggesting only gradual rises in short, medium and longer-term fixed borrowing rates during 2022/23 but, by August 2022, it had become clear that inflation was moving up towards 40-year highs, and the Bank of England engaged in monetary policy tightening at every Monetary Policy Committee meeting during 2022 and into 2023. Currently the CPI measure of inflation is expected to fall back towards 4% by year end 2023. Nonetheless, there remain significant risks to that central forecast.
- 6.12. All investment/overdraft limits specified in the 2022/23 TMSS strategy have been complied with.
- 6.13. The table below shows the forecast investment income to be achieved in the year: budget versus actual and the variance. The Council’s budgeted investment return for 2022/23 was £2.013m, and performance for the year is £26.060m above budget.

Year 2022/23	Budget £000	Actual £000	Variance £000
Investment Income	2,013	28,073	26,060

Borrowing

- 6.14. The Council's underlying need to borrow for capital expenditure is termed the Capital Financing Requirement (CFR). This figure is a gauge of the Council's indebtedness. The CFR results from the capital activity of the Council and resources used to pay for the capital spend. It represents the 2022/23 unfinanced capital expenditure, and prior years' net or unfinanced capital expenditure which has not yet been paid for by revenue or other external resources.
- 6.15. At £400.1m, the Council's borrowing at 31 March 2023 was within the Prudential Indicator for external borrowing, namely, that borrowing should not exceed the estimated CFR for 2022/23 of £1,333m. The final CFR for 2022/23 was £1,026m.
- 6.16. During 2022/23, the Council maintained an under-borrowed position of £626m. This meant that the Capital Financing Requirement was not fully funded with loan debt as cash, supporting the Council's reserves, balances and cash flow, was used as an interim measure. This strategy was prudent as investment returns were low at the time and minimising counterparty risk on the placing of treasury investments needed to be considered.
- 6.17. The table below shows the details around the Council's external borrowing as at 31 March 2023, split between the General Fund and HRA.

Total Borrowing	31 March 2022 (£m)	31 March 2023 (£m)
HRA	175.6	175.6
General Fund	122.6	224.5
Total Borrowing	298.2	400.1

- 6.18. The breakdown of the existing loans is shown below:

Borrowing Type	Loan Balance 31 March 2022 (£m)	Loan Balance 31 March 2023 (£m)	Movement (£m)
PWLB	130.6	130.6	0.0
LOBO	70.0	70.0	0.0
Mortgage Annuity	0.1	0.0	-0.1
Private Placement	37.5	199.5	162.0
Local Authority	60.0	0.0	-60.0
Total:	298.2	400.1	101.9

- 6.19. During 2022/23, the Council repaid £60.0m of short-term loans from other local authorities which were required in March 2022. These loans were for an average duration of 35 days and all were fully repaid by 4th May 2022. £0.001m of mortgage annuity loans were also repaid so the Council no longer holds loans of this type. Further advances from the forward borrowing loan portfolio were

received in August 2022 and March 2023. This consisted of £150m from Barings LLC and £12.5m from Phoenix Group.

Forward Borrowing

- 6.20. As anticipated in the TMSS 2022/23, the Council took no additional long-term borrowing for the financial year due to the high level of cash holdings. Officers are monitoring market conditions and reviewing the need to borrow if a requirement is identified for either the General Fund or Housing Revenue Account (HRA). The monitoring process includes the setting of various trigger points, the breaking of which will require officer consideration of borrowing requirements and market conditions.
- 6.21. Due to the overall financial position and the underlying need to borrow for capital purposes, it is prudent for the Council to lock in affordability by placing some forward borrowing for the amounts it can be relatively certain it will need, while maintaining some forward flexibility as projects may or may not proceed within the expected timeframes.
- 6.22. During the financial year 2019/20, the Council arranged forward borrowing loans totalling £400m. These loans enabled the Council to agree competitive rates in advance of need which eliminated the “cost of carry”, i.e., the difference between loan interest cost and the rate of return on cash investments.
- 6.23. An analysis of these loans can be found in the table below.

Counterparty	Amount (£m)	Start Date	Maturity Date	Rate (%)	Profile
Phoenix Group	37.5	15 March 2022	15 March 2062	2.706	Annuity
Barings LLC	150.0	15 August 2022	15 August 2052	1.970	Maturity
Phoenix Group	12.5	15 March 2023	15 March 2063	2.751	Annuity
Rothsay Life Plc	200.0	08 May 2023	08 May 2063	2.887	Equal Instalment of Principal
Weighted average interest rate	400.0			2.579	

7. Financial Implications

- 7.1. The financial implications are set out in the main body of the report.

8. Legal Implications

- 8.1. Section 151 of the Local Government Act 1972 requires the Council to make such arrangements for the proper administration of their financial affairs.
- 8.2. Section 25 of the Local Government Act 2003 requires the Council’s Chief Finance Officer to report on the robustness of the estimates made and the adequacy of the proposed financial reserves in the budget calculations. This is included throughout the report.

- 8.3. Section 114 of the Local Government Finance Act 1988 requires the Chief Finance Officer to report if there is or is likely to be unlawful expenditure or an unbalanced budget. Failure to set an appropriate budget may lead to intervention from the Secretary of State.
- 8.4. The keeping of the Housing Revenue Account (HRA) is governed by Schedule 4 of the Local Government and Housing Act 1989. On 10 November 2020, the Ministry of Housing, Communities and Local Government (MHCLG) published guidance on the operation of the ring-fenced HRA account. The guidance updated and replaced previous guidance and the Council should adhere to such guidance in relation to the HRA.
- 8.5. Section 76 of the Local Government and Housing Act 1989 requires the Council to prevent debit balances on the Housing Revenue Account.

If you have any queries about this report or wish to inspect any of the background papers please contact:

Jake Bacchus (jbacchus@westminster.gov.uk)

BACKGROUND PAPERS

- Appendix 1 – Project by Project analysis of GF slippage**
- Appendix 2 – Project by Project analysis of HRA slippage**
- Appendix 3 – List of achieved savings**

Appendix 1 - General Fund Slippage from 2022/23 to Future Years

Project	Expenditure Slippage from 2022/23 to Future Years	Income Slippage from 2022/23 to Future Years
Beachcroft	(30)	-
Affordable Housing Fund Budget	(1,239)	-
Targeted Housing OOB For Vulnerable Households	(14)	-
Luxborough Development	(625)	-
Jubilee Sport Centre Redevelopment	(356)	-
Temp Accommodation Acquisitions	(547)	-
Temporary Accommodation Purchase In-Borough	(1)	-
Westmead	(1,413)	-
Lisson Grove Programme	(715)	886
West End Partnership - The Strand-Aldwych	(1,560)	-
Enterprise	(524)	1,096
Open Spaces And Greener Places	(47)	-
Housing Service Digitisation	(126)	-
Church St Green Spine Public Realm	(1,562)	-
Soho Area Public Realm Improvements	(233)	-
Church St Good Growth Fund	(917)	917
Church St Regeneration Hub	(35)	-
Paddington North Bank	(130)	-
West End Partnership Programme	(1,339)	-
Church Street Acquisitions	(3,400)	-
Harrow Road Place Shaping Scheme	(1,188)	-
The Lodge	(9)	36
Victoria Place Plan	(87)	-
Greening Improvements To Hall Place	(13)	-
Major Works On Temporary Accommodation And Intermediate Housing Properties	502	-
Acquisition Of 3&4 Bed Properties For Temporary Accommodation	(3,315)	-
Green Spine Phase 2	(407)	-
Housing Solutions Online Services & Back Office	(320)	-
Rough Sleeper Programme Acquisitions	(722)	-
300 Harrow Road	1,351	-
WCH Development Loan & AHF - Vic Ph2 & Harrow Rd	(5,733)	-
Lisson Grove Programme - GF Acquisitions	(1,763)	-
Strategic Infrastructure Pot Expenditure	97	(97)
291 Harrow Road	(75)	-
Church Street Sites ABC Equity Loan	(425)	-
Ebury Bridge Estate Equity Loan For Resident Leaseholders	345	-
Commissioned Services It System	(130)	-
Intermediate Housing Register On-Line Application	(90)	-
District High Streets	(432)	-
Crompton Street	(307)	-
Growth, Planning & Housing	(27,533)	2,838
Planned Preventative Maintenance - Bridges & Structures	525	-
Carriageway Programme Maintenance	135	-

Footway Programme Maintenance	(404)	-
Drainage Improvement Programme	907	-
Lighting Improvements	597	-
Regulatory Sign Replacement	(42)	-
Structurally Critical Columns	(894)	-
Legible London	(24)	-
Recycling Containers And Bins	5	-
Great Scotland Yard	(13)	-
Arundel Court	(477)	477
Elizabeth St/Buckingham Palace	(100)	100
Bus Stop Accessibility Programme	(16)	-
Royal Albert Hall Hostile Vehicle Management Programme	(1,356)	541
Piccadilly Underpass	(213)	-
Led Lighting Rollout	(789)	-
Commercial Waste Containers	(64)	-
Ceremonial Streetscape	(559)	559
Trial 20mph Scheme	(125)	-
Minor Works Programme	195	-
North Wharf Gardens Site II	(22)	22
Isolated Pitches Electrics	(1,198)	480
Golden Jubilee Footbridge Improvements	(620)	664
Villiers Street Public Realm	(364)	-
Thayer/Mandeville Street	(24)	-
Lighting-Gas Valve Safety Connections	(328)	-
Neat Streets 2	(79)	-
Minor Safety	(94)	50
Riding House St Pedestrianisation	(362)	-
Tachbrook Market Electric Update	(664)	-
St Georges Drive & Warwick Way Pedestrianisation	(67)	67
Paddington Environmental And Place Plan	(386)	259
Portman Square Footways	(30)	-
Burlington Gardens Public Realm Improvements	(203)	-
Street Trees – New Planting	2	-
Planned Preventative Maintenance (PPM) - Highways	(517)	-
Buckingham Gate Red Route And Coach Management	(201)	-
Zero Emissions Street Cleansing Vehicles	(376)	376
Sackville Street & Vigo Street	(2)	78
School Streets & STP	268	-
Wellington Hotel (P689)	(89)	89
Highways Innovation	(1,396)	-
Waterloo Bridge Streetscape	(154)	-
Electric Vehicle Charging	596	-
Grosvenor Square PR Scheme	(100)	100
Parking - Business Processing And Technology	1,166	-
Future City Management	(200)	-
Highways Buildouts For Trees	(558)	-
Public Conveniences Renovation Programme	(564)	-
Connaught Village Green	(17)	17
Covent Garden TMS	(126)	-

Accessible- Accessibility Audit & Scheme	(88)	-
Asset Update	(94)	-
Cycle Parking	459	-
Food Waste Containers	(91)	-
Freight & Servicing Action Plan	(93)	-
Parks And Cemeteries Tree Planting	(34)	-
Pimlico Low Traffic Neighbourhood	(273)	-
Voids In The Public Highway	64	-
Wesbourne Terrace Ped Sub Infill	208	-
Replacement Street Nameplates	(55)	-
Conduit St & St George St Public Realm	(182)	182
Protective Measures	(2,172)	-
Public Lighting - Aged Expired Equipment	(16)	-
Load Testing	(107)	-
Value Management & Surveys PPM	(74)	-
Central London Cycle Grid In Westminster	(268)	-
Main Fleet Replacement Programme	(16,711)	-
Westbourne Grove – Garway Road Zebra Crossing	125	-
Improving Pedestrian Accessibility	(480)	-
Improving Of Response To Noise Complaint	(1)	-
Wcc Public Mortuary - Contingency Power	(100)	-
Dockless Mobility Infrastructure	(100)	-
Market Infrastructure	(159)	-
Lisson Green Footbridge Refurbishment	(192)	-
LSS - Drury Lane - Russell Street	186	-
LSS Signals - Lisson Grove/Frampton	376	-
Regent Street (Permanent Scheme)	(119)	-
Cctv Enforcement School Street Programme	133	-
Environment & City Management	(29,279)	4,061
Pimlico Gardens Recreation Ground	(188)	-
Active Westminster Project	(50)	-
Health & Wellbeing Projects	(357)	-
Wilberforce Multi Use Game Areas	(20)	20
Tree Preservation Replacement Programme	(68)	-
Westminster Academy Skatepark And MUGAs	3	(3)
Cemeteries Infrastructure	(10)	-
Parks & Open Spaces Infrastructure	8	-
Parks And Gardens Lighting	(203)	-
Innovation & Change	(885)	17
King Solomon School Expansion	(25)	25
Social Care System Reprourement	(153)	153
Queen Elizabeth II ASD Class Build Prov	(352)	352
Carer's Extensions Funding (LAC)	(20)	-
Safeguarding Community Primary Schools	(556)	556
School Development Capital Projects	(531)	531
Libraries IT/Smart Open	(22)	-
SEN High Needs And Family Support	(818)	818
Children's Services	(2,477)	2,435
Digital Transformation	(180)	-
Meeting Rooms Refurbishment	(277)	-
Carbon Management Programme	(3,207)	353
Telephony - Phase 2 And Contact Centre	11	-

Seymour Leisure Centre New Build	(288)	-
Schools Minor Works Projects	(268)	268
Queens Park Family Hub	(100)	-
Tresham Centre Expansion	(337)	-
Changing Places Bid Programme	(57)	(13)
Customer Experience Enhancements	(174)	-
Smart City - Clean Tech City Theme	(100)	-
Smart City - Innovative Ecosystems	(180)	-
Smart City - Extraordinary Experiences	(100)	-
Smart City - Empowering People	(405)	-
Smart City Operating System	(30)	-
Gf Portman - Remodel	(269)	-
Remodelling of Early Help/Children Centres	(17)	-
Capital Contingency	(204)	-
Landlord Responsibilities	(743)	-
Coroners Court Improvements	(632)	371
Huguenot House Redevelopment	(432)	-
Minor Works Operational Portfolio	(103)	-
Property Investment Acquisitions	185	-
Strategic Acquisitions - Huguenot House	(453)	-
Min Energy Efficiency Std (MEES)	(100)	-
Improvements Investment Properties	(2,425)	374
Accessibility Programme - Access & Inclusion	(90)	-
Workplace Property Responsibilities	(202)	-
Barnard & Florey	(50)	-
Sports & Leisure - Sayers Croft Maintenance	16	-
WEP - Connect Westminster - Broadband	(231)	231
Street Markets Wifi ERDF (European Regional Development Fund)	(268)	268
Residential Broadband Connections	(77)	-
Sports & Leisure- Leisure Review Maintenance	(50)	50
Finance & Resources	(11,837)	1,902
Frameworki- Upgrade To Mosaic	(363)	363
Health Integration	(119)	119
Oxford Street	(74)	-
Adults & Deputy Chief Executive Services	(556)	482
Luton Street	56	-
Westminster Hsg Investment Limited (WHIL)	2,843	-
Westminster Housing Investments Limited	2,899	-
Grand Total	(69,667)	11,735

Appendix -HRA Slippage report 2022/23 to 2023/24

Project	HRA Slippage report 2022/23 to 2023/24	HRA Slippage report - Over/underspend	HRA Slippage report 2022/23 to future
Housing Planned Maintenance	0	2,793	0
LIFTS		(320)	
O.T ADAPTIONS		(141)	
VOIDS		(680)	
ASEET MANAGEMENT & CONDENSATION		5	
MECHANICAL SERVICES		1,769	
MINOR WORKS		1,753	
DOMESTIC HEATING AND HOT WATER		12	
MAJOR WORKS		(1,674)	
FIRE PRECAUTION -MAJOR WORK		226	
ELECTRICAL SERVICES		(701)	
FIRE PRECAUTIONS (FST)		425	
CLIMATE WORKS		1,655	
PDHU		464	
Housing Regeneration	(18,323)	400	7,431
Church Street Phase 2		39	
Church Street Phase 2 Acquisitions			5,684
Lisson Arches	294		
Luton Street	27		
Parsons North	661		
Cosway	(1,149)		
Ashbridge	(61)		
Edgware Road/AlmaCantar		7	
Ashmill Street	(183)		
Carlton Dene	375		
Brunel		(128)	
Ebury	(14,667)		
Ebury Acquisitions	(12,606)		
Tollgate Gardens	(265)		
Ebury Bridge Estate Renewal - Phase 2	(838)		
Infills	(1,044)		
Woodchester		(100)	
Warwick Community Hall (WOC)	0		
Churchill Gardens(Pimilico or Darwin house)		577	
Bayswater	0		
Queenspark Court	759		
West End Gate	158		
Cundy St Quarter	(1,000)		
Kemp House/Berwick St		5	
CHURCH STREET- WCH ACQUISITION			1,747
EBURY- WCH ACQUISITION	11,216		
Other Works	(3,092)	0	(11,103)
Contingency			(11,103)
Self Financing	(3,092)		
Grand Total	(21,416)	3,194	(3,672)
Total Variance			(21,894)

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Appendix 3. List of Savings Achieved 2022/23

Saving Title
ADULTS
Review of Contracts
Improved Market Management
Promoting Independence
Contract saving - Transition into Beachcroft
Staffing Review (restructure, agency spend and vacancy factor)
Increased focus on prevention and greater utilisation of community strength and assets
Promoting independence
Review of contracts
Mental Health - Review of management costs paid to CNWL
Staff Review
ADULTS TOTAL
CHILDREN'S SERVICES
Education Funding and Efficiencies
EHCP/Joint Funding Strategies
Joint Working Opportunities
Passenger Transport Alternative Delivery Mechanisms
Registrars Income
Delivering Transport Differently
Delivering Short Breaks Differently
Rationalisation of Non-Essential Spend
Placements and Accommodation Transformation
Pre-Birth to Five Service Redesign
CHILDREN'S SERVICES TOTAL
ENVIRONMENT AND CITY MANAGEMENT
Highways Contract Re-let
Implementation of SMART Lighting
Parking
Parking - Traffic-Sensitive Streets Kerbside Management
Highways Infrastructure & Public Realm
Waste - Food waste recycling impact on disposal costs
Moving Traffic Initiatives
Traffic Sensitive Streets
Crane Oversailing Licence
Emergency Crane Licence
Parking Fee increases 2022-23
Higways Fee increases 2022-23
SMS Charging – 20p optional charge to users of the Pay to Park service
ENVIRONMENT AND CITY MANAGEMENT TOTAL
FINANCE & RESOURCES
Investment Property Growth
Repurposing Building
Cloud migration
Realignment of Claimant Contact Facilities for the Council's Benefits service
Review of C&FM
Reduction on charges

Business Rates review
Acceleration of Repurposing Building Programme
Review of Insurance
FINANCE & RESOURCES TOTAL
GROWTH, PLANNING & HOUSING
Targeted Purchases for Vulnerable Households
Capital Letters - Pan London
TA Purchase Programme
Rental income from Intermediate Housing
Planning Application Process Review
Place Shaping Review
Additional Capitalisation of Development Team
Reduce Office Space Usage (Housing GF)
Temporary Accommodation
Capitalisation of Development PMO
Homelessness Prevention Grant
Church St review
GROWTH, PLANNING & HOUSING TOTAL
INNOVATION & CHANGE
Sayers Croft Commercial Review
Review of the Communications function
Non-pay efficiencies - Cabinet Secretariat
Increase in Banners & Events income
Innovation Change - Service efficiencies
Unallocated Grant
Church St review
Reduced Grant awards (Church St)
INNOVATION & CHANGE TOTAL
GENERAL FUND TOTAL

2022/23
£m
0.350
0.100
0.200
0.075
0.035
0.300
0.750
0.200
0.100
0.500
2.610
0.125
0.250
0.050
0.050
0.149
0.100
0.034
0.025
0.350
0.350
1.483
0.750
0.060
0.070
1.000
0.150
0.040
0.480
0.375
0.050
0.015
1.150
0.250
0.300
4.790
0.500
0.200
0.090
0.035
0.100
0.100

0.100
0.300
0.250
1.675
0.138
0.200
0.188
0.079
0.130
0.050
0.150
0.035
0.664
0.150
0.500
0.125
2.410
0.020
0.075
0.020
0.188
0.069
0.050
0.040
0.150
0.612
13.580